



OCT 24 2017

Mr. Dale Johnson
Chevron USA Inc
PO Box 1392
Bakersfield, CA 93302

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-1128
Project # 1173308**

Dear Mr. Johnson:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes a new tank and modifications to two tanks.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

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San Joaquin Valley Air Pollution Control District Authority to Construct Application Review

Modify Tank Permits to add Maintenance/Repair/Upset Provisions; and Create a
Separate Permit for Vapor Control System

Facility Name: Chevron USA, Inc. Date: October 9, 2017
Mailing Address: P.O. Box 1392 Engineer: Richard Edgehill
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Application #: S-1128-411, -412, -1019, and '-1020
Project #: S-1173308
Deemed Complete: September 22, 2017

I. Proposal

CUSA is requesting Authorities to Construct (ATCs) to authorize 600 hr/yr disconnection of the vapor control system (VCS) S-1128-1019 serving tanks S-1128-411, '-412 and newly installed 10,000 bbl tank '-1020 (authorized by this project) for maintenance and repair activities, process upsets, and equipment breakdowns.

The project results in an increase in VOC emissions and in a Federal Major Modification. BACT, offsets, and public notice are required.

CUSA facility S-1128 operates under a Title V permit. This modification can be classified as a Title V Significant Modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. CUSA must apply to administratively amend their Title V permit.

Disposition of Outstanding ATCs

ATC S-1128-1019-0, which authorizes the 31X OCP vapor control system, serves as the base document for this project.

Current PTOs S-1128-411-8 and '-412-8 and ATC S-1128-1019-0 are included in **Attachment I**.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (6/16/11) - <i>This rule applies to attainment pollutants only. The subject equipment only emits VOC. VOC is not an attainment pollutant; therefore, this rule does not apply.</i>
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)

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

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

Rule 4102	Nuisance (12/17/92)
Rule 4623	Storage of Organic Liquids (5/19/05)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

III. Project Location

This project is located at 31X OCP, Cymric Oilfield, CUSA's Western Kern County field heavy oil production stationary source (Section 31, T29S, R22E). This project is not located within 1,000 feet of a K-12 school

IV. Process Description

The tanks and vessels at 31X OCP receive production prior to custody transfer. VOC emissions from the tanks are controlled by a shared VCS listed on S-1128-1019. The VCS collects vapors from the tanks and routes the uncondensed vapors to a VOC control device that reduces inlet VOC emissions by at least 99% by weight.

Proposed Modification

Applicant is requesting provisions to disconnect the VCS S-1128-1019 serving tanks S-1128-411, '-412 and '-1020 (new) for up to 600 hr/yr in order to conduct maintenance and repair activities required for long term compliance with District rules and regulations.

Please note that, previously the VCS serving 31XOCP units was listed on tank permit S-1128-248. CUSA requested designation of the VCS listed on permit S-1128-248 as a separate permit unit (S-1128-1019) in project 1162415. As such, all units (and their respective VOC emissions) previously listed as sharing the '-248 VCS were listed on '-1019. Note that, because, tanks '-411 and '-412 were to be replaced by larger tanks (ATCs '-1016 and '-1017) in project 1161165, and they were not listed on VCS '-1019. CUSA has since decided not to install '-1016 and '-1017 and the ATCs have been cancelled. CUSA has requested that '-411 and '-412 be added to the list of units sharing the '-1019 VCS in this project. The "updated" list of the "18" units is included in the table below.

Permit Unit	Chevron ID	Tank Function
Oil Side Tanks		
S-1128-400	T-11	FWKO
S-1128-401	T-12	FWKO
S-1128-935	T-13	FWKO
S-1128-936	T-25	FWKO
S-1128-404	T-21	Wash Tanks
S-1128-405	T-22	Wash Tanks
S-1128-406	T-23	Wash Tanks
S-1128-248	T-24	Wash Tanks
S-1128-938	T-18	Pump Suction Reservoir
S-1128-1020	T-27	New Wash Tank (this project)
S-1128-402	T-19	Pump Suction Reservoir
S-1128-407	T-40	Shipping Tank
S-1128-250	T-41	Shipping Tank
Water Side Tanks		
S-1128-411	T-31	Settling Tank – Add to -1019
S-1128-1016	T-31	Not Constructed – ATC cancelled
S-1128-1017	T-32	Not Constructed – ATC cancelled
S-1128-412	T-32	Settling Tank – Add to -1019
S-1128-1014	T-33	Settling Tank
S-1128-262	T-35	Settling Tank
S-1128-263	T-36	Settling Tank

The '-1019 permit condition listing the units sharing the VCS is

Vapor control system may be inoperable during maintenance/repairs/upset conditions of tanks S-1128-248, -250, -262, -263, -400, -401, -402, -404, -405, -406, -407, -411, -412, -935, -936, -938, -1014, and -1020 for up to 600 hours per rolling 12-month period. District-approved breakdowns and relief periods granted by variance and supported by the District shall not be included in this limit. [District Rule 2201] Y

A site plan is provided in **Attachment II**.

V. Equipment Listing

Pre-Project ATC Equipment Description

- ATC S-1128-1019-0 CYMRIC 31X OIL CLEANING PLANT VAPOR CONTROL SYSTEM SHARED WITH 21 PERMIT UNITS; INCLUDING HEAT EXCHANGER(S), G/L SEPARATORS, GAS COMPRESSORS, & GAS PIPING TO EITHER TEOR PERMIT S-1128-116 COLLECTION SYSTEM, SCRUBBED STEAM GENERATORS S-1128-3, -24, -25, -26, AND -29 THROUGH -34, OR DOGGR APPROVED DISPOSAL WELLS (FORMERLY S-1128-248)
- S-1128-411-8 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-31) VENTED TO VAPOR CONTROL SYSTEM LISTED ON PTO S-1128-248 (CYMRIC 31X OCP)
- S-1128-412-7 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-32) VENTED TO VAPOR CONTROL SYSTEM LISTED ON PTO S-1128-248 (CYMRIC 31X OCP)

Proposed ATC Modifications

- S-1128-1019-1 MODIFICATION OF CYMRIC 31X OIL CLEANING PLANT VAPOR CONTROL SYSTEM SHARED WITH 21 PERMIT UNITS; INCLUDING HEAT EXCHANGER(S), G/L SEPARATORS, GAS COMPRESSORS, & GAS PIPING TO EITHER TEOR PERMIT S-1128-116 COLLECTION SYSTEM, SCRUBBED STEAM GENERATORS S-1128-3, -24, -25, -26, AND -29 THROUGH -34, OR DOGGR APPROVED DISPOSAL WELLS: CONNECT TANKS '-411, '-412, AND '-1020 TO VAPOR CONTROL SYSTEM, CORRECT NUMBER OF SHARED UNITS TO 18
- S-1128-411-10 MODIFICATION OF 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-31) VENTED TO VAPOR CONTROL SYSTEM LISTED ON ATC S-1128-1019 (CYMRIC 31X OCP): REPLACE REFERENCE TO '-248 WITH '-1019, ADD PROVISIONS FOR TANK TO BE DISCONNECTED FROM VAPOR CONTROL SYSTEM FOR UP TO 600 HOURS PER YEAR, LOWER VOC CONTENT OF VAPORS TO 10%
- S-1128-412-10 MODIFICATION 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-32) VENTED TO VAPOR CONTROL SYSTEM LISTED ON ATC S-1128-1019 (CYMRIC 31X OCP: REPLACE REFERENCE TO '-248 WITH '-1019, ADD PROVISIONS FOR TANK TO BE DISCONNECTED FROM VAPOR CONTROL SYSTEM FOR UP TO 600 HOURS PER YEAR, LOWER VOC CONTENT OF VAPORS TO 10%

Post-Project Equipment Description

- S-1128-1019-0 CYMRIC 31X OIL CLEANING PLANT VAPOR CONTROL SYSTEM SHARED WITH 22 PERMIT UNITS; INCLUDING HEAT EXCHANGER(S), G/L SEPARATORS, GAS COMPRESSORS, & GAS PIPING TO EITHER TEOR PERMIT S-1128-116 COLLECTION SYSTEM, SCRUBBED STEAM GENERATORS S-1128-3, -24, -25, -26, AND -29 THROUGH -34, OR DOGGR APPROVED DISPOSAL WELLS
- S-1128-411-10 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-31) VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1128-1019 (CYMRIC 31X OCP)
- S-1128-412-11 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-32) VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1128-1019 (CYMRIC 31X OCP)
- S-1128-1020-0: 10,000 BBL FIXED-ROOF WASH TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1128-1019

VI. Emission Control Technology Evaluation

During maintenance and/or repair of the tank VCS, emissions will be minimized by keeping the tanks near constant level and returning the system to normal operation as quickly as possible to control the potential VOC emissions.

VII. General Calculations

A. Assumptions

- The facility operates 24 hrs/day, 7 days/week, & 365 days/year
- Tanks '-411, '-412, and '-1020 process liquids with API gravity less than 30 degrees and the permitted VOC concentration of collected vapors is limited to less than 10%; therefore, pursuant to section VII.A, above, the fugitive emissions from tanks '-411, '-412, and '-1020 are negligible. The current PTO listed on '-411 and '-412 restricting maximum VOC content to 50% is not consistent with other 31XOCP units and appears to have been added in error (CUSA email 10/2/17). Therefore, for this project, both PE1 and PE2 for '-411 and '-412 are zero.
- The tanks/vessels will be disconnected from the VCS up to a maximum of 24 hr/day and 600 hr/yr.
- Uncontrolled emissions (during VCS maintenance) from tanks '-411, '-412, and '-1019 are considered "new point source emissions" in the Federal Major Modification calculation. Annual emissions, calculated assuming 365 days/yr, are multiplied by the ratio 25 days (600 hrs)/365 days to obtain post-project emissions. Results of calculations are included in **Attachment III**.

- No fugitive emissions are assigned to liquid service components processing heavy crude oil and/or produced water pursuant to District policy SSP-2015.
- During maintenance of the vapor control system, there are no working or flashing loss emissions of VOCs.
- Tank temperature, 195° F
- TVP, 0.5 psia
- When the tanks are disconnected from the vapor recovery system, they will operate at near constant level, so working losses are assumed to be negligible.
- The tanks in this project are not “front line” tanks and therefore do not receive production from TEOR wells operated with closed casing vents (CUSA 10/2/17 email).

When using the District’s tank calculation spreadsheet, flashing losses are assumed to be negligible.

- Vapor space component counts do not change with the project. No change in fugitive VOC emissions (included on ‘-1019) with removal of the VCS for < 600 hrs/yr is assumed.
- VCS ‘-1019 is not being modified by the project as there are no physical changes and no changes in emissions (other than administrative). Therefore, formal calculations are not required.

B. Emission Factors

Emissions from ‘-411, ‘-412 and ‘-1020, during the 600 hr/yr tank maintenance and repair period, emissions will be calculated using the District tank calculation spreadsheet (based on EPA Tanks calculator).

Fugitive emissions from ‘-1020, used for HRA modelling only, are based on California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999. Emissions in this project are calculated using the "average" emissions factors.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

PE1 for ‘-1019 was calculated in project S-1128, 1062415.

Pre-Project Potential to Emit (PE1)		
	VOC - Daily PE1 (lb/day)	VOC - Annual PE1 (lb/yr)
S-1128-411	0.0	0
S-1128-412	0.0	0
S-1128-1019	112.1	40,917

2. Post-Project Potential to Emit (PE2)

Emissions from '-1020 included in '-1019.

Post-Project Potential to Emit (PE2)		
	VOC - Daily PE2 (lb/day)	VOC - Annual PE2 (lb/yr) (lb/day x 1 day/24 hr x 600 hr/yr)
S-1128-411	10.82	271
S-1128-412	10.82	271
S-1128-1019	112.1	40,917
S-1128-1020	16.6	417
TOTAL	150.34	41,876

$$\begin{aligned} \text{SSIPE} &= 271 \text{ ('-411 uncontrolled)} + 271 \text{ ('-412 uncontrolled)} + 417 \text{ ('-1020} \\ &\quad \text{uncontrolled)} \\ &= 959 \text{ lb/yr} \end{aligned}$$

Emissions profiles are included in **Attachment IV**.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for VOC; therefore, SSPE1 calculations are not necessary.

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct or Permits to Operate at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since 9/19/1991 for Actual Emissions Reductions that have occurred at the source, which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for VOC; therefore, SSPE2 calculations are not necessary.

5. Major Source Determination

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

Rule 2410 Major Source Determination:

This source concedes it is an existing Major Source for PSD for at least one pollutant. Therefore, the facility is an existing major source for PSD.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = PE1 for:

- Any unit located at a non-major source,
- Any highly-utilized emissions unit, located at a major source,
- Any fully-offset emissions unit, located at a major source, or
- Any clean emissions unit, located at a major source.

Pursuant to Rule 2201, Section 3.12, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

Tanks '-411 and '-412 are equipped with a VCS which is at least 95% effective. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1). BE for '-1020 is zero as it is a new emissions unit.

BE	
Current PTO	lb-VOC/yr
S-1128-411	0.0
S-1128-412	0.0
S-1128-1020	0.0

7. SB 288 Major Modification

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

Since this facility is a major source for VOC, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
VOC	959	50,000	No

As demonstrated in the preceding table, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

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

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

The project's combined total emission increases are calculated in Section VII B.2, above, and compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
VOC*	959	0	Yes

*If there is any emission increase in VOC, this project is a Federal Major Modification and no further analysis is required.

Since there is an increase in VOC emissions, this project constitutes a Federal Major Modification, and no further analysis is required.

Federal Offset quantities are calculated below:

Federal Offset Quantities:

The Federal offset quantity is only calculated only for the pollutants for which the project is a Federal Major Modification. The Federal offset quantity is the sum of the annual emission changes for all new and modified emission units in a project calculated as the potential to emit after the modification (PE2) minus the actual emissions (AE) during the baseline period for each emission unit times the

applicable federal offset ratio. There are no special calculations performed for units covered by an SLC.

VOC			Federal Offset Ratio	1.5
Permit No.	Actual Emissions (lb/year)	Potential Emissions (lb/year)	Emissions Change (lb/yr)	
S-1128-411	0	271	271	
S-1128-412	0	271	271	
S-1128-1019	0	417	417	
			0	
			Net Emission Change (lb/year): 959	
			Federal Offset Quantity: (NEC * 1.5) 1,439	

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV. The project emissions are VOCs and therefore the rule is not applicable.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District’s PAS emissions profile screen. The project QNEC is shown below.

QNEC = PE2 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Quarterly Net Emissions Change			
	VOC PE2 lb(gtr)	VOC PE1 (lb/qtr)	VOC QNEC (lb/qtr)
S-1128-411	271	0	67.75
S-1128-412	271	0	67.75
S-1128-1019	41,784	41,784	0
S-1128-1020	419	0	104.75

VIII. Compliance

Rule 2201 - New and Modified Source Review (NSR)

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As seen in Section VII.C.2 above, the applicant is proposing to install a new 10,000 bbl wash tank (S-1128-1020) with a PE greater than 2 lb/day for VOC; therefore BACT is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I. above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered for relocation of an emissions unit with a PE > 2 lb/day.

c. Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's Potential to Emit prior to modification, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$AIPE = PE2 - (PE1 * (EF2 / EF1))$$

Note that EF2 > EF1 since post- project emissions are uncontrolled.

S-1128-411, '-412

PE1 = 0, EF2 > EF1 or EF2/EF1 = 1 (uncontrolled post-project emissions)

'-411 and '-412

$$AIPE = PE2 = 10.8$$

AIPE > 2 for '-411 and '-412 and therefore BACT is triggered for modification purposes.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 above, this project does not constitute an SB 288 mod for any pollutant. However, the project does result in a Federal Major Modification for VOC emissions. Therefore, BACT is triggered for VOC for Federal Major Mod purposes.

2. BACT Guideline

There is not an existing BACT Guideline for disconnection of a tank VCS for maintenance and repair activities, process upsets, and equipment breakdowns which is considered a highly unusual (nonroutine) activity. The project specific BACT analysis approved for projects S-1128, 1142757, C-311, 1161067, S-1135, 1171557 and which was similar to this project will be used.

3. Top-Down BACT Analysis

Pursuant to the attached Top-Down BACT Analysis (see **Attachment V**), BACT has been satisfied with the following:

VOC: Work practices to minimize VOC emissions including:

- Near constant level tank operation
- Use of operational P/V valve where possible
- Work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts
- Minimization of tank openings and liquid drainage from disconnects
- Inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work.

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

CUSA is over the VOC offset threshold; therefore the quantity of offsets required will be calculated in the following section.

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for VOC and the SSPE2 is greater than the offset threshold; therefore offset calculations will be required for this project.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets required (lb/year) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

Otherwise,

BE = Historic Actual Emissions (HAE)

As calculated in Section VII.C.6 above, the Baseline Emissions (BE) from this unit are equal to the Pre-Project Potential to Emit (PE1) since the unit is a Clean Emissions Unit.

Also, there are multiple emissions units associated with this project, which result in an increase in emissions associated with non-emergency operation, and there are no increases in cargo carrier emissions.

CUSA has identified ERC certification S-4859-1 (or a daughter certificate originating from this certificate) to provide offsets for this project. A distance offset ratio (DOR) of 1.5:1 applies to this project because it is a Federal Major Mod. (Rule 2201, Section 4.8.1). Therefore, offsets can be determined as follows:

S-1128-411 and '-412 (each)

Offsets required (lb/year) = $([PE2 - BE] + ICCE) \times DOR$

PE2 (VOC) = 271 lb/year
BE (VOC) = 0 lb/year
ICCE = 0 lb/year
DOR = 1.5

Offsets required (lb/year) = 406 lb VOC/year (101.5 lb/qtr)

As shown in the calculation above, the quarterly amount of offsets required, when evenly distributed to each quarter, results in fractional pounds of offsets being required each quarter. Since offsets are required to be withdrawn as whole pounds, the quarterly amounts of offsets need to be adjusted to ensure the quarterly values sum to the total annual amount of offsets required.

To adjust the quarterly amount of offsets required, the fractional amount of offsets required in each quarter will be summed and redistributed to each quarter based on the number of days in each quarter. The redistribution is based on the Quarter 1 having the fewest days and the Quarters 3 and 4 having the most days. The redistribution method is summarized in the following table:

Redistribution of Required Quarterly Offsets (where X is the annual amount of offsets, and $X \div 4 = Y.z$)				
Value of z	Quarter 1	Quarter 2	Quarter 3	Quarter 4
.0	Y	Y	Y	Y
.25	Y	Y	Y	Y+1
.5	Y	Y	Y+1	Y+1
.75	Y	Y+1	Y+1	Y+1

Therefore, the appropriate quarterly emissions to be offset are as follows:

<u>1st Quarter</u>	<u>2nd Quarter</u>	<u>3rd Quarter</u>	<u>4th Quarter</u>	<u>Total Annual</u>
101	101	102	102	406

S-1128-1020

Offsets required (lb/year) = $([PE2 - BE] + ICCE) \times DOR$

PE2 (VOC) = 417 lb/year
 BE (VOC) = 0 lb/year
 ICCE = 0 lb/year
 DOR = 1.5

Offsets required (lb/year) = 417 lb VOC/year \times 1.5 = 626 (156.5 lb/qtr)

<u>1st Quarter</u>	<u>2nd Quarter</u>	<u>3rd Quarter</u>	<u>4th Quarter</u>	<u>Total Annual</u>
156	156	157	157	626

Emission Offset Required (Station 2-22 OCP)				
Permit Unit	PE2-BE VOC lb/yr (proposed 600 hrs)	DOR	PE2-BE x 1.5 Offset (lbs-VOC /yr)	Offset (lbs-VOC /qtr)
S-1128-411	271	1.5	407	101.5
S-1128-412	271	1.5	407	101.5
S-1128-1020	417	1.5	626	156.5
Total	959		1,440	359.5

The applicant has stated that the facility plans to use ERC certificate S-4859-1 to offset the increases in VOC emissions associated with this project. The above certificate has available quarterly VOC credits as follows:

Certificate	Pollutant	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Facility	Facility Name
<i>S-4859-1</i>	VOC	27,662	28,587	29,512	29,508	1127	CHEVRON USA INC

As seen above, the facility has sufficient credits to fully offset the quarterly VOC emissions increases associated with this project.

Proposed Rule 2201 (offset) Conditions:

S-1128-411, '-412

- *Prior to operating equipment under this Authority to Construct, permittee shall surrender emission reduction credits for the following quantities of emissions: VOC: 1st quarter – 101 lb, 2nd quarter – 101 lb, 3rd quarter – 102 lb, and 4th quarter – 102 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERCs specified below. [District Rule 2201 and Public Resources Code 21000-21177: California Environmental Quality Act]*

S-1128-1020

- *Prior to operating equipment under this Authority to Construct, permittee shall surrender emission reduction credits for the following quantities of emissions: VOC: 1st quarter – 156 lb, 2nd quarter – 156 lb, 3rd quarter – 157 lb, and 4th quarter – 157 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERCs specified below. [District Rule 2201 and Public Resources Code 21000-21177: California Environmental Quality Act]*
- *ERC Certificate Number S-4859-1 (VOC) (or certificate split(s) from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]*

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,

- c. Any project which results in the offset thresholds being surpassed,
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
- e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Mods, and SB 288 Major Mods

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.8 this project proposal constitutes a Federal Major Modification; therefore, public noticing for Federal Major Modification purposes is required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant; therefore, public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

Public notification is required if the SSPE is increased from below the offset threshold to a level exceeding the emissions offset threshold, for any pollutant.

The applicant is already over the offset thresholds, therefore no thresholds were surpassed with this project; therefore public noticing for offset purposes is not required.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
VOC	>20,000	>20,000	959	20,000 lb/year	No

As demonstrated above, the SSIPEs for VOC were less than 20,000 lb/year; therefore, public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V Significant Modifications is required for this project.

Since this facility does not have a Title V operating permit, this change is not a Title V Significant Modification, and therefore public noticing is not required.

2. Public Notice Action

As discussed above, public noticing is required for Federal Major Mod purposes. Therefore, Public Notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATCs for this equipment.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

S-1128-411, -412, and '-1020

Maximum VOC content of vapor in the tank vapor space shall not exceed 10% by weight. [District Rule 2201] Y

VOC content of vapor by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rules 1081 and 2201] Y

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

Monitoring is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201 as sateted in the following condition:

Operator shall conduct quarterly gas sampling of gas handled by TVR system. 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] Y

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. A condition addressing this requirement is included on the S-1128 facility-wide permit and listed below.

Operator shall keep records of VOC content of tank vapors as required under this permit and shall make such records available for District inspection upon request. [District Rule 2201] Y

The District shall be notified within 24 hours of each maintenance/repairs/upset period. Records of the date, time, duration, rolling 12-month duration with end of month totals, and description of the activity shall be maintained. [District Rule 2201] Y

Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Y

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. There is no air quality standard for VOCs, and therefore an AAQA is not required.

G. Compliance Certification

Compliance certification is required for any project which constitutes a New Major Source or a Federal Major Modification.

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in Section VIII above, this project does constitute a Federal Major Modification, therefore this requirement is applicable. CUSA's compliance certification is included in **Attachment VI**.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant proposes to install tanks and vessels at existing sites in the Chevron's heavy oil western stationary source.

Since the project will provide tanks and vessels to be used at the same location, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.

Rule 2520 - Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. Section 3.29 defines a significant permit modification as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

The project is Federal Major Modification and therefore is also a Title V Significant Modification. As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Included in **Attachment VI** CUSA's Title V Modification Compliance Certification form. Continued compliance with this rule is expected.

Rule 4102 - Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Attachment VII**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-1128-411, '-412, '-1019, and '-1020	1.66 E-09 (project)	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

Rule 4623 - Storage of Organic Liquids

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

The tanks limit the TVP of the stored liquid to less than 0.5 psia and include required TVP testing every two years. Therefore, the existing VCSs not required by Rule 4623 and no provisions of the rule restrict its disconnection for maintenance/repair/upset conditions.

Section 4.0 Exemptions

Section 4.4 Tanks exclusively receiving and/or storing an organic liquid with a TVP less than 0.5 psia are exempt from all other provisions of the rule except for complying with the following provisions:

- 4.4.1 TVP and API Gravity Testing provisions pursuant to Section 6.2,
- 4.4.2 Recordkeeping provisions pursuant to Section 6.3.6,
- 4.4.3 Test Methods provisions pursuant to Section 6.4, and
- 4.4.4 Compliance schedules pursuant to Section 7.2

Continued compliance with the requirements of this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

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

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

Oil and gas operations in Kern County must comply with the *Kern County Zoning Ordinance – 2015 (C) Focused on Oil and Gas Local Permitting*. In 2015, Kern County revised the Kern County Zoning Ordinance Focused on Oil and Gas

Activities (Kern Oil and Gas Zoning Ordinance) in regards to future oil and gas exploration, and drilling and production of hydrocarbon resource projects occurring within Kern County.

Kern County served as lead agency for the revision to their ordinance under the California Environmental Quality Act (CEQA), and prepared an Environmental Impact Report (EIR) that was certified on November 9, 2015. The EIR evaluated and disclosed to the public the environmental impacts associated with the growth of oil and gas exploration in Kern County, and determined that such growth will result in significant GHG impacts in the San Joaquin Valley. As such, the EIR included mitigation measures for GHG.

The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). As a Responsible Agency, the District is limited to mitigating or avoiding impacts for which it has statutory authority. The District does not have statutory authority for regulating GHGs. The District has determined that the applicant is responsible for implementing GHG mitigation measures imposed in the EIR by the Kern County for the Kern County Zoning Ordinance.

District CEQA Findings

The proposed project is located in Kern County and is thus subject to the Kern County Zoning Ordinance – 2015 (C) Focused on Oil and Gas Local Permitting. The Kern County Zoning Ordinance was developed by the Kern County Planning Agency as a comprehensive set of goals, objectives, policies, and standards to guide development, expansion, and operation of oil and gas exploration within Kern County.

In 2015, Kern County revised their *Kern County Zoning Ordinance* in regards to exploration, drilling and production of hydrocarbon resources projects. Kern County, as the lead agency, is the agency that will enforce the mitigation measures identified the EIR, including the mitigation requirements of the Oil and Gas ERA. As a responsible agency the District complies with CEQA by considering the EIR prepared by the Lead Agency, and by reaching its own conclusion on whether and how to approve the project involved (CCR §15096). The District has reviewed the EIR prepared by Kern County, the Lead Agency for the project, and finds it to be adequate. The District also prepared a full findings document. The full findings document, *California Environmental Quality Act (CEQA) Statement of Findings for the Kern County Zoning Ordinance EIR* contains the details of the District's findings regarding the Project. The District's implementation of the Kern Zoning Ordinance and its EIR applies to ATC applications received for any new/modified equipment used in oil/gas production in Kern County, including new wells. The full findings applies to the Project and the Project's related activity equipment(s) is covered under the Kern Zoning Ordinance. To reduce project related impacts on air quality, the District

evaluates emission controls for the project such as Best Available Control Technology (BACT) under District Rule 2201 (New and Modified Stationary Source Review). In addition, the District is requiring the applicant to surrender emission reduction credits (ERC) for stationary source emissions above the offset threshold.

Thus, the District concludes that through a combination of project design elements, permit conditions, and the Oil and Gas ERA, the project will be fully mitigated to result in no net increase in emissions. Pursuant to CCR §15096, prior to project approval and issuance of ATCs the District prepared findings.

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project’s potential for litigation risk, which in turn may be based on a project’s potential to generate public concern, its potential for significant impacts, and the project proponent’s ability to pay for the costs of litigation without a letter of credit, among other factors.

The revision to the *Kern County Zoning Ordinance* went through an extensive public process that included a Notice of Preparation, a preparation of an EIR, scoping meetings, and public hearings. The process led to the certification of the final EIR and approval of the revised *Kern County Zoning Ordinance* in November 2015 by the Kern County Board of Supervisors. As mentioned above, the proposed project will be fully mitigated and will result in no net increase in emissions. In addition, the proposed project is not located at a facility of concern; therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

I. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs subject to the permit conditions listed on draft Authorities to Construct (Appendix H).

J. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fees
S-1128-411	3020-05-E	277,000 gallons	\$270.00
S-1128-412	3020-05-E	277,000 gallons	\$270.00
s-1128-1019	3020-01-E	399 HP	\$451.00
S-1128-1020	3020-050	420,000 gallons	\$270.00

Attachments

- I: Current PTOs and ATC S-1128-1019-0
- II: Site Plan
- III: Tank Emissions Calculations
- IV: Emissions Profiles
- V: BACT Analysis
- VI: Title V Compliance Certification Form and Statewide Compliance Statement
- VII: HRA
- VIII: Draft ATC

ATTACHMENT I
Current PTOs and ATC

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1128-411-8

EXPIRATION DATE: 02/28/2021

SECTION: SW31 **TOWNSHIP:** 29S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-31) VENTED TO VAPOR CONTROL SYSTEM LISTED ON PTO S-1128-248 (CYMRIC 31X OCP)

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 NSR Rule and District Rule 4623, 4.4] 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 NSR Rule and District Rule 4623, 6.2.2] 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, 6.4.2] 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 NSR Rule and District Rule 4623, 6.4.4] 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, 6.2.1.2] 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, 6.3.6] Federally Enforceable Through Title V Permit
7. 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, 6.3] Federally Enforceable Through Title V Permit
8. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] 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.

9. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
10. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
11. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
13. VOC content of total hydrocarbons in gas processed by the vapor control system shall not exceed 50% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
16. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
17. 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 NSR Rule] Federally Enforceable Through Title V Permit
18. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Any component found to be leaking on two consecutive annual inspections is in violation of the District NSR Rule, even if it is under the voluntary inspection and maintenance program. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The efficiency of any VOC destruction device shall be measured by EPA Method 18, 25, 25a, or 25b. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit
28. The tank shall vent to vapor control system listed in S-1128-248. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Fugitive VOC emissions from this tank and associated vapor recovery system shall not exceed the amount specified on S-1128-248. [District NSR Rule] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1128-412-8

EXPIRATION DATE: 02/28/2021

SECTION: SW31 **TOWNSHIP:** 29S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-32) VENTED TO VAPOR CONTROL SYSTEM LISTED ON PTO S-1128-248 (CYMRIC 31X OCP)

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 NSR Rule and District Rule 4623, 4.4] 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 NSR Rule and District Rule 4623, 6.2.2] 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, 6.4.2] 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 NSR Rule and District Rule 4623, 6.4.4] 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, 6.2.1.2] 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, 6.3.6] Federally Enforceable Through Title V Permit
7. 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, 6.3] Federally Enforceable Through Title V Permit
8. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] 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.

9. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
10. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
11. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
13. VOC content of total hydrocarbons in gas processed by the vapor control system shall not exceed 50% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
16. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
17. 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 NSR Rule] Federally Enforceable Through Title V Permit
18. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Any component found to be leaking on two consecutive annual inspections is in violation of the District NSR Rule, even if it is under the voluntary inspection and maintenance program. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The efficiency of any VOC destruction device shall be measured by EPA Method 18, 25, 25a, or 25b. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit
28. The tank shall vent to vapor control system listed in S-1128-248. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Fugitive VOC emissions from this tank and associated vapor recovery system shall not exceed the amount specified on S-1128-248. [District NSR Rule] Federally Enforceable Through Title V Permit

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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1128-1019-0

ISSUANCE DATE: 06/22/2017

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY

SECTION: SW31 TOWNSHIP: 29S RANGE: 22E

EQUIPMENT DESCRIPTION:

CYMRIC 31X OIL CLEANING PLANT VAPOR CONTROL SYSTEM SHARED WITH 21 PERMIT UNITS; INCLUDING HEAT EXCHANGER(S), G/L SEPARATORS, GAS COMPRESSORS, & GAS PIPING TO EITHER TEOR PERMIT S-1128-116 COLLECTION SYSTEM, SCRUBBED STEAM GENERATORS S-1128-3, -24, -25, -26, AND -29 THROUGH -34, OR DOGGR APPROVED DISPOSAL WELLS

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-1128-248-44 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
4. Vapor control system may be inoperable during maintenance/repairs/upset conditions of tanks S-1128-248, -250, -262, -263, -400, -401, -402, -404, -405, -406, -407, -935, -936, -938, -1014, -1016 and -1017 for up to 600 hours per rolling 12-month period. District-approved breakdowns and relief periods granted by variance and supported by the District shall not be included in this limit. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Sayed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-1128-1019-0 Oct 8 2017 11:29AM -- EDGEHILL Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

5. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, storage of coatings, adhesives, sealants, and organic solvents in closed containers. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Inspection, monitoring, and repair if necessary of fugitive emissions components installed when vapor control system is inoperable for tank maintenance/repairs/upset conditions shall be done within 7 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Records of the dates, hr/day, and hr/yr when vapor control system is inoperable for tank maintenance/repairs/upset conditions shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fugitive VOC emission rate, calculated using the Oil and Gas Production Operations Average Emission Factors, U.S. EPA Protocol for Equipment Leak Emission Estimates, Table 2 4 (EPA 453/R-95-017) November 1995 from the total number of vapor components associated with tank and vapor control system shall not exceed 112.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The vapor control system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired 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. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. The efficiency of any VOC destruction device shall be measured by USEPA Method 18, 25, 25a, or 25b. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fugitive VOC limit listed above does not include components handling produced fluids with an API gravity less than 30 degrees, or components in water/oil service (condensate) with a water content equal to or greater than 50% by weight, or components handling fluid streams with a VOC content of 10% or less by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Vapor control equipment compressor shall activate before the pressure relief valve vents on any of the units served by the vapor control equipment when operational. Vapor recovery system may be inoperable during maintenance/repairs/upset conditions for up to 600 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

16. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: near constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, storage of coatings, adhesives, sealants, and organic solvents in closed containers, inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. A leak is defined as a reading of methane on a portable hydrocarbon detection instrument (calibrated with methane) in excess of 10,000 ppm when measured pursuant to EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
19. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. The District shall be notified within 24 hours of each maintenance/repairs/upset period. Records of the date, time, duration, and description of the activity shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2, and 4623, 6.3] Federally Enforceable Through Title V Permit

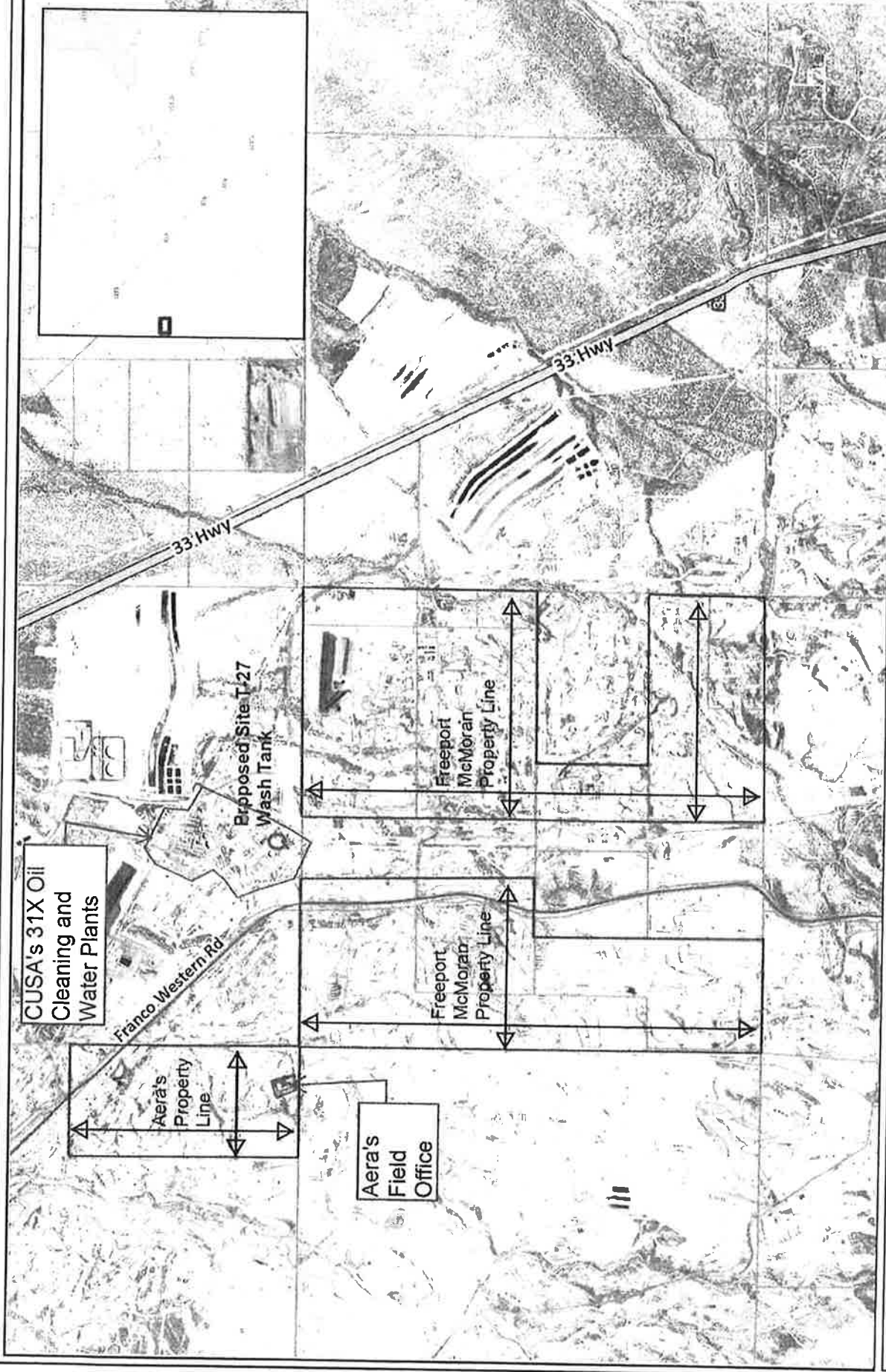
ATTACHMENT II

Site Plan



Kern County GIS

Chevron USA, Inc. (CUSA) - New 31X OCP Tank T-27 ATC Application



0.71

0 0.35 0.71 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
 © Latitude Geographics Group Ltd.

1:22,427



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
 THIS MAP IS NOT TO BE USED FOR NAVIGATION

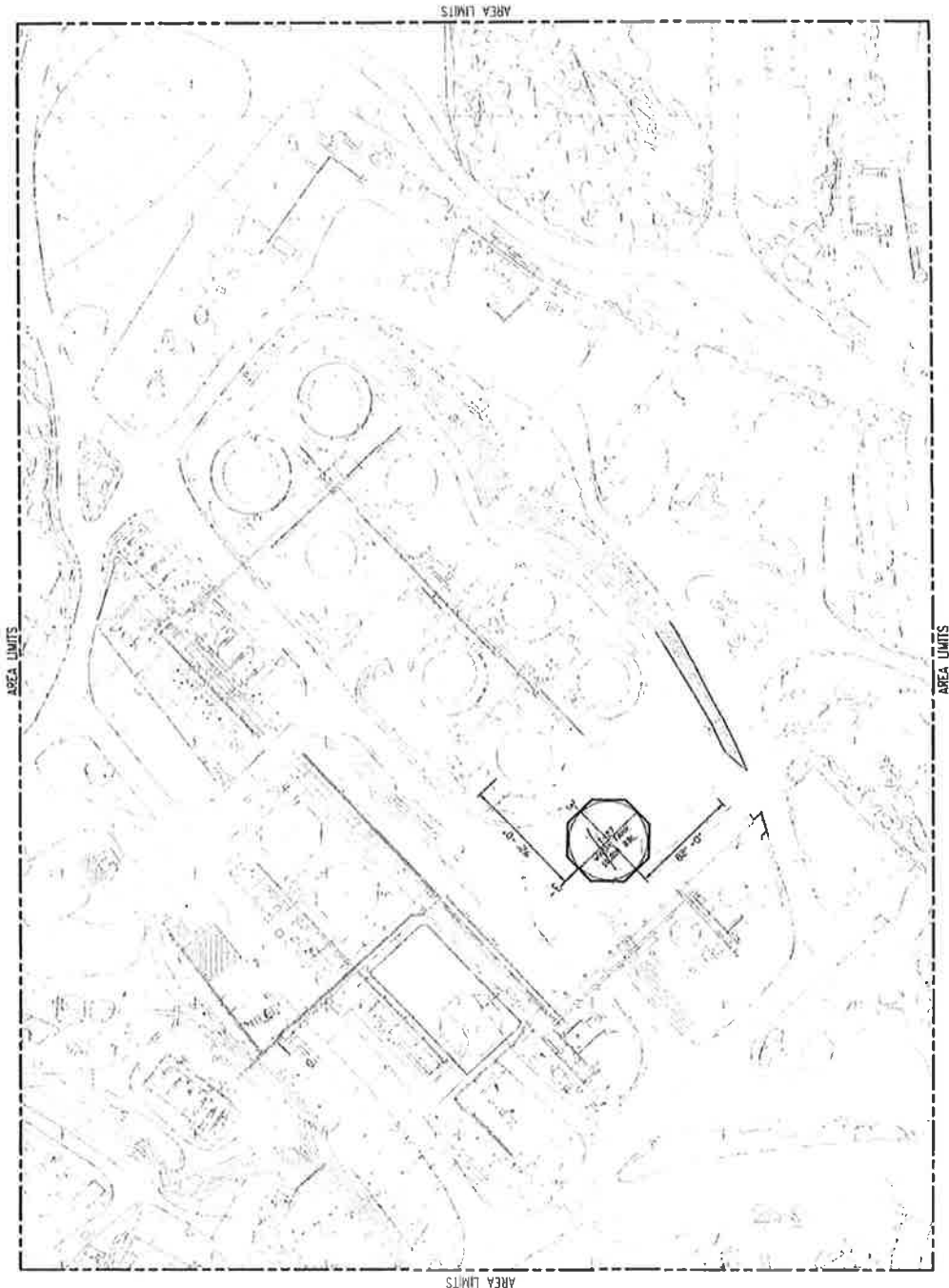
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- NOTES:**
- CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS AND COORDINATES AND REPORT ANY DISCREPANCIES TO THE DESIGNER PRIOR TO THE BEGINNING OF CONSTRUCTION. THE DESIGNER SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED IN THIS DRAWING.
 - PROPOSED CONSTRUCTION SHALL BE IN ACCORDANCE WITH ALL APPLICABLE REGULATIONS AND ORDINANCES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS PRIOR TO THE BEGINNING OF CONSTRUCTION. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS PRIOR TO THE BEGINNING OF CONSTRUCTION.
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LEGEND:

EXISTING
NEW

**PRELIMINARY
NOT FOR CONSTRUCTION**



REVISIONS	REVISIONS	APPROVED	TYPICAL
ISSUED FOR 30% REVIEW - BY PARSONS	ISSUED FOR 30% REVIEW - BY PARSONS	CT SIX DEP WASH TANK (17-27) DESIGN PROJECT: PARP	CT SIX DEP WASH TANK (17-27) DESIGN PROJECT: PARP
ISSUED FOR 100% - BY PARSONS	ISSUED FOR 100% - BY PARSONS	SIX OIL CLEANING FACILITY	SIX OIL CLEANING FACILITY
DATE: 02/11/17	DATE: 02/11/17	SYNOPSIS AREA: T. BEAR BEE	SYNOPSIS AREA: T. BEAR BEE
DATE: 02/11/17	DATE: 02/11/17	SECTION: SIX	SECTION: SIX
DATE: 02/11/17	DATE: 02/11/17	SCALE: 1"=40'-0"	SCALE: 1"=40'-0"
DATE: 02/11/17	DATE: 02/11/17	DR APP: PE	DR APP: PE
DATE: 02/11/17	DATE: 02/11/17	SK-17014-05	SK-17014-05
DATE: 02/11/17	DATE: 02/11/17	1 OF 1	1 OF 1

ATTACHMENT III

Tank Emissions Calculations

1-411
1-412

Tank Input Data	
permit number (S-xxxx-xx-xx)	S-1128-411, 412
facility tank I.D.	T-31, T-32
nearest city (1: Bakersfield, 2: Fresno, 3: Stockton)	31X OCP
tank ROC vapor pressure (psia)	1
liquid bulk storage temperature, T _b (°F)	0.5
is this a constant-level tank? (yes, no)	195
will flashing losses occur in this tank (only if first-line tank)? (yes, no)	yes
breather vent pressure setting range (psi)	no
diameter of tank (feet)	0
capacity of tank (bbbl)	55
conical or dome roof? (c, d)	6,600
shell height of tank (feet)	c
average liquid height (feet)	16
are the roof and shell the same color? (yes,no)	13
For roof:	
color (1:Spec Al, 2:Diff Al, 3:Light, 4:Med, 5:Red, 6:White)	yes
condition (1: Good, 2: Poor)	4
-----This row only used if shell is different color from roof-----	1
-----This row only used if shell is different color from roof-----	

Liquid Input Data	A	B
maximum daily fluid throughput (bbbl)		
maximum annual fluid throughput (bbbl)		0
-----This row only used if flashing losses occur in this tank-----		
-----This row only used if flashing losses occur in this tank-----		
molecular weight, Mw (lb/lb-mol)		100

Calculated Values	A	B
daily maximum ambient temperature, T _{ax} (°F)		77.65
daily minimum ambient temperature, T _{an} (°F)		53.15
daily total solar insolation factor, I (Btu/ft ² -day)		1648.9
atmospheric pressure, P _a (psia)		14.47
water vapor pressure at daily maximum liquid surface temperature (T _{ix}), P _{vx} (psia)	152.2	3.9495
water vapor pressure at daily minimum liquid surface temperature (T _{in}), P _{vn} (psia)	141.4	3.0118
water vapor pressure at average liquid surface temperature (T _{la}), P _{va} (psia)	146.8	3.4592
roof outage, H _{ro} (feet)		0.5729
vapor space volume, V _v (cubic feet)		8488.64
paint factor, alpha		0.68
vapor density, W _v (lb/cubic foot)		0.0077
daily vapor temperature range, delta T _v (degrees Rankine)		49.04
vapor space expansion factor, K _e		0.1660

Results	lb/year	lb/day
Standing Storage Loss	3,948	10.82
Working Loss	N/A	N/A
Flashing Loss	N/A	N/A
Total Uncontrolled Tank VOC Emissions	3,948	10.82

Summary Table	
Permit Number	S-1128-411, 412
Facility Tank I.D.	T-31, T-32
Tank capacity (bbbl)	31X OCP
Tank diameter (ft)	6,600
Tank shell height (ft)	55
Conical or Dome Roof	16
Maximum Daily Fluid Throughput (bbbl/day)	Conical
Maximum Annual Fluid Throughput (bbbl/year)	-
Maximum Daily Oil Throughput (bbbl/day)	0
Maximum Annual Oil Throughput (bbbl/year)	N/A
Total Uncontrolled Daily Tank VOC Emissions (lb/day)	10.82
Total Uncontrolled Annual Tank VOC Emissions (lb/year)	3,948

Project
1162415

L1020

Tank Input Data	
permit number (S-xxxx-xx-xx)	S-1128-408 T-23
facility tank I.D.	T-23, 31X OCP
nearest city (1: Bakersfield, 2: Fresno, 3: Stockton)	1
tank ROC vapor pressure (psia)	0.8
liquid bulk storage temperature, T _b (°F)	195
is this a constant-level tank? (yes, no)	yes
will flashing losses occur in this tank (only if first-line tank)? (yes, no)	no
breather vent pressure setting range (psi)	0
diameter of tank (feet)	60
capacity of tank (bbbl)	10,000
conical or dome roof? (c, d)	c
shell height of tank (feet)	20
average liquid height (feet)	16
are the roof and shell the same color? (yes, no)	yes
For roof:	
color (1:Spec Al, 2:Diff Al, 3:Light, 4:Med, 5:Red, 6:White)	4
condition (1: Good, 2: Poor)	1
-----This row only used if shell is different color from roof-----	3
-----This row only used if shell is different color from roof-----	1

Liquid Input Data	A	B
maximum daily fluid throughput (bbbl)		
maximum annual fluid throughput (bbbl)		0
----- This row only used if flashing losses occur in this tank-----		
----- This row only used if flashing losses occur in this tank-----		
molecular weight, M _w (lb/lb-mol)		100

Calculated Values	A	B
daily maximum ambient temperature, T _{ax} (°F)		77.66
daily minimum ambient temperature, T _{an} (°F)		53.15
daily total solar insolation factor, I (Btu/R ² -day)		1648.9
atmospheric pressure, P _a (psia)		14.47
water vapor pressure at daily maximum liquid surface temperature (T _{ix}), P _{vx} (psia)	152.2	3.9495
water vapor pressure at daily minimum liquid surface temperature (T _{in}), P _{vn} (psia)	141.4	3.0118
water vapor pressure at average liquid surface temperature (T _{ia}), P _{va} (psia)	146.8	3.4592
roof outage, H _{ro} (feet)		0.8250
vapor space volume, V _v (cubic feet)		13076.88
paint factor, alpha		0.68
vapor density, W _v (lb/cubic foot)		0.0077
daily vapor temperature range, delta T _v (degrees Rankine)		49.04
vapor space expansion factor, K _e		0.1660

Results	lb/year	lb/day
Standing Storage Loss	6,082	16.66
Working Loss	N/A	N/A
Flashing Loss	N/A	N/A
Total Uncontrolled Tank VOC Emissions	6,082	16.66

Summary Table	
Permit Number	S-1128-408 T-23
Facility Tank I.D.	T-23, 31X OCP
Tank capacity (bbbl)	10,000
Tank diameter (ft)	60
Tank shell height (ft)	20
Conical or Dome Roof	Conical
Maximum Daily Fluid Throughput (bbbl/day)	-
Maximum Annual Fluid Throughput (bbbl/year)	0
Maximum Daily Oil Throughput (bbbl/day)	N/A
Maximum Annual Oil Throughput (bbbl/year)	N/A
Total Uncontrolled Daily Tank VOC Emissions (lb/day)	16.66
Total Uncontrolled Annual Tank VOC Emissions (lb/year)	6,082

ATTACHMENT IV Emissions Profiles

Permit #: S-1128-411-10	Last Updated
Facility: CHEVRON USA INC	10/08/2017 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	271.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	10.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	67.0
Q2:	0.0	0.0	0.0	0.0	68.0
Q3:	0.0	0.0	0.0	0.0	68.0
Q4:	0.0	0.0	0.0	0.0	68.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					1.5
Quarterly Offset Amounts (lb/Qtr)					
Q1:					101.0
Q2:					101.0
Q3:					102.0
Q4:					102.0

Permit #: S-1128-412-10	Last Updated
Facility: CHEVRON USA INC	10/08/2017 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	271.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	10.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	67.0
Q2:	0.0	0.0	0.0	0.0	68.0
Q3:	0.0	0.0	0.0	0.0	68.0
Q4:	0.0	0.0	0.0	0.0	68.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					1.5
Quarterly Offset Amounts (lb/Qtr)					
Q1:					101.0
Q2:					101.0
Q3:					102.0
Q4:					102.0

Permit #: S-1128-1019-1 **Last Updated**
 Facility: CHEVRON USA INC 10/08/2017 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	40917.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	112.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:		0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1128-1020-0	Last Updated
Facility: CHEVRON USA INC	10/08/2017 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	417.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	16.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	104.0
Q2:	0.0	0.0	0.0	0.0	105.0
Q3:	0.0	0.0	0.0	0.0	105.0
Q4:		0.0	0.0	0.0	105.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					1.5
Quarterly Offset Amounts (lb/Qtr)					
Q1:					156.0
Q2:					156.0
Q3:					157.0
Q4:					157.0

ATTACHMENT V BACT Analysis

Top Down BACT Analysis

VOC emissions occur with temporary disconnection of the tank vapor control system for maintenance and repair activities, process upsets, and equipment breakdowns. There is no current BACT Guideline for this highly unusual, nonroutine, activity. Therefore, a project specific BACT analysis will be done.

Step 1 - Identify All Possible Control Technologies

There is no applicable BACT Guideline for this class and category of equipment. The following control technologies have been identified:

VOC: Work practices to minimize VOC emissions (Achieved-in-Practice) including:

- Near constant level tank operation
- Use of operational P/V valve where possible
- Work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts
- Minimization of tank openings and liquid drainage from disconnects
- Storage of coatings, adhesives, sealents, and organic solvents in closed containers
- Inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work.

Step 2 - Eliminate Technologically Infeasible Options

All of the above identified control options are technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

VOC: Work practices to minimize VOC emissions (Achieved-in-Practice) including:

- Near constant level tank operation
- Use of operational P/V valve where possible
- Work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts
- Minimization of tank openings and liquid drainage from disconnects
- Storage of coatings, adhesives, sealents, and organic solvents in closed containers
- Inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work.

Step 4 - Cost Effectiveness Analysis

Applicant has selected the only option listed above and therefore a cost analysis is not required.

Step 5 - Select BACT

VOC:Work practices to minimize VOC emissions (Achieved-in-Practice) as stated in the following ATC condition:

During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, storage of coatings, adhesives, sealants, and organic solvents in closed containers, inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work. [District Rule 2201] Y

ATTACHMENT VI
Title V Compliance Certification and
Statewide Compliance Statement



Donald Puckett
General Manager - Operations

San Joaquin Valley SBU
Chevron North America
Exploration and Production
P. O. Box 1392

January 13, 2015

Mr. Seyed Sadredin
San Joaquin Valley Air Pollution Control District
34946 Flyover Court
Bakersfield, CA 93308

RE: Statewide Compliance Certification

Dear Mr. Sadredin:

As required under District Rule 2201, Subsection 4.15.2 and Section 173(a)(3) of the Clean Air Act, 42 U.S.C. Section 7503, Chevron U.S.A. Inc. hereby submits this letter of certification regarding statewide compliance as of this date.

Based on reasonable inquiry and to the best of my knowledge and belief, the major stationary sources, as defined in the jurisdiction where the facilities are located, that are owned or operated by Chevron U.S.A. Inc. in the State of California as listed below are subject to emission limitations and are in compliance or on a schedule for compliance with all applicable emission limitations and standards under the Clean Air Act:

- El Segundo Refinery
- El Segundo Marketing Terminal
- Richmond Refinery
- Banta Marketing Terminal
- Huntington Beach Marketing Terminal
- Montebello Marketing Terminal
- Sacramento Marketing Terminal
- Van Nuys Marketing Terminal
- Cross Valley Carneras Gas Compressor Facility (Kern County)
- Kettleman City Pump Station (Kings County)
- 27G Pump Station (Kern County)

- San Joaquin Valley Business Unit:
 - Fresno County Heavy Oil Source (Coalinga)
 - Fresno County Natural Gas Source (Coalinga)
 - Kern County Central Heavy Oil Source (Kern River)
 - Kern County Western Heavy Oil Source (Midway Sunset & Cymric)
 - Kern County Western Light Oil Source (Midway Sunset, Cymric & Lost Hills)
 - Kern County Western Gas Source (Cymric & Lost Hills)
 - San Ardo (Monterey County)

Mr. Seyed Sadredin
Statewide Compliance Certification
January 13, 2015
Page 2

San Luis Obispo (San Luis Obispo County)

- **Global Power (Joint Venture Facilities):**
 - Coalinga Cogeneration Company in Fresno County
 - Kern River Cogeneration Company in Kern County
 - Mid-Set Cogeneration Company in Kern County
 - Salinas River Cogeneration Company in Monterey County
 - Sargent Canyon Cogeneration Company in Monterey County
 - Sycamore Cogeneration Company in Kern County

Please telephone Ashley Dahlstrom at (661) 654-7293 or Dave Bone at (661) 654-7150 if there are questions.

Sincerely,



Donald Puckett
General Manager - Operations



San Joaquin Valley Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

COMPANY NAME: Chevron U.S.A., Inc.		FACILITY ID: S-1128
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility		
2. Owner's Name: Chevron U.S.A., Inc.		
3. Agent to the Owner: N/A		

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true, accurate, and complete.
- For minor modifications, this application meets the criteria for use of minor permit modification procedures pursuant to District Rule 2520.

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

Bob Allen
Signature of Responsible Official

9/20/17
Date

Bob Allen
Name of Responsible Official (please print)

Superintendent Plants/Thermal
Title of Responsible Official (please print)

ATTACHMENT VII
HRA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Richard Edgehill – Permit Services
 From: Georgia Stewart – Technical Services
 Date: September 27, 2017
 Facility Name: Chevron USA, Inc.
 Location: 31X OCP Tank Battery, Section 31, Township 29S, Range 22E
 Application #(s): S-1128-411-10, 412-10, 1019-1 and 1020-0
 Project #: S-1173308

A. RMR SUMMARY

RMR Summary						
Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required?	Special Permit Requirements?
Unit 411-10 6,600 bbl Oil Tank	3.50E-03	6.53E-03	0.00	1.57E-10	No	No
Unit 412-10 6,600 bbl Oil Tank	3.50E-03	6.32E-03	0.00	1.63E-10	No	No
Unit 1019-1 31X Cleaning Plant	7.45E-03	8.40E-04	0.00	9.15E-10	No	No
Unit 1020-0 10,000 bbl Oil Tank	5.36E-03	8.03E-02	0.00	4.20E-10	No	No
Project Totals	1.57E-02	2.17E-02	7.00E-05	1.66E-09		
Facility Totals¹	>1.0	0.679	0.04	5.606E-06		

¹ Facilities S-1128, S-1129, and S-1141 are part of the same stationary source. The facility totals in this summary represent the combined score for these facilities.

Proposed Permit Requirements

To ensure that human health risks will not exceed District allowable levels; the following shall be included as requirements for:

Units # 411-10, 412-10, 1019-1 & 1020-0

No special requirements are required.

B. RMR REPORT

I. Project Description

Technical Services received a request on September 22, 2017 to perform an Ambient Air Quality Analysis and a Risk Management Review for a modification to an oil and natural gas production operation. A modification to allow 600 hr/yr maintenance of the Vapor Control System (VCS, S-1128-1019) for tanks S-1128-411 and 412 and install a new 10,000 bbl tank S-1128-1020 connected to VCS S-1128-1019.

Facilities S-1128, S-1129, and S-1141 are part of the same stationary source.

II. Analysis

Toxic emissions from Oilfield Fugitives were calculated using emission factors derived from 1991 source tests of Central Valley sites with VOC emission rates supplied by the processing engineer. Emissions were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines. The prioritization score for the facility is greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required. The AERMOD model was used with the parameters outlined below and meteorological data for 2004-2008 from Fellows to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project. Additionally, due to the nature of the project, a conservative method for aggregating components with a non-uniform spatial distribution according to District policy APR 1965 was utilized. This placed the aggregated source at the location of the nearest source receptor combination.

The following parameters were used for the review:

Analysis Parameters Units 411-10 and 412-10			
Source Type	Circular Area	Location Type	Rural
X-Length (m)	8.38	Closest Receptor (m)	850
Y-Length (m)	N/A	Type of Receptor	Business
Release Height (m)	4.877	Pollutant Type	VOC
Fugitive VOC Emissions (lbs/hr)	0.451	Fugitive VOC Emissions (lbs/yr)	271

Analysis Parameters Unit 1019-1¹			
Source Type	Area	Location Type	Rural
X-Length (m)	25	Closest Receptor (m)	850
Y-Length (m)	25	Type of Receptor	Business
Release Height (m)	1	Pollutant Type	VOC
Fugitive VOC Emissions (lbs/hr)	0.1	Fugitive VOC Emissions (lbs/yr)	867

¹Area source modeled using APR-1965 Aggregation Methodology (worst case).

Analysis Parameters Unit 1020-0			
Source Type	Circular Area	Location Type	Rural
X-Length (m)	9.14	Closest Receptor (m)	850
Y-Length (m)	N/A	Type of Receptor	Business
Release Height (m)	6.096	Pollutant Type	VOC
Fugitive VOC Emissions (lbs/hr)	0.69	Fugitive VOC Emissions (lbs/yr)	417

AAQA

An AAQA is modeled for the criteria pollutants CO, NOx, SOx and PM10. However, there are no State or Federal standards for VOC. Therefore, an AAQA was not performed.

III. Conclusions

The acute and chronic indices are below 1.0 and the cancer risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Prioritization score w/ toxic emissions summary
- D. Facility Summary

ATTACHMENT VIII
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1128-411-10

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY

SECTION: SW31 TOWNSHIP: 29S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-31) VENTED TO VAPOR CONTROL SYSTEM LISTED ON PTO S-1128-248 (CYMRIC 31X OCP): ALLOW 600 HR/YR MAINTENANCE AND REPLACE REFERENCE OF '1248 VCS WITH '1019 VCS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender emission reduction credits for the following quantities of emissions: VOC: 1st quarter - 101 lb, 2nd quarter - 101 lb, 3rd quarter - 102 lb, and 4th quarter - 102 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERCs specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-4859-1 (VOC) (or certificate split(s) from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1128-411-10 - Oct 8 2017 11:26AM - EDGEHILR : Joint Inspection NOT Required

5. Tank shall only vent to vapor recovery system, permit S-1128-1019, except during District approved cleaning and during maintenance procedures. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Tank shall not be required to be served by vapor control system S-1129-1019 during vapor recovery system (tanks to disposal devices, inclusive) maintenance/repairs/upset conditions for up to 600 hours per year. Approved breakdowns and relief periods granted by variance and supported by the District shall not be included in this limit. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
8. When disconnected from the vapor control system for maintenance/repairs/upset conditions, tank will store organic liquid with a true vapor pressure less than 0.5 psia. [District Rule 4623]
9. Maximum VOC content of vapor in the tank vapor space shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall conduct quarterly gas sampling of gas handled by TVR system. 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
11. VOC content of vapor by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Except as otherwise provided on this permit, this tank shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3 and 5.6] Federally Enforceable Through Title V Permit
13. 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 NSR Rule and District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
14. 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 NSR Rule and District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
15. 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, 6.4.2] Federally Enforceable Through Title V Permit
16. 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 NSR Rule and District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
17. 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, 6.2.1.2] Federally Enforceable Through Title V Permit
18. 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, 6.3.6] Federally Enforceable Through Title V Permit
19. 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, 6.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
21. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
22. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
25. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
28. 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 NSR Rule] Federally Enforceable Through Title V Permit
29. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District NSR Rule] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
32. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District NSR Rule] Federally Enforceable Through Title V Permit
33. Any component found to be leaking on two consecutive annual inspections is in violation of the District NSR Rule, even if it is under the voluntary inspection and maintenance program. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District NSR Rule] Federally Enforceable Through Title V Permit
36. The efficiency of any VOC destruction device shall be measured by EPA Method 18, 25, 25a, or 25b. [District NSR Rule] Federally Enforceable Through Title V Permit
37. {981} The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. The District shall be notified within 24 hours of each maintenance/repairs/upset period. Records of the date, time, duration, rolling 12-month duration with end of month totals, and description of the activity shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
40. Operator shall keep records of VOC content of tank vapors as required under this permit and shall make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
41. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1128-412-10

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY

SECTION: SW31 TOWNSHIP: 29S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,600 BBL FIXED ROOF CRUDE OIL STORAGE TANK (T-32) VENTED TO VAPOR CONTROL SYSTEM LISTED ON PTO S-1128-248 (CYMRIC 31X OCP): ALLOW 600 HR/YR MAINTENANCE AND REPLACE REFERENCE OF '-248 VCS WITH '-1019 VCS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender emission reduction credits for the following quantities of emissions: VOC: 1st quarter - 101 lb, 2nd quarter - 101 lb, 3rd quarter - 102 lb, and 4th quarter - 102 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERCs specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-4859-1 (VOC) (or certificate split(s) from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1128-412-10 Oct 8 2017 11:26AM -- EDGEHILL - Joint Inspection NOT Required

5. Tank shall only vent to vapor recovery system, permit S-1128-1019, except during District approved cleaning and during maintenance procedures. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Tank shall not be required to be served by vapor control system S-1129-1019 during vapor recovery system (tanks to disposal devices, inclusive) maintenance/repairs/upset conditions for up to 600 hours per year. Approved breakdowns and relief periods granted by variance and supported by the District shall not be included in this limit. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
8. When disconnected from the vapor control system for maintenance/repairs/upset conditions, tank will store organic liquid with a true vapor pressure less than 0.5 psia. [District Rule 4623]
9. Maximum VOC content of vapor in the tank vapor space shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall conduct quarterly gas sampling of gas handled by TVR system. 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
11. VOC content of vapor by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Except as otherwise provided on this permit, this tank shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3 and 5.6] Federally Enforceable Through Title V Permit
13. 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 NSR Rule and District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
14. 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 NSR Rule and District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
15. 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, 6.4.2] Federally Enforceable Through Title V Permit
16. 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 NSR Rule and District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
17. 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, 6.2.1.2] Federally Enforceable Through Title V Permit
18. 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, 6.3.6] Federally Enforceable Through Title V Permit
19. 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, 6.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
21. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
22. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
25. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
28. 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 NSR Rule] Federally Enforceable Through Title V Permit
29. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District NSR Rule] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
32. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District NSR Rule] Federally Enforceable Through Title V Permit
33. Any component found to be leaking on two consecutive annual inspections is in violation of the District NSR Rule, even if it is under the voluntary inspection and maintenance program. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District NSR Rule] Federally Enforceable Through Title V Permit
36. The efficiency of any VOC destruction device shall be measured by EPA Method 18, 25, 25a, or 25b. [District NSR Rule] Federally Enforceable Through Title V Permit
37. {981} The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. Operator shall keep records of VOC content of tank vapors as required under this permit and shall make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
39. The District shall be notified within 24 hours of each maintenance/repairs/upset period. Records of the date, time, duration, rolling 12-month duration with end of month totals, and description of the activity shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
41. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-1128-1019-1

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY

SECTION: SW31 **TOWNSHIP:** 29S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF CYMRIC 31X OIL CLEANING PLANT VAPOR CONTROL SYSTEM SHARED WITH 21 PERMIT UNITS; INCLUDING HEAT EXCHANGER(S), G/L SEPARATORS, GAS COMPRESSORS, & GAS PIPING TO EITHER TEOR PERMIT S-1128-116 COLLECTION SYSTEM, SCRUBBED STEAM GENERATORS S-1128-3, -24, -25, -26, AND -29 THROUGH -34, OR DOGGR APPROVED DISPOSAL WELLS: CONNECT TANKS '-411, '-412, AND '-1020 TO VAPOR CONTROL SYSTEM, CORRECT NUMBER OF SHARED UNITS TO 18

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-1128-1019-0 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
4. Vapor control system may be inoperable during maintenance/repairs/upset conditions of tanks S-1128-248, -250, -262, -263, -400, -401, -402, -404, -405, -406, -407, '-411, '-412, -935, -936, -938, -1014, and '-1020 for up to 600 hours per rolling 12-month period. District-approved breakdowns and relief periods granted by variance and supported by the District shall not be included in this limit. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

S-1128-1019-1 Oct 6 2017 11 28AM -- EDGEHILL : Joint Inspection NOT Required

5. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, storage of coatings, adhesives, sealants, and organic solvents in closed containers. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Inspection, monitoring, and repair if necessary of fugitive emissions components installed when vapor control system is inoperable for tank maintenance/repairs/upset conditions shall be done within 7 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Records of the dates, hr/day, and hr/yr when vapor control system is inoperable for tank maintenance/repairs/upset conditions shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fugitive VOC emission rate, calculated using the Oil and Gas Production Operations Average Emission Factors, U.S. EPA Protocol for Equipment Leak Emission Estimates, Table 2-4 (EPA-453/R-95-017) November 1995 from the total number of vapor components associated with tank and vapor control system shall not exceed 112.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The vapor control system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired 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. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. The efficiency of any VOC destruction device shall be measured by USEPA Method 18, 25, 25a, or 25b. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fugitive VOC limit listed above does not include components handling produced fluids with an API gravity less than 30 degrees, or components in water/oil service (condensate) with a water content equal to or greater than 50% by weight, or components handling fluid streams with a VOC content of 10% or less by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Vapor control equipment compressor shall activate before the pressure relief valve vents on any of the units served by the vapor control equipment when operational. Vapor recovery system may be inoperable during maintenance/repairs/upset conditions for up to 600 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

16. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: near constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, storage of coatings, adhesives, sealants, and organic solvents in closed containers, inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. A leak is defined as a reading of methane on a portable hydrocarbon detection instrument (calibrated with methane) in excess of 10,000 ppm when measured pursuant to EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
19. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. The District shall be notified within 24 hours of each maintenance/repairs/upset period. Records of the date, time, duration, and description of the activity shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2, and 4623, 6.3] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1128-1020-0

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY

SECTION: SW31 **TOWNSHIP:** 29S **RANGE:** 22E

EQUIPMENT DESCRIPTION:
10,000 BBL FIXED-ROOF WASH TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1128-1019

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender emission reduction credits for the following quantities of emissions: VOC: 1st quarter - 156 lb, 2nd quarter - 156 lb, 3rd quarter - 157 lb, and 4th quarter - 157 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERCs specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-4859-1 (VOC) (or certificate split(s) from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
5. Tank shall only vent to vapor recovery system, permit S-1128-1019, except during District approved cleaning and during maintenance procedures. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

S-1128-1020-0 Oct 6 2017 11:26AM - EDGEHILL : Joint Inspection NOT Required

6. Tank shall not be required to be served by vapor control system S-1129-1019 during vapor recovery system (tanks to disposal devices, inclusive) maintenance/repairs/upset conditions for up to 600 hours per year. Approved breakdowns and relief periods granted by variance and supported by the District shall not be included in this limit. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During temporary periods of maintenance/repair/upsets covered by this permit, operator shall use work practices to minimize VOC emissions including: constant level tank operation, use of operational P/V valve where possible, work completed expeditiously with pre-staging of equipment and material and pre-fabrication of parts, minimization of tank openings and liquid drainage from disconnects, inspection, monitoring, and repair if necessary of fugitive emissions components at job site within 30 days of completion of work. [District Rule 2201] Federally Enforceable Through Title V Permit
8. When disconnected from the vapor control system for maintenance/repairs/upset conditions, tank will store organic liquid with a true vapor pressure less than 0.5 psia. [District Rule 4623]
9. Maximum VOC content of vapor in the tank vapor space shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall conduct quarterly gas sampling of gas handled by TVR system. 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
11. VOC content of vapor by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Except as otherwise provided on this permit, this tank shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3 and 5.6] Federally Enforceable Through Title V Permit
13. 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 NSR Rule and District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
14. 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 NSR Rule and District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
15. 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, 6.4.2] Federally Enforceable Through Title V Permit
16. 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 NSR Rule and District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
17. 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, 6.2.1.2] Federally Enforceable Through Title V Permit
18. 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, 6.3.6] Federally Enforceable Through Title V Permit
19. 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, 6.3] Federally Enforceable Through Title V Permit

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20. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
21. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
22. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
25. VOC content of total hydrocarbons in gas processed by the vapor control system shall not exceed 50% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District NSR Rule] Federally Enforceable Through Title V Permit
29. 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 NSR Rule] Federally Enforceable Through Title V Permit
30. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection; (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District NSR Rule] Federally Enforceable Through Title V Permit

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32. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
33. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Any component found to be leaking on two consecutive annual inspections is in violation of the District NSR Rule, even if it is under the voluntary inspection and maintenance program. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District NSR Rule] Federally Enforceable Through Title V Permit
37. The efficiency of any VOC destruction device shall be measured by EPA Method 18, 25, 25a, or 25b. [District NSR Rule] Federally Enforceable Through Title V Permit
38. {981} The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. Operator shall keep records of VOC content of tank vapors as required under this permit and shall make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
40. The District shall be notified within 24 hours of each maintenance/repairs/upset period. Records of the date, time, duration, rolling 12-month duration with end of month totals, and description of the activity shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
41. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
42. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit

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