



AUG 2 7 2018

Mr. Juan Campos California Resources Production Corp 11109 Ruver Run blvd Bakersfield, CA 93311

Re: Notice of Significant Title V Permit Modification

Facility Number: S-8282 Project Number: S-1183283

Dear Mr. Campos:

Enclosed for your review is the District's analysis of an application for significant Title V permit modification for the facility identified above. California Resources Production Corp is proposing a Title V significant permit modification to incorporate the recently issued ATC S-8282-203-0, and S-8282-204-0 (under project S-1181300) into the Title V operating permit (see enclosures). The proposed modification include the installation of two natural gas-fired IC engines/compressors.

Enclosed are the current Title V permit, recently issued ATC S-8282-203-0, and S-8282-204-0, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the modified Title V operating permit. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Mr. Juan Campos Page 2

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

Sincerely,

Arnaud Marjollet

Director of Permit Services

Enclosures

cc: Tung Le, CARB (w/enclosure) via email

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

TITLE V APPLICATION REVIEW

Significant Modification Project #: S-1183283

Engineer: William Jones

Date: 8/23/18

Facility Number: S-8282

Facility Name: California Resources Production Corp.

Mailing Address: 11109 River Run Blvd.

Bakersfield. CA 93311

Contact Name: Juan Campos

Phone: 661-529-4370

Responsible Official: Raymond Rodriguez

Title: Environmental Director

I. PROPOSAL

California Resources Production Corporation (CRPC)is proposing a Title V significant permit modification to incorporate recently issued permit S-8282-203-0, and "-204-0 (under project S-1181300) into the Title V operating permit. The permits authorize the use of (2) 1,680 bhp Waukesha model 7044 GSI natural gas-fired IC engines.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

Soudan Lease, Heavy Oil Western, Coalinga Hills Coalinga, CA

III. EQUIPMENT DESCRIPTION

ATC S-8282-203-0: 1,680 BHP WAUKESHA MODEL L7044 GSI NATURAL

GAS-FIRED IC ENGINE WITH NON-SELECTIVE

CATALYTIC REDUCTION AND POSITIVE CRANKCASE VENTILATION POWERING A GAS COMPRESSOR

OPERATING AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-8282

ATC S-8282-204-0: 1,680 BHP WAUKESHA MODEL L7044 GSI NATURAL

GAS-FIRED IC ENGINE WITH NON-SELECTIVE

CATALYTIC REDUCTION AND POSITIVE CRANKCASE VENTILATION POWERING A GAS COMPRESSOR OPERATING AT VARIOUS UNSPECIFIED LOCATIONS

WITHIN FACILITY S-8282

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered a significant modification because the applicant did not originally apply for a Certificate of Conformity (COC) with the original New Source Review (NSR) Authorities to Construct (ATCs). As such, this project requires public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, <u>Federally Mandated Operating Permits</u> (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

California Resources Production Corporation (CRPC) is proposing to modify permit units S-8282-203-0, "-204-0.

VII. COMPLIANCE

District Rule 2520, Section 6.0 describes the source's ability to make changes including significant permit modification. This modification does not meet the minor permit modification criteria pursuant to Section 3.20 described as follows.

- 1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
- 2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
- 3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

- 4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
- 5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of Section 11.3 by including;

- 1. The identification of the source, the name and address of the permit holder, the activities and emissions change involved in the permit action;
- 2. The name and address of the District, the name and telephone number of District staff to contact for additional information:
- 3. The availability, upon request, of a statement that sets forth the legal and factual basis for the proposed permit conditions;
- 4. The location where the public may inspect the complete application, the District analysis, the proposed permit, and all relevant supporting materials;
- 5. A statement that the public may submit written comments regarding the proposed decision within at least 30 days from the date of publication and a brief description of commenting procedures, and
- 6. A statement that members of the public may request the APCO or his designee to preside over a public hearing for the purpose of receiving oral public comment, if a hearing has not already been scheduled. The APCO shall provide notice of any public hearing scheduled to address the proposed decision at least 30 days prior to such hearing;

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No.'s S-8282-203-1, "-204-1.
- B. Authorities to Construct No.'s S-8282-203-0, "-204-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.'s S-8282-203-1, "-204-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-203-1

SECTION: 35 TOWNSHIP: 31S RANGE: 23E

EQUIPMENT DESCRIPTION:

1,680 BHP WAUKESHA MODEL L7044 GSI NATURAL GAS-FIRED IC ENGINE WITH NON-SELECTIVE CATALYTIC REDUCTION AND POSITIVE CRANKCASE VENTILATION POWERING A COMPRESSOR SKID AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-8282

PERMIT UNIT REQUIREMENTS

- 1. This engine will only be operated at various locations within Section 35, Township 31S, and Range 23E. [District Rule 22011
- Unit shall be fired only on natural gas or field gas with a sulfur content of less than or equal to 1.0 grains per 100 dry standard cubic feet of fuel gas. [District Rule 2201 and 4801]
- 3. The operator shall notify the District in writing at least two weeks prior to starting operations at a new location. [District Rule 1070]
- Annual fuel consumption for this natural gas-fired engine shall not exceed 104.6 MMScf per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall maintain annual records of fuel consumption, in MMScf, to show compliance with the annual fuel consumption limit of 104.6 MMScf. [District Rule 2201] Federally Enforceable Through Title V Permit
- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- {3404} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved 7. alternative. [District Rule 4702]
- The permittee shall install and operate a nonresettable fuel flow meter to determine annual fuel usage, [District Rule 22011 Federally Enforceable Through Title V Permit
- {3202} This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (1&M) plan submitted to the District, [District Rule 4702]
- 10. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmv @ 15% O2, 0.0094 g-SOx/hp-hr, 0.02 g-PM10/hp-hr, 56 ppmv @ 15% O2, or 25 ppmv @ 15% O2. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 11. VOC fugitive emissions from the components in gas service associated with the compressor shall not exceed 0.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain accurate component count for compressor according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities." Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Particulate matter emissions shall not exceed 0.1 grains/dsefin concentration. [District Rule 4201]

CONTINUE ON NEXT PAGE PERMIT UNITY F These terms and conditions of the Facility-wide Permit to Operate.

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE, KERN COUNTY, CA 9-0202-203-1: Aug 10 2018 8.42AM -- JONESW

- 14. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
- 15. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
- 16. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications. [In-stack O2 monitors may be allowed if approved by the APCO] Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies [District Rule 4702]
- 17. {3786} If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than eight (8) hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after eight (8) hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]
- 18. {3787} All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702]
- 19. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time [District Rule 4702]
- 20. The operator shall collect data through the I&M plan in a form approved by the APCO. [District Rule 4702]
- 21. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4701 and 4702]
- 22. Source testing of the NOx, CO and VOC emission concentrations shall be conducted within 60 days of initial startup and at least once every 24 months thereafter. [District Rule 4701 and 4702]
- 23. {3791} Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702]
- 24. {3792} For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. (VOC, NOx, and CO concentrations shall be reported in ppmy. corrected to 15% oxygen. [District Rule 4702]

 PERMITUNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

 Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP

- 25. {3793} The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702]
- 26. {109} Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- 27. {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
- 28. {3212} The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702]
- 29. The permittee shall maintain records of: (1) total hours of operation; (2) type and quantity of fuel used; (3) maintenance or modifications performed; (4) the date and time of NOx, CO, and O2 measurements; (5) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2; (6) make and model of exhaust gas analyzer; (7) exhaust gas analyzer calibration records; and (8) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 2201, 4701 and 4702]
- 30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and 4702]
- 31. Formerly S-2234-209 [District Rule 2201]

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

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORF Location: LIGHT OIL WESTERN STATIONARY SOURCE, N 9-8282-203-1 Aug 16 2018 8-42AM...JONESW

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-204-1

SECTION: 35 TOWNSHIP: 31S RANGE: 23E

EQUIPMENT DESCRIPTION:

1.680 BHP WAUKESHA MODEL L7044 GSI NATURAL GAS-FIRED IC ENGINE WITH NON-SELECTIVE CATALYTIC REDUCTION AND POSITIVE CRANKCASE VENTILATION POWERING A COMPRESSOR SKID AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-8282

PERMIT UNIT REQUIREMENTS

- This engine will only be operated at various locations within Section 35, Township 31S, and Range 23E. [District Rule 1.
- The operator shall notify the District in writing at least two weeks prior to starting operations at a new location. [District Rule 1070]
- Unit shall be fired only on natural gas, or field gas with a sulfur content of less than or equal to 1.0 grains per 100 dry standard cubic feet of fuel gas. [District Rule 2201 and 4801]
- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- {3404} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
- The permittee shall install and operate a nonresettable fuel flow meter to determine annual fuel usage. [District Rule 2201] Federally Enforceable Through Title V Permit
- {3202} This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702]
- Emissions from this IC engine shall not exceed any of the following limits: 5 ppmv @ 15% O2, 0.0094 g-SOx/hp-hr, 0.02 g-PM10/hp-hr, 56 ppmv @ 15% O2, or 25 ppmv @ 15% O2. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 9. VOC fugitive emissions from the components in gas service associated with the compressor shall not exceed 0.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain accurate component count for compressor according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. The fuel consumption for this engine shall not exceed 88.184 MMscf/year. Compliance with this limit may be shown by dividing the quantity of fuel used during a calendar month over the number of days operated during that month. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 13. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]

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

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP LIGHT OIL WESTERN STATIONARY SOURCE, KERN GOUNTY, CA

- 14. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
- 15. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications. [In-stack O2 monitors may be allowed if approved by the APCO] Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies [District Rule 4702]
- 16. {3786} If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than eight (8) hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after eight (8) hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]
- 17. {3787} All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702]
- 18. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time [District Rule 4702]
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- 22. {3792} For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702]
- 23. {3793} The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, CO (ppmv) -EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702]
- 24. {109} Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- 25. {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

PERMITUNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCES

LIGHT OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

8-8282-204-1 : Aug 16 2018 8:42AM -- JONESV

- 26. {3212} The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702]
- 27. The permittee shall maintain records of: (1) total hours of operation; (2) type and quantity of fuel used; (3) maintenance or modifications performed; (4) the date and time of NOx, CO, and O2 measurements; (5) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2; (6) make and model of exhaust gas analyzer; (7) exhaust gas analyzer calibration records; and (8) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 2201, 4701 and 4702]
- 28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and 4702]
- 29. Formerly PTO S-2234-184 [District Rule 2201]

These terms and go he Facility-wide Permit to Operate.

Facility Name: CALIFORNIA RESOURCES PRODUCTION CO Location: LIGHT OIL WESTERN STATIONARY SOURCES-8282-204-1 Aug 16 2018 8-42AM - JONESW

ATTACHMENT B

Authorities to Construct No.'s S-8282-203-0, "-204-0





AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-203-0

ISSUANCE DATE: 07/31/2018

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES PRODUCTION CORP

MAILING ADDRESS:

11109 RIVER RUN BLVD BAKERSFIELD, CA 93311

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

KERN COUNTY, CA

SECTION: 35 TOWNSHIP: 318 RANGE: 23E

EQUIPMENT DESCRIPTION:

1,680 BHP WAUKESHA MODEL L7044 GSI NATURAL GAS-FIRED IC ENGINE WITH NON-SELECTIVE CATALYTIC REDUCTION AND POSITIVE CRANKCASE VENTILATION POWERING A COMPRESSOR SKID AUTHORIZED FOR **OPERATION**

CONDITIONS

- PTO S-2234-209 shall be cancelled upon implementation of this ATC [District Rule 2201]
- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- 3. This engine will only be operated at various locations within Section 35, Township 31S, and Range 23E. [District Rule 22011
- Unit shall be fired only on natural gas or field gas with a sulfur content of less than or equal to 1.0 grains per 100 dry standard cubic feet of fuel gas. [District Rule 2201 and 4801]
- The operator shall notify the District in writing at least two weeks prior to starting operations at a new location. [District Rule 1070]
- Annual fuel consumption for this natural gas-fired engine shall not exceed 104.6 MMScf per year, [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall maintain annual records of fuel consumption, in MMScf, to show compliance with the annual fuel consumption limit of 104.6 MMScf. [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.

Samir Sheikh, Executive Director / APCO

yaud Marjollet, Director of Permit Services

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

- 8. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- 9. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
- The permittee shall install and operate a nonresettable fuel flow meter to determine annual fuel usage. [District Rule 2201] Federally Enforceable Through Title V Permit
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- 16. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
- 17. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
- 18. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications. [In-stack O2 monitors may be allowed if approved by the APCO] Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies [District Rule 4702]
- 19. If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than eight (8) hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after eight (8) hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]
- 20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702]

- 21. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time [District Rule 4702]
- 22. The operator shall collect data through the I&M plan in a form approved by the APCO. [District Rule 4702]
- 23. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4701 and 4702]
- 24. Source testing of the NOx, CO and VOC emission concentrations shall be conducted within 60 days of initial startup and at least once every 24 months thereafter. [District Rule 4701 and 4702]
- 25. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702]
- 26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702]
- 27. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702]
- 28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- 29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
- 30. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702]
- 31. The permittee shall maintain records of: (1) total hours of operation; (2) type and quantity of fuel used; (3) maintenance or modifications performed; (4) the date and time of NOx, CO, and O2 measurements; (5) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2; (6) make and model of exhaust gas analyzer; (7) exhaust gas analyzer calibration records; and (8) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 2201, 4701 and 4702]
- 32. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and 4702]





AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-204-0

ISSUANCE DATE: 07/31/2018

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES PRODUCTION CORP

MAILING ADDRESS:

11109 RIVER RUN BLVD BAKERSFIELD, CA 93311

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

KERN COUNTY, CA

SECTION: 35 TOWNSHIP: 31S RANGE: 23E

EQUIPMENT DESCRIPTION:

1,680 BHP WAUKESHA MODEL L7044 GSI NATURAL GAS-FIRED IC ENGINE WITH NON-SELECTIVE CATALYTIC REDUCTION AND POSITIVE CRANKCASE VENTILATION POWERING A COMPRESSOR SKID AUTHORIZED FOR **OPERATION**

CONDITIONS

- PTO S-2234-184 shall be cancelled upon implementation of this ATC. [District Rule 2201]
- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- This engine will only be operated at various locations within Section 35, Township 31S, and Range 23E. [District Rule
- The operator shall notify the District in writing at least two weeks prior to starting operations at a new location. [District Rule 1070]
- Unit shall be fired only on natural gas, or field gas with a sulfur content of less than or equal to 1.0 grains per 100 dry standard cubic feet of fuel gas. [District Rule 2201 and 4801]
- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]

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.

Samir Sheikh, Executive Director / APCO

Arhaud Marjollet, Director of Permit Services

- 8. The permittee shall install and operate a nonresettable fuel flow meter to determine annual fuel usage. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702]
- 10. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmv @ 15% O2, 0.0094 g-SOx/hp-hr, 0.02 g-PM10/hp-hr, 56 ppmv @ 15% O2, or 25 ppmv @ 15% O2. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 11. VOC fugitive emissions from the components in gas service associated with the compressor shall not exceed 0.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain accurate component count for compressor according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. The fuel consumption for this engine shall not exceed 88.184 MMscf/year. Compliance with this limit may be shown by dividing the quantity of fuel used during a calendar month over the number of days operated during that month. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 15. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
- 16. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
- 17. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications. [In-stack O2 monitors may be allowed if approved by the APCO] Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies [District Rule 4702]
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- 22. Source testing of the NOx, CO and VOC emission concentrations shall be conducted within 60 days of initial startup and at least once every 24 months thereafter. [District Rule 4701 and 4702]
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- 24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702]
- 25. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702]
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- 30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and 4702]

ATTACHMENT C

Emission Increases

Project S-1181300

The units are exempt from the offset per Section 4.6.7 of Rule 2201, which states that a transfer of location of an emissions unit from one Stationary Source to another within the District. Under the same owner is exempt provided:

- The Potential to Emit of any affected pollutant will not be greater at the new location than at the previous location when all emissions units are operated at the same permitted conditions, and
- The offsets that would be otherwise required for the unit at the new location have been provided for the emissions unit previously.

Since both of these requirements were satisfied, increase in emissions associated with this project are exempt from offsets.

The increase in permitted emissions are calculated below (see project S-1181300):

SSIPE				
Pollutant	SSPE2 (lb./year)	SSPE1 (lb./year)	SSIPE (lb./year)	
NO _x	550,535	547,244	3,291	
SO _x	70,725	70,265	460	
PM ₁₀	81,503	80,552	951	
СО	5,496,637	5,474,200	22,437	
VOC	1,130,287	1,124,556	5,731	

ATTACHMENT E

Application



San Joaquin Valley Air Pollution Control District



www.valleyair.org

Permit Application For:

[] ADMINISTRATIVE AMENDMEN	IT [X] MINOR MODIFICATION	[] SIGNIFICANT MODIFICATION		
PERMIT TO BE ISSUED TO: Californ	ia Resources Production Corp			
2. MAILING ADDRESS:				
STREET/P.O. BOX: 11109 River Run blvd				
CITY: Bakersfield	STATE: <u>CA</u>	9-DIGIT ZIP CODE: 93311		
3. LOCATION WHERE THE EQUIPMENT W	INSTALLATION DATE:			
STREET: Buena Vista Hill				
NE % SECTION 35B TOWNSHIP 31S RANGE 23E				
4. GENERAL NATURE OF BUSINESS:				
(include Permit #'s if known, and use addition: Incorporation of ATCs S-8282-203				
6. TYPE OR PRINT NAME OF APPLICANT: Juan Campos	TITLE OF APPLICANT: Sr. Environmental Advisor			
7. SIGNATURE OF APPLICANT:	PHONE: (661) 529-4370			
·m	FAX: () EMAIL: Juan.Campos@crc.com			
For APCD Use Only:				
DATE STAMP	FILING FEE RECEIVED: \$	CHECK#:		
	DATE PAID:			
	PROJECT NO: 5-1183283	FACILITY ID: S-8282		



San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)					
SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT MINOR PERMIT MODIFICATION					
COMPANY NAME: California Resources Corporation FACILITY ID: S-8282					
1. Type of Organization: Corporation Sole Ownership Government Partnership Utility					
2. Owner's Name: California Resources Corporation					
3. Agent to the Owner:					
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:					
Signature of Responsible Official 8/1/2018					
Raymon Rodriguez Date					
Name of Responsible Official (please print)					
Environmental Director					
Title of Responsible Official (please print)					
Re: R3 and R38 transfer to BV Hills					

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY MANDATED OPERATING PERMIT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed significant modification of the Federally Mandated Operating Permit to California Resources Production Corp in Western Kern County, California. The proposed modification include the installation of two natural gas-fired IC engines/compressors.

The District's analysis of the legal and factual basis for this proposed action, project # S-1183283, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. The emission increase(s) associated with this project are: 3,292 lb.-NOx/year, 460 lb.-SOx/year, 951 lb.-PM10/year, 951 lb.-PM2.5/year, 22,437 lb.-CO/year and 5,987 lb.-VOC/year. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact the District at (661) 392-5500. Written comments on this project must be sent or postmarked by <DATE> to publicnotices@valleyair.org or ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.

AVISO DE UNA DECISIÓN PRELIMINAR PARA LA PROPUESTA MODIFICACIÓN SIGNIFICANTIVA DE UN PERMISO MANDATORIO FEDERAL PARA OPERAR

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios públicos en la propuesta modificación de un Permiso Mandatorio Federal Para Operar a California Resources Production Corp en el oeste del Condado de Kern, California. La modificación propuesta incluye la instalación de dos motores de combustión interna/compresores de gas natural.

El análisis de los fundamentos jurídicos y fácticos de esta acción propuesta, Número del Provecto S-1183283. está disponible para inspección la http://www.valleyair.org/notices/public notices idx.htm y en cualquiera de las oficinas del Distrito. El aumento de emisiones asociadas con este proyecto son de: 3,292 libras de NOx por año. 460 libras de SOx por año, 951 libras de PM10 por año, 951 libras de PM2.5 por año, 22,437 libras de CO por año y 5,987 libras de VOC por año. Esta será la única oportunidad para que el público haga comentarios en las condiciones especificadas de esta modificación. Si se solicita, el Distrito llevará a cabo una audiencia pública acerca de la emisión de esta modificación. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500. Comentarios por escrito acerca de este proyecto deben ser sometidos o con matasellos antes del <DATE> a publicnotices@vallevair.org o a ARNAUD MARJOLLET. DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY MANDATED OPERATING PERMIT

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The District's analysis of the legal and factual basis for this proposed action, project # S-1183283, is available for public inspection at http://www.valleyair.org/notices/public notices idx.htm and at any District office. The emission increase(s) associated with this project are: 3,292 lb.-NOx/year, 460 lb.-SOx/year, 951 lb.-PM10/year, 951 lb.-PM2.5/year, 22,437 lb.-CO/year and 5,987 lb.-VOC/year. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact the District at (661) 392-5500. Written comments on this project must be sent or postmarked by <DATE> to

<u>publicnotices@valleyair.org</u> or ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.