



APR 1 1 2017

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

Notice of Revised Final Action - Title V Permit Renewal Re:

District Facility # S-3755

Project # 1153639

Dear Mr. Alburger:

The District has revised the final action for the Title V Permit renewal for Seneca Resources (see enclosure). The original final action was made on 3/14/2017. Subsequently, it was determined that the notice included the incorrect renewed final Title V permits. The correct renewed Title V permits are enclosed.

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 Mariollet

Director of Permit Services

**Enclosures** 

CC:

Tung Le, CARB (w/enclosure) via email

CC:

Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin

Executive Director/Air Pollution Control Officer





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

# Notice of Permit Issuance

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

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

Modesto:

(209) 557-6446

Fresno:

(559) 230-5888

Bakersfield:

(661) 392-5665

Seyed Sadredin

Executive Director/Air Pollution Control Officer

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

Central Region (Main Office) 1990 E. Gettysburg Avenue Fresno, CA 93726-0244

Tel: (559) 230-6000 FAX: (559) 230-6061

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

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





# Permit to Operate

FACILITY: S-3755

**EXPIRATION DATE: 02/28/2022** 

**LEGAL OWNER OR OPERATOR:** 

**MAILING ADDRESS:** 

SENECA RESOURCES 4800 CORPORATE CT BAKERSFIELD, CA 93311

**FACILITY LOCATION:** 

**HEAVY OIL WESTERN** 

**FACILITY DESCRIPTION:** 

OIL AND GAS PRODUCTION

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

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

Seyed Sadredin Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

FACILITY: S-3755-0-2 **EXPIRATION DATE: 02/28/2022** 

# **FACILITY-WIDE REQUIREMENTS**

- The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later 1. 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
- 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
- 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
- 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
- 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
- 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
- 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
- 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
- The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 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.

- 23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
- 30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
- 31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
- 32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
- 33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
- 34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
- 35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

- 36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin May 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
- 42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 43. Facilities S-1114, S-3007, S-3755 and S-4159 are part of the same stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR

# PERMIT UNIT REQUIREMENTS

- Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
- Except for the pilot, the gas inlet to flare shall be equipped with recording flow rate meter. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
- 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 Rules 2201 and 4311] Federally Enforceable Through Title V Permit
- 4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
- Air-assist blower shall be maintained and operated for smokeless combustion. [District Rules 2201 and 4101]
   Federally Enforceable Through Title V Permit
- 6. Flare shall be equipped with continuous pilot fired solely on propane or natural gas consisting primarily of methane containing no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas and no more than 5% by weight hydrocarbons heavier than butane. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
- 7. 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] Federally Enforceable Through Title V Permit
- 8. 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] Federally Enforceable Through Title V Permit
- Pilot gas flow rate to flare shall not exceed 100 scf per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311]
   Federally Enforceable Through Title V Permit
- 11. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
- 12. Sulfur content of produced (TEOR) gas combusted shall not exceed 500 ppmv. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 5-3755-10-8: Apr 5 2017 1:55PM - TORID

- 13. Emissions from this permit unit shall not exceed any of the following: PM10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMscf; or CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Weekly records of the produced (TEOR) gas sulfur content and daily records of produced (TEOR) gas flow rate shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H2S and mercaptans or Draeger tube analysis. Sulfur content of produced (TEOR) gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 16. All records, including required monitoring data and support information, shall be maintained and retained for a period of 5 years and made available for inspection at any time. [District Rules 1070 and 4311] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-3755-11-10

**EXPIRATION DATE: 02/28/2022** 

#### **EQUIPMENT DESCRIPTION:**

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

# PERMIT UNIT REQUIREMENTS

- Steam generator shall operate only in Sections 7, 18, 19, and 20, T11N, R23W, Section 13 T11N, R24W, Section 24 T26S R20E, Sections 14 and 15 T31S, R22E. [District Rule 4102]
- 2. Exhaust gas stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- 4. Unit shall not operate within 2,500 feet of the nearest receptor. [District Rule 4102]
- 5. Steam generator shall only be fired on produced (TEOR) gas, PUC quality natural gas, or gas containing less than 50% by volume PUC quality natural gas with a sulfur content not exceeding 5.0 gr S/100 scf or scrubbed to remove 95% sulfur. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 6. Except when the fuel is less than 50% by volume PUC quality gas and during startup and shutdown, NOx emission rates shall not exceed 9 ppmv@ 3% 02. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 7. When the fuel is less than 50% by volume PUC quality gas, NOx emission rates shall not exceed 12 ppmv @ 3% 02. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 8. Emission rates shall not exceed any of the following: PMI0: 0.0117 lb/MMBtu, VOC: 0.008 lb/MMBtu or CO: 154 ppmvd @ 3% 02. [District Rule 220 1, 4306, and 4320] Federally Enforceable Through Title V Permit
- 9. The permittee shall monitor and record the stack concentration of NOx, CO, and 02 at least once every month (in which a source test is not performed) using a portable analyzer 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 &4320] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES
Location: HEAVY OIL WESTERN
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- 10. If either the NOX or CO concentrations corrected to 3% 02, 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 I hour and conduct a cet1ified 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 & 4320] Federally Enforceable Through Title V Permit
- 11. 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. [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 & 4320] Federally Enforceable Through Title V Permit
- 12. 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 & 4320] Federally Enforceable Through Title V Permit
- 13. The portable analyzer shall be calibrated prior to each use with a two-point calibration method (zero and span). Calibration shall be performed with certified calibration gases. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
- 14. Source testing shall be by District witnessed, or authorized, sample collection by ARB cetlified testing laboratory. [District Rule 108I] 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
- The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 & 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 are-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 & 4320] Federally Enforceable Through Title V Permit
- 18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1 081] 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 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 220 1, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 21. If permittee fails any compliance demonstration for NOx and CO emissions when testing not less than once every 36 months, source testing for NOx and CO emissions shall be conducted not less than once every 12 months. [District Rules 2520, 4305, 4606 and 4320] Federally Enforceable Through Title V Permit
- 22. Fuel H2S, total sulfur, and methane content of combusted gas shall be determined whenever there is a change in fuel type and semi-annually thereafter using the test methods (or other approved methods listed in this permit) H2S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320, 6.2] Federally Enforceable Through Title V Permit
- 23. Permittee shall maintain records of the types (TEOR and/or PUC quality natural gas), fuel sulfur content and % volume of PUC quality natural gas, higher heating value, and quantities of fuel gas combusted each day. [District Rule 1070] Federally Enforceable Through Title V Permit
- 24. 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 10B or ARB Method 100, stack gas oxygen- EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu)- ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content- EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv- ASTM 01826 or 01945 in conjunction with ASTM 03588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 25. 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-3755-12-16

**EXPIRATION DATE: 02/28/2022** 

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

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

# PERMIT UNIT REQUIREMENTS

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- All emissions units shall always operate at least 2,900 feet away from the nearest receptor. [District Rule 4102]
   Federally Enforceable Through Title V Permit
- Steam generators S-2891-1 and S-2891-2 shall not be located in Section 7, T11N, R23W and SE Section 13, T11N, R24W. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Un-condensable vapors from steam enhanced wells located in east half of Section 13, T11N, R24W and Sections 7, 18, 19, and 20 T11N, R23W shall be incinerated at steam generators (S-2891-1, S-2891-2, S-3755-11 and S-3755-19) and/or flare (S-3755-10). [District Rule 2201] Federally Enforceable Through Title V Permit
- Sulfatreat vessels shall operated and maintained to achieve 95% by weight removal of sulfur compounds from TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- Fugitive VOC emissions from this casing vapor control system (CVCS) shall not exceed 0.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. VOC content of the vapor processed through this operation shall not exceed 10% by weight. Permittee shall sample and record the VOC content of the vapor at least once every 12 months. The sample shall be taken on the main vapor line after all individual vapor streams are combined and prior to the sulfur scrubbers. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 8. 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 Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 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] Federally Enforceable Through Title
  V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 8-3755-12-16: Apr 5 2017 1:55PM — TORID

- 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. [District Rule 4401]
  Federally Enforceable Through Title V Permit
- 11. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
- 12. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content often percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
- 13. 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 4!101 at least once every year. [District Rule 4401] Federally Enforceable Through Title V Permit
- 14. 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] Federally Enforceable Through Title V Permit
- 15. 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] Federally Enforceable Through Title V Permit
- 16. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 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] Federally Enforceable Through Title V Permit
- 17. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] 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] Federally Enforceable Through Title V Permit
- 19. 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. Notwithstanding the above, wells that are not operating are exempt from these requirements while undergoing service or repair. [District Rule 4401] Federally Enforceable Through Title V Permit
- 20. 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. Notwithstanding the above, wells that are not operating are exempt from these requirements while undergoing service or repair. [District Rule 4401] Federally Enforceable Through Title V Permit

- 21. 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] Federally Enforceable Through Title V Permit
- 22. 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] Federally Enforceable Through Title V Permit
- 23. 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] Federally Enforceable Through Title V Permit
- 24. 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] Federally Enforceable Through Title V Permit
- 25. 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 the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
- 26. 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] Federally Enforceable Through Title V Permit
- 27. 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] Federally Enforceable Through Title V Permit
- 28. 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] Federally Enforceable Through Title V Permit
- 29. 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] Federally Enforceable Through Title V Permit
- 30. 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] Federally Enforceable Through Title V Permit
- 31. 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] Federally Enforceable Through Title V Permit
- 32. 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] Federally Enforceable Through Title V Permit
- 33. 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] Federally Enforceable Through Title V Permit

- 34. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
- 35. 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] Federally Enforceable Through Title V Permit
- 36. 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] Federally Enforceable Through Title V Permit
- 37. An operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] Federally Enforceable Through Title V Permit
- 38. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. 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] Federally Enforceable Through Title V Permit
- 39. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
- 40. 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] Federally Enforceable Through Title V Permit
- 41. 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401] Federally Enforceable Through Title V Permit
- 42. If approved by EPA, ARB, and 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 are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401] Federally Enforceable Through Title V Permit
- 43. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: 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] Federally Enforceable Through Title V Permit
- 44. 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] Federally Enforceable Through Title V Permit
- 45. VOC content shall be analyzed by using the latest revision of ASTM Method E 168, E 169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 9-3755-12-16: Apr 5 2017 1:59FM - TORID

- 46. 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] 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 cet1ifying the accuracy of the information recorded in the log. [District Rule 44401] Federally Enforceable Through Title V Permit
- 48. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 44401] Federally Enforceable Through Title V Permit
- 49. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
- 50. 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] Federally Enforceable Through Title V Permit

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

**EXPIRATION DATE: 02/28/2022** 

#### **EQUIPMENT DESCRIPTION:**

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

# **PERMIT UNIT REQUIREMENTS**

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize
  emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% C02, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
- Approved locations for this equipment: Sections 7, 8, 18, 19 and 20, T11N, R23W, Section 13, T11N, R24W, Section 15, T31S, R22E, Section 17, T29S, R21E, and Section 24, T26S, R20E. [District Rule 2201] Federally Enforceable Through Title V Permit
- Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
- 6. 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
- Flue gas recirculation system shall be operated at all times when steam generator is in use. [District Rule 2201]
   Federally Enforceable Through Title V Permit
- Steam generator shall be fired only on produced (TEOR) gas and/or PUC quality natural gas with a combined sulfur content not to exceed 5.0 gr-S/100 dscf. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NOx@ 3% 02 or 0.011 lb-NOx/MMBtu, 100 ppmvd CO@ 3%02 or 0.074 lb-CO/MMBtu, 0.0076lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 10. The permittee shall monitor and record the stack concentration of NOx, CO, and 02 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

Facility Name: SENECA RESOURCES
Location: HEAVY OIL WESTERN
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- If either the NOx or CO concentrations corrected to 3% 02, 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 p01 lable analyzer readings continue to exceed the allowable emissions concentration after I 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
- 12. 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
- 13. The permittee shall maintain records of: (1) the date and time of NOx, CO, and 02 measurements, (2) the 02 concentration in percent and the measured NOx and CO concentrations corrected to 3% 02, (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
- 14. If the unit is fired on noncertified gaseous fuel then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM 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
- 15. Copies of fuel supplier sulfur content certification, and test results to determine compliance with the conditions of this permit shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Except for certified gaseous fuels, all fuel sources shall be tested for sulfur content within 30 days of using the fuel source as fuel in the steam generator and at least once every 12 months thereafter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rule 2201, 4305, 4306 and 2201] Federally Enforceable Through Title V Permit
- 18. 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 Rule 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. Unless otherwise 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
- 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 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. 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
- 23. 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
- 24. 24. Stack gas oxygen (02) 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
- Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rules 4305, 4306 and 4320]
   Federally Enforceable Through Title V Permit
- 26. 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
- 27. 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
- 28. Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this emissions unit, or any malfunction of the air pollution control equipment. [District Rule 4001 40CFR60, Subpart A] Federally Enforceable Through Title V Permit
- 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

PERMIT UNIT: S-3755-20-4 EXPIRATION DATE: 02/28/2022

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

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

# PERMIT UNIT REQUIREMENTS

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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 leaking provisions of this permit. [District Rule 2201 and 4323] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 9-3755-20-4; Apr 5 2017 1:55PM ~ TORID

- 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM

LISTED ON S-3755-20

#### PERMIT UNIT REQUIREMENTS

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA
  Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this
  permit. [District Rule 2201 and 4323] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN \$-3756-21-2: Apr 5 2017 1:55PM... TORID

- 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM

LISTED ON S-3755-20

### PERMIT UNIT REQUIREMENTS

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA
  Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this
  permit. [District Rule 2201 and 4323] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 9-3755-22-2: Apr 5 2017 1:55PM - TORIO

- 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM

LISTED ON S-3755-20

# **PERMIT UNIT REQUIREMENTS**

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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
- The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 2201 and 4323] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 5-3755-23-2: Apr 5 2017 1:55PM -- TORID

- 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

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

# PERMIT UNIT REQUIREMENTS

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA
  Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this
  permit. [District Rule 2201 and 4323] 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

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

## PERMIT UNIT REQUIREMENTS

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA
  Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this
  permit. [District Rule 2201 and 4323] 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

EXPIRATION DATE: 02/28/2022

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM

LISTED ON S-3755-20

# PERMIT UNIT REQUIREMENTS

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 2201 and 4323] 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 2201 and 4623] 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3755-26-2: Apr 5 2017 1:55PM - TORIO

PERMIT UNIT: S-3755-27-2 EXPIRATION DATE: 02/28/2022

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

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

3755-20

#### PERMIT UNIT REQUIREMENTS

- 1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. Permittee shall maintain a written record of VOC content of the gas and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free
  cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally
  Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3765-27-2: Apr 6 2017 1:55PM - TORID

- 10. 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 2201] Federally Enforceable Through Title V Permit
- 11. 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 2201] Federally Enforceable Through Title V Permit
- 12. 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 2201] Federally Enforceable Through Title V Permit
- 13. 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 2201] Federally Enforceable Through Title V Permit
- 14. 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 permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. 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 2201] Federally Enforceable Through Title V Permit
- 16. Any component found to be leaking on two consecutive annual inspections is in violation of this permit, even if covered under the voluntary inspection and maintenance program. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**EXPIRATION DATE: 02/28/2022** 

#### **EQUIPMENT DESCRIPTION:**

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

## **PERMIT UNIT REQUIREMENTS**

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 2201 and 4323] 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 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.

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 8-3755-28-1: Apr 6 2017 1:59PM - YORID

- 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 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

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

EXPIRATION DATE: 02/28/2022

#### **EQUIPMENT DESCRIPTION:**

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

# **PERMIT UNIT REQUIREMENTS**

- The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA
  Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this
  permit. [District Rule 2201 and 4323] 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 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.

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 5-375-29-1: Apr 5 2017 1:59PM -- TORID

- 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 Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-3755-30-1

**EXPIRATION DATE: 02/28/2022** 

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

537 BBL FIXED ROOF PETROLEUM STORAGE TANK #P156205

## PERMIT UNIT REQUIREMENTS

- 1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- 2. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
- 3. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- 5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
- The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be
  made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title
  V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 5-3755-30-1: Apr S 2017 1:56PM - TORID

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

**EXPIRATION DATE: 02/28/2022** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

300 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK

#### PERMIT UNIT REQUIREMENTS

- Tank shall be designed and operated at a constant level. [District Rule 2201] Federally Enforceable Through Title V
  Permit
- 2. Tank throughput shall be less than 50 barrels/day when averaged over a one month period. [District Rule 4623] 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. VOC emissions from this tank shall not exceed 0.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. True vapor pressure (TVP) of liquids stored, received, or held in tank shall not exceed 0.1 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e 1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain monthly records of average daily crude oil throughput. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
- 11. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 9-3755-31-1: Apr 5 2017 1:59PM - TORID

- 12. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 13. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

EXPIRATION DATE: 02/28/2022

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

85 MMBTU/HR PCL NATURAL GAS-FIRED STEAM GENERATOR, WITH NORTH AMERICAN LEL ULTRA LOW NOX

BURNER AND A FLUE GAS RECIRCULATION SYSTEM

### PERMIT UNIT REQUIREMENTS

- 1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- Steam generator shall the equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- 4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 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
- 6. 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 D1072, D3031, D3246, D4084, D4468, D6667 or grab sample analysis by GC-FPD/TCD or double GC performed in the laboratory. [District Rules1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- 7. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested monthly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 6 consecutive months for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, monthly testing shall resume. [District Rules1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- 8. 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 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- Emissions shall not exceed any of the following limits: 5 ppmvd NOx @ 3% 02 or 0.0062 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 25 ppmvd CO@ 3%02 or 0.0185 lb-CO/MMBtu, or 0.00537 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- Flue gas recirculation system shall be operated whenever steam generator is operated. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN \$-3755-32-1: Apr 5 2017 1:58PM - TORID

- 11. The permittee shall monitor and record the stack concentration of NOx, CO, and 02 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
- 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 Rules4305, 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 02 measurements, (2) the 02 concentration in percent and the measured NOx and CO concentrations corrected to 3% 02, (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 Rules4305, 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 are-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 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
- 17. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted once every twelve (12) months thereafter. 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 Rules4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 18. 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
- 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
- 20. 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

- 21. 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
- 22. 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 4305,4306 and 4320] Federally Enforceable Through Title V Permit
- 23. 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
- 24. Stack gas oxygen (02) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4305,4306 and 4320] Federally Enforceable Through Title V Permit
- 25. 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 Rule 4305,4306 and 4320] Federally Enforceable Through Title V Permit
- 26. Records of sulfur content (gr S/100 set) of combusted gas shall be maintained. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 27. 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