

FEB 26 2019

Mr. Jeff Campbell  
Sentinel Peak Resources CA, LLC  
1200 Discovery Drive  
Bakersfield, CA 93309

**Re: Final - Authorities to Construct / Certificates of Conformity (Significant Mod)**  
**Facility Number: S-1372**  
**Project Number: S-1183873**

Dear Mr. Campbell:

The Air Pollution Control Officer has issued Authorities to Construct (ATCs) S-1372-100-35, '-209-4, '-210-4, '-211-4, '-212-4, '213-4, and '-215-4 with Certificates of Conformity to Sentinel Peak Resources CA, LLC in Western Kern county. The proposal consists of installing vapor control on six oilfield tanks. Enclosed are the ATCs and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ATCs was published on January 10, 2019. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on January 7, 2019. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Prior to operating with the modifications authorized by the ATCs, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms are found on the District's website at [www.valleyair.org/permits/TVforms](http://www.valleyair.org/permits/TVforms).

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6081

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

Mr. Jeff Campbell  
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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,



*AM* Arnaud Marjollet  
Director of Permit Services

Enclosures

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

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-100-35

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 06 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF TEOR OPERATION WITH WELL CASING COLLECTION SYSTEM WITH VAPOR PIPING TO UNIT S-1372-99 SERVING 633 STEAM ENHANCED WELLS WITH 3-PHASE SEPARATORS, STANDBY FLARE, SLUG CATCHER, SCRUBBERS, HEAT EXCHANGERS, COMPRESSORS, PUMPS, SULFA CHECK AND LIQUID SULFUR REMOVAL SYSTEMS (GAMBLE/MCKITTRICK FRONT); AUTHORIZE THE RECEIPT OF VAPORS FROM THE VAPOR RECOVERY SYSTEM LISTED ON PERMIT -209 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

## 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-1372-100-34 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include the following equipment: 633 steam enhanced wells, well vent vapor collection system, standby flare, slug catchers, heat exchangers, compressors, pumps, vapor piping, dry fuel gas sulfur scrubbing system and liquid sulfur removal systems, tanks and 3-phase separators. [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



Arnaud Marjollet, Director of Permit Services  
S-1372-100-35 Feb 27 2019 8:04AM - DAVIDGCS Joint Inspection NOT Required

5. Operation shall include vapor piping from devices S-1372-128, -412, -87, -99, -404, -405, S-1641-34, -35, -36, and -37 to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
6. At least one sulfur removal system shall be operated at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. There shall be no leaks exceeding 10,000 ppmv from fugitive emissions components associated with liquid sulfur removal system. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Collected condensate shall be discharged into production pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare S-1372-100 shall only be used to incinerate TEOR vapors when one or more of steam generators S-1372-1, -2 or -4 are not in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Flare shall only use PUC quality natural gas as auxiliary fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Flare shall be designed for smokeless operation, with no visible emissions in excess of 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520] Federally Enforceable Through Title V Permit
13. The flare in this permit shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Flare shall comply with all of the applicable requirements of Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
15. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
16. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
17. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
18. Flares using flow-sensing automatic ignition systems and not using a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
19. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311] Federally Enforceable Through Title V Permit
20. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Rule 4311, Section 6.5, and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere [District Rule 4311] Federally Enforceable Through Title V Permit
21. The operator of a flare subject to flare minimization requirements pursuant to Section 5.8 shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare. [District Rule 4311] Federally Enforceable Through Title V Permit

22. The following records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request: 1) A copy of the compliance determination conducted pursuant to Section 6.4.1, 2) For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation, 3) A copy of the approved flare minimization plan pursuant to Section 6.5, 4) On and after July 1, 2012, where applicable, a copy of annual reports submitted to the APCO pursuant to Section 6.2, and 5) Where applicable, monitoring data collected pursuant to Sections 5.10. [District Rule 4311] Federally Enforceable Through Title V Permit
23. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 of Rule 4311 shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
24. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: 1) The results of an investigation to determine the primary cause and contributing factors of the flaring event; 2) Any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; 3) If appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and 4) The date, time, and duration of the flaring event. [District Rule 4311] Federally Enforceable Through Title V Permit
25. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare monitoring requirements pursuant to Rule 4311, Sections 5.10, 6.6, 6.7, 6.8, 6.9, and 6.10, as appropriate, shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: 1) The total volumetric flow of vent gas in standard cubic feet for each day, 2) Hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition pursuant to Section 6.6, 3) If vent gas composition is monitored by a continuous analyzer or analyzers pursuant to Section 5.11, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used pursuant to Section 6.3.4, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month, 4) If the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month, 5) For any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month, and the means used to determine flow, 6) Flare monitoring system downtime periods, including dates and times, 7) For each day and for each month provide calculated sulfur dioxide emissions, and 8) A flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311] Federally Enforceable Through Title V Permit
26. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, or ASTM Method D 4810-88. [District Rule 4311] Federally Enforceable Through Title V Permit
27. Upon request, the operator of flares that are subject to Section 5.6 shall make available to the APCO the compliance determination records that demonstrate compliance with the provisions of 40 CFR 60.18, (c)(3) through (c)(5). [District Rule 4311] Federally Enforceable Through Title V Permit
28. Operator shall monitor vent gas composition using one of the five methods pursuant to Section 6.6.1 through Section 6.6.5, as appropriate. [District Rule 4311] Federally Enforceable Through Title V Permit
29. Operator shall monitor the volumetric flows of purge and pilot gases with flow measuring devices or other parameters as specified on the Permit to Operate so that volumetric flows of pilot and purge gas may be calculated based on pilot design and the parameters monitored. [District Rule 4311] Federally Enforceable Through Title V Permit
30. All of the general monitoring provisions of Section 6.9, as applicable, shall be met. [District Rule 4311] Federally Enforceable Through Title V Permit

31. Operator shall install and maintain equipment that records a real-time digital image of the flare and flame at a frame rate of no less than one frame per minute. The recorded image of the flare shall be of sufficient size, contrast, and resolution to be readily apparent in the overall image or frame. The image shall include an embedded date and time stamp. The equipment shall archive the images for each 24-hour period. In lieu of video monitoring the operator may use an alternative monitoring method that provides data to verify date, time, vent gas flow, and duration of flaring events. [District Rule 4311] Federally Enforceable Through Title V Permit
32. Vapors from this well vent vapor control system shall be incinerated in steam generators S-1372-1, -2, -4, -30, -32, -33, -127, -317, -334 or standby flare and/or injected into DOGGR approved gas injection wells. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Total sulfur oxide (SOx as SO2) emissions shall not exceed 1,075.2 lb/day for the following steam generators: S-1372-1, -2, -4, '127, '317, and standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
34. Fugitive emissions from vapor collection and control system shall not exceed 239.6 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
35. There shall be no more than 30 gas leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Permittee shall maintain accurate records of well casing vapor H2S concentration (periodic sampling of no less than once per month), daily volume of casing vapor incinerated, and calculated daily SO2 emissions from S-1372-1, '-2, and '-4. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
37. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Permittee shall maintain accurate component count for TEOR operation 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. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
39. The following test method shall be used for fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520] Federally Enforceable Through Title V Permit
40. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081 and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
41. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
42. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
43. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
44. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

45. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401] Federally Enforceable Through Title V Permit
46. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
47. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
48. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
49. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
50. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401] Federally Enforceable Through Title V Permit
51. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
52. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
53. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
54. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
55. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401] Federally Enforceable Through Title V Permit

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

CONDITIONS CONTINUE ON NEXT PAGE



70. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit
71. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
72. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401] Federally Enforceable Through Title V Permit
73. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401] Federally Enforceable Through Title V Permit
74. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401] Federally Enforceable Through Title V Permit
75. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
76. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401] Federally Enforceable Through Title V Permit
77. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
78. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
79. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit

80. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit
81. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401] Federally Enforceable Through Title V Permit
82. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
83. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
84. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
85. The concentration of sulfur compounds in the exhaust from combustion equipment shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520] Federally Enforceable Through Title V Permit
86. The requirements of SJVUAPCD Rule 4407 (Adopted 5/19/94) and SJVUAPCD Rule 4801 (Adopted 12/17/92) do not apply to the well vents. For Rule 4801 applicability, well vent emissions are fugitive emissions not considered to come from a point source. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-209-4

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 6 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#010554) AND ONE FREE WATER KNOCKOUT VESSEL (GAMBLE LEASE); ADD VAPOR RECOVERY SYSTEM, ROUTE COLLECTED VAPORS TO PERMIT '100 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

### 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. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
4. Except during maintenance, vessel shall be connected to the vapor collection system listed on S-1372-100. [17 CCR 95668]

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



Franca Marjollet, Director of Permit Services

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5. The vapors may only be vented to a non-destructive vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not result in emissions of nitrogen oxides (NO<sub>x</sub>); or, a vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not generate more than 15 parts per million volume (ppmv) NO<sub>x</sub> when measured at 3 percent oxygen and does not require the use of supplemental fuel gas, other than gas required for a pilot burner, to operate. [17 CCR 95671]
6. Vapor collection systems and control devices are allowed to be taken out of service for up to 30 calendar days per calendar year for performing maintenance. In lieu of taking the vapor collection systems and control devices taken out of service, the vapors may be vented to the standby flare listed on permit S-1372-100-35. A time extension to perform maintenance not to exceed 14 calendar days per calendar year may be granted by the ARB Executive Officer. The owner or operator is responsible for maintaining a record of the number of calendar days per calendar year that the vapor collection system or vapor control device is out of service and shall provide a record of such activity at the request of the District. If an alternate vapor control device compliant with is installed prior to conducting maintenance and the vapor collection and control system continues to collect and control vapors during the maintenance operation consistent with the applicable standards specified in 17 CCR Section 95671, the event does not count towards the 30 calendar day limit. Vapor collection system and control device shutdowns that result from utility power outages are not subject to enforcement action provided the equipment resumes normal operation as soon as normal utility power is restored. Vapor collection system and control device shutdowns that result from utility power outages do not count towards the 30 calendar day limit for maintenance. [District Rule 17 CCR 95671(f)(1)(2)(3)]
7. Fugitive emissions inspections and repairs pursuant to Leak Detection and Repair 17 CCR 95669 shall be implemented for subject equipment. [17 CCR 95669]
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-210-4

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 6 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#010555): INSTALL VAPOR CONTROL SYSTEM VENTED TO TANK S-1372-209 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

## 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. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
4. Except during maintenance, vessel shall be connected to the vapor collection system listed on S-1372-100. [17 CCR 95668]
5. The vapors may only be vented to a non-destructive vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not result in emissions of nitrogen oxides (NOx); or, a vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not generate more than 15 parts per million volume (ppmv) NOx when measured at 3 percent oxygen and does not require the use of supplemental fuel gas, other than gas required for a pilot burner, to operate. [17.CCR 95671]

### CONDITIONS CONTINUE ON NEXT PAGE

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Samir Sheikh, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

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6. Vapor collection systems and control devices are allowed to be taken out of service for up to 30 calendar days per calendar year for performing maintenance. In lieu of taking the vapor collection systems and control devices taken out of service, the vapors may be vented to the standby flare listed on permit S-1372-100-35. A time extension to perform maintenance not to exceed 14 calendar days per calendar year may be granted by the ARB Executive Officer. The owner or operator is responsible for maintaining a record of the number of calendar days per calendar year that the vapor collection system or vapor control device is out of service and shall provide a record of such activity at the request of the District. If an alternate vapor control device compliant with is installed prior to conducting maintenance and the vapor collection and control system continues to collect and control vapors during the maintenance operation consistent with the applicable standards specified in 17 CCR Section 95671, the event does not count towards the 30 calendar day limit. Vapor collection system and control device shutdowns that result from utility power outages are not subject to enforcement action provided the equipment resumes normal operation as soon as normal utility power is restored. Vapor collection system and control device shutdowns that result from utility power outages do not count towards the 30 calendar day limit for maintenance. [District Rule 17 CCR 95671(f)(1)(2)(3)]
7. Fugitive emissions inspections and repairs pursuant to Leak Detection and Repair 17 CCR 95669 shall be implemented for subject equipment. [17 CCR 95669]
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-211-4

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 6 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#006798): INCREASE CAPACITY TO 3,000 BBLs AND INSTALL VAPOR CONTROL SYSTEM VENTED TO TANK S-1372-209 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

## 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. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
5. Except during maintenance, vessel shall be connected to the vapor collection system listed on S-1372-100. [17 CCR 95668]

### CONDITIONS CONTINUE ON NEXT PAGE

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Samir Sheikh, Executive Director / APCO



Renaud Marjollet, Director of Permit Services

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6. The vapors may only be vented to a non-destructive vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not result in emissions of nitrogen oxides (NOx); or, a vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not generate more than 15 parts per million volume (ppmv) NOx when measured at 3 percent oxygen and does not require the use of supplemental fuel gas, other than gas required for a pilot burner, to operate. [17 CCR 95671]
7. Vapor collection systems and control devices are allowed to be taken out of service for up to 30 calendar days per calendar year for performing maintenance. In lieu of taking the vapor collection systems and control devices taken out of service, the vapors may be vented to the standby flare listed on permit S-1372-100-35. A time extension to perform maintenance not to exceed 14 calendar days per calendar year may be granted by the ARB Executive Officer. The owner or operator is responsible for maintaining a record of the number of calendar days per calendar year that the vapor collection system or vapor control device is out of service and shall provide a record of such activity at the request of the District. If an alternate vapor control device compliant with is installed prior to conducting maintenance and the vapor collection and control system continues to collect and control vapors during the maintenance operation consistent with the applicable standards specified in 17 CCR Section 95671, the event does not count towards the 30 calendar day limit. Vapor collection system and control device shutdowns that result from utility power outages are not subject to enforcement action provided the equipment resumes normal operation as soon as normal utility power is restored. Vapor collection system and control device shutdowns that result from utility power outages do not count towards the 30 calendar day limit for maintenance. [District Rule 17 CCR 95671(f)(1)(2)(3)]
8. Fugitive emissions inspections and repairs pursuant to Leak Detection and Repair 17 CCR 95669 shall be implemented for subject equipment. [17 CCR 95669]
9. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-212-4

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 6 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10664): INSTALL VAPOR CONTROL SYSTEM VENTED TO TANK S-1372-209 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

### 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. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
4. Except during maintenance, vessel shall be connected to the vapor collection system listed on S-1372-100. [17 CCR 95668]
5. The vapors may only be vented to a non-destructive vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not result in emissions of nitrogen oxides (NOx); or, a vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not generate more than 15 parts per million volume (ppmv) NOx when measured at 3 percent oxygen and does not require the use of supplemental fuel gas, other than gas required for a pilot burner, to operate. [17 CCR 95671]

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



Arnaud Marjollet, Director of Permit Services

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6. Vapor collection systems and control devices are allowed to be taken out of service for up to 30 calendar days per calendar year for performing maintenance. In lieu of taking the vapor collection systems and control devices taken out of service, the vapors may be vented to the standby flare listed on permit S-1372-100-35. A time extension to perform maintenance not to exceed 14 calendar days per calendar year may be granted by the ARB Executive Officer. The owner or operator is responsible for maintaining a record of the number of calendar days per calendar year that the vapor collection system or vapor control device is out of service and shall provide a record of such activity at the request of the District. If an alternate vapor control device compliant with is installed prior to conducting maintenance and the vapor collection and control system continues to collect and control vapors during the maintenance operation consistent with the applicable standards specified in 17 CCR Section 95671, the event does not count towards the 30 calendar day limit. Vapor collection system and control device shutdowns that result from utility power outages are not subject to enforcement action provided the equipment resumes normal operation as soon as normal utility power is restored. Vapor collection system and control device shutdowns that result from utility power outages do not count towards the 30 calendar day limit for maintenance. [District Rule 17 CCR 95671(f)(1)(2)(3)]
7. Fugitive emissions inspections and repairs pursuant to Leak Detection and Repair 17 CCR 95669 shall be implemented for subject equipment. [17 CCR 95669]
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-213-4

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 6 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,500 BBL FIXED ROOF CRUDE OIL STORAGE/ CLARIFIER TANK: INSTALL VAPOR CONTROL SYSTEM VENTED TO TANK S-1372-209 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

## 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. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
4. Except during maintenance, vessel shall be connected to the vapor collection system listed on S-1372-100. [17 CCR 95668]
5. The vapors may only be vented to a non-destructive vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not result in emissions of nitrogen oxides (NOx); or, a vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not generate more than 15 parts per million volume (ppmv) NOx when measured at 3 percent oxygen and does not require the use of supplemental fuel gas; other than gas required for a pilot burner, to operate. [17 CCR 95671]

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



Armand Marjollet, Director of Permit Services

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6. Vapor collection systems and control devices are allowed to be taken out of service for up to 30 calendar days per calendar year for performing maintenance. In lieu of taking the vapor collection systems and control devices taken out of service, the vapors may be vented to the standby flare listed on permit S-1372-100-35. A time extension to perform maintenance not to exceed 14 calendar days per calendar year may be granted by the ARB Executive Officer. The owner or operator is responsible for maintaining a record of the number of calendar days per calendar year that the vapor collection system or vapor control device is out of service and shall provide a record of such activity at the request of the District. If an alternate vapor control device compliant with is installed prior to conducting maintenance and the vapor collection and control system continues to collect and control vapors during the maintenance operation consistent with the applicable standards specified in 17 CCR Section 95671, the event does not count towards the 30 calendar day limit. Vapor collection system and control device shutdowns that result from utility power outages are not subject to enforcement action provided the equipment resumes normal operation as soon as normal utility power is restored. Vapor collection system and control device shutdowns that result from utility power outages do not count towards the 30 calendar day limit for maintenance. [District Rule 17 CCR 95671(f)(1)(2)(3)]
7. Fugitive emissions inspections and repairs pursuant to Leak Detection and Repair 17 CCR 95669 shall be implemented for subject equipment. [17 CCR 95669]
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1372-214-4

**ISSUANCE DATE:** 02/22/2019

**LEGAL OWNER OR OPERATOR:** SENTINEL PEAK RESOURCES CA LLC

**MAILING ADDRESS:** 1200 DISCOVERY DR, STE 500  
BAKERSFIELD, CA 93309

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
CA

**SECTION:** 6 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 250 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#GD-TK-1): ADD VAPOR RECOVERY CONNECT TO '209 FOR CARB'S GREENHOUSE GAS EMISSION STANDARDS FOR CRUDE OIL AND NATURAL GAS FACILITIES COMPLIANCE

## 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. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
4. Except during maintenance, vessel shall be connected to the vapor collection system listed on S-1372-100. [17 CCR 95668]
5. The vapors may only be vented to a non-destructive vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not result in emissions of nitrogen oxides (NOx); or, a vapor control device that achieves at least 95 percent vapor control efficiency of total emissions and does not generate more than 15 parts per million volume (ppmv) NOx when measured at 3 percent oxygen and does not require the use of supplemental fuel gas, other than gas required for a pilot burner, to operate. [17 CCR 95671]

### CONDITIONS CONTINUE ON NEXT PAGE

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Samir Sheikh, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

S-1372-214-4 Feb 22 2019 8 05AM - DAVIDSOS : Joint Inspection NOT Required

6. Vapor collection systems and control devices are allowed to be taken out of service for up to 30 calendar days per calendar year for performing maintenance. In lieu of taking the vapor collection systems and control devices taken out of service, the vapors may be vented to the standby flare listed on permit S-1372-100-35. A time extension to perform maintenance not to exceed 14 calendar days per calendar year may be granted by the ARB Executive Officer. The owner or operator is responsible for maintaining a record of the number of calendar days per calendar year that the vapor collection system or vapor control device is out of service and shall provide a record of such activity at the request of the District. If an alternate vapor control device compliant with is installed prior to conducting maintenance and the vapor collection and control system continues to collect and control vapors during the maintenance operation consistent with the applicable standards specified in 17 CCR Section 95671, the event does not count towards the 30 calendar day limit. Vapor collection system and control device shutdowns that result from utility power outages are not subject to enforcement action provided the equipment resumes normal operation as soon as normal utility power is restored. Vapor collection system and control device shutdowns that result from utility power outages do not count towards the 30 calendar day limit for maintenance. [District Rule 17 CCR 95671(f)(1)(2)(3)]
7. Fugitive emissions inspections and repairs pursuant to Leak Detection and Repair 17 CCR 95669 shall be implemented for subject equipment. [17 CCR 95669]
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit