



APR 1 1 2017

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

Re:

Notice of Final Action - Title V Permit Renewal

District Facility # S-1114

Project # 1153636

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 2/21/2017. 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

Queund Mayolles

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

PERMIT UNIT: S-1114-109-2

EXPIRATION DATE: 02/28/2022

EQUIPMENT DESCRIPTION:

500 BBL FIXED ROOF PETROLEUM STORAGE TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- 1. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 3. A leak-free condition is defined as a condition without a gas leak or liquid leak. A gas leak is defined as a 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 4. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain accurate component count for tank according to EPAs "Protocol for Equipment Leak Emission Estimate," Table 2-4, Oil and Gas Production Operations Average Emission factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total hydrocarbon content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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

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- 11. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
- 17. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-110-2

EXPIRATION DATE: 02/28/2022

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF PETROLEUM STORAGE TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- 1. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 4623] Federally Enforceable Through Title V Permit
- 2. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. 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 Rule 4623] Federally Enforceable Through Title V Permit
- 3. 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
- 4. VOC fugitive emissions from the components in gas service on tank shall not exceed 1.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain accurate component count for tank according to EPAs "Protocol for Equipment Leak Emission Estimate," Table 2-4, Oil and Gas Production Operations Average Emission factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total hydrocarbon content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. 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 provisions of this permit. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 10. 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 Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
- 11. 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 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.

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- 12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
- 13. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (Amended December 20, 2001). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 14. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-111-2

EXPIRATION DATE: 02/28/2022

EQUIPMENT DESCRIPTION:

85 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH A NORTH AMERICAN LOW-NOX LEL BURNER AUTHORIZED TO BE OPERATED AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

- 1. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 42 ppmvd CO @ 3% O2 or 0.031 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305,, 4306, and 4320] Federally Enforceable Through Title V Permit
- 2. This steam generator is approved for operation at the following locations: SE/4 Section 14 and SE/4 Section 15, Township 31 South, Range 22 East, and NE/4 Section 24, Township 26 South, Range 20 East, MDB&M. [District NSR Rule and CH&SC 41700] Federally Enforceable Through Title V Permit
- 3. 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
- 4. This steam generator and Unit S-1114-16 shall not be operated at the same permitted location at the same time. [District Rule 2201 and CH&SC 41700] Federally Enforceable Through Title V Permit
- Flue gas recirculation system shall be operated whenever generator is operated. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 4306, and 4320] Federally Enforceable Through Title V Permit
- 7. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 4306, and 4320] 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, CA
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- 8. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305–4306, and 4320] Federally Enforceable Through Title V Permit
- 9. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 4306, and 4320] Federally Enforceable Through Title V Permit
- 10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 4306, and 4320] Federally Enforceable Through Title V Permit
- 11. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 4306, and 4320] Federally Enforceable Through Title V Permit
- 12. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 4306, and 4320] Federally Enforceable Through Title V Permit
- 13. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 16. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. Records of fuel gas sulfur content analysis shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
- 17. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or ARB Method 100, and stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and fuel gas sulfur content ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 18. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 19. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit

- 20. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, and 4305. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 24. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-112-2

EXPIRATION DATE: 02/28/2022

SECTION: NE24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

107 BBL WEMCO MODEL 66 DEPURATOR WITH VAPOR PIPING TO SHARED VAPOR RECOVERY SYSTEM LISTED ON TANK PERMIT S-1114-54 (SECURITY LEASE)

PERMIT UNIT REQUIREMENTS

- 1. The vapor space of the Wemco unit shall be connected to the vapor recovery system listed on S-1114-54 by a system that is constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. This Wemco unit shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3] Federally Enforceable Through Title V Permit
- 3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 4. Fugitive VOC emissions from the Wemco unit shall not exceed 0.3 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total organic compound content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain with the permit an accurate fugitive component count and the resulting emissions calculated pursuant to EPA document, "EPA Protocol for Equipment Leak Emission Estimate," Table 2-4, "Oil and Gas Production Operations," using average emission factors. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 8. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 9. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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, CA 9-1114-112-2; Apr 4 2017 12:33PM – TORID

- 10. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 11. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 12. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-113-1

EXPIRATION DATE: 02/28/2022

EQUIPMENT DESCRIPTION:

85 MMBTU/HR PCL NATURAL GAS AND WASTE GAS-FIRED STEAM GENERATOR, WITH NORTH AMERICAN LEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION AUTHORIZED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

- 1. This unit shall be equipped with horizontal convection section with at least 235 square feet of bare tube surface area (or thermodynamically equivalent number of square feet of finned tube) per MMBtu/hr of heat input. [Public Resources Code 21000-21177: California Environmental Quality Act]
- 2. This unit shall be equipped with variable frequency drive high efficiency electrical motors driving the blower and water pump. [Public Resources Code 21000-21177: California Environmental Quality Act]
- 3. Steam generator shall be equipped with operational fuel gas and waste gas volumetric flow meters . [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Only natural gas, or a combination of natural gas and waste gas shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. 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
- 6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 7. 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
- 8. 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
- 9. 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 weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks 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, weekly testing shall resume. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- 10. 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
- 11. Emissions shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 42 ppmvd CO @ 3% O2 or 0.031 lb-CO/MMBtu, or 0.00537 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] 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, CA 8-1114-113-1 : Apr 4 2017 12:30PM - TORID

- 12. This steam generator is approved for operation at the following locations: NE/4 Section 18, NE/4 Section 19 and NW/4 Section 20, Township 11 North, Range 23 West; NE/4 Section 15, Township 31 South, Range 22 East; and NE/4 Section 24, Township 26 South, Range 20 East, MDB&M. [District Rule 4201] Federally Enforceable Through Title V Permit
- 13. 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
- 14. Flue gas recirculation system shall be operated whenever generator is operated. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 16. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 18. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 21. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES
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- 22. When the unit changes fuel source, the unit shall undergo source testing to measure NOx and CO emissions within 60 days of the change unless the unit has already undergone source testing in the last twelve (12) months or thirty-six (36) months after demonstrating compliance on the previous two (2) source tests when fired on that fuel source. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 28. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 29. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 30. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 31. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 32. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 33. Permittee shall maintain a record of the duration of each startup and shutdown of this unit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 34. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 35. Documentation showing that this unit is equipped with a horizontal convection section with at least 235 square feet of bare tube surface area (or thermodynamically equivalent number of square feet of finned tube) per MMBtu/hr of heat input and equipped with variable frequency drive high efficiency electrical motors driving the blower and water pump shall be retained on site. [Public Resources Code 21000-21177: California Environmental Quality Act]
- 36. 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 Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-124-1

EXPIRATION DATE: 02/28/2022

SECTION: NE 24 TOWNSHIP: 248 RANGE: 20E

EQUIPMENT DESCRIPTION:

3.0 MMBTU/HR NATURAL GAS-FIRED PROCESS HEATER/BOILER WITH ECLIPSE WINNOX WX0300 LOW NOX BURNER - STAR SECURITY 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. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 3. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 4. The owner/operator shall monitor, at least once a month, the operational characteristics recommended by the manufacturer and approved by the APCO. [District Rule 4307] Federally Enforceable Through Title V Permit
- 5. The permittee shall tune the unit at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year. The unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
- 6. In lieu of tuning the unit twice each calendar year, the owner/operator shall monitor the emissions with a portable NOx analyzer at least twice each calendar year and adjust the unit's operating parameters accordingly to assure compliance with the emission limits of this rule. [District Rule 4307] Federally Enforceable Through Title V Permit
- 7. This unit shall be fired only on gas with a sulfur content not exceeding 5 grains/100 dscf, or 80 ppmv. [District Rules 2201 and 4307] Federally Enforceable Through Title V Permit
- 8. Except for periods of startup and shutdown, emissions shall not exceed any of the following limits: NOx: 30 ppmvd @ 3% O2 or 0.036 lb-NOx/MMBtu; 0.0076 lb-PM10/MMBtu; CO: 400 ppmv @ 3% O2 or 0.296 lb-CO/MMBtu; VOC: 13 ppmv (as methane) @ 3% O2 or 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4307] Federally Enforceable Through Title V Permit
- 9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rule 4307] 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
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- 11. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4307] Federally Enforceable Through Title V Permit
- 12. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4307] Federally Enforceable Through Title V Permit
- 13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 4307] Federally Enforceable Through Title V Permit
- 14. The owner/operator shall maintain records to verify that the required monitoring of the operational characteristics, and tune-ups or portable NOx analyzing has been performed. [District Rule 4307] Federally Enforceable Through Title V Permit
- 15. Tune-up records shall include: 1) date of tune-up, 2) name of technician performing tune-up, and 3) reason that they are qualified. [District Rule 4307] Federally Enforceable Through Title V Permit
- 16. Portable analyzer records shall include: 1) date of emissions analyzing, 2) results of emissions analyzing, 3) name of technician performing analyzing, 4) make and model of analyzer, 5) date of last calibration of the analyzer, and 6) a description of any adjustments made to the unit's operating parameters for the purposes of assuring compliance. [District Rule 4307] Federally Enforceable Through Title V Permit
- 17. 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 Rules 4307] Federally Enforceable Through Title V Permit
- 18. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. [District Rules 2201 and 4307] Federally Enforceable Through Title V Permit
- 19. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-139-0

EXPIRATION DATE: 02/28/2022

SECTION: 17 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

100 STEAM-ENHANCED CRUDE OIL PRODUCTION WELLS WITH CLOSED CASING VENTS

PERMIT UNIT REQUIREMENTS

- 1. Casing vent valves shall be closed and plugged. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. All components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.), pump seals, valves and other (pressure relief devices, compressor seals, meters, etc.). [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Fugitive VOC emissions from components in vapor and condensate service shall not exceed 53.9 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Permittee shall maintain with the permit accurate fugitive component counts of components in gas service and resulting emissions calculated using the emission factors in the USEPA's 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) Oil and Gas Production Operations Average Emissions Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain with the permit an accurate, current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
- 6. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4401, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
- 7. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or 2) The steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system. [District Rule 4401, 5.1] Federally Enforceable Through Title V Permit
- 8. Permittee shall install and maintain an APCO-approved VOC collection and control system that is not open to the atmosphere and that is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to an APCO-approved control device that has a VOC destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rules 2201 and 4401, 5.1] Federally Enforceable Through Title V Permit
- 9. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit

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,CA 9-1114-139-0: Apr 4 2017 12:03PM -- TORID

- 10. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
- 11. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
- 12. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
- 13. In accordance with the approved OMP, permittee shall meet all applicable operating, leak standards, inspection and reinspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
- 14. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
- 15. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
- 16. During District compliance inspection, the following conditions shall be used to determination of a violation: 1)

 Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 2 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
- 17. Permittee shall keep all hatches closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
- 18. Except for pipes and unsafe-to-monitor components, permittee shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4.1 & 5.4.2] Federally Enforceable Through Title V Permit
- 19. Permittee shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4.5] Federally Enforceable Through Title V Permit
- 20. Permittee shall inspect audio-visually (by hearing and by sight) for leaks all accessible operating pumps, compressors, and pressure relief devices (PRDs) in service at least once each calendar week. [District Rule 4401, 5.4.3.1] Federally Enforceable Through Title V Permit

- 21. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4.3.2] Federally Enforceable Through Title V Permit
- 22. Permittee shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. Permittee shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401, 5.4.4.1] Federally Enforceable Through Title V Permit
- 23. Permittee shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401, 5.4.4.2] Federally Enforceable Through Title V Permit
- 24. Except for PRDs, permittee shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4.3] Federally Enforceable Through Title V Permit
- 25. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
- 26. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
- 27. Permittee shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
- 28. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
- 29. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 3 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
- 30. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit

- 31. Permittee shall maintain an inspection log in which, at a minimum, all of the following information shall be recorded for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type; 2) The location, type, and name or description of each leaking component and description of any unit where the leaking component is found; 3) The date of leak detection and the method of leak detection; 4) For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of leaking components; 6) The identity and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number; and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
- 32. Permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
- 33. Annual control efficiency compliance tests shall be performed by source testers certified by the California Air Resource Board (CARB) on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive these source testing requirements if the vapor control system does not exhaust to atmosphere, or if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine, or in a smokeless flare. [District Rule 4401, 6.2.1 & 6.2.2] Federally Enforceable Through Title V Permit
- 34. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
- 35. VOC content shall be determined using ASTM Method E168, E169, or E260 as applicable. Halogenated exempt compounds shall be determined by ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
- 36. VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.4] Federally Enforceable Through Title V Permit
- 37. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401, 6.1.6 & 6.5] Federally Enforceable Through Title V Permit
- 38. Unless the source testing requirement is waived by the District, permittee shall maintain source test records which show that the control efficiency requirements of the VOC collection and control system have been satisfied. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
- 39. Permittee shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit

40. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit





Permit to Operate

FACILITY: S-1114

EXPIRATION DATE: 02/28/2022

LEGAL OWNER OR OPERATOR:

SENECA RESOURCES

MAILING ADDRESS:

4800 CORPORATE CT BAKERSFIELD, CA 93311

FACILITY LOCATION:

HEAVY OIL WESTERN

CA

FACILITY DESCRIPTION:

OIL AND NATURAL 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-1114-0-4 **EXPIRATION DATE:** 02/28/2022

FACILITY-WIDE REQUIREMENTS

- 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, 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

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.

- 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

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

Facility Name: SENECA RESOURCES
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- 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
- 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-1114-9-17 **EXPIRATION DATE:** 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

10 MMBTU/HR GAS-FIRED C.E. NATCO M&M HEATER TREATER #3 WITH LESS THAN 5.0 MMBTU/HR BURNERS

PERMIT UNIT REQUIREMENTS

- 1. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations [District Rule 4306] Federally Enforceable Through Title V Permit
- 2. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
- 3. The fuel supply line shall be physically disconnected from this unit, or an alternate method approved by the APCO shall be instituted to ensure this unit is not operated. [District Rule 4306] Federally Enforceable Through Title V Permit
- 4. Unit shall be equipped with a permanently affixed mechanical stop on the positioner that shall used to control the inlet air butterfly valve and the natural gas supply valve to limit the quantity of natural gas to 4762 scf/hr (equivalent to 5 MMBtu/hr) for each independent burner. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. Maximum heat input of each burner shall be less than or equal to 5 million Btu per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Each burner's products of combustion shall not come into contact with the products of combustion of any other burner. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. Maximum emissions shall not exceed any of the following: PM10 0.005 lb/MMBtu, SOx (as SO2) 0.001 lb/MMBtu, NOx (as NO2) 30 ppmv @ 3% O2, VOC 0.003 lb/MMBtu, or CO 113 ppmv @ 3% O2. [District Rules 2201 and 4306] Federally Enforceable Through Title V Permit
- 8. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. Records of fuel gas sulfur content analysis shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 10. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] 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.

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- 11. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 12. 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 D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 14. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201, and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 15. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 16. The owner or operator of a boiler, steam generator, or process heater subject to the requirement of District Rule 4306 shall comply with all applicable deadlines in Table 2, Section 7.0 of the Rule. [District Rule 4306] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 02/28/2022

PERMIT UNIT: S-1114-10-30

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/TEOR GAS FIRED STRUTHERS STEAM GENERATOR WITH LOW NOX BURNER AND 02 CONTROLLER SERVED BY AIRPOL DUAL VALVE TRAY SOX SCRUBBER WITH CHEVRON TYPE MIST ELIMINATOR AND WET ELECTROSTATIC PRECIPITATOR SHARED WITH S-1114-10. '-74

PERMIT UNIT REQUIREMENTS

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 4. Steam generator is authorized to operate at the following locations: SE Section 14, T31S, R22E; SE and NE Section 15, T31S, R22E; NE Section 24, T26S, R20E; Sections 18, 19, and 20, T11N, R 23W. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- 6. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 7. Total fuel consumption, including TEOR gas, shall not exceed 511,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Except as provided below, fuel burned in this unit shall not be PUC quality natural gas. 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 4320] Federally Enforceable Through Title V Permit
- 9. Fuel H2S, total sulfur, and methane content shall be determined semi-annually using the following test methods H2S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, double GC for H2S and mercaptans or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
- 10. When PUC quality gas is burned, the total gas fired in this unit in any calendar month shall be less than 50% by volume PUC quality natural gas. [District Rule 4320] Federally Enforceable Through Title V Permit
- 11. In months where PUC quality gas is burned, the permittee shall maintain records on a calendar month basis of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] 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.

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Location: HEAVY OIL WESTERN, CA
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- 12. Permittee shall install and maintain operational non-resettable, totalizing mass or volumetric flow meter(s) in the fuel (natural gas and TEOR gas) line(s) of the unit. Permittee shall determine the higher heating value (hhv) of the fuels (natural gas and TEOR gas) on a quarterly basis once per calendar quarter and whenever there is a change in the source of the TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Exhaust from unit shall be directed only to SO2 scrubber authorized herein except when burning PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Scrubber/wet ESP shall be in operation when combusting TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be maintained with no detectable leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Emission rate of SOx from S-1114-10, and '-74 shall not exceed 262,537 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Scrubber recirculation liquid pH shall be maintained only by the addition of caustic, including sodium hydroxide and sodium carbonate. Other caustics may be used upon written District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. Scrubber liquor pH shall be maintained between 6 and 8, and shall be continuously monitored. [District Rule 2201 and 40 CFR part 64] Federally Enforceable Through Title V Permit
- 19. Scrubber mist eliminator shall be properly cleaned and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Scrubber recirculation liquor liquid to gas ratio shall be maintained at no less than 8.0 gpm/1000 acfm. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Scrubber/wet ESP control efficiency shall not be less than 95% by weight sulfur compounds. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. When any unit connected to scrubber is burning TEOR gas, scrubber shall be operating and permittee shall demonstrate compliance with PM10 and sulfur oxide emissions limit by stack source testing within 60 days of initial scrubbing date and annually thereafter unless no TEOR gas has been burned since the last scrubber performance source test. Sulfur removal efficiency of scrubber shall be demonstrated during initial stack source test and calculated with subsequent tests. Ongoing compliance with sulfur oxide emissions limit shall be by calculation using the scrubber liquid pH, the demonstrated sulfur removal efficiency, and the fuel gas sulfur content. Fuel gas sulfur content shall be obtained by sample analysis at least quarterly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. When unit is operated without scrubber/wet ESP, permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content within 60 days of initiating operation without scrubber. Analyses, as approved by the APCO, provided by the gas supplier may be used to satisfy this requirement. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. When complying with PM10 and SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Methods 5 or 201A, 6, 6B, 8, or ARB 100. When operating unscrubbed, a grab sample analysis by double GC performed in the laboratory and EPA Method 19 may be used to calculate SOx emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every 36 months unless testing is required by scrubber operational mode change as noted above. Annual source testing shall resume if any test fails to show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. At no time shall amount of TEOR gas introduced to this unit and all units connected to scrubber/wet ESP exceed the amount introduced during a source test demonstrating compliance with permit limits. [District Rule 2201] Federally Enforceable Through Title V Permit

- 26. Emissions rates shall not exceed any of the following: NOx (as NO2): 9 ppmv @ 3% O2 or 0.011 lb/MMBtu, SOx (as SO2): 0.324 lb/MMBtu, PM10: 0.0713 lb/MMBtu, CO: 42 ppmv @ 3% O2 or 0.031 lb/MMBtu, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 27. Source testing to demonstrate compliance with PM10, SOx, NOx, and CO emission limits shall be conducted annually, except as provided below. [District Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 28. Source testing to demonstrate compliance with PM10, SOx, NOx, and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 29. If permittee fails any compliance demonstration for NOx and/or CO emission limits when testing not less than once every 36 months, compliance with NOx and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 30. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320]
- 32. Source test results from an individual unit that is identical to this unit, in terms of rated capacity, operational conditions, fuel used, and control method, as approved by the APCO, will satisfy the NOx and CO source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 33. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 35. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 36. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, sulfur oxides ARB Methods 1-6, and fuel gas sulfur content ASTM D3246 or double GC for H2S and mercaptans. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 37. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 38. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] 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, CA S-1114-10 30: Apr 4 2017 12:32PM – TORIO

- 39. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 40. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 41. Permittee shall maintain records of fuel gas and TEOR gas sulfur content, higher heating value, annual consumption in MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 42. Permittee shall comply with all notification and recordkeeping requirements of 40 CFR 60.7 a (1)(3) and (b). [District Rule 4001] Federally Enforceable Through Title V Permit
- 43. Fuel gas sulfur content shall be determined using ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 44. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 45. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 46. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306, and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 47. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 48. When the scrubber is operating, the scrubber liquor pH shall be recorded every 15 minutes. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 49. An excursion from the scrubber liquor pH level is defined as a daily pH reading of less than 6 or greater than 8. Upon detecting any excursion from the acceptable pH level, the permittee shall investigate the excursion and take corrective action to restore required pH level and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 50. Records of scrubber pH monitoring equipment downtime, scrubber pH level excursions, and scrubber operation shall be maintained. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 51. The scrubber pH sensor shall be calibrated annually. Calibration of the pH sensor shall be conducted by comparison of the sensor reading with a laboratory measurement of the scrubber recirculation fluid. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 52. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit

- 53. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 54. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 55. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 56. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be inspected monthly for detectable leaks. Operator shall repair each leak within 15 calendar days of detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 57. Records of steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork monthly inspections shall be maintained. Inspection log shall contain at a minimum the following: 1) date of inspection; 2) name of inspector; 3) identification and location of leak; and 4) date when leak has been repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 58. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 59. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-15-20 EXPIRATION DATE: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

12.6 MMBTU/HR NATURAL GAS-FIRED TRICO SUPERIOR MODEL X-4398 HEATER TREATER V-3 WITH MAXON MODELS XPO 7.6 MMBTU/HR AND 5.0 MMBTU/HR LOW NOX BURNERS

PERMIT UNIT REQUIREMENTS

- Only PUC regulated natural gas shall be used as fuel. [District Rules 2201 & 4320] Federally Enforceable Through
 Title V Permit
- 2. Maximum emission rate(s) shall not exceed any of the following: PM10 0.005 lb/MMBtu, SOx (as SO2) 0.001 lb/MMBtu, NOx (as NO2) 9 ppmv @ 3% O2; VOC 0.003 lb/MMBtu, as methane; or CO 113 ppmv @ 3% O2. [District NSR Rule, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 3. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 4. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 5. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 6. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] 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, CA S-1114-15-20: Apr 4 2017 12:32PM – TORID

- 7. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 8. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 9. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 12. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 14. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 18. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 19. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. [District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 20. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. [Kern County Rule 407] Federally Enforceable Through Title V Permit
- 21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306 and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

23. 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 Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-16-21 EXPIRATION DATE: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

85 MMBTU/HR STRUTHERS NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN LOW NOX BURNER AND FGR AUTHORIZED TO BE OPERATED AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

- 1. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 42 ppmvd CO @ 3% O2 or 0.031 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 2. This steam generator is approved for operation at the following locations: SE/4 Section 14 and SE/4 Section 15, Township 31 South, Range 22 East, and NE/4 Section 24, Township 26 South, Range 20 East, MDB&M. [District NSR Rule and CH&SC 41700] Federally Enforceable Through Title V Permit
- 3. 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
- 4. This steam generator and Unit S-1114-111-0 shall not be operated at the same permitted location at the same time. [District Rule 2201 and CH&SC 41700] Federally Enforceable Through Title V Permit
- 5. Flue gas recirculation system shall be operated whenever generator is operated. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 7. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN,CA S-1114-16-21: Apr 4 2017 12:32PM - TORID

- 8. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 9. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 11. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 12. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 13. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 16. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. Records of fuel gas sulfur content analysis shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
- 17. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or ARB Method 100, and stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and fuel gas sulfur content ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 18. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 19. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit

- 20. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, and 4305. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5; 4306, 5.5.5; and 4320] Federally Enforceable Through Title V Permit
- 24. 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 Rules 1070, 4305, 6.1; 4306, 6.1; and 4320] Federally Enforceable Through Title V Permit

5-1114-16-21 : Apr 4 2017 12:32PM - TORID

PERMIT UNIT: S-1114-18-18

EXPIRATION DATE: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

10 MMBTU/HR NATURAL GAS-FIRED H.T.I. M&M HEATER TREATER #3 WITH TWO MAXON MODEL XPO EB ULTRA LOW NOX BURNERS OPERATING AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-1114

PERMIT UNIT REQUIREMENTS

- 1. The permittee shall notify the District Compliance Division of each location at which the operation 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
- 2. The Heater Treater shall not be operated within 2,500 feet of the nearest business or residence receptor. [District Rule 4102]
- 3. The exhaust stacks 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]
- 4. 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
- 5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 6. 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
- 7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 8. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 9. The unit shall only be fired on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 0.001 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, 113 ppmvd CO @ 3% O2 or 0.082 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 11. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] 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. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 13. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 14. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 16. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 19. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 20. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 21. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

- 23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

 Federally Enforceable Through Title V Permit
- 24. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. Records of fuel gas sulfur content analysis shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule and Rule 4320] Federally Enforceable Through Title V Permit
- 25. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rules 4301, 5.2.1 and 4320] Federally Enforceable Through Title V Permit
- 26. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 27. 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 D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 28. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels.

 [District Rules 2520, 9.3.2 and 4320, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 29. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201, and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-19-19 **EXPIRATION DATE**: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

10 MMBTU/HR NATURAL GAS-FIRED H.T.I. HEATER TREATER #4, SA# 0392 WITH DORMANT BURNERS, FUNCTIONING AS AN EXEMPT FWKO PRESSURE VESSEL WHILE THE BURNERS ARE DORMANT

PERMIT UNIT REQUIREMENTS

- 1. This unit may be operated as an un-fired free water knockout vessel when it is in dormant status. Conditions 9 through 18 shall not apply while this unit is being operated as an un-fired exempt free water knockout vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. The burners from this equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rule 4306] Federally Enforceable Through Title V Permit
- 3. The burners from this equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4320 and all other applicable District regulations. [District Rule 4320] Federally Enforceable Through Title V Permit
- 4. No modifications to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
- 5. The fuel supply line shall be physically disconnected from this unit, or an alternate method approved by the APCO shall be instituted to ensure this unit is not operated as a heater treater. [District Rule 4306] Federally Enforceable Through Title V Permit
- 6. This heater treater/ free water knockout vessel shall only operate at the following specified locations: NE and SE Section 15, Township 31S, Range 22E; and NE Section 24, Township 26S, Range 20E. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 7. A permanently affixed mechanical stop on the positioner shall control the inlet air butterfly valve and the natural gas supply valve such that the natural gas supply is limited to 4,762 scf/hr (equivalent to 5 MMBtu/hr) for each independent burner. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Maximum heat input of each burner shall be less than or equal to 5 million Btu per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Each burner's products of combustion shall not come into contact with the products of combustion of any other burner. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 11. Emissions shall not exceed any of the following limits: 0.095 lb-NOx/MMBtu (as NO2) (78 ppmv @ 3% O2), 0.001 lb-SOx/MMBtu (6 ppmv H2S), 0.005 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu (113 ppmv @ 3% O2), or 0.003 lb-VOC/MMBtu (7 ppmv @ 3% O2). [District Rule 2201] 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, CA 8-1114-19-19: Apr 4 2017 12:32PM – TORID

- 12. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 13. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 15. 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 D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 16. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 17. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 18. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 19. Records of fuel gas sulfur content analysis shall be kept for a period of five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-20-19 EXPIRATION DATE: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR STRUTHERS NATURAL/TEOR GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME LE BURNER, MULTIPLE LOCATIONS - M & M GENERATOR #5

PERMIT UNIT REQUIREMENTS

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- 4. Steam generator is authorized to operate at the following locations: SE Section 14, T31S, R22E; SE and NE Section 15, T31S, R22E; NE Section 24, T26S, R20E; Sections 18, 19, and 20, T11N, R 23W. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- 6. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 7. Except as provided below, fuel burned in this unit shall not be PUC quality natural gas. 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 4320] Federally Enforceable Through Title V Permit
- 8. Fuel H2S, total sulfur, and methane content shall be determined semi-annually using the following test methods H2S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, double GC for H2S and mercaptans or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
- 9. When PUC quality gas is burned, the total gas fired in this unit in any calendar month shall be less than 50% by volume PUC quality natural gas. [District Rule 4320] Federally Enforceable Through Title V Permit
- 10. In months where PUC quality gas is burned, the permittee shall maintain records on a calendar month basis of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit
- 11. Permittee shall install and maintain operational non-resettable, totalizing mass or volumetric flow meter(s) in the fuel (natural gas and TEOR gas) line(s) of the unit. Permittee shall determine the higher heating value (hhv) of the fuels (natural gas and TEOR gas) on a quarterly basis once per calendar quarter and whenever there is a change in the source of the TEOR gas. [District Rule 2201] 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,CA
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- 12. Emissions rates shall not exceed any of the following limits: NOx (as NO2): 9 ppmv @ 3% O2 or 0.011 lb/MMBtu, SOx: 0.00285 lb/MMBtu, PM10: 0.005 lb/MMBtu, CO: 50 ppmv @ 3% O2 or 0.037 lb/MMBtu, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 13. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 14. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 21. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

- 23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 24. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 27. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. [District Rules 2520, 9.3.2 and 4320, 5.7.6.1] Federally Enforceable Through Title V Permit
- 28. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 29. 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 D1826-88 or D1945-81 in conjunction with ASTM D3588-89 for gaseous fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 30. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2 and Kern County Rule 407] Federally Enforceable Through Title V Permit
- 31. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306, and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 33. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 34. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-28-5

EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

42,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

- 1. The tank shall be fully enclosed and shall be maintained in a leak-free condition. The vapor recovery system shall consist of a closed system that collects all VOCs from the storage tank, and a VOC control device. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
- 2. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 4. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 5. The control efficiency shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
- 6. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 7. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2520, 9.3.2] 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,CA 8-1114-28-5 Apr 4 2017 12:32PM – TORID

- 8. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 9. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-29-5 EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

10,500 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

- 1. The tank shall be fully enclosed and shall be maintained in a leak-free condition. The vapor recovery system shall consist of a closed system that collects all VOCs from the storage tank, and a VOC control device. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
- 2. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 4. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 5. The control efficiency shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
- 6. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 7. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2520, 9.3.2] 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, CA
S-1114-29-5 Apr 4 2017 12:32PM - TORID

- 8. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 9. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-36-5

EXPIRATION DATE: 02/28/2022

SECTION: 14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

7,560 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

- 1. The tank shall be fully enclosed and shall be maintained in a leak-free condition. The vapor recovery system shall consist of a closed system that collects all VOCs from the storage tank, and a VOC control device. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
- 2. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 4. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 5. The control efficiency shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
- 6. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 7. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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- 8. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 9. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-54-8

EXPIRATION DATE: 02/28/2022

SECTION: NE24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

500 BBL WASH TANK #10754 WITH VAPOR RECOVERY PIPING SHARED WITH PERMITS S-1114-58, -59, -60, -72, -101, -109, -110 AND 112 (SECURITY LEASE)

PERMIT UNIT REQUIREMENTS

- 1. This tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. This tank shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3] Federally Enforceable Through Title V Permit
- 3. Tank seams, welds, joints, piping, valves and fittings shall be inspected and maintained leak-free. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The vapor recovery system shall be maintained in a leak-free condition. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
- 5. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 7. VOC emissions from fugitive emissions sources in this permit unit shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total organic compound content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using U.S. EPA document "EPA Protocol for Equipment Leak Emission Estimate," Table 2-4, "Oil and Gas Production Operations," using average emission factors. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. The vapor control device shall reduce the inlet VOC emissions by at least 99% by weight. [District Rules 2201 and 4623, 5.6.1] Federally Enforceable Through Title V Permit
- 11. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25 a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
- 12. Vapor control system compressor shall activate before tanks' internal pressure exceeds any pressure relief valve setting. [District Rule 2201] Federally Enforceable Through Title V Permit

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- 13. Vapor space pressure in tanks shall be controlled by a gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. PUC-quality, PUC-regulated, inert gas, produced gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Blanket gas pressure control valves shall be set to minimize tanks in-breathing and prevent tanks pressure relief valves from opening. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Collected vapors shall be discharged only to sales gas compressor listed on S-1114-103, flare S-1114-73 or boiler S-1114-91. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed any tank's pressure relief valve setting. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 21. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 22. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 23. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 24. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 25. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 26. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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- 27. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]
- 28. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 29. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 30. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-58-7 **EXPIRATION DATE:** 02/28/2022

SECTION: 24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

21,000 GALLON FIXED ROOF SHIPPING TANK #10814 WITH VAPOR PIPING TO VAPOR CONTROL SYSTEM ON

PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- 1. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 3. A leak-free condition is defined as a condition without a gas leak or liquid leak. A gas leak is defined as a 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 4. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain accurate component count for tank according to EPAs "Protocol for Equipment Leak Emission Estimate," Table 2-4, Oil and Gas Production Operations Average Emission factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total hydrocarbon content by weight. (District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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- 11. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
- 17. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-59-7 **EXPIRATION DATE:** 02/28/2022

SECTION: 24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

21,000 GALLON FIXED ROOF WASH TANK #10815 WITH VAPOR PIPING TO VAPOR CONTROL SYSTEM ON

PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- 1. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 3. A leak-free condition is defined as a condition without a gas leak or liquid leak. A gas leak is defined as a 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 4. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain accurate component count for tank according to EPAs "Protocol for Equipment Leak Emission Estimate," Table 2-4, Oil and Gas Production Operations Average Emission factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total hydrocarbon content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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- 11. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
- 17. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-60-7 EXPIRATION DATE: 02/28/2022

SECTION: 24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

42,000 GALLON FIXED ROOF SHIPPING TANK # 10824 WITH VAPOR PIPING TO VAPOR CONTROL SYSTEM ON

PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 3. A leak-free condition is defined as a condition without a gas leak or liquid leak. A gas leak is defined as a 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 4. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain accurate component count for tank according to EPAs "Protocol for Equipment Leak Emission Estimate," Table 2-4, Oil and Gas Production Operations Average Emission factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total hydrocarbon content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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- 11. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
- 17. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-66-19 EXPIRATION DATE: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 711 STEAM-ENHANCED CRUDE OIL PRODUCTION WELLS

PERMIT UNIT REQUIREMENTS

- 1. The total number of steam drive wells included in this unit may be up to 85 wells. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall maintain with the permit a current listing of all wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 1081] Federally Enforceable Through Title V Permit
- 3. Non-condensible vapors shall either be incinerated in scrubbed steam generator S-1114-10, '-74 and/or S-1114-107 or shall be disposed of in a well approved by the Division of Oil Gas and Geothermal Resources (D.O.G.G.E.R) for the disposal of well vent vapor recovery system gases. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Volatile Organic Compound (VOC) emission rate shall not exceed 247.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Collected liquids shall be handled, stored, and disposed of in a manner preventing air contaminant emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. When steam generator is used for waste gas disposal permittee shall maintain daily records of waste gas volume and quarterly records of waste gas sulfur content [District Rule 1081] Federally Enforceable Through Title V Permit
- 7. Components associated with the steam enhanced crude oil production wells and the vapor recovery systems shall be inspected on a quarterly basis, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2201, 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
- 8. Compliance with permit conditions in the Title V permit shall be deemed in compliance with District Rule 1081 (Amended December 16, 1993). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. The well vent vapor control system listed on this permit may receive vapors from other Chevron USA Inc's TEOR system listed on PTO S-1141-250. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. For pressure relief devices (PRDs) a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 400 to 10,000 ppmv. For components other than PRDs a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 2,000 to 10,000 ppmv. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of more than three drops per minute. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401 3.20] Federally Enforceable Through Title V Permit

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- 11. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1] Federally Enforceable Through Title V Permit
- 12. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere., a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401 5.2] Federally Enforceable Through Title V Permit
- 13. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401 5.2.2] Federally Enforceable Through Title V Permit
- 14. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401 5.3.1] Federally Enforceable Through Title V Permit
- 15. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401 5.3.2] Federally Enforceable Through Title V Permit
- 16. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401 5.3.3] Federally Enforceable Through Title V Permit
- 17. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401 5.4.1] Federally Enforceable Through Title V Permit
- 18. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401 5.4.2] Federally Enforceable Through Title V Permit
- 19. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401 5.4.3] Federally Enforceable Through Title V Permit

- 20. In addition to the inspections required by Sections 5.4.1, Section 5.4.2 and Section 5.4.3 of Rule 4401, operator shall perform the following: initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401 5.4.4] Federally Enforceable Through Title V Permit
- 21. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.4.7] Federally Enforceable Through Title V Permit
- 22. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401 5.4.8] Federally Enforceable Through Title V Permit
- 23. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401 5.5.1] Federally Enforceable Through Title V Permit
- 24. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and 5.5.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5.2] Federally Enforceable Through Title V Permit
- 25. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.5.3] Federally Enforceable Through Title V Permit
- 26. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401 5.5.4] Federally Enforceable Through Title V Permit
- 27. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leak less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401 5.5.4] Federally Enforceable Through Title V Permit
- 28. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.5] Federally Enforceable Through Title V Permit
- 29. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.6] Federally Enforceable Through Title V Permit
- 30. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.5.7] Federally Enforceable Through Title V Permit
- 31. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401 6.1.1] Federally Enforceable Through Title V Permit

- 32. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401 6.1.3] Federally Enforceable Through Title V Permit
- 33. Operator shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.4] Federally Enforceable Through Title V Permit
- 34. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.5] Federally Enforceable Through Title V Permit
- 35. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.6] Federally Enforceable Through Title V Permit
- 36. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.7] Federally Enforceable Through Title V Permit
- 37. Operator shall submit a list of all gauge tanks, as defined in Section 3.0. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
- 38. The results of gauge tank TVP testing conducted pursuant to Section 6.2.5 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401 6.1.9] Federally Enforceable Through Title V Permit
- 39. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401 6.1.10] Federally Enforceable Through Title V Permit
- 40. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit
- 41. If approved by the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401 6.2.2] Federally Enforceable Through Title V Permit
- 42. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401 6.2.3] Federally Enforceable Through Title V Permit
- 43. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401 6.3.1] Federally Enforceable Through Title V Permit

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- 44. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable.

 Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401 6.3.2] Federally Enforceable Through Title V Permit
- 45. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401 6.3.3] Federally Enforceable Through Title V Permit
- 46. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401 6.3.4] Federally Enforceable Through Title V Permit
- 47. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Federally Enforceable Through Title V Permit
- 48. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
- 49. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description The results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.6 shall be submitted with the OMP. A detailed schedule of an operator's inspections of components to be conducted by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary, [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
- 50. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit

51. 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 Rules 1070 and 4401, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-72-6 EXPIRATION DATE: 02/28/2022

SECTION: NE24 TOWNSHIP: 26 RANGE: 20

EQUIPMENT DESCRIPTION:

1,000 BARREL FIXED-ROOF CRUDE OIL STORAGE TANK VENTING TO VAPOR CONTROL SYSTEM LISTED ON

PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- 1. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 3. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 4. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain accurate component count for tank according to EPAs "Protocol for Equipment Leak Emission Estimate," Table 2-4, Oil and Gas Production Operations Average Emission factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. VOC content of the tank vapor space and tank vapor control system gas shall not exceed 68% of the total hydrocarbon content by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the tank vapor space and tank vapor control system gas shall be tested at least once annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or an equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit

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- 11. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
- 17. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-73-7 EXPIRATION DATE: 02/28/2022

SECTION: NE24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

20 MMBTU/HR FLARE, 3 IN DIA X 12 FT TALL, WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MM BTU/HR, SERVING PRIMARY PRODUCTION WELL VENT VAPOR CONTROL SYSTEM, TANK BATTERY '-54 VAPOR CONTROL SYSTEM, & TEOR WELL VENT VAPOR CONTROL SYSTEM '-100 (STAR LEASE)

PERMIT UNIT REQUIREMENTS

- 1. Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311]
- 2. Except for the pilot, each gas inlet to flare shall be equipped with recording flow rate meter. [District Rules 2201 and 4311]
- 3. Operator shall demonstrate the heat input capacity of the flare daily by calculation, using the metered volume of the gas delivered to the flare and the most current measured heating value of the gas stream. Except for the pilot, heating value for the gas stream shall be determined at least once every six months by sample analysis. [District Rule2201 and 4311]
- 4. Emission rates shall not exceed the following: PM10: 0.0202 lb/MMBtu, NOx (as NO2): 0.068 lb/MMBtu, VOC: 0.0210 lb/MMBtu, and CO: 0.37 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. Sulfur content of gases burned in flare shall not exceed 303.7 gr/100 Scf as total sulfur. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Gas sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SOx emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SOx emission rate shall be recorded in format approved by the District. If compliance with the SOx emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 7. The permittee shall keep accurate daily records of volume of gas flared for a period of five years, and shall make such records available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 8. Flares shall be designed for and operated with no visible emissions except for periods not to exceed a total of three (3) minutes in any one (1) hour. [District Rule 4101, 5.1] Federally Enforceable Through Title V Permit
- 9. The flare shall be inspected quarterly during operation for visible emissions, using EPA Method 22. If visible emissions are observed, corrective action shall be taken. If visible emissions cannot be eliminated, an EPA Method 9 test shall be conducted within 24 hours. [2520, 9.3.2] Federally Enforceable Through Title V Permit
- 10. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
- 11. The 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, 5.3] Federally Enforceable Through Title V Permit

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- 12. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
- 13. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
- 14. The requirements of SJVAPCD District Rule 4101 (Amended November 15, 2001) are addressed in a previous permit condition. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 15. The requirements of SJVAPCD District Rule 4311 (as amended June 18, 2009) are addressed in this permit. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 16. 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] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-74-15 EXPIRATION DATE: 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL /TEOR GAS FIRED STEAM GENERATOR (CUSA ID # 50-1-15A, DIS# 43005-78) WITH O2 CONTROLLER AND SO2 SCRUBBER AND WET ELECTROSTATIC PRECIPITATOR SHARED WITH UNIT S-1114-10

PERMIT UNIT REQUIREMENTS

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 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. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 4. Steam generator is authorized to operate at the following locations: SE Section 14, T31S, R22E; SE and NE Section 15, T31S, R22E; NE Section 24, T26S, R20E; Sections 18, 19, and 20, T11N, R 23W. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. The permittee shall notify the District Compliance Division of each location at which the operation is located in excess of 24 hours. Such notification shall be made in writing no later than 48 hours after starting operation at the location. [District Rule 1070 and Kern County Rule 107] Federally Enforceable Through Title V Permit
- 6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- 7. When operating at NE15, T31S/R22E, scrubber shall be used when burning TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Except as provided below, fuel burned in this unit shall not be PUC quality natural gas. 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 4320] Federally Enforceable Through Title V Permit
- 9. Fuel H2S, total sulfur, and methane content shall be determined semi-annually using the following test methods H2S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, double GC for H2S and mercaptans or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
- 10. When PUC quality gas is burned, the total gas fired in this unit in any calendar month shall be less than 50% by volume PUC quality natural gas. [District Rule 4320] Federally Enforceable Through Title V Permit
- 11. In months where PUC quality gas is burned, the permittee shall maintain records on a calendar month basis of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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- 12. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be maintained with no detectable leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Emission rates of SOx for units S-1114-10 and '-74 shall not exceed 262,537 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Emissions rates shall not exceed any of the following: NOx (as NO2): 9 ppmv @ 3% O2 or 0.011 lb/MMBtu, SOx (as SO2): 0.324 lb/MMBtu, PM10: 0.0713 lb/MMBtu, CO: 29 ppmv @ 3% O2 or 0.021 lb/MMBtu, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 15. At no time shall TEOR gas introduced to this unit and all units connected to scrubber exceed the amount introduced during a source test demonstrating compliance with permit limits. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 17. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 19. Source test results from an individual unit that is identical to this unit, in terms of rated capacity, operational conditions, fuel used, and control method, as approved by the APCO, will satisfy the NOx and CO source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 20. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 23. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, sulfur oxides ARB Methods 1-6, and fuel gas sulfur content ASTM D3246 or double GC for H2S and mercaptans. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

- 25. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 28. Permittee shall maintain records of fuel gas and TEOR gas sulfur contents and annual consumption of each. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be inspected monthly for detectable leaks. Operator shall repair each leak within 15 calendar days of detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 30. Records of steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork monthly inspections shall be maintained. Inspection log shall contain at a minimum the following: 1) date of inspection; 2) name of inspector; 3) identification and location of leak; and 4) date when leak has been repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 31. Fuel gas sulfur content shall be determined using ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 32. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. [District Rule 4301] Federally Enforceable Through Title V Permit
- 33. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. [Kern County Rule 407] Federally Enforceable Through Title V Permit
- 34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306, and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 36. Scrubber/wet ESP control efficiency shall not be less than 95% by weight sulfur compounds. [District Rule 4320] Federally Enforceable Through Title V Permit
- 37. When the scrubber is operating, scrubber liquor pH shall be maintained between 6 and 8, and shall be continuously monitored. [40 CFR part 64] Federally Enforceable Through Title V Permit

- 38. When the scrubber is operating, the scrubber liquor pH shall be recorded every 15 minutes. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 39. An excursion from the scrubber liquor pH level is defined as a daily pH reading of less than 6 or greater than 8. Upon detecting any excursion from the acceptable pH level, the permittee shall investigate the excursion and take corrective action to restore required pH level and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 40. Records of scrubber pH monitoring equipment downtime, scrubber pH level excursions, and scrubber operation shall be maintained. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 41. The scrubber pH sensor shall be calibrated annually. Calibration of the pH sensor shall be conducted by comparison of the sensor reading with a laboratory measurement of the scrubber recirculation fluid. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 42. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 43. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 44. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
- 45. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 46. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 47. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-78-7 EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

5,000 BBL FIXED ROOF FREE WATER KNOCKOUT TANK T-1 W/VAPOR CONTROL SYSTEM INCLUDING HEAT EXCHANGER, LIQUID KNOCKOUT VESSELS, & VAPOR COMPRESSOR WITH PIPING TO STEAM GENERATOR S-1114-74, HEATER TREATERS S-1114-83 & 84, AND SERVING TANKS S-1114-78,79,80,81,82,85,86,87,104,105 AND 106 (MIDWAY SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] 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.

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- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-79-4

EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

2,000 BBL LACT TANK #T-2 WITH VAPOR RECOVERY SYSTEM SHARED WITH TANK S-1114-78 (MIDWAY SUNSET

FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

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- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-81-4

EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

1,000 BBL SLOP TANK #T-4 WITH VAPOR RECOVERY SYSTEM SHARED WITH TANK S-1114-78 (MIDWAY SUNSET

FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

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- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections.

 [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-82-4 EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

3,000 BBL WASTEWATER TANK #T-5 WITH VAPOR RECOVERY SYSTEM SHARED WITH TANK S-1114-78 (MIDWAY

SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] 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
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- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-83-11 EXPIRATION DATE: 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

12.3 MMBTU/HR NATURAL GAS FIRED NATCO MODEL VFH-RM, SERIAL NO. ELIN22901-01 HEATER TREATER V-1 WITH TWO MAXON MODELS XPO 6.15 MMBTU/HR LOW NOX BURNERS WITH VAPOR RECOVERY PIPING TO S-1114-78

PERMIT UNIT REQUIREMENTS

- 1. Only natural gas with a maximum sulfur content of 0.2 grain/100 scf shall be used as fuel or make up gas. [District Rule 2201 & 4320] Federally Enforceable Through Title V Permit
- 2. Maximum emission rate(s) shall not exceed any of the following: PM10 0.005 lb/MMBtu, NOx (as NO2) 9 ppmv @ 3% O2; VOC 0.003 lb/MMBtu or 7.1 ppmv @ 3% O2, as methane; or CO 250 ppmv @ 3% O2. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
- 3. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 4. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 5. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V
- 6. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] 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.

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- 7. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 8. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 9. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted every twelve (12) months. After demonstrating compliance on two (2) consecutive source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 12. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 14. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 18. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 19. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 20. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 21. 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 D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 4305, 6.2.1] Federally Enforceable Through Title V Permit

- 22. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 23. Permittee shall maintain records of fuel gas sulfur content analysis and annual fuel use. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. All records required to be maintained by this permit shall be maintained for a period of five (5) years and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
- 25. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305 and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN, CA 5-1114-63-11 LApr 4 2017 12:33PM - TORID

PERMIT UNIT: S-1114-84-14

EXPIRATION DATE: 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

NATURAL GAS FIRED HEATER TREATER V-2 WITH TWO 6.0 MMBTU/HR MAXON XPO5PB ULTRA LOW NOX BURNERS WITH VAPOR RECOVERY PIPING TO S-1114-78

PERMIT UNIT REQUIREMENTS

- 1. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
- 3. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Only natural gas with a maximum sulfur content of 0.2 grain/100 scf shall be used as fuel or make up gas. [District Rules 2201 & 4320] Federally Enforceable Through Title V Permit
- 6. Maximum emission rate(s) shall not exceed any of the following: PM10 0.005 lb/MMBtu, NOx (as NO2) 9 ppmv @ 3% O2; VOC 0.003 lb/MMBtu or 7.1 ppmv @ 3% O2, as methane; or CO 250 ppmv @ 3% O2. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
- 7. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 8. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] 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.

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- 9. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 10. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 11. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 13. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted every twelve (12) months. After demonstrating compliance on two (2) consecutive source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 21. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN,CA S-1114-84-14 Apr 4 2017 12 33PM - TORID

- 22. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
- 23. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. [District Rule 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 24. If 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 D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 25. 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 D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 4305, 6.2.1] Federally Enforceable Through Title V Permit
- 26. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
- 27. Permittee shall maintain records of fuel gas sulfur content analysis and annual fuel use. [District Rule 2201] Federally Enforceable Through Title V Permit
- 28. All records required to be maintained by this permit shall be maintained for a period of five (5) years and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
- 29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305 and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-85-4

EXPIRATION DATE: 02/28/2022

SECTION: 15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

WEMCO AIR FLOTATION UNIT #W-1 WITH VAPOR RECOVERY SYSTEM SHARED WITH TANK S-1114-78 (MIDWAY

SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] 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,CA 8-1114-85-4: Apr 4 2017 12:39PM - TORID

- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-86-4 **EXPIRATION DATE:** 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

1,000 BBL SUMP REPLACEMENT TANK #T-9 WITH VAPOR RECOVERY SYSTEM SHARED WITH TANK S-1114-78 (MIDWAY SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN, CA S-1114-86-4: Apr 4 2017 12:33PM – TORID

- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-87-4 EXPIRATION DATE: 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

1,000 BBL SUMP REPLACEMENT TANK #T-10 WITH VAPOR RECOVERY SYSTEM SHARED WITH TANK S-1114-78 (MIDWAY SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN,CA S-1114-87-4: Agr 4 2017 12:33PM – TORID

- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-100-6 EXPIRATION DATE: 02/28/2022

SECTION: NE24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

20 STEAM ENHANCED CRUDE OIL PRODUCTION WELLS, AND THERMALLY ENHANCED OIL RECOVERY OPERATION AND WELL-VENT VAPOR CONTROL SYSTEM INCLUDING SEPARATORS, COLLECTORS, COOLERS, AND COMPRESSORS

PERMIT UNIT REQUIREMENTS

- 1. Total uncontrolled VOC emissions from all well vents shall be reduced by at least 99%. [District NSR Rule and 4401] Federally Enforceable Through Title V Permit
- 2. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Permittee shall conduct quarterly gas sampling immediately downstream of the initial compressor. If gas samples are 10% VOC by weight or less for 8 consecutive quarterly samplings, sampling shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Collected vapors shall be sent to the sales gas line, incinerated in flare S-1114-73, or injected into the formation. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. Injection of collected vapors shall only be performed using Department of Oil, Gas & Geothermal (DOGGR) approved injection wells. Permittee shall make copies of DOGGR approval for injection wells and make such documentation readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Permittee shall cease injecting vapors and notify the District immediately if DOGGR injection approval is revoked, denied, terminated, surrendered or altered to disallow injection. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. Permittee shall inspect all components on a quarterly basis for leaks, using the inspection procedures contained in Rule 4401. Any component found to be leaking shall be reinspected within 30 days after it is repaired. [District NSR Rule] Federally Enforceable Through Title V Permit
- 8. Permittee shall maintain with the permit a listing (updated annually within 60 days of permit anniversary) of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9. Compliance with permit conditions in the Title V permit shall be deemed in compliance with District Rule 1081(as amended December 16, 1993). A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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, CA
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- 10. For pressure relief devices (PRDs) a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 400 to 10,000 ppmv. For components other than PRDs a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 2,000 to 10,000 ppmv. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of more than three drops per minute. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401 3.20] Federally Enforceable Through Title V Permit
- 11. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
- 12. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1] Federally Enforceable Through Title V Permit
- 13. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere., a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401 5.2] Federally Enforceable Through Title V Permit
- 14. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401 5.2.2] Federally Enforceable Through Title V Permit
- 15. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401 5.3.1] Federally Enforceable Through Title V Permit
- 16. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401 5.3.2] Federally Enforceable Through Title V Permit
- 17. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401 5.3.3] Federally Enforceable Through Title V Permit
- 18. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401 5.4.8] Federally Enforceable Through Title V Permit

- 19. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401 5.5.1] Federally Enforceable Through Title V Permit
- 20. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and 5.5.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5.2] Federally Enforceable Through Title V Permit
- 21. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.5.3] Federally Enforceable Through Title V Permit
- 22. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401 5.5.4] Federally Enforceable Through Title V Permit
- 23. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401 5.5.4] Federally Enforceable Through Title V Permit
- 24. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.5] Federally Enforceable Through Title V Permit
- 25. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.6] Federally Enforceable Through Title V Permit
- 26. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.5.7] Federally Enforceable Through Title V Permit
- 27. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401 6.1.1] Federally Enforceable Through Title V Permit
- 28. Operator shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.4] Federally Enforceable Through Title V Permit
- 29. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.5] Federally Enforceable Through Title V Permit
- 30. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.6] Federally Enforceable Through Title V Permit
- 31. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.7] Federally Enforceable Through Title V Permit

- 32. Operator shall submit a list of all gauge tanks, as defined in Section 3.0. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
- 33. The results of gauge tank TVP testing conducted pursuant to Section 6.2.5 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401 6.1.9] Federally Enforceable Through Title V Permit
- 34. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401 6.1.10] Federally Enforceable Through Title V Permit
- 35. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401 6.2.3] Federally Enforceable Through Title V Permit
- 36. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401 6.3.1] Federally Enforceable Through Title V Permit
- 37. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401 6.3.2] Federally Enforceable Through Title V Permit
- 38. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401 6.3.3] Federally Enforceable Through Title V Permit
- 39. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401 6.3.4] Federally Enforceable Through Title V Permit

- 40. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Federally Enforceable Through Title V Permit
- 41. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
- 42. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description The results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.6 shall be submitted with the OMP. A detailed schedule of an operator's inspections of components to be conducted by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
- 43. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
- 44. 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 Rules 1070, 2201, and 4401, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-101-4

EXPIRATION DATE: 02/28/2022

SECTION: NE 24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

3,300 BARREL LACT TANK WITH VAPOR PIPING TO VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1114-54

PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a fixed roof with no holes or openings. [District NSR Rule] Federally Enforceable Through Title V Permit
- Vapor control efficiency shall be maintained at no less than 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
- 3. Tank gauging, sampling devices, relief valves, manholes, vapor recovery system components, etc. shall be leak free (as defined in Rule 4623) and shall remain closed at all times except during gauging or sampling. [District NSR Rule and 4623] Federally Enforceable Through Title V Permit
- 4. Tank seams, welds, joints, piping, valves and fittings shall be inspected and maintained leak free (as defined in Rule 4623). [District NSR Rule and 4623] 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 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. 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
- 6. All piping, fittings, and valves shall be inspected annually in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 7. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 8. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 9. VOC emissions from fugitive emissions sources in this permit unit shall not exceed 0.6 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using U.S. EPA publication 453/R-95-17, Table 2-4. [District NSR Rule] 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,CA S-1114-101-4 Apr 4 2017 12:33PM - TORID

- 11. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
- 12. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-103-9

EXPIRATION DATE: 02/28/2022

SECTION: NE24 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A

GAS COMPRESSOR

PERMIT UNIT REQUIREMENTS

- 1. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
- While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
- 3. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 4. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
- 5. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain with the permit accurate fugitive component count associated with operation of engine/compressor and resultant emissions calculated using EPA Publication 453/R-95-017, Table 2-4 factors. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The engine shall only burn natural gas with fuel gas sulfur content of 2.0 grains/100 Scf or less. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Air contaminant emissions shall not exceed any of the following: NOx: 11ppmv @ 15% O2; VOC: 30 ppmv @ 15% O2; CO: 400 ppmv @ 15% O2); and PM10: 10.0 lb/MMscf. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 9. The permittee shall monitor and record the stack concentrations of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications [in stack O2 monitors may be allowed if approved by the APCO]. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 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,

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN, CA S-1114-103-9 Apr 4 2017 12:33PM - TORIO

- 10. If the NOx and/or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 11. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 12. District witnessed or approved compliance source testing for NOx, VOC, and CO emission limits shall be demonstrated not less than once every 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 13. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 16. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit
- 17. Fuel sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SOx emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SOx emission rate shall be recorded in format approved by the District. If compliance with the SOx emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume. [District Rule 1070] Federally Enforceable Through Title V Permit
- 18. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
- 19. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
- 20. The sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D1072, D3031, D4084 or D3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 21. Permittee shall operate this engine with a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of operating a nonresettable fuel meter, the owner or operator may use an alternative device, method, or technique in determining monthly fuel consumption provided that the alternative is approved by the APCO. Permittee shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit

- 22. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
- 23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
- 24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
- 25. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
- 26. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 27. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
- 28. The engine shall be in full compliance with the applicable sections of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 29. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emissions standards applicable to all times other than startup in Table 2d of 40 CFR 63 Subpart ZZZZ apply. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- The engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first.
 [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 31. The engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 32. The engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 33. The permittee shall maintain records of engine hours, dates, and cumulative hours since last service for each of the following maintenance activities: oil and filter changes, spark plug inspection and replacement, hose and belt inspection and replacement. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 34. The permittee shall maintain records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

35. 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 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1114-104-4

EXPIRATION DATE: 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

3,000 BBL (126,000 GALLON) FIXED ROOF PETROLEUM STORAGE TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1114-78 (MIDWAY SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] 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,CA 8-1114-104-4 Apr 4 2017 12:33PM - TORID

- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections.

 [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN, CA \$-1114-104-4 | Apr 4 2017 12 39PM - TORID

PERMIT UNIT: S-1114-105-4

EXPIRATION DATE: 02/28/2022

SECTION: NE 15 TOWNSHIP: 318 RANGE: 22E

EQUIPMENT DESCRIPTION:

3,000 BBL (126,000 GALLON) FIXED ROOF PETROLEUM STORAGE TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1114-78 (MIDWAY SUNSET FIELD 15A TANK BATTERY)

PERMIT UNIT REQUIREMENTS

- 1. Vapor space pressure in tanks shall be controlled by gas blanketing system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. PUC-quality, PUC-regulated, inert gas or equivalent shall be used as blanketing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. 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 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 that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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 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. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be maintained to be leak-free and the cover shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 7. Except as otherwise provided in this permit, the permittee shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The same component found to be leaking on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520] Federally Enforceable Through Title V Permit
- 10. The VOC content of the gas in the vapor control system shall not exceed 10% by weight. [District Rule 2201] 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.

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- 11. Permittee shall conduct quarterly gas sampling for gas leaving the tank's vapor space. If the VOC content of the gas sample is equal to or less than 10% VOC by weight for 8 consecutive quarterly samples, sampling frequency shall only be required annually. If the VOC content of the gas sample is greater than 10% VOC content for any sample, the source shall resume fugitive component counts for all components associated with the tank until the VOC content of at least 2 consecutive quarterly gas samples are equal to or less than 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Permittee shall also visually or ultrasonically inspect, as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 13. Upon detection of a liquid leak, with a leak rate of greater than or equal to 30 drops per minute, permittee shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 14. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, permittee shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 15. Components found to be leaking fluids (liquids or gases) shall be immediately affixed with a tag showing the component to be leaking. Permittee shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 16. Leaking components that have been discovered by the permittee that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3, shall not constitute a violation of this rule. Leaking components, as defined by District Rule 4623, discovered by District staff that were not previously identified and/or tagged by the permittee, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3, shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 17. If a component type for a given tank is found to leak during an annual inspection, permittee shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components of that component type are found to leak after four consecutive quarters, the permittee may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
- 18. The permittee shall keep accurate records of the date VOC sampling occurred, who performed the sampling and testing, and the results. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. All monitoring data, support information and 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 1070] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN,CA 8-1114-105-4: Apr 4 2017 12:33PM - TORID

PERMIT UNIT: S-1114-106-3

EXPIRATION DATE: 02/28/2022

SECTION: NE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

3,000 BBL (126,000 GALLON) FIXED ROOF PETROLEUM STORAGE TANK CONNECTED TO VAPOR CONTROL

SYSTEM LISTED ON PERMIT S-1114-78

PERMIT UNIT REQUIREMENTS

- 1. Tank shall be equipped with a fixed roof with no holes or openings. [District Rule 4623] Federally Enforceable Through Title V Permit
- 2. Tank shall vent only to vapor control system listed on permit S-1114-78. Vapor control system shall have a minimum control efficiency of 99%. [District Rule 4623] Federally Enforceable Through Title V Permit
- 3. Tank vapors shall be disposed of only by injection in DOGGR approved gas disposal well(s). [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. Permittee shall submit copies of DOGGR approval of gas disposal well(s) prior to injection. [District Rule 4623] Federally Enforceable Through Title V Permit
- 5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
- 6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
- 7. A leak-free condition is defined as a condition without a gas leak or 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 US 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, 3.17] Federally Enforceable Through Title V Permit
- 8. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25 a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES
Location: HEAVY OIL WESTERN,CA
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- 9. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 10. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 12. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (Amended December 20, 2001). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 13. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN,CA 5-1114-106-3: Apr 4 2017 12:33PM – TORID

PERMIT UNIT: S-1114-107-6

EXPIRATION DATE: 02/28/2022

SECTION: SE15 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

77.6 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA FLAME LE BURNER

AND 02 CONTROLLER

PERMIT UNIT REQUIREMENTS

- 1. This unit may be operated at the following locations: Sections 14 & 15, T31S, R22E, Sections 18, 19, and 20, T11N, R23W, and Section 24, T26S, R20E. [District Rule 4102]
- 2. 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
- 3. Permittee shall determine the higher heating value (hhv) of the fuel at least once per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Emissions rates shall not exceed any of the following: NOx (as NO2): 7 ppmv @ 3% O2 or 0.008 lb/MMBtu, SOx (as SO2) 0.00285 lb/MMBtu, PM10: 0.0076 lb/MMBtu, CO: 42 ppmv @ 3% O2 or 0.031 lb/MMBtu, or VOC: 0.0055 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 6. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 7. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 8. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 9. Source test results from an individual unit that is identical to this unit, in terms of rated capacity, operational conditions, fuel used, and control method, as approved by the APCO, will satisfy the NOx and CO source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 10. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit

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- 11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 12. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 14. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and fuel gas sulfur content ASTM D3246 or double GC for H2S and mercaptans. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 15. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 16. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 18. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 19. Permittee shall maintain records of fuel gas sulfur content and higher heating value. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. All records required to be maintained by this permit shall be maintained for a period of five (5) years and shall be made readily available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit