



JAN 26 2017

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

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # S-3755
Project # 1153639**

Dear Mr. Alburger:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Seneca Resources in western Kern County, California.

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 renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

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SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation Seneca Resources S-3755

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TITLE V PERMIT RENEWAL EVALUATION

Oil and Gas Production

Engineer: David Torii

Date: 9/14/16

Facility Number: S-3755

Facility Name: Seneca Resources

Mailing Address: 4800 Corporate Court
Bakersfield, Ca 93311

Contact Name: Tim Alburger

Phone: 661-399-4270 x3544

Responsible Official: Brad Elliot

Title: Vice President

Project # : 1153639

Deemed Complete: 11/9/16

I. PROPOSAL

Seneca Resources was issued a Title V permit on 3/31/12. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit on 3/31/12.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Seneca Resources' facility S-3755 is located in the Western Kern County Fields Heavy Oil stationary source.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment A.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 2020 Exemptions, (Amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended 2/18/16)
- 40 CFR Part 60, Subpart OOOO Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (8/12/15)
- 40 CFR Part 64, Compliance Assurance Monitoring (10/22/97)
- 40 CFR Part 82, Subpart B Stratospheric Ozone (June 25, 2013)
- 40 CFR Part 82, Subpart F Stratospheric Ozone (June 25, 2013)

B. Rules Removed

None.

C. Rules Added

- District Rule 2410, Prevention of Significant Deterioration_ (adopted June 16, 2011, effective November 26, 2012)

D. Rules Not Updated

- District Rule 1070 Inspections (Amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)

- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4305, Boilers, Steam Generators and Process Heaters - Phase 2 (amended August 21, 2003)
- District Rule 4306, Boilers, Steam Generators and Process Heaters - Phase 3 (amended October 16, 2008)
- District Rule 4311 Flares (amended June 18, 2009)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters greater than 5.0 MMBtu/hr (adopted October 16, 2008)
- District Rule 4401, Steam-Enhanced Crude Oil Production Wells (6/16/11)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR Part 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (2/16/2012)
- 40 CFR Part 60 Subpart K—Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (10/17/2000)
- 40 CFR Part 60 Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (10/15/03)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (7/20/04)
- 40 CFR 63 Subpart Q - National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers (4/7/06)
- 40 CFR Part 72 - Acid Rain Program (3/28/11)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit". For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added

None.

B. Rules Not Updated

District Rule 4102, Nuisance (as amended December 17, 1992)

Condition 42 of permit unit '0-2 is based on District Rule 4102 and will therefore not be discussed any further.

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

C. District Rule 2410 – Prevention of Significant Deterioration

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant. The provisions of this rule apply to any source and the owner or operator of any source subject to any requirement under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

The rule did not create new requirements, but merely transfers the authority for the 40 CFR Part 52.21 requirements to the District. Prior to adoption of this rule, that authority was vested with the USEPA. This action does not involve construction and thus does not trigger additional PSD requirements for this source. Therefore, the facility is not subject to this rule and no further discussion is required.

D. 40 CFR Part 60, Subpart OOOO Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

Subpart OOOO could potentially apply to this facility's tanks. However, pursuant to section §60.5365(e), this subpart does not apply since the emissions from each of the tanks are estimated to be less than 6 tons per year. Therefore, the requirements of this subpart are not applicable to this facility.

E. 40 CFR Part 64 – Compliance Assurance Monitoring

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

This regulation was last amended on 10/22/97; however, the Rule 2201 Major Source thresholds for NO_x and VOC were lowered from 50,000 to 20,000 lb/year via the 12/18/08 amendment to Rule 2201 (the amended rule was not effective till 6/10/10). The initial Title V permit was issued on 3/31/12, evaluated the permits at the 20,000 lb/year NO_x and VOC thresholds; consequently, a CAM discussion is not required for this renewal.

F. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2013, and conditions 27 and 27 of S-3755-0-4 assure compliance with the requirements.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Final Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Comment Received During Preliminary Decision and District Response

ATTACHMENT A

Proposed Title V Permit Renewal Evaluation

San Joaquin Valley Air Pollution Control District

FACILITY: S-3755-0-2

EXPIRATION DATE: 02/29/2016

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-10-8

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311]
2. Air-assist blower shall be maintained and operated for smokeless combustion. [District Rules 2201 and 4101]
3. Flare shall be equipped with continuous pilot fired solely on propane or natural gas consisting primarily of methane containing no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas and no more than 5% by weight hydrocarbons heavier than butane. [District Rules 2201 and 4311]
4. Pilot gas flow rate to flare shall not exceed 100 scf per hour. [District Rule 2201]
5. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6]
6. Sulfur content of produced (TEOR) gas combusted shall not exceed 500 ppmv. [District Rules 2201 and 4801]
7. Emissions from this permit unit shall not exceed any of the following: PM10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMscf; or CO: 0.37 lb/MMBtu. [District Rule 2201]
8. Weekly records of the produced (TEOR) gas sulfur content and daily records of produced (TEOR) gas flow rate shall be maintained. [District Rule 2201]
9. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H2S and mercaptans or Draeger tube analysis. Sulfur content of produced (TEOR) gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201]
10. All records, including required monitoring data and support information, shall be maintained and retained for a period of 5 years and made available for inspection at any time. [District Rules 1070 and 4311]
11. This unit is subject to Flare General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-11-10

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. Steam generator shall operate only in Sections 7, 18, 19, and 20 T11N, R23W, Section 13 T11N, R24W, Section 24 T26S R20E, Sections 14 and 15 T31S, R22E. [District Rule 4102] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Unit shall not operate within 2,500 feet of the nearest receptor. [District Rule 4102]
4. Steam generator shall only be fired on produced (TEOR) gas, PUC quality natural gas, or gas containing less than 50% by volume PUC quality natural gas with a sulfur content not exceeding 5.0 gr S/100 scf or scrubbed to remove 95% sulfur. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 2201 and 4320] Federally Enforceable Through Title V Permit
5. Except when the fuel is less than 50% by volume PUC quality gas and during startup and shutdown, NOx emission rates shall not exceed 9 ppmv @ 3% O₂. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. When the fuel is less than 50% by volume PUC quality gas, NOx emission rates shall not exceed 12 ppmv @ 3% O₂. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Emission rates shall not exceed any of the following: PM₁₀: 0.0117 lb/MMBtu, VOC: 0.008 lb/MMBtu or CO: 154 ppmvd @ 3% O₂. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Fuel H₂S, total sulfur, and methane content of combusted gas shall be determined whenever there is a change in fuel type and semi-annually thereafter using the test methods (or other approved methods listed in this permit) H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320, 6.2] Federally Enforceable Through Title V Permit
9. Permittee shall maintain records of the types (TEOR and/or PUC quality natural gas), fuel sulfur content and % volume of PUC quality natural gas, higher heating value, and quantities of fuel gas combusted each day. [District Rule 1070] Federally Enforceable Through Title V Permit
10. This unit is subject to Steam Generator General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
11. This unit is subject to Steam Generator Periodic Monitoring Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-12-16

EXPIRATION DATE: 02/29/2016

SECTION: 18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All emissions units shall always operate at least 2,900 feet away from the nearest receptor. [District Rule 4102]
3. Steam enhanced wells shall only be located in the east half of Section 13, T11N, R24W and Sections 7, 18, 19, and 20 T11N, R23W. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Steam generators S-2891-1 and S-2891-2 shall not be located in Section 7, T11N, R23W and SE Section 13, T11N, R24W. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Un-condensable vapors from steam enhanced wells located in east half of Section 13, T11N, R24W and Sections 7, 18, 19, and 20 T11N, R23W shall be incinerated at steam generators (S-2891-1, S-2891-2, S-3755-11 and S-3755-19) and/or flare (S-3755-10). [District Rule 2201] Federally Enforceable Through Title V Permit
6. Sulfatreat vessels shall operated and maintained to achieve 95% by weight removal of sulfur compounds from TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions from this Casing Vapor Control System (CVCS) shall not exceed 18.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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, 4.7] Federally Enforceable Through Title V Permit
9. VOC content of hydrocarbons in gas processed from steam enhanced wells approved by ATC S-3755-12-13 shall not exceed 10% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
10. VOC content of hydrocarbons in gas processed from steam enhanced wells located in Section 7, T11N, R23W shall not exceed 10% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. VOC content of hydrocarbons in gas processed from steam enhanced wells located in the east half of Section 13, T11N, R24W shall not exceed 50% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
12. VOC content of hydrocarbons in gas processed from steam enhanced wells located in Section 18, T11N, R23W shall not exceed 16% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-19-7

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Approved locations for this equipment: Sections 7, 8, 18, 19 and 20, T11N, R23W, Section 13, T11N, R24W, Section 15, T31S, R22E, Section 17, T29S, R21E, and Section 24, T26S, R20E. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
5. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Flue gas recirculation system shall be operated at all times when steam generator is in use. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Steam generator shall be fired only on produced (TEOR) gas and/or PUC quality natural gas with a combined sulfur content not to exceed 5.0 gr-S/100 dscf. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. Emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. If the unit is fired on noncertified gaseous fuel then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Copies of fuel supplier sulfur content certification, and test results to determine compliance with the conditions of this permit shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except for certified gaseous fuels, all fuel sources shall be tested for sulfur content within 30 days of using the fuel source as fuel in the steam generator and at least once every 12 months thereafter. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this emissions unit, or any malfunction of the air pollution control equipment. [District Rule 4001 40CFR60, Subpart A] Federally Enforceable Through Title V Permit
13. This unit is subject to Steam Generator General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-20-4

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-21-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-22-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-23-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

**San Joaquin Valley
Air Pollution Control District**

PERMIT UNIT: S-3755-24-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-25-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
9. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
10. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-26-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-27-2

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. Permittee shall maintain a written record of VOC content of the gas and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
9. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-28-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
2. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-29-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
2. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-3755-30-1

EXPIRATION DATE: 02/29/2016

SECTION: 18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

537 BBL FIXED ROOF PETROLEUM STORAGE TANK #P156205

PERMIT UNIT REQUIREMENTS

1. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
2. This unit is subject to Tanks with a 0.5 psia TVP Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
3. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-31-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

300 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK

PERMIT UNIT REQUIREMENTS

1. Tank shall be designed and operated at a constant level. [District Rule 2201]
2. Tank throughput shall be less than 50 barrels/day when averaged over a one month period. [District Rule 2201]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. VOC emissions from this tank shall not exceed 0.0 lb/day. [District Rule 2201]
5. True vapor pressure (TVP) of liquids stored, received, or held in tank shall not exceed 0.1 psia. [District Rule 2201]
6. {2910} Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623]
7. {2482} The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
8. {2483} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
9. {2911} The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
10. Permittee shall maintain monthly records of average daily crude oil throughput. [District Rule 2201 and 4623]
11. {2912} Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
12. {2913} The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
13. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-32-1

EXPIRATION DATE: 02/29/2016

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

EQUIPMENT DESCRIPTION:

85 MMBTU/HR PCL NATURAL GAS-FIRED STEAM GENERATOR, WITH NORTH AMERICAN LEL ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The sulfur content of any fuel, or fuels combined, shall not exceed 1 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by GC-FPD/TCD or double GC performed in the laboratory. [District Rule 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested monthly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 6 consecutive months for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, monthly testing shall resume. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
6. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
7. Emissions shall not exceed any of the following limits: 5 ppmvd NO_x @ 3% O₂ or 0.0062 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 25 ppmvd CO @ 3% O₂ or 0.0185 lb-CO/MMBtu, or 0.00537 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. Flue gas recirculation system shall be operated whenever steam generator is operated. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Records of sulfur content (gr S/100 scf) of combusted gas shall be maintained. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
10. This unit is subject to Steam Generator General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
11. This unit is subject to Steam Generator Periodic Monitoring Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: S-3755-0-1

EXPIRATION DATE: 02/29/2016

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: SENECA RESOURCES

Location: HEAVY OIL WESTERN

S-3755-0-1 Sup 11 2010 12 01PM -- TORID

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-10-6

EXPIRATION DATE: 02/29/2016

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311]
2. Except for the pilot, the gas inlet to flare shall be equipped with recording flow rate meter. [District Rules 2201 and 4311]
3. Operator shall demonstrate the heat input capacity of the flare daily by calculation, using the metered volume of the gas delivered to the flare and the most current measured heating value of the gas stream. Except for the pilot, heating value for the gas stream shall be determined at least once every six months by sample analysis. [District Rule 2201 and 4311]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1/4 or 5% opacity. [District Rule 2201]
5. Air-assist blower shall be maintained and operated for smokeless combustion. [District Rules 2201 and 4101]
6. Flare shall be equipped with continuous pilot fired solely on propane or natural gas consisting primarily of methane containing no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas and no more than 5% by weight hydrocarbons heavier than butane. [District Rules 2201 and 4311]
7. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311]
8. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5]
9. Pilot gas flow rate to flare shall not exceed 100 scf per hour. [District Rule 2201]
10. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311]
11. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6]
12. Sulfur content of produced (TEOR) gas combusted shall not exceed 500 ppmv. [District Rules 2201 and 4801]
13. Emissions from this permit unit shall not exceed any of the following: PM10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMscf; or CO: 0.37 lb/MMBtu. [District Rule 2201]
14. Weekly records of the produced (TEOR) gas sulfur content and daily records of produced (TEOR) gas flow rate shall be maintained. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-11-8

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. Steam generator shall operate only in Sections 7, 18, 19, and 20 T11N, R23W, Section 13 T11N, R24W, Section 24 T26S R20E, Sections 14 and 15 T31S, R22E. [District Rule 4102] Federally Enforceable Through Title V Permit
2. Exhaust gas stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District Rules 1081, 2201] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. Unit shall not operate within 2,500 feet of the nearest receptor. [District Rule 4102]
5. Steam generator shall only be fired on produced (TEOR) gas, PUC quality natural gas, or gas containing less than 50% by volume PUC quality natural gas with a sulfur content not exceeding 5.0 gr S/100 scf or scrubbed to remove 95% sulfur. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except when the fuel is less than 50% by volume PUC quality gas and during startup and shutdown, NOx emission rates shall not exceed 9 ppmv @ 3% O2. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. When the fuel is less than 50% by volume PUC quality gas, NOx emission rates shall not exceed 12 ppmv @ 3% O2. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 0.0117 lb/MMBtu, VOC: 0.008 lb/MMBtu or CO: 154 ppmvd @ 3% O2. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit
9. The permittee shall monitor and record the stack concentration of NOX, CO, and O2 at least once every month (in which a source test is not performed) using a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 & 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. If permittee fails any compliance demonstration for NO_x and CO emissions when testing not less than once every 36 months, source testing for NO_x and CO emissions shall be conducted not less than once every 12 months. [District Rules 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit
22. Fuel H₂S, total sulfur, and methane content of combusted gas shall be determined whenever there is a change in fuel type and semi-annually thereafter using the test methods (or other approved methods listed in this permit) H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320, 6.2] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of the types (TEOR and/or PUC quality natural gas), fuel sulfur content and % volume of PUC quality natural gas, higher heating value, and quantities of fuel gas combusted each day. [District Rule 1070] Federally Enforceable Through Title V Permit
24. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-12-15

EXPIRATION DATE: 02/29/2016

SECTION: 18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH 200 CYCLIC WELLS SERVED BY A CASING VENT VAPOR CONTROL SYSTEM WITH LIQUID KNOCKOUT(S), HEAT EXCHANGER(S), H₂S SULFA TREAT CONTACTOR VESSEL(S), AND COMPRESSOR(S) LOCATED IN THE EAST HALF OF SECTION 13, T11N, R24W AND SECTIONS 7, 18, 19, AND 20 T11N, R23W

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All emissions units shall always operate at least 2,900 feet away away from the nearest receptor. [District Rule 4102]
3. Steam generators S-2891-1 and S-2891-2 shall not be located in Section 7, T11N, R23W and SE Section 13, T11N, R24W. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Un-condensable vapors from steam enhanced wells located in east half of Section 13, T11N, R24W and Sections 7, 18, 19, and 20 T11N, R23W shall be incinerated at steam generators (S-2891-1, S-2891-2, S-3755-11 and S-3755-19) and/or flare (S-3755-10). [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfatreat vessels shall operated and maintained to achieve 95% by weight removal of sulfur compounds from TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC emissions from this casing vapor control system (CVCS) shall not exceed 0.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC content of the vapor processed through this operation shall not exceed 10% by weight. Permittee shall sample and record the VOC content of the vapor at least once every 12 months. The sample shall be taken on the main vapor line after all individual vapor streams are combined and prior to the sulfur scrubbers. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
8. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401; the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rules 2201 and 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
9. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
22. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
23. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
24. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
25. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5.2] Federally Enforceable Through Title V Permit
26. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
27. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
28. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
29. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
30. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
31. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
32. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
33. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

46. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
47. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
48. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
49. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
50. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-19-6

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO₂, nor 10 lb/hr. [District Rule 4201 and Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
4. Approved locations for this equipment: Sections 7, 8, 18, 19 and 20, T11N, R23W, Section 13, T11N, R24W, Section 15, T31S, R22E, Section 17, T29S, R21E, and Section 24, T26S, R20E. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
6. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Flue gas recirculation system shall be operated at all times when steam generator is in use. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Steam generator shall be fired only on produced (TEOR) gas and/or PUC quality natural gas with a combined sulfur content not to exceed 5.0 gr-S/100 dscf. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 100 ppmvd CO @ 3% O₂ or 0.074 lb-CO/MMBtu, 0.0076 lb-PM₁₀/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
25. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306, 5.5] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this emissions unit, or any malfunction of the air pollution control equipment. [District Rule 4001 40CFR60, Subpart A] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-20-3

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-21-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-22-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-23-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-24-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-25-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-26-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM
LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-27-1

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain a written record of VOC content of the gas and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-28-0

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
3. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
4. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
7. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623]
8. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of this permit, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-29-0

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
3. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
4. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
7. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623]
8. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of this permit, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-30-0

EXPIRATION DATE: 02/29/2016

SECTION: 18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

537 BBL FIXED ROOF PETROLEUM STORAGE TANK #P156205

PERMIT UNIT REQUIREMENTS

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-31-0

EXPIRATION DATE: 02/29/2016

SECTION: NW18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

300 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK

PERMIT UNIT REQUIREMENTS

1. Tank shall be designed and operated at a constant level. [District Rule 2201]
2. Tank throughput shall be less than 50 barrels/day when averaged over a one month period. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. VOC emissions from this tank shall not exceed 0.0 lb/day. [District Rule 2201]
5. True vapor pressure (TVP) of liquids stored, received, or held in tank shall not exceed 0.1 psia. [District Rule 2201]
6. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623]
7. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
8. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
9. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
10. Permittee shall maintain monthly records of average daily crude oil throughput. [District Rule 2201 and 4623]
11. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
12. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
13. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-32-0

EXPIRATION DATE: 02/29/2016

SECTION: 18 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

85 MMBTU/HR PCL NATURAL GAS-FIRED STEAM GENERATOR, WITH NORTH AMERICAN LEL ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The sulfur content of any fuel, or fuels combined, shall not exceed 1 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by GC-FPD/TCD or double GC performed in the laboratory. [District Rule 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
7. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested monthly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 6 consecutive months for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, monthly testing shall resume. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
9. Emissions shall not exceed any of the following limits: 5 ppmvd NO_x @ 3% O₂ or 0.0062 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 25 ppmvd CO @ 3% O₂ or 0.0185 lb-CO/MMBtu, or 0.00537 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
10. Flue gas recirculation system shall be operated whenever steam generator is operated. [District Rule 2201] Federally Enforceable Through Title V Permit

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

21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. Records of sulfur content (gr S/100 scf) of combusted gas shall be maintained. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=3755 and excluding Deleted Permits
Sorted by Facility Name and Permit Number9/14/16
11:53 am

SENECA RESOURCES HEAVY OIL WESTERN		FAC # STATUS: TELEPHONE:	S 3755 A	TYPE: TOXIC ID:	TitleV 60311	EXP. DATE: AREA: INSP. DATE:	02/29/2016 104 / 01/17
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-3755-10-6	16,700 KBTU/HR	3020-02 H	1	1,128.00	1,128.00	A	16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR
S-3755-11-8	20,000 KBTU/HR	3020-02 H	1	1,128.00	1,128.00	A	20 MMBTU/HR TEOR GAS AND NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME LE MODEL 4211- 21/X1288 LOW NOX BURNER
S-3755-12-15	200 STEAM ENHANCED WELLS	3020-09 A	200	10.23	2,046.00	A	THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH 200 CYCLIC WELLS SERVED BY A CASING VENT VAPOR CONTROL SYSTEM WITH LIQUID KNOCKOUT(S), HEAT EXCHANGER(S), H2S SULFA TREAT CONTACTOR VESSEL(S), AND COMPRESSOR(S) LOCATED IN THE EAST HALF OF SECTION 13, T11N, R24W AND SECTIONS 7, 18, 19, AND 20 T11N, R23W
S-3755-19-6	25 MMBTU/HR	3020-02 H	1	1,128.00	1,128.00	A	20.0 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH ACT GIDEON MGW-25 LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION OPERATED AT VARIOUS SPECIFIED LOCATIONS WITHIN THE STATIONARY SOURCE
S-3755-20-3	63,000 gal.	3020-05 D	1	203.00	203.00	A	1,500 BBL WELDED FIXED ROOF WASH TANK WITH VAPOR RECOVERY SYSTEM VENTED TO THE CASING GAS GATHERING SYSTEM AND APPROVED INCINERATION DEVICES STEAM GENERATORS S-3755-11, '19, S-1114-113, AND/OR FLARE S-3755-10 AND SERVING TANKS S-3755-21, 22, 23, 24, 25, 26, 27, 28 AND 29
S-3755-21-1	63,000 gal.	3020-05 D	1	203.00	203.00	A	1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-22-1	63,000 gal.	3020-05 D	1	203.00	203.00	A	1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-23-1	63,000 gal.	3020-05 D	1	203.00	203.00	A	1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-24-1	25,200 gal.	3020-05 C	1	149.00	149.00	A	600 BBL FWKO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-25-1	4500 gal.	3020-05 A	1	83.00	83.00	A	107 BBL WEMCO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-26-1	42,000 gal.	3020-05 C	1	149.00	149.00	A	1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-27-1	25,200 gal.	3020-05 C	1	149.00	149.00	A	600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-28-0	21,000 gallons	3020-05 C	1	149.00	149.00	A	500 BBL WELDED FIXED ROOF PRODUCED WATER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20
S-3755-29-0	21,000 gallons	3020-05 C	1	149.00	149.00	A	500 BBL WELDED FIXED ROOF SAND DUMP TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20