VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

4567 Telephone Road
Ventura, CA 93003
805/303-1405

PART 70 PERMIT No. 00012

Permit Term: May 14, 2019 to December 31, 2023

Company Name / Address
CalNRG Operating, LLC
1746-F South Victoria Avenue #245
Ventura, CA 93003

Facility Name / Address
Tenby Production Facility
3450 East Fifth St.
Oxnard, CA 93030

Responsible Official
Mr. Joe Benson
Operations Manager
805/477-9805

Title V Contact
Ms. Kim Wolfe
HS&E Lead
805/455-1333

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

Pursuant to Rule 42.H, "Renewal Fees," this stationary source is non-operational. The stationary source shall not be operated. Prior to resuming operation, the permittee shall pay the regular renewal fee in full for the respective annual renewal billing period and shall submit a Part 70 Administrative Amendment application to remove this requirement.

Ali R. Ghasemi
Air Pollution Control Officer

June 15, 2022

PART 70 PERMIT NO. 00012
TABLE OF CONTENTS

9. General Applicable Requirements (Attachments)

    a. Rule 50, Opacity (50)
    b. Rule 54.B.1, Sulfur Compounds - SO_x at Point of Discharge (54.B.1)
    c. Rule 54.B.2, Sulfur Compounds - SO_x at or Beyond Property Line (54.B.2)
    d. Rule 55, Fugitive Dust (55)
    e. Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment (57.1)
    f. Rule 64.B.1, Sulfur Content of Fuels - Gaseous Fuels (64.B.1)
    g. Rule 64.B.2, Sulfur Content of Fuels - Solid or Liquid Fuels (64.B.2)
    h. Rule 71.1.C, Crude Oil Production and Separation - Produced Gas (71.1.C)
    i. Rule 71.4.B.1, First Stage Sump Prohibition (71.4.B.1)
    j. Rule 71.4.B.3, Well Cellar Storage Prohibition (71.4.B.3)
    k. Rule 74.6, Surface Cleaning and Degreasing - Wipe Cleaning (74.6)
    l. Rule 74.10, Fugitive Emissions – Oilfields (74.10)
    m. Rule 74.11.1, Large Water Heaters and Small Boilers (74.11.1)
    n. Rule 74.22, Natural Gas-Fired Central Furnaces (74.22)
    o. Title 17, California Code of Regulations, Sections 9566 to 95677, Greenhouse Gas Emissions Standards for Crude Oil and Natural Gas Facilities (CARB GHG OIL GAS)

10. General Requirements for Short-Term Activities (Attachments)

    a. Rule 74.1, Abrasive Blasting (74.1)
    b. Rule 74.2, Architectural Coatings (74.2)
    c. Rule 74.4.D, Cutback Asphalt – Road Oil (74.4.D)
    d. Rule 74.16, Oilfield Drilling Operations (74.16)
    e. Rule 74.26, Crude Oil Storage Tank Degassing Operations (74.26)
    f. Rule 74.29, Soil Decontamination Operations (74.29N3)

11. General Permit Conditions

    a. Part 70 Permit General Conditions (Part 70 General)
    b. Permit to Operate General Conditions (PO General)
    c. Part 70 Permit Shield (PO00012 Shield 1, PO00012 Shield 2)
    d. 40 CFR Part 60, Subpart OOOO, Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission, and Distribution (40CFR60OOOO)
    e. 40 CFR Part 60, Subpart OOOOa, Standards of Performance (NSPS) for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015 (40CFR60OOOOa)

12. Miscellaneous Federal Program Conditions

    a. 40 CFR Part 68 - Accidental Release Prevention and Risk Management Plans (40CFR68)
    b. 40 CFR Part 82 - Protection of Stratospheric Ozone (40CFR82)

13. Part 70 Permit Application Package

Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

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1.a. PERMIT REVISONS TABLE

Application No.	Issue Date	Description / Category	Revised Permit Sections
00012-151	03/09/2000	Modified Storage Tank Description / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4
00012-161	01/13/03	Permit Reissuance for Term: January 1, 2003 to December 31, 2007	See "Stationary Source Description"
00012-ADM1	02/09/04	Administrative Amendment to revise the permitted emissions to reflect updated EPA-AP42 emissions factors for natural gas external combustion	• Signature Cover Page • Permit Revisions Table • Table No. 4
00012-171	08/04/04	Designate Steam Generator No. 3 as Out of Service / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO00012PC5 • Attachment PO00012PC8
00012-181	05/03/05	Add Existing Emergency Engines to Permitted Equipment Tables	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Table • Table No. 2 • Applicable Requirement Code Key • Table No. 3 • Table No. 4 • Insignificant Activities Table • ATCM Engine N1 • ATCM Engine N2
00012-191	01/15/08	Permit Reissuance for Term January 1, 2008 to December 31, 2012	See "Permit Summary and Statement of Basis"
00012-201	02/01/12	Transfer of Ownership / Administrative Amendment	• Signature Cover Page

Application No.	Issue Date	Description / Category	Revised Permit Sections
00012-211	07/18/12	Designate Various Emissions Units as Out of Service / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO00012PC8
00012-231	10/18/12	Administrative Amendment to change responsible official	• Signature Cover Page • Permit Revisions Table
00012-271	05/28/13	Revise Responsible Officials /Administrative Amendment	• Signature Cover Page • Permit Revisions Table
00012-221 00012-241 00012-242 00012-243 00012-244 00012-291 00012-301	12/03/13	App -221: Permit Reissuance for Term Ending December 31, 2018 Apps -241,-242,-243,-244: Well Replacements App -291: Administrative Amendment to change Company Name and Responsible Official App -301: Administrative Amendment to change Responsible Official	See "Permit Summary and Statement of Basis"
00012-281	07/10/14	Permit backup flare / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Permit Summary and Statement of Basis • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO00012PC9 *(new)* • Attachment 54.B.1 • Attachment 54.B.2
00012-245 00012-331	01/21/15	App -245: Well Replacements App - 331: Company Name Change	• Signature Cover Page • Permit Revisions Table • Oil Well List • Attachment PO00012PC1

Application No.	Issue Date	Description / Category	Revised Permit Sections
00012-351	07/07/15	Remove Emergency Engine From Permit / Revise Engine Description	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • *Remove* Attachment ATCM Engine N2
00012-321	01/19/16	Replacement of Steam Generator No. 0 / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO00012PC5 • Attachment SHIELD-Steam Generator • Attachment 40CFR60OOOO
00012-361	02/17/16	Revise Responsible Officials and Title V Contact/Administrative Amendment	• Signature Cover Page • Permit Revisions Table
00012-371	04/04/18	Administrative Amendment to designate stationary source as non-operational per Rule 42	• Signature Cover Page • Permit Revisions Table
00012-381	05/14/19	Permit Reissuance for Term Ending December 31, 2023	See "Permit Summary and Statement of Basis"
00012-391 00012-401	06/11/20	App -391: Administrative Amendment to replace Responsible Officials App -401: Administrative Amendment to designate stationary source as non-operational per Rule 42.H	• Signature Cover Page • Permit Revisions Table
00012-411	10/02/20	Administrative Amendment to change company address	• Signature Cover Page • Permit Revisions Table
00012-421	06/15/22	Administrative Amendment to permit transfer of ownership	• Signature Cover Page • Permit Revisions Table

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1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is a crude oil production and storage facility. This source has a Standard Industrial Classification (SIC) Code of 1311, Crude Oil Production. The source operates various oil production and processing equipment, including wells, crude oil storage tanks, produced water and slop tanks, gas oil (diluent) storage tanks, nitrite solution vessels, boilers, steam generators, asphalt heaters, asphalt storage tanks, and various loading racks. This stationary source extracts heavy crude oil from tar sands and blends the material into asphalt products. Steam generators are used to inject steam into the tar sand formation to heat the heavy crude and help it flow into the well pump. Diluent is injected into the well casing to enable the well pump to bring the heavy crude to the surface. The diluent is then removed from the crude and recycled for continued heavy crude recovery. This stationary source is subject to the Part 70 permit program based upon the potential to emit nitrogen oxides (NOx).

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required", and District Rule 23, "Exemptions from Permit". These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit", may be subject to District rules such as District Rule 50, "Opacity". This includes "Insignificant Activities" as listed in Section No. 6 of the permit. In addition, "Short Term Activities" as listed in Section No. 10 of the permit are subject to certain rules and regulations. This permit does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such equipment is subject to District Rule 50, "Opacity". This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NOx and 100 tons per year for PM, SOx, and CO, pursuant to Rule 33.B.2 and Ventura County's "Serious" nonattainment classification with the federal ozone standard. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NOx, PM, SOx, and CO for this stationary source. District Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of natural gas and diesel fuel in the boilers and steam generators. Reactive Organic Compound

(ROC) emissions result from the storage, handling, and loading of crude oil in the tanks and loading racks.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. There are no Maximum Achievable Control Technology (MACT) major-source standards that apply to this facility. As described below, there are some applicable area-source MACT standards for this stationary source. The Part 70 Permit re-issuance application includes a summary (in the units of pounds per year and pounds per hour) of pollutants that are subject to the State of California AB2588 Air Toxics "Hot Spot" Program. All HAPS are subject to "Hot Spots" reporting. The goal of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the "Hot Spots" program. This facility has been subject to the "Hot Spots" program since 1989. Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified as "low level". As a low level facility, the stationary source is exempt from toxics reporting requirements unless any changes are made; such as facility changes, receptor changes, or toxicity calculation changes, which would put the facility in the "intermediate" category. The most recent data submitted was for the calendar year 1994.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. However, in a Federal Register notice dated August 19, 2015, EPA ruled that GHG emissions alone cannot be used to determine Title V applicability. This ruling was based on the U.S. Supreme Court decision of June 23, 2015. Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. Carbon dioxide equivalent emissions (CO_{2e}) is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant.

The CO_2 potential to emit for this stationary source has been calculated to be 86,239.3 tons per year. The District's potential to emit is based on the permitted annual combustion and operational (hours per year) limits listed in Table No. 3 of the permit. The District has used emission factors of 10.14 kg CO_2/gallon diesel (22.33 lb CO_2/gallon diesel) and 53.02 kg CO_2/MMBTU natural gas (116.78 lb CO_2/MMBTU natural gas) from the *Regulation For The Mandatory Reporting of Greenhouse Gas Emissions*, California Code of Regulations, title 17, Subchapter 10, Article 2, sections 95100 to 95133; Appendix A, Table 4. This CO_2 potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit".

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the time period January 1, 1996 to December 31, 2018, the facility received twelve (12) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 00012 located at the end of this section of the Part 70 permit.

Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

Equipment Description and Applicable Requirements - Specific

The crude oil, gas oil (diluent), and asphalt storage tanks and processing tanks at this facility are subject to Rule 71.1, "Crude Oil Production and Separation". The tanks are equipped with vapor recovery for Rule 71.1 compliance. The gas oil and crude oil loading racks are equipped with vapor recovery and primary and secondary overfill protection for Rule 71.3, "Transfer of Reactive Organic Compound Liquids", compliance. The gas oil and crude oil loading rack vapor recovery systems are also required for Rule 26, "New Source Review", compliance. The asphalt loading racks are exempt from the requirements of Rule 71.3 since the ROC liquid transferred has a modified Reid vapor pressure of less than 0.5 psia; however, pursuant to Rule 51, "Nuisance", the units are equipped with a vapor collection system that passes vapors through a water scrubber and filtration system.

The 20.0 MMBTU/Hr Erie City boiler, the six (6) 20.0 MMBTU/Hr steam generators, and the 20.0 MMBTU/Hr Natco Crude oil process heater are equipped with Lo NOx burners for Rule 74.15, "Boilers, Steam Generators and Process Heaters", compliance. Some of these units are also equipped with flue gas recirculation (FGR) and the capability to burn fuel oil. The 20.0 MMBTU/Hr Erie City boiler, the 20.0 MMBTU/Hr Natco crude oil process heater, and the 20.0

MMBTU/hr PCL Steam Generator (No. 0) have NOx concentration emission limits that are Rule 26, "New Source Review", limits which are more stringent than the Rule 74.15 requirements.

The facility includes a 5.0 MMBTU/hr flare (PROS Model FLTR-1) which is used for the combustion of gases pursuant to Rules 71.1.B.1.a or 71.1.C.1 by burning excess gas that cannot be combusted in the steam generators or asphalt heaters. The flare is required to be operated properly pursuant to Rules 71.1 and 71.3. The sulfur content of the gas prior to flaring is treated for compliance with Rules 26 and 54.

This stationary source is subject to the fugitive leak and inspection requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". The stationary source is also subject to the California "Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities. This is a state regulation that is enforced by the District via a Memorandum of Understanding between the District and the California ARB.

A substantial amount of the emissions units listed on this permit are identified as Out of Service (OOS). As stated in Attachment PO00012PC8, the tanks designated as OOS shall not contain any liquids; and the combustion units shall not be connected to a fuel source. Demonstrations of compliance for the Out of Service emissions units are at the discretion of the VCAPCD Compliance Division.

The diesel-fired emergency engines greater than 50 BHP are subject to the requirements of Rule 74.9, "Stationary Internal Combustion Engines"; the California Air Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines; and 40 CFR Part 63, Subpart ZZZZ, NESHAPS for Stationary Reciprocating Internal Combustion Engines (RICE MACT). Since the engines are emergency use only, the requirements of these regulations are limited to fuel use, maintenance, and recordkeeping. There are engines listed in the Insignificant Activities Table that are subject to applicable rules. The fire water pump engine that is exempt because it is rated less than 50 HP is subject to the RICE MACT; the fire water pump engine that is exempt because it is a spark ignited emergency use engine is subject the RICE MACT and to Rule 74.9.

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. The facility does not store any specified materials in sufficient quantities to make them subject to 40 CFR Part 68. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

This stationary source does not have any emission units subject to 40 CFR Part 64, "Compliance Assurance Monitoring" (CAM). There are no "control devices" on emissions units, as defined in the CAM regulation.

This Part 70 Permit contains a permit shield from 40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units". The shield applies to the six (6) 20.0 MMBTU/Hr steam generators (Units Nos. 0, 1, 2, 3, 4, 5), the one (1) 20.0 MMBTU/Hr Erie City boiler, and the one (1) 20.0 MMBTU/Hr Natco crude oil heater. Except for Unit No. 0, all of these units were constructed prior to the applicability date of

June 9, 1989. Unit No. 0 is subject to Subpart Dc; but since it combusts natural gas only, it is only subject to recordkeeping requirements.

This Part 70 Permit also contains permit shields from 40 CFR Part 60, Subpart J, "Standards of Performance for Petroleum Refineries"; 40 CFR Part 60, Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture"; 40 CFR Part 60, Subpart GGG, "Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries"; and 40 CFR Part 60, Subpart QQQ, "Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems". These New Source Performance Standards do not apply to this stationary source because the source does not meet the applicable definitions of a petroleum refinery, asphalt roofing plant, or asphalt processing plant.

Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 00012 was initially issued on January 1, 1998. A detailed list of a portion of the permit revisions is described below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 00012-161: Application No. 00012-161 is for the reissuance of Part 70 Permit No. 00012 for the period January 1, 2003 to December 31, 2007. The following items summarize the changes from the initial Part 70 Permit No. 00012 (January 1, 1998 to December 31, 2002):

- This "Stationary Source Description" has been added to the permit. It was not included in the initial Part 70 Permit No. 00012.
- The number of oil wells on the permit has been reduced from 86 to 70 wells; thereby reducing the permitted emissions by 5.84 tons per year ROC and 1.33 pounds per hour ROC.
- An attachment detailing the requirements of Rule 74.9, "Stationary Internal Combustion Engines", that apply to emergency standby stationary internal combustion engines rated at 50 or more horsepower and operated during an emergency or maintenance operation has been added to the permit. These exempt units have been specifically listed in the Insignificant Activities Table and now are also generally listed in Tables 2, 3, and 4 of the permit.
- Attachments detailing the applicable requirements for Rule 74.11.1, "Large Water Heaters and Small Boilers", and Rule 74.22, "Natural Gas-Fired Central Furnaces", have been added to the permit.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of Part 70 Permit No. 00012:
  a) Rule 54, "Sulfur Compounds"
  b) Rule 57, "Combustion Contaminants – Specific"

c) Rule 64, "Sulfur Content of Fuels"
d) Rule 68, "Carbon Monoxide"
e) Rule 74.2, "Architectural Coatings"
f) Rule 74.6, "Surface Cleaning and Degreasing"
g) Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
h) Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters (1 to 5 MMBTUs)"
i) Rule 74.16, "Oilfield Drilling Operations"
j) Rule 74.29, "Soil Decontamination Operations"

Application No. 00012-191: Application No. 00012-191 is for the reissuance of Part 70 Permit No. 00012 for the period January 1, 2008 to December 31, 2012. The following items summarize the revisions to the permit since the January 1, 2003 to December 31, 2007 reissuance:

- The Permit Summary and Statement of Basis for the permit has been expanded.
- Attachment PO0012PC1, Condition No. 3 has been revised to reflect the November 11, 2003 changes to Rule 23, "Exemptions From Permit", Section F.10, regarding solvent cleaning operations.
- Attachment PO0012PC2 was revised pursuant to revisions to Rule 64, "Sulfur Content of Fuels".
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last reissuance of Part 70 Permit No. 00012:
  a) Rule 51, "Nuisance"
  b) Rule 52, "Particulate Matter – Concentration (Grain Loading)" – The rule was revised such that it no longer is applicable to the emissions units at this stationary source.
  c) Rule 57, "Combustion Contaminants – Specific" – The rule has been replaced by Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
  d) Rule 68, "Carbon Monoxide" – The rule was revised such that it no longer is applicable to the emissions units at this stationary source.
  e) Rule 74.6, "Surface Cleaning and Degreasing"
  f) Rule 74.9, "Stationary Internal Combustion Engines"

Application No. 00012-221: Application No. 00012-221 is for the reissuance of Part 70 Permit No. 00012 for the five-year period ending December 31, 2018. This permit revision also includes Application No. 00012-241, -242, -243, and -244 which are for well replacements. Application No. 00012-291 is also included; and is an Administrative Amendment to change the company name, Responsible Official, and Title V Contact. Application No. 00012-301 is also included; and is an Administrative Amendment to replace a Responsible Official. The following items summarize the revisions to the permit since the January 1, 2008 to December 31, 2012 reissuance:

- A discussion of Greenhouse Gases has been included.
- Attachment PO0012PC1 has been revised to name the wells which are required to operate as BACT wells, pursuant to Application Nos. 00012-241, -242, -243, and -244.
- A permit condition attachment has been added for 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).
- A permit condition attachment for Rule 55, "Fugitive Dust", has been added to the permit.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last reissuance of Part 70 Permit No. 00012:
  a) California Air Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines
  b) Rule 74.2, "Architectural Coatings"
  c) Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
  d) Rule 74.11.1, "Large Water Heaters and Small Boilers"
  e) Rule 74.29, "Soil Decontamination Operations"

Application No. 00012-381 Application No. 00012-381 is for the reissuance of Part 70 Permit No. 00012 for the five-year period ending December 31, 2023. The following items summarize the revisions to the permit since the January 1, 2014 to December 31, 2018 reissuance:

- A condition attachment for the California ARB Greenhouse Gas Emissions Standards for Crude Oil and Natural Gas Facilities has been added to the permit.

- A condition attachment for 40 CFR Part 60, Subpart OOOOa, Standards of Performance (NSPS) for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Re-Construction Commenced After September 18, 2015 has been added to the permit.

- The District has revised some monitoring requirements to exclude the phrase "routine surveillance" from the permit. The following attachments have been revised to reflect this change:
  a) Attachment 50
  b) Attachment 71.3N4
  c) Attachment 71.3N6
  d) Attachment 74.1
  e) Attachment 74.2
  f) Attachment 74.6
  g) Attachment 74.15.1N1
  h) Attachment 74.15.1N4
  i) Attachment 74.26
  j) Attachment 74.29N3
  k) Attachment PO00012PC6

- The following District and EPA rules have been revised and/or revisions of the District rule have been adopted into the State Implementation Plan (SIP):
  a) Rule 54, "Sulfur Compounds"
  b) Rule 74.11.1, "Large Water Heaters and Small Boilers"
  c) Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
  d) 40 CFR Part 63, Subpart ZZZZ, "NESHAPS for Stationary Reciprocating Internal Combustion Engines (RICE MACT)

NOV by Facility

Since January 1, 1996

Facility selected

00012

Facility No 00012 Tenby Production Facility

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
10/01/1996	018259	74.15	Failure To Meet Emissions - Steam Generator Viol. 74.15.B.1. Paid $500.00	$500.00	11/11/1996
10/01/1996	018260	29.C	Permit Condition Not Met - Boiler Emissions Viol. 29.C. Paid $0.00	$0.00	11/11/1996
09/25/1997	018287	29.C	Permit Condition Not Met - Boiler Viol. 29.C. Paid $750.00	$750.00	11/10/1997
03/24/1999	019059	74.10.C.2	Exceeding Leak Rate Threshold - Two Open Ended Lines	$2,000.00	05/04/1999
09/20/1999	019080	29.C	Permit Condition Not Met - Exceeded Gas Oil Tanks Throughput	$0.00	10/04/1999
05/02/2001	019522	74.15.B.1	Failure To Meet Boiler Emissions - CO Emissions	$0.00	05/30/2001
04/07/2004	020259	71.1.B.1	Improper Vapor Recovery System - Vapor Recovery	$1,000.00	05/18/2004
04/20/2005	021063	71.1.B.1	Improper Vapor Recovery System - Vapor Recovery System	$3,500.00	06/01/2005
07/06/2011	022626	74.15.B.1	Failure To Meet Boiler Emissions - Heater	$500.00	09/08/2011
03/22/2012	022852	74.10	Exceeding Leak Rate Threshold - Oilfield	$3,500.00	04/27/2012
04/04/2013	022873	29.C	Permit Condition Not Met - Failure To Conduct VEE Survey	$5,000.00	05/23/2013
02/23/2016	023307	71.1.B.1.a	Improper Vapor Recovery System - Vapor Recovery System	$1,000.00	03/16/2016

Total for 12 NOVs	$17,750.00

1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1. - Specific Applicable Requirements
- Table 1.c.2. - Permit-Specific Conditions
- Table 1.c.3. - General Applicable Requirements
- Table 1.c.4. - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1N1	Rules 71.1.B.1.a, 74.10	•Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable •Verbal notice of maintenance activities •Rule 74.10 inspections •Annual compliance certification including verification that tanks are equipped with a vapor recovery system	•Records of quarterly inspections and tank maintenance activities •Rule 74.10 records	None	None	
71.3N4	Rules 71, 71.3.B.2.a.1, 71.3.B.2.b.2	•Annual compliance certification •Annually monitor one complete loading operation for leaks and for proper operation of the loading equipment and delivery vessel vapor recovery and overfill protection systems •Visual inspection of truck tank level after each liquid loading	•Records of annual inspections of the loading operations	None	•Leak Detection - Appropriate analyzer calibrated with methane or alternative screening procedure in EPA Reference 21	

1.c.1. Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.3N6	Rule 71.3.E.1	•Annual compliance certification with records of data to ensure modified Reid vapor pressure of liquid is < 0.5 psia	•Records of vapor pressure determinations	None	•VP of petroleum products - ASTM Method D-323-82 Volume 5.01, Section 5	Organic liquids listed in Attachment 1 of Rule 71.2 w/ a transfer temp not exceeding the max. temp listed corresponding w/ 0.5 psia are exempt from Rule 71.3.
74.9N7	Rule 74.9.D.3	•Annual compliance certification •Hours of operation	•Records of operating hours •Date, time, duration, and reason for emergency operation •Records of engine data	None	None	
74.15N1	Rule 74.15.B.1	•Annual compliance certification •Biennial Source Test (NO_x, CO)	•Records of source tests •Daily records of alternate fuel consumption	None	•NO_x-ARB Method 100 •CO-ARB Method 100	
74.15.1N1	Rule 74.15.1.B.1	•Annual compliance certification •Source test every 24 or 48 months (NO_x, CO) •Annual screening analysis (NOx, CO) with a portable analyzer	•Records of source tests •Daily records of alternate fuel consumption	•Submit report of annual screening analysis within 45 days	•NO_x-ARB Method 100 •CO-ARB Method 100	
74.15.1N4	Rules 74.15.1.D.1 and 74.15.B.1 or2	•Annual compliance certification •Notice to the District and fuel records if operating	•Notice to the District and fuel records if operating	None	None	
ATCM Engine N1	California ATCM for Stationary Compression Engines – fuel requirements	•Maintain records of fuel type •Maintain records of hours of operation •Maintain records of fuel used	•Maintain records of fuel type •Maintain records of hours of operation •Maintain records of fuel used	None	None	
40CFR63ZZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	•Maintenance records •Annual compliance certification	•Maintenance records •Hours of operation records	None	None	
40CFR63ZZZZN9	RICE MACT for emergency spark ignited engines – oil change and inspections	•Maintenance records •Annual compliance certification	•Maintenance records •Hours of operation records	None	None	

1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO00012PC1 - Condition No. 1	Rules 26 and 29 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	
PO00012PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	•Annual compliance certification	None	None	None	
PO00012PC1 – Condition No. 3	Rule 26 – BACT wells	•Annual compliance certification	None	None	None	
PO00012PC1 - Condition No.4	Rule 29 Solvent Recordkeeping	•Monthly records of solvent purchase and usage •Annual compliance certification	•Records of solvent purchase and usage	None	None	
PO00012PC2	Rule 64 Nitrite Solution Vessel Operation	•Weekly tests of H_2S content in gases •Annual analysis of sulfur content in fuel gas •Annual compliance certification	•Records of H_2S test information •Records of fuel gas sulfur analysis tests	None	H_2S content - detector tubes Sulfur content - SCAQMD Method 307-94	
PO00012PC3	Rules 26 and 74.15 Boiler Emission Limits and FGR Settings	•Monthly records of FGR valve opening setting •Biennial Source Test (NO_x) •Annual compliance certification	•Records of FGR valve settings •Records of emissions source test	None	•NO_x-ARB Method 100	
PO00012PC4	Rules 26 and 74.15 Process Heater Emission Limits and FGR Settings	•Monthly records of FGR valve opening setting •Biennial Source Test (NO_x) •Annual compliance certification	•Records of FGR valve settings •Records of emissions source test	None	•NO_x-ARB Method 100	
PO00012PC5 - Condition Nos. 1, 5, 6,7, and 8	Rules 26, 29, and 74.15 Steam Generator Nos. 4 and 5 Max. Fuel Oil Rate, Sulfur and Nitrogen Concentration Limits, Emission Limits , and FGR Settings	•Monthly records of FGR valve opening setting •Monthly records of oxygen trim controller settings •Source Test (NO_x) while burning fuel oil during curtailment when > 118.2 gal/hr •Source Test (NO_x, CO) while burning fuel oil during periods of other than curtailment •Biennial Source Test (NO_x, CO) while burning natural gas •Fuel supplier's certification, or fuel test per each delivery documenting nitrogen and sulfur content of fuel •Amount of fuel consumed •Annual compliance certification	•Records of FGR valve settings •Records of oxygen trim controller settings •Records of emissions source tests •Records of fuel tests •Fuel consumption records	None	•NO_x-ARB Method 100 •CO - ARB Method 100	

1.c.2. Permit-Specific Conditions (Continued)

PO00012PC5 - Condition Nos. 2, 3, and 8	Rules 26, 29, 54, 64, and 74.15 Steam Generator No. 0 Emission Limits and fuel limits	•Source Test (NO_x and CO) every 24 months •Annual monitoring of fuel sulfur content •Annual compliance certification	•Records of emissions source test •Fuel sulfur content measurements	None	•NO_x-ARB Method 100 •CO - ARB Method 100 •SCAQMD Method 307-91	
PO00012PC5 - Condition Nos. 4, 6, 7, and 8	Rules 26, 29, and 74.15 Steam Generator Nos. 1 and 2 Emission Limits and FGR Settings	•Monthly records of FGR valve opening setting •Monthly records of oxygen trim controller settings •Source Test (NO_x) prior to burning fuel oil during curtailment •Source Test (NO_x, CO) while burning fuel oil during periods of other than curtailment •Biennial Source Test (NO_x, CO) while burning natural gas •Amount of fuel consumed •Monthly records of oxygen trim controller settings •Annual compliance certification	•Records of FGR valve settings •Records of oxygen trim controller settings •Records of emissions source tests •Fuel consumption records	None	•NO_x-ARB Method 100 •CO - ARB Method 100	
PO00012PC6	Rule 51 Asphalt Loading Rack Odor Control	•Annual certification that the vapor collection and scrubbing system is operating properly	None	None	None	•District-enforceable only
PO00012PC7	Rules 26 and 71.3 Crude Oil and Gas Oil Loading Rack Vapor Control	•Annual compliance certification including monitoring one complete loading operation for leaks and for proper operation of the loading equipment and delivery vessel vapor recovery and overfill protection systems	•Records of annual inspections of the loading operations	None	•Leak Detection - Appropriate analyzer calibrated with methane or alternative screening procedure in EPA Reference 21	
PO00012PC8	Rule 29 Out of Service Emissions Units	•Annual compliance certification to ensure that emissions unit is shut down and not being operated	None	None	None	
PO00012PC9 Condition Nos. 1, 2, 3, and 4	Rules 26, 71.1, 71.3 Flare ignition system operation, Smokeless	•Annual compliance certification •Monthly test of flare's ignition system	•Records of monthly tests and maintenance activities	None	None	
PO00012PC9 Condition No. 5	Rules 26 and 54 20 ppm sulfur content	•Annual testing of sulfur content of gas	•Records of annual testing	None	•Detector tubes, SCAQMD Method 307-91, or EPA Method 16	

1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	•Periodic visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1	Rule 54.B.1	•Annual compliance certification •Follow monitoring requirements under Rule 64 •Upon request, source test for sulfur compounds at point of discharge	None	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	•Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	•Annual compliance certification •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and compliance demonstration	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
55	Rule 55	•Annual compliance certification	•Specific activity records as applicable	None	•EPA Method 9 with modifications	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •None for PUC-quality gas •Annual test for non PUC-quality gas (submit with annual compliance certification)	•Annual fuel gas analysis for non PUC-quality gas	None	•SCAQMD Method 307-94	
64.B.2	Rule 64.B.2	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	
71.1.C	Rules 71.1.C and 74.10	•Annual compliance certification •Rule 74.10 inspections •Visual inspection to ensure collection system is closed •Quarterly inspection of flare to ensure proper operation	•Records of inspections of flare •Rule 74.10 records	None	None	Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements

1.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4.B.1	Rule 71.4.B.1	•Annual compliance certification to ensure there are no first stage sumps	None	None	None	
71.4.B.3	Rule 71.4.B.3	•Annual compliance certification	•Records of maintenance or well workover activity during periods of crude oil storage	None	None	
74.6	Rule 74.6	•Conduct periodic facility inspections •Annual compliance certification •Maintain current solvent information •Upon request, solvent testing	•Records of current solvent information	None	•ROC content-EPA Test Method 24 or 24A •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	
74.10	Rule 74.10	•Annual compliance certification •Identify leaking components •Inspections every shift or 8 hours at natural gas processing plants •Daily and/or weekly inspections for specified equipment •Quarterly inspections for specified components •Pressure relief valve inspections •Annual update to Operator Management Plan •Notification of major leaks in critical components •Notification of repeat leaks	•Records of leak inspections in inspection log	None	•Gas Leaks - EPA Method 21 •ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85 •Weight percentage of evaporated compounds of liquids - ASTM Method D 86-82 •API Gravity - ASTM Method D287	
74.11.1	Rule 74.11.1	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 10 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	•Monitor each abrasive blasting operation •Annual compliance certification •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation-Section 92400 of CCR	
74.2	Rule 74.2	•Conduct periodic inspections •Annual compliance certification •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•Pursuant to Rule 74.2.G	
74.4.D	Rule 74.4.D	•Annual compliance certification •Test ROC content of oil sample being proposed for usage	•Records of oil analyses	None	•ASTM D402	
74.16	Rule 74.16	•Annual compliance certification to ensure grid power being used, and/or •Annual compliance certification to ensure drilling engine has a valid APCD Permit to Operate, and meets NO_x limit, or •Maintain cost analysis documentation as verification to grid power exemption, if applicable •Annual source tests (NO_x) or engine manufacturer certification	•Records of source tests or engine manufacturer certification •Records of cost analysis documentation	None	•NO_x-ARB Method 100	
74.26	Rule 74.26	•Annual compliance certification •Record vapor concentration and gas flow rate of control device •Record vapor concentration of tank •Vapor destruction or removal efficiency upon request •Insure subcontractor has valid permit for portable equipment, if applicable •Notification req'd for degassing	•Vapor concentration and gas flow rate of control device •Vapor concentration of tank being degassed	None	•Liquid mRVP-ASTM Method D 323-82 •Vapor concentration-EPA Method 21 •Vapor flow-EPA Method 2A •Vapor destruction or removal efficiency-EPA Method 25A	

1.c.4. General Requirements for Short-Term Activities (Continued)

74.29N3	Rule 74.29	•Annual compliance certification •Weekly measurements of in-situ soil bioventing or bioremediation •Weekly measurements of soil aeration •Date and quantity of soil aerated •Notification req'd for excavation	•Weekly measurements of soil decontamination operation vapor concentration •Date and quantity of soil aerated	None	•Vapor concentration- EPA Method 21 •Wt. % of contaminant in soil-EPA Method 8015B	

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2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7 , "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also

corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions", that contains the permit specific requirements.

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 00012

Permitted Equipment and Applicable Requirements

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Equipment		71.1	71.3	74.9	74.15	74.15.1	ATCM Engine	RICE MACT	Additional Requirements
Indirect Process Heat									
1 - 20.0 MMBTU/Hr NG/FO Erie City Boiler (7) Lo Nox (36 PPM)	OOS				1				PC1, PC3, PC8
1 - 4.0 MMBTU/Hr NG/FO Boiler (5) Standby UNC	OOS					4			PC1, PC8
1 - 4.5 MMBTU/Hr NG/FO Boiler (6) Standby UNC	OOS					4			PC1, PC8
1 - 3.0 MMBTU/Hr NG/FO Boiler (1) Standby UNC	OOS					4			PC1, PC8
1 - 3.0 MMBTU/Hr NG/FO Boiler (4) Standby UNC	OOS					4			PC1, PC8
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)	OOS					4			PC1, PC8
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)	OOS					4			PC1, PC8
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)	OOS					4			PC1, PC8
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)	OOS					4			PC1, PC8
Solids Recycling and Disposal System									
1 - 150 BBL Slop Tank (TC-14) VR	OOS	1							PC1, PC8
1 - 500 BBL PWT (501) VR	OOS	1							PC8
1 - 500 BBL PWT (502) VR	OOS	1							PC8
Produced Gas Sweetening System									
1 (or More) - Nitrite Solution Vessels									PC2
Flare									
1 - 5.0 MMBTU/Hr Flare, PROS, Inc., Model FLTR-1, 45 scf/hr pilot, 26' high, electronic auto ignition pilot, sulfur pre-treatment system, used as backup VR system									PC9
Portable Steam Generators for Thermally EOR									
1 - 20.0 MMBTU/Hr NG PCL Industrial Services, Inc. Steam Generator (0), equipped with Coen QLN-II Low NOx burner, automatic FGR, fired on PUC Natural gas, with PUC natural gas mixed with produced gas as secondary fuel					1				PC1,PC5
1 - 20.0 MMBTU/Hr NG Steam Generator (1) Lo NOx					1				PC1,PC5
1 - 20.0 MMBTU/Hr NG Steam Generator (2) Lo NOx	OOS				1				PC1,PC5,PC8
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (3) Lo NOx	OOS								PC1, PC8
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (4) Lo NOx					1				PC1, PC5
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (5) Lo NOx	OOS				1				PC1,PC5,PC8
Production Tank System									
1 - 2000 BBL COST (2001) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2002) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2003) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2004) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2005) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2006) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2008) VR		1							PC1
1 - 2000 BBL COST (2009) VR		1							PC1
1 - 2000 BBL COST (2011) VR	OOS	1							PC1,PC8
1 - 2000 BBL COST (2012) VR		1							PC1
1 - 2500 BBL COST (C-1) VR (Transamerica Lease)	OOS	1							PC1,PC8
1 - 2000 BBL COST (C-2) VR (Transamerica Lease @ Texcon)	OOS	1							PC1,PC8
1 - 2000 BBL COST (C-3) VR (Transamerica Lease @ Texcon)	OOS	1							PC1,PC8
1 - 30000 BBL COST (30001) VR	OOS	1							PC1,PC8
1 - 2500 BBL PWT (2501) VR	OOS	1							PC1,PC8
1 - Crude Oil Loading Rack BL VR (Transamerica @ C-1 Tank)	OOS		4						PC1,PC7,PC8
1 - Crude Oil Loading Rack BL VR (Texcon @ C-2,C-3 Tanks)	OOS		4						PC1,PC7,PC8
1 - Crude Oil Loading Rack BL VR (2005-2006 Tank Area)	OOS		4						PC1,PC7,PC8

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 00012

Permitted Equipment and Applicable Requirements

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Equipment		71.1	71.3	74.9	74.15	74.15.1	ATCM Engine	RICE MACT	Additional Requirements
Process Heater Prior to Separation Tower									
1 - 20.0 MMBTU/Hr NG/FO Natco Crude Oil Process Heater Lo NOx	OOS				1				PC1,PC4,PC8
Gas Oil (Diluent) Storage & Injection System									
1 - 1500 BBL Gas Oil Storage Tank (1501) VR	OOS	1							PC1, PC8
1 - 1500 BBL Gas Oil Storage Tank (1502) VR		1							PC1
1 - 1500 BBL Gas Oil Storage Tank (1503) VR	OOS	1							PC1,PC8
1 - 700 BBL Gas Oil Storage Tank (701) VR	OOS	1							PC1,PC8
1 - 700 BBL Gas Oil Storage Tank (702) VR	OOS	1							PC1,PC8
1 - 3500 BBL Gas Oil Storage Tank (3500) VR		1							PC1
1 - 3000 BBL Gas Oil Storage Tank (3001) VR	OOS	1							PC1,PC8
1 - 3000 BBL Gas Oil Storage Tank (3003) VR	OOS	1							PC1,PC8
1 - 1500 BBL Gas Oil Storage Tank (1506) VR	OOS	1							PC1,PC8
1 - 1500 BBL Gas Oil Storage Tank (1507) VR		1							PC1
1 - 1000 BBL Gas Oil Storage Tank (1505) VR	OOS	1							PC1,PC8
1 - 2000 BBL Gas Oil Storage Tank (2000) VR	OOS	1							PC1,PC8
1 - Gas Oil Loading Rack BL VR (1501 -1503 Tank Area)	OOS		4						PC1,PC7,PC8
1 - Gas Oil Loading Rack BL VR (3500 Tank Area)			4						PC1
Asphalt Tank Heating and Storage									
1 - 4.9 MMBTU/Hr Asphalt Heater (Tank12001) Lo NOx	OOS					1			PC1,PC8
1 - 4.9 MMBTU/Hr Asphalt Heater (P-1) Lo NOx						1			PC1
1 - 1.0 MMBTU/Hr Asphalt Heater (506) UNC (stndby)	OOS					4			PC1,PC8
1 - 1.0 MMBTU/Hr Asphalt Heater (Shell 1 & 2) UNC (stndby)	OOS					4			PC1,PC8
1 - 12000 BBL Asphalt Storage Tank (12001) VR	OOS	1							PC1,PC8
1 - 2000 BBL Asphalt Storage Tank (2007) VR	OOS	1							PC1,PC8
1 - 2000 BBL Asphalt Storage Tank (2010) VR	OOS	1							PC1,PC8
1 - 800 BBL Asphalt Storage Tank (1001) VR	OOS	1							PC1,PC8
1 - 1000 BBL Asphalt Storage Tank (1002) VR	OOS	1							PC1,PC8
1 - 1000 BBL Asphalt Storage Tank (1003) VR	OOS	1							PC1,PC8
1 - 1000 BBL Asphalt Storage Tank (1004) VR	OOS	1							PC1,PC8
1 - 500 BBL Asphalt Storage Tank (505) VR	OOS	1							PC1,PC8
1 - 500 BBL Asphalt Storage Tank (506) VR	OOS	1							PC1,PC8
1 - 600 BBL Asphalt Storage Tank (Shell 1 & 2) VR	OOS	1							PC1,PC8
1 - 3500 BBL Asphalt Storage Tank (3501) VR	OOS	1							PC1,PC8
1 - Asphalt Loading Rack SF VR (Shell Tanks)	OOS		6						PC1,PC6,PC8
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	OOS		6						PC1,PC6,PC8
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	OOS		6						PC1,PC6,PC8
1 - Asphalt Loading Rack SF VR (@ 1002 Tank)	OOS		6						PC1,PC6,PC8
1 - Asphalt Loading Rack SF VR (@ 3501 Tank)	OOS		6						PC1,PC6,PC8
Diesel-Fired Emergency Standby Engine									
1 - 160 BHP Detroit, Model PTA-1SD-50, Serial No. 292084, used for fire suppression	OOS			7			1	3	PC8
For Use Throughout Leases									
70 - Oil Wells									PC1
Exempt Emissions Units									
1 - 40 BHP Perkins Diesel Fired Fire Water Pump Engine	OOS							3	PC8
1 - 130 BHP Gasoline Fired Fire Water Pump Engine	OOS			7				9	PC8

OOS - Out of Service

TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

BHP The output of an internal combustion engine as measured in brake horsepower.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

Pit Device used to receive emergency or intermittent flows.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 74.23 compliance requirements.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

Sump Device used for separation, generally in constant use.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 71.1, "Crude Oil Production and Separation"

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"

1. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery based on low throughput. (71.3.B.1) Requirement for leak-free equipment. (71.3.B.3)
2. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system with automatic primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
3. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system with automatic primary and secondary overfill protection. (71.3.B.2.a.2 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
4. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system and APCO-approved alternative primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
5. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system and APCO-approved alternative primary and secondary overfill protection (71.3.B.2.a.2 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
6. Exemption from Rule 71.3 because the crude oil has a modified Reid vapor pressure of less than 0.5 psia. (71.3.E.1)
7. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank exempt from the vapor recovery requirements of Rule 71.1. (71.3.B.1 and 71.3.E.2) Requirement for leak-free equipment. (71.3.B.3)

8. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank that is located more than 1200 feet from a loading facility constructed prior to July 1, 1990. (71.3.B.1 and 71.3.E.3) Requirement for leak-free equipment. (71.3.B.3)
9. Exemption from Rule 71.3 because the crude oil is being transferred into a vacuum truck, and not into a ROC liquid delivery vessel as defined in Rule 71.B.26. (71.B.26)

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

Rule 74.15, "Boilers, Steam Generators and Process Heaters"

1. NOx and CO emission limits for units with an annual heat input rate greater than or equal to 9,000 MMBTU per calendar year (74.15.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of less than 9,000 MMBTU per calendar year. (74.15.B.2 and 74.15.D.1)

Rule 74.15.1, "Boilers, Steam Generators and Process Heaters"

1. NOx and CO emission limits for units with an annual heat input greater than or equal to 1,800 MMBTU. (74.15.1.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of greater than or equal to 300 MMBTU and less than 1,800 MMBTU. (74.15.1.B.2 and 74.15.1.D.1)

3. Exemption from tuning requirements for units with an annual heat input rate less than 300 MMBTU and requirement for metering. (74.15.1.B.2 and 74.15.1.D.1)
4. Equipment is currently shut-down and not operating. Upon operation will install fuel meter (74.15.1.D.1). Based on annual heat input will perform tuning (74.15.1.B.2) or will comply with NOx and CO emission limits (74.15.1.B.1).

Section 93115, Title 17, California Code of Regulations California Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines

1. In-use emergency fire pump assembly engines
2. In-use emergency engines operated not more than 20 hours per year for maintenance and testing purposes.
3. Engines operated solely on OCS Platforms
4. In-use emergency engines – 50 hours per year
5. Emergency engines installed after January 1, 2005

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine (RICE MACT)

1. Existing compression ignition and spark ignition engine compliance dates
2. Existing landfill gas engines – area source
3. Existing emergency diesel engines – area source
4. Existing non-emergency diesel engines $\leq$ 300 HP – area source
5. Existing non-emergency diesel engines 300 HP $<$ X $\leq$ 500 HP – area source
6. Existing non-emergency diesel engines $<$ 500 HP – area source
7. Existing non-emergency spark-ignited remote engine $>$ 500 HP – area source
8. Existing non-emergency diesel engines greater than 300 HP at an area source of HAPs that qualify under the national security exemption
9. Existing emergency spark ignited engines

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits." Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 7, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits."

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table."

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable," a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits." Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit." When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year
Days/Yr: days per year
FO: fuel oil or diesel fuel
Gal/Yr: gallons per year
Hrs/Day: hours per day
Hrs/Yr: hours per year
Lbs/day: pounds per day
Lbs ROC/Yr: pounds of reactive organic compounds per year
MBBL/Yr: thousands of barrels per year
MGal/Yr: thousands of gallons per year
MMBTU/Yr: million British Thermal Units of heat input per year
MMCF/Yr: million standard cubic feet of natural gas per year
MMGal/Yr: million gallons per year
NG: natural gas
TPY: tons per year

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 00012

Permitted Throughput/Consumption Limits

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Equipment		Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit
Indirect Process Heat				
1 - 20.0 MMBTU/Hr NG/FO Erie City Boiler (7) Lo NOx	OOS	144.0 MMCF/Yr NG & 7.1 MGal/Yr FO & 152,201.1 MMBTU/Yr Total Fuel	F	144 MMCF/Yr NG & 7.09 Mgal/Yr FO
1 - 4.0 MMBTU/Hr NG/FO Boiler (5) Standby UNC	OOS	76.6 MMCF/Yr NG & 13.8 Mgal/Yr FO & 82,320 MMBTU/Yr Total Fuel	D	15.8 MMCF/Yr NG & 10.3 MGal/Yr FO
1 - 4.5 MMBTU/Hr NG/FO Boiler (6) Standby UNC	OOS	*	D	*
1 - 3.0 MMBTU/Hr NG/FO Boiler (1) Standby UNC	OOS	*	D	*
1 - 3.0 MMBTU/Hr NG/FO Boiler (4) Standby UNC	OOS	*	D	*
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	*	D	*
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	*	D	*
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	*	D	*
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	*	D	*
Solids Recycling and Disposal System				
1 - 150 BBL Slop Tank (TC-14) VR	OOS	21.9 MBOPY	D	21.9 MBOPY
1 - 500 BBL PWT (501) VR	OOS			
1 - 500 BBL PWT (502) VR	OOS			
Produced Gas Sweetening System				
1 (or More) - Nitrite Solution Vessels (No PE)				
Flare				
1 - 5.0 MMBTU/Hr Flare, PROS, Inc., Model FLTR-1, 45 scf/hr pilot, 26' high, electronic auto ignition pilot, sulfur pre-treatment system, used as backup VR system		No Limit	F	43,800 MMBTU/yr
Portable Steam Generators for Thermally EOR				
1 - 20.0 MMBTU/Hr NG PCL Industrial Services, Inc. Steam Generator (0) w/ Coen QLN-II low NOx burner, automatic FGR, fired on PUC natural gas, with PUC natural gas mixed with produced gas as secondary fuel		163.3 MMCF/Yr NG & 0 MGal/Yr FO	F	163.3 MMCF/Yr NG
1 - 20.0 MMBTU/Hr NG Steam Generator (1) Lo NOx		163.3 MMCF/Yr NG & 0 MGal/Yr FO	F	163.3 MMCF/Yr NG
1 - 20.0 MMBTU/Hr NG Steam Generator (2) Lo NOx	OOS	163.3 MMCF/Yr NG & 0 MGal/Yr FO	F	163.3 MMCF/Yr NG
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (3) Lo NOx	OOS	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO	F	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (4) Lo NOx		163.3 MMCF/Yr NG & 5.91 MGal/Yr FO	F	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (5) Lo NOx	OOS	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO	F	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO
Production Tank System				
1 - 2000 BBL COST (2001) VR	OOS	2,241.0 MBBL/Yr	D	547.0 MBBL/Yr
1 - 2000 BBL COST (2002) VR	OOS	*	D	547.0 MBBL/Yr
1 - 2000 BBL COST (2003) VR	OOS	*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2004) VR	OOS	*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2005) VR	OOS	*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2006) VR	OOS	*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2008) VR		*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2009) VR		*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2011) VR	OOS	*	D	143.4 MBBL/Yr
1 - 2000 BBL COST (2012) VR		*	D	143.4 MBBL/Yr
1 - 2500 BBL COST (C-1) VR (Transamerica Lease)	OOS	136.3 MBBL/Yr	D	136.3 MBBL/Yr
1 - 2000 BBL COST (C-2) VR (Transamerica Lease@Texcon)	OOS	356.0 MBBL/Yr	D	178.0 MBBL/Yr
1 - 2000 BBL COST (C-3) VR (Transamerica Lease@Texcon)	OOS	*	D	178.0 MBBL/Yr
1 - 30000 BBL COST (30001) VR	OOS	110.0 MBBL/Yr	D	110.0 MBBL/Yr
1 - 2500 BBL PWT (2501) VR	OOS			
1 - Crude Oil Loading Rack BL VR (Transamerica@C-1 Tank)	OOS	191.4 MBBL/Yr	D	191.4 MBBL/Yr
1 - Crude Oil Loading Rack BL VR (Texcon@C-2,C-3 Tanks)	OOS	227.9 MBBL/Yr	D	227.9 MBB;L/Yr
1 - Crude Oil Loading Rack BL VR (2005-2006 Tank Area)	OOS	529.2 MBBL/Yr	D	529.2 MBBL/Yr
Process Heater Prior to Separation Tower				
1 - 20.0 MMBTU/Hr NG/FO Natco Crude Oil Process Heater Lo NOx	OOS	136.1 MMCF/Yr NG & 7.1 MGal/Yr FO & 143,801.1 MMBTU/Yr Total Fuel	F	136.1 MMCF/Yr NG and 7.09 MGal/Yr FO
Gas Oil (Diluent) Storage & Injection System				
1 - 1500 BBL Gas Oil Storage Tank (1501) VR	OOS	702.4 MBBL/Yr	F	115.0 MBBL/Yr
1 - 1500 BBL Gas Oil Storage Tank (1502) VR		*	F	91.4 MBBL/Yr

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 00012
Permitted Throughput/Consumption Limits

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Equipment		Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit
1 - 1500 BBL Gas Oil Storage Tank (1503) VR	OOS	*	F	70.0 MBBL/Yr
1 - 700 BBL Gas Oil Storage Tank (701) VR	OOS	*	F	100.0 MBBL/Yr
1 - 700 BBL Gas Oil Storage Tank (702) VR	OOS	*	F	100.0 MBBL/Yr
1 - 3500 BBL Gas Oil Storage Tank (3500) VR		*	F	20.0 MBBL/Yr
1 - 3000 BBL Gas Oil Storage Tank (3001) VR	OOS	*	F	20.0 MBBL/Yr
1 - 3000 BBL Gas Oil Storage Tank (3003) VR	OOS	*	F	20.0 MBBL/Yr
1 - 1500 BBL Gas Oil Storage Tank (1506) VR	OOS	*	F	146.0 MBBL/Yr
1 - 1500 BBL Gas Oil Storage Tank (1507) VR		*	F	10.0 MBBL/Yr
1 - 1000 BBL Gas Oil Storage Tank (1505) VR	OOS	*	F	5.0 MBBL/Yr
1 - 2000 BBL Gas Oil Storage Tank (2000) VR	OOS	*	F	5.0 MBBL/Yr
1 - Gas Oil Loading Rack BL VR (1501 -1503 Tank Area)	OOS	345.2 MBBL/Yr	F	345.2 MBBL/Yr
1 - Gas Oil Loading Rack BL VR (3500 Tank Area)		*	F	*
Asphalt Tank Heating and Storage				
1 - 4.9 MMBTU/Hr Asphalt Heater (Tank 12001) Lo NOx	OOS	**	D	60.8 MMCF/Yr NG and 3.5 MGal/Yr FO
1 - 4.9 MMBTU/Hr Asphalt Heater (P-1) Lo NOx		**	D	*
1 - 1.0 MMBTU/Hr Asphalt Heater (506) UNC (stndby)	OOS	**	D	***
1 - 1.0 MMBTU/Hr Asphalt Heater (Shell 1 & 2) UNC (stndby)	OOS	**	D	***
1 - 12000 BBL Asphalt Storage Tank (12001) VR	OOS	1,034.9 MBBL/Yr	D	300.0 MBBL/Yr
1 - 2000 BBL Asphalt Storage Tank (2007) VR	OOS	*	D	150.0 MBBL/Yr
1 - 2000 BBL Asphalt Storage Tank (2010) VR	OOS	*	D	150.0 MBBL/Yr
1 - 800 BBL Asphalt Storage Tank (1001) VR	OOS	*	D	10.0 MBBL/Yr
1 - 1000 BBL Asphalt Storage Tank (1002) VR	OOS	*	D	50.0 MBBL/Yr
1 - 1000 BBL Asphalt Storage Tank (1003) VR	OOS	*	D	30.0 MBBL/Yr
1 - 1000 BBL Asphalt Storage Tank (1004) VR	OOS	*	D	30.0 MBBL/Yr
1 - 500 BBL Asphalt Storage Tank (505) VR	OOS	*	D	0.0 MBBL/Yr
1 - 500 BBL Asphalt Storage Tank (506) VR	OOS	*	D	0.0 MBBL/Yr
1 - 600 BBL Asphalt Storage Tank (Shell 1 & 2) VR	OOS	*	D	21.9 MBBL/Yr
1 - 3500 BBL Asphalt Storage Tank (3501) VR	OOS	*	D	293.0 MBBL/Yr
1 - Asphalt Loading Rack SF VR (Shell Tanks)	OOS	17,178.0 MGal/Yr	D	17,178 MGal/Yr
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	OOS	*	D	*
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	OOS	*	D	*
1 - Asphalt Loading Rack SF VR (@ 1002 Tank)	OOS	*	D	*
1 - Asphalt Loading Rack SF VR (@ 3501 Tank)	OOS	*	D	*
Diesel-Fired Emergency Standby Engine				
1 - 160 BHP Detroit, Model PTA-1SD-50, Serial No. 292084, used for fire suppression	OOS	20 Hr/yr****	D	20 Hr/yr
For Use Throughout Leases				
70 - Oil Wells				

* - Included in Limit Above
** - Included in Permit Throughput Limit Abovefor Standby Boiler (5)
*** - Included in Calculation Throughput Limit for standby Boiler (5)
**** - Limit for maintenance and testing, does not include emergency operation
OOS - Out of Service
Note: The MMBtu/Yr values were calculated based on Heating Values of 1050 Btu/Scf for NG and 141,000 Btu/Gal for FO

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits," requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors, or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table," contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table."

Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since

October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one-hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application or the facility's AB-2588, Air Toxics "Hot Spots," Report referenced at the bottom of the "Permitted Emissions Table." For Outer Continental Source (OCS) sources and other sources not subject to AB-2588, HAP emissions information is included in the permit reissuance application and is maintained by the stationary source.

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 00012

Permitted Emissions

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Equipment		TONS PER YEAR					POUNDS PER HOUR				
		ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
Indirect Process Heat											
1 - 20.0 MMBTU/Hr NG/FO Erie City Boiler (7) Lo NOx	OOS	0.40	3.33	0.56	3.15	7.34	0.10	2.84	0.28	10.18	1.93
1 - 4.0 MMBTU/Hr NG/FO Boiler (5) Standby UNC	OOS	0.04	0.89	0.07	0.69	0.69	0.02	0.57	0.06	2.04	0.32
1 - 4.5 MMBTU/Hr NG/FO Boiler (6) Standby UNC	OOS	**	**	**	**	**	0.02	0.64	0.06	2.29	0.36
1 - 3.0 MMBTU/Hr NG/FO Boiler (1) Standby UNC	OOS	**	**	**	**	**	0.02	0.43	0.04	1.53	0.24
1 - 3.0 MMBTU/Hr NG/FO Boiler (4) Standby UNC	OOS	**	**	**	**	**	0.02	0.43	0.04	1.53	0.24
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	**	**	**	**	**	0.02	0.45	0.04	1.60	0.25
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	**	**	**	**	**	0.02	0.45	0.04	1.60	0.25
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	**	**	**	**	**	0.02	0.45	0.04	1.60	0.25
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	OOS	**	**	**	**	**	0.02	0.45	0.04	1.60	0.25
Solids Recycling and Disposal System											
1 - 150 BBL Slop Tank (TC-14) VR	OOS	0.01					0.00				
1 - 500 BBL PWT (501) VR	OOS	0.01					0.00				
1 - 500 BBL PWT (502) VR	OOS	0.03					0.01				
Produced Gas Sweetening System											
1 (or More) - Nitrite Solution Vessels (No PE)											
Flare											
1 - 5.0 MMBTU/Hr Flare, PROS, Inc., Model FLTR-1, 45 scf/hr pilot, 26' high, electronic auto ignition pilot, sulfur pre-treatment system, used as backup VR system		1.13	1.49	0.11	0.07	8.10	0.26	0.34	0.03	0.02	1.85
Portable Steam Generators for Thermally EOR											
1 - 20.0 MMBTU/Hr NG PCL Industrial Services, Inc. Steam Generator (0) w/ Coen QLN-II Low NOx burner, automatic FGR, fired on PUC natural gas, with PUC natural gas mixed with produced gas as secondary fuel		0.45	0.27	0.62	0.27	2.73	0.10	0.06	0.14	0.06	0.63
1 - 20.0 MMBTU/Hr NG Steam Generator (1) Lo NOx		4.53	4.08	0.62	3.29	4.59	1.05	0.95	0.14	0.77	1.07
1 - 20.0 MMBTU/Hr NG Steam Generator (2) Lo NOx	OOS	0.45	4.08	0.62	3.29	3.69	0.10	0.95	0.14	0.77	0.86
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (3) Lo NOx	OOS	1.79	4.16	0.63	3.40	8.25	0.42	3.14	0.24	4.26	1.92
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (4) Lo NOx		0.45	4.17	0.63	3.40	6.87	0.10	3.74	0.24	4.26	1.60
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (5) Lo NOx	OOS	0.45	4.17	0.63	3.40	6.87	0.10	3.74	0.24	4.26	1.60
Production Tank System											
1 - 2000 BBL COST (2001) VR	OOS	0.37					0.09				
1 - 2000 BBL COST (2002) VR	OOS	0.37					0.09				
1 - 2000 BBL COST (2003) VR	OOS	0.50					0.11				
1 - 2000 BBL COST (2004) VR	OOS	0.50					0.11				
1 - 2000 BBL COST (2005) VR	OOS	0.50					0.11				
1 - 2000 BBL COST (2006) VR	OOS	0.50					0.11				
1 - 2000 BBL COST (2008) VR		0.81					0.18				
1 - 2000 BBL COST (2009) VR		0.81					0.18				
1 - 2000 BBL COST (2011) VR	OOS	0.81					0.18				
1 - 2000 BBL COST (2012) VR		0.81					0.18				
1 - 2500 BBL COST (C-1) VR (Transamerica Lease)	OOS	0.13					0.03				
1 - 2000 BBL COST (C-2) VR (Transamerica Lease@Texcon)	OOS	0.15					0.03				
1 - 2000 BBL COST (C-3) VR (Transamerica Lease@Texcon)	OOS	0.15					0.03				
1 - 30000 BBL COST (30001) VR	OOS	0.58					0.14				
1 - 2500 BBL PWT (2501) VR	OOS	0.05					0.01				
1 - Crude Oil Loading Rack BL VR (Transamerica@C-1 Tank)	OOS	1.10					2.30				
1 - Crude Oil Loading Rack BL VR (Texcon@C-2,C-3 Tanks)	OOS	1.31					2.30				
1 - Crude Oil Loading Rack BL VR (2005-2006 Tank Area)	OOS	0.44					0.34				
Process Heater Prior to Separation Tower											
1 - 20.0 MMBTU/Hr NG/FO Natco Crude Oil Process Heater Lo NOx	OOS	0.37	2.96	0.53	2.99	5.73	0.10	2.84	0.28	10.18	1.60

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 00012

Permitted Emissions

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Equipment		TONS PER YEAR					POUNDS PER HOUR				
		ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
Gas Oil (Diluent) Storage & Injection System											
1 - 1500 BBL Gas Oil Storage Tank (1501) VR	OOS	0.35					0.08				
1 - 1500 BBL Gas Oil Storage Tank (1502) VR		0.33					0.08				
1 - 1500 BBL Gas Oil Storage Tank (1503) VR	OOS	0.32					0.07				
1 - 700 BBL Gas Oil Storage Tank (701) VR	OOS	0.20					0.04				
1 - 700 BBL Gas Oil Storage Tank (702) VR	OOS	0.2					0.04				
1 - 3500 BBL Gas Oil Storage Tank (3500) VR		0.21					0.05				
1 - 3000 BBL Gas Oil Storage Tank (3001) VR	OOS	0.19					0.04				
1 - 3000 BBL Gas Oil Storage Tank (3003) VR	OOS	0.19					0.04				
1 - 1500 BBL Gas Oil Storage Tank (1506) VR	OOS	0.38					0.09				
1 - 1500 BBL Gas Oil Storage Tank (1507) VR		0.09					0.02				
1 - 1000 BBL Gas Oil Storage Tank (1505) VR	OOS	0.05					0.02				
1 - 2000 BBL Gas Oil Storage Tank (2000) VR	OOS	0.09					0.03				
1 - Gas Oil Loading Rack BL VR (1501 -1503 Tank Area)	OOS	1.98					4.60				
1 - Gas Oil Loading Rack BL VR (3500 Tank Area)		*					*				
Asphalt Tank Heating and Storage											
1 - 4.9 MMBTU/Hr Asphalt Heater (Tank 12001) Lo NOx	OOS	0.17	1.18	0.23	1.36	2.56	0.03	0.70	0.07	2.50	0.39
1 - 4.9 MMBTU/Hr Asphalt Heater (P-1) Lo NOx		*	*	*	*	*	0.03	0.70	0.07	2.50	0.39
1.0 MMBTU/Hr Asphalt Heater (506) UNC (stndby)	OOS	**	**	**	**	**	0.01	0.14	0.01	0.51	0.08
1.0 MMBTU/Hr Asphalt Heater (Shell 1 & 2) UNC (stndby)	OOS	**	**	**	**	**	0.01	0.14	0.01	0.51	0.08
1 - 12000 BBL Asphalt Storage Tank (12001) VR	OOS	0.27					0.06				
1 - 2000 BBL Asphalt Storage Tank (2007) VR	OOS	0.07					0.01				
1 - 2000 BBL Asphalt Storage Tank (2010) VR	OOS	0.07					0.01				
1 - 800 BBL Asphalt Storage Tank (1001) VR	OOS	0.02					0.00				
1 - 1000 BBL Asphalt Storage Tank (1002) VR	OOS	0.04					0.01				
1 - 1000 BBL Asphalt Storage Tank (1003) VR	OOS	0.03					0.00				
1 - 1000 BBL Asphalt Storage Tank (1004) VR	OOS	0.03					0.00				
1 - 500 BBL Asphalt Storage Tank (505) VR	OOS	0.01					0.00				
1 - 500 BBL Asphalt Storage Tank (506) VR	OOS	0.01					0.00				
1 - 600 BBL Asphalt Storage Tank (Shell 1 & 2) VR	OOS	0.01					0.00				
1 - 3500 BBL Asphalt Storage Tank (3501) VR	OOS	0.12					0.03				
1 - Asphalt Loading Rack SF VR (Shell Tanks)	OOS	0.23					0.49				
1 - Asphalt Loading Rack VR (12001 Tank Farm)	OOS	*					*				
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	OOS	*					*				
1 - Asphalt Loading Rack SF VR (@ 1002 Tank)	OOS	*					*				
1 - Asphalt Loading Rack SF VR (@ 3501 Tank)	OOS	*					*				
Diesel-Fired Emergency Standby Engine											
1 - 160 BHP Detroit, Model PTA-1SD-50, Serial No. 292084, used for fire suppression	OOS	0.00	0.05	0.00	0.00	0.01	0.04	0.53	0.04	0.01	0.12
For Use Throughout Leases											
70 - Oil Wells		25.55					5.84				
Total Permitted Emissions		51.21	30.83	5.25	25.31	57.43	20.79	24.68	2.29	54.58	16.28

* - Included in Emissions Above
** - Boiler (5) Includes All Standby Boilers and Heaters
OOS - Out of Service

HAP Emissions Ref.: AB 2588 Air Toxics Report Reporting Year: 1994 Submittal Date: July 17, 1996

5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are desired, the permit holder is required to submit an application to modify the Part 70 Permit.

An Authority to Construct is also required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list.

Section No. 8, "Permit Specific Conditions", includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, "New Source Review".

Ventura County Air Pollution Control District

OIL WELL LIST

Part 70 Permit No. 00012

The following oil wells are on permit with at the Tenby Production Facility:

Philtom Lease Wells

Janet Culberson 2

Chase Lease Wells

El-Rio 1
El-Rio 2
El-Rio 5
El-Rio 7
Chase 1
Chase 2
Chase 3
Chase 5
Chase 6
Chase 8
Chase 9
Chase 11
Chase 12
Chase 14
Chase 15
Chase 16
Chase 17
Chase 18
Chase 20
Chase 21
Chase 22
Chase 23
Chase 24
Chase 25
Chase 26
Chase 27
Chase 28
Chase 29
Chase 30
Chase 31
Chase 32
Chase 33
Chase 34
Chase 35
Chase C8
Chase E9
Chase D11
Chase F12

Transamerica Lease Wells

Texcon 1
Texcon 203
Texcon 204
Texcon 205
Texcon 206
Texcon 207
Texcon 208
Texcon 209
Texcon 210
Texcon 212
Texcon 213
Texcon 214
Texcon 215
Texcon 216
Texcon 217
Texcon 218
Texcon 219
Texcon 702
Texcon 709
Texcon 710
Texcon 711
Texcon 713
Texcon 715
Texcon 716
Texcon 717
Texcon 718
Texcon 719
Transamerica D10
TA B5
TA C2

Total Number of Wells: 70

6. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

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Ventura County Air Pollution Control District

INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)

Part 70 Permit No. 00012

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
Ajax Boiler at Texcon	< 1 MMBTU/Hr	23.C.1
40 BHP Perkins Diesel Fired Fire Water Pump Engine	< 50 BHP	23.D.6
130 BHP Gasoline Fire Water Pump	Spark-ignited engine used for emergency pumping of water for fire protection, and engine maintenance operation is < 50 hr/yr	23.D.7.a

7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Rule 71.1.B.1.a Applicable Requirements
Tanks Equipped with Vapor Recovery

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.

2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.

3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.

5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

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Ventura County Air Pollution Control District
Rules 71.3.B.2.a.1 and 71.3.B.2.b.2 Applicable Requirements
ROC Liquid Loading Facilities
Bottom Loaded Vapor Recovery System To Gas Pipeline
District-Approved Alternative
Primary and Secondary Overfill Protection

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to equipment used to transfer reactive organic compound (ROC) liquids with a Modified Reid Vapor Pressure (MRVP) greater than or equal to 0.5 psia. This attachment does not apply to the transfer of gasoline, or to the transfer of ROC liquids via pipeline.

Specifically, this attachment applies to loading facilities that are equipped with a bottom-loaded vapor recovery system that connects to a gas pipeline recovery and distribution system and are equipped with a District-approved alternative primary and secondary overfill protection system.

A loading facility is defined as any aggregation or combination of organic liquid loading equipment which is located so that all the organic liquid loading outlets for such aggregation or combination of loading equipment can be encompassed within any circle of 300 feet in diameter.

Conditions:

1. Pursuant to Rule 71.3.B.2.a.1, no person shall transfer ROC liquids into any ROC liquid delivery vessel without utilizing a bottom-loaded vapor recovery system that prevents the displaced vapors during loading from being released into the atmosphere. The vapor recovery system shall be capable of collecting all ROC vapors, and shall have a vapor return or condensation system that connects to a gas pipeline recovery and distribution system.

2. Pursuant to Rule 71.3.B.2.b.2, no person shall transfer ROC liquids into any ROC liquid delivery vessel without utilizing a combination of overfill devices and/or procedures, submitted in writing to the APCO, that is at least as effective in preventing overfill spillage as the system in Rule 71.3.B.2.b.1. Permittee has submitted an alternative overfill protection system and shall comply with Rule 71.3.B.2.b in the following manner:

   In order to meet primary overfill protection requirements, the applicable loading racks shall be equipped with meters that automatically shut off when the preset volume in gallons is loaded. This preset gallon amount is based on the maximum

weight of ROC liquid that can be legally loaded into the delivery vessel. The maximum weight of liquid that can be loaded shall be determined by first weighing the delivery vessel prior to loading, then subtracting its weight from the total legal weight limit, and then dividing the maximum weight by the liquid density (weight per gallon) to get this amount in gallons.

In order to meet secondary overfill protection requirements, the operator shall set the meter initially to a volume in gallons less than that which would indicate a maximum load, and then the operator shall visually check the truck tank level after the meter shuts off the liquid transfer process. The driver shall then determine how much more liquid, if any, can be loaded. The preset fill meter shall also be used for any additional liquid loading.

As an additional precaution, the maximum weight of liquid that can be legally loaded in the delivery vessel shall still allow for additional volume to load more liquid before an overfill condition would occur. This additional volume can equate up to 3500 gallons or more, depending on the type of liquid and delivery vessel being loaded.

3. Pursuant to Rule 71.3.B.2.c, no person shall transfer ROC liquids into any ROC liquid delivery vessel without utilizing either a block and bleed valve system or other connectors with equivalent spill prevention characteristics.

4. Pursuant to Rule 71.3.B.3, any loading operation equipment, vapor recovery system, or other equipment required by Rule 71.3 shall not leak. The vapor recovery system shall be operated and maintained so that it does not cause the pressure in any delivery vessel to exceed 18 inches water gauge or the vacuum to exceed 6 inches water gauge.

5. Pursuant to Rule 71.3.C.1, no person shall transfer ROC liquids into a delivery vessel using loading equipment having a vapor recovery system unless the delivery vessel is leak free and is permanently equipped with:

   a. A properly installed vapor recovery system that is compatible with the loading facility.

   b. A pressure-vacuum relief device for each compartment that is set at 90 percent of the maximum, safe pressure and vacuum ratings of the vessel.

   c. A secondary overfill protection system compatible with the loading operation APCO-approved secondary overfill protection system.

   d. A loading connector/adapter that is compatible with those required at the loading facility.

6. Pursuant to Rule 71.3.C.2, no person shall fill an ROC liquid delivery vessel unless the vapor recovery system is properly operating, properly maintained, does not leak, and all hatches are closed during transfer operations.

7. Pursuant to Rule 71.3.D.1, permittee shall annually monitor one complete loading operation for leaks and for proper operation of the loading equipment and delivery vessel vapor recovery and overfill protection systems. In order to detect leaks during the annual operator inspection, the permittee shall utilize an appropriate analyzer calibrated with methane or the alternative screening procedure in EPA Reference Method 21, as detailed in Rule 71.3.G.3.

8. Pursuant to Rule 71.3.D.2, permittee shall notify the District Enforcement Section of the following problems no later than 72 hours after the annual inspection required by Rule 71.3.D.1:

   a. If any leaks were detected,
   b. If the vapor recovery system, including any flare or incinerator, was not operating properly,
   c. If any hatches were opened during the filling operation,
   d. If the overfill prevention systems malfunctioned, or
   e. If any spillage of ROC liquid occurred.

9. Pursuant to Rule 71.3.D.3, any leak detected shall be repaired to a leak free state and any vapor recovery system or overfill prevention system found malfunctioning shall be restored to a properly operating condition. These repairs shall be done as soon as practicable but no later than 5 calendar days from the detection date.

10. Pursuant to Rule 71.3.F.1, the operator of any loading equipment equipped with a bottom-loaded vapor recovery system shall maintain a record of the inspection required by Rule 71.3.D.1 and submit this record to the District upon request. These records shall, at a minimum, include the following:

    a. Date of inspection and operator's initials.
    b. Name and location of loading equipment and amount of ROC liquid transferred.
    c. Description of any leak or malfunction of the vapor recovery or overfill prevention systems.
    d. Date component was repaired and type of repair, if applicable.
    e. Whether or not delivery vessels hatches are closed during filling and if any spillage occurred.
    f. Delivery vessel identification and name of delivery company.

Ventura County Air Pollution Control District
Rule 71.3.E.1 Applicable Requirements
ROC Liquid Loading Facilities
Low Vapor Pressure Exemption

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to ROC liquid loading facilities that are exempt from Rule 71.3 requirements, pursuant to the exemption of Rule 71.3.E.1. The exemption states that the provisions of this rule shall not apply to any equipment that transfers an ROC liquid with a modified Reid vapor pressure of less than 0.5 psia. This attachment does not apply to the transfer of gasoline, or to the transfer of ROC liquids via pipeline.

A loading facility is defined as any aggregation or combination of organic liquid loading equipment which is located so that all the organic liquid loading outlets for such aggregation or combination of loading equipment can be encompassed within any circle of 300 feet in diameter.

Conditions:

1. Pursuant to Rule 71.3.E.1, the loading facility shall not be used to transfer an ROC liquid with a modified Reid vapor pressure of greater than or equal to 0.5 psia.

2. Permittee shall annually determine the liquid vapor pressure of all products at the loading facility in order to certify that the modified Reid vapor pressure is less than 0.5 psia. Records of the vapor pressure determinations shall be maintained at the facility and submitted to the District with the annual compliance certification.

3. Pursuant to Rule 71.3.G.1 the method for determining the vapor pressure shall be as follows:

    a. For petroleum products, the modified Reid vapor pressure shall be measured at the product transfer temperature using ASTM Method No. D-323-82 Volume 5.01, Section 5.

    b. For an organic liquid, if the liquid is listed in Attachment 1 of Rule 71.2, and if the transfer temperature of the liquid does not exceed the maximum temperature listed corresponding to 0.5 psia, then it shall be deemed exempt from Rule 71.3 requirements.

Ventura County Air Pollution Control District
Rule 74.9.D.3 Applicable Requirements
Emergency Standby Stationary Internal Combustion Engines
Operated During Either an Emergency or Maintenance Operation

Rule 74.9, "Stationary Internal Combustion Engines"

Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to emergency standby stationary internal combustion engines rated at 50 or more horsepower, not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations," and operated during an emergency or maintenance operation. Maintenance operation is limited to 50 hours per calendar year. Pursuant to Rule 74.9.D.3, emergency standby stationary internal combustion engines operated during an emergency or during maintenance operation of no more than 50 hours per calendar year are exempt from all provisions of Rule 74.9.

As detailed in Rule 74.9.I.2 an emergency standby engine is defined as an internal combustion engine used only when normal power line or natural gas service fails, or for the emergency pumping of water for either fire protection or flood relief. An emergency standby engine may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has been either reached or exceeded.

Conditions:

1. Pursuant to Section D.3 of Rule 74.9, an applicable emergency standby stationary internal combustion engine shall only be operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.

   Pursuant to Section I.5 of Rule 74.9, a maintenance operation is defined as the use of an emergency standby engine and fuel system during testing, repair and routine maintenance to verify its readiness for emergency standby use.

2. Pursuant to Section D.3 of Rule 74.9, each emergency standby engine shall be equipped with an operating, non-resettable, elapsed hour meter.

3. Pursuant to Section F.1 of Rule 74.9, the Annual Compliance Certification shall include the following records for each emergency standby engine: Engine manufacturer, model number, operator identification number, and location.

4. Pursuant to Section F.2 of Rule 74.9, the annual engine hours of maintenance operation shall be reported annually. A report shall be provided to the District after every calendar year by February 15.

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Ventura County Air Pollution Control District
Rule 74.15.B.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
NOx and CO Emission Limits
Annual Heat Input ≥ 9,000 MMBTU

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/08/94, Federally-Enforceable

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 5 MMBTU/Hr that have operated with an annual heat input rate of greater than or equal to 9,000 MMBTU during any twelve (12) calendar month rolling period. This attachment also applies to any unit operated with an annual heat input rate of less than 9,000 MMBTU that is equipped with low NOx burners or other such equipment to comply with the NOx and CO requirements of Rule 74.15.B.1. A heat input of 9,000 MMBTU is equivalent to 90,000 therms and equivalent to 8.57 million cubic feet of natural gas at a higher heating value of 1,050 BTU/cf.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment that transfers heat from combustion gases to water or process streams. Process heater does not include any kiln or oven used for drying, baking, cooking, calcinating or vitrifying, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Pursuant to Rule 74.15.B.1, emissions from an applicable emission unit shall not exceed the following limits:

   a. Oxides of Nitrogen (NOx expressed as NO_2): 40 ppmvd
   b. Carbon Monoxide (CO): 400 ppmvd

   These limits shall be referenced at three (3) percent volume stack gas oxygen on a dry basis averaged over 15 consecutive minutes. Compliance with this condition shall be verified every 24 months by source testing.

2. Pursuant to Rule 74.15.B.1, an applicable emission unit shall be source tested not less than once every 24 months (biennially) utilizing the following methods as detailed in Rule 74.15.E:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	Stack Gas Oxygen	ARB Method 100

Pursuant to Rule 74.15.E.2, emission tests shall be conducted on units in "as-found" operating condition. However, no emission test for Rule 74.15 shall be conducted during start-up, shutdown or under breakdown conditions. Prior to conducting a biennial emissions test, permittee shall notify the District Compliance Division. Written notification, and a source test protocol subject to District approval, shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

3. Pursuant to Rule 74.15.C.2, the emission limits of Rule 74.15.B.1 shall not apply to any unit operated on alternate fuel under the following conditions:

a. Alternate fuel is required due to the curtailment of natural gas service to the individual unit by the natural gas supplier. Alternate fuel use in this case shall not exceed the period of natural gas curtailment.

b. Alternate fuel use is required to maintain the alternate fuel system. Alternate fuel use in this case shall not exceed 50 hours per year.

4. Pursuant to Rule 74.15.C.4, the emission limits of Rule 74.15.B.1 shall not apply during the cold startup of an applicable unit. For units with a rated heat input capacity of equal to, or greater than, one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed three (3) hours. For units with a rated heat input capacity of less than one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed one (1) hour.

5. Permittee shall record and maintain the following information:

a. Daily records of alternate fuel consumption as required by Rule 74.15.D.3. Each record shall include the type of fuel, the quantity of fuel, and the duration of the occurrence; and

b. The biennial source test report.

This information shall be submitted to the District upon request.

6. If the emission unit is equipped with an external flue gas recirculation (FGR) system for the control of nitrogen oxides, permittee shall also comply with the FGR monitoring and recordkeeping requirements in the Permit Specific Conditions (Attachments) presented in Section No. 7 of this permit.

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Ventura County Air Pollution Control District
Rule 74.15.1.B.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
Heat Inputs ≥ 1 MMBTU/hr and < 5 MMBTU/hr
NOx and CO Emission Limits
Annual Heat Input ≥ 1,800 MMBTU

Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
Adopted 06/23/15, Federally-Enforceable

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a rated heat input capacity equal to or greater than 1 MMBTU/Hr and less than 5 MMBTU/Hr that have operated with an annual heat input rate of greater than or equal to 1,800 MMBTU during any twelve (12) calendar month rolling period. This attachment also applies to any unit operated with an annual heat input rate of less than 1,800 MMBTU that is equipped with low NOx burners or other such equipment to comply with the NOx and CO requirements of Rule 74.15.1.B.1. A heat input of 1,800 MMBTU is equivalent to 18,000 therms and equivalent to 1.71 million cubic feet of natural gas at a higher heating value of 1,050 BTU/cf. This attachment specifically applies to units installed prior to January 1, 2013 for units with a heat input capacity of equal to or greater than 1 MMBTU/hr and less than or equal to 2 MMBTU/hr; and installed prior to January 1, 2016 for units with a heat input capacity of greater than 2 MMBTU/hr and less than 5 MMBTU/hr. These units have a Rule 74.15.1.B.1 limit of 30 ppmvd NOx at 3% oxygen.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment that transfers heat from combustion gases to water or process streams. A process heater does not include any of the following combustion sources: kiln, oven, open heated tank, dehydrator, dryer, crematory, incinerator, calciner, cooker, roaster, furnace; unfired waste heat recovery heater that is used to recover sensible heat from the exhaust of any combustion equipment; fuel-fired degreasing or metal finishing equipment including parts washers and metal heat treating or metal furnaces; afterburner, vapor incinerator, thermal or catalytic oxidizers used as an emission control device; glass melting furnace; tenter frame, fabric, or carpet dryer. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Pursuant to Rule 74.15.1.B.1, emissions from an applicable emission unit shall not exceed the following limits:

   a. Oxides of Nitrogen (NOx expressed as NO_2): 30 ppmvd
   b. Carbon Monoxide (CO): 400 ppmvd

   These limits shall be referenced at three (3) percent volume stack gas oxygen on a dry basis averaged over 15 consecutive minutes. Compliance with this condition shall be verified by source testing as detailed below.

2. Source testing:

   a. Pursuant to Rule 74.15.1.B.4.a, units with a rated heat input capacity greater than 2 MMBTU/hr shall be source tested for compliance not less than once every 24 months.
   b. Pursuant to Rule 74.15.1.B.4.c, units with a rated heat input capacity of less than or equal to 2 MMBTU/hr shall be source tested for compliance not less than once every 48 months.

3. Required source testing shall utilize the following methods as detailed in Rule 74.15.1.E:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	Stack Gas Oxygen	ARB Method 100

   Pursuant to Rule 74.15.1.E.2, emission tests shall be conducted on units in "As-found" operating condition. Prior to conducting a required emissions test, permittee shall notify the District Compliance Division. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

4. Pursuant to Rule 74.15.1.B.4.d, an annual screening analysis of NOx and CO emissions shall be performed on the unit. The screening analysis is not required if the source testing required by Rule 74.15.1.B.4.a or 74.15.1.B.4.c (Condition No. 2) is required that year. The permittee shall notify the VCAPCD Compliance Division by telephone, fax, or email 24 hours prior to any screening analysis. Pursuant to Rule 74.15.1.D.3, the permittee shall submit a report to the District Compliance Division within 45 days after each screening analysis.

5. Pursuant to Rule 74.15.1.C.1, the emission limits of Rule 74.15.1.B.1 shall not apply to any unit operated on alternate fuel under the following conditions:

a. Alternate fuel is required due to curtailment of natural gas service to the individual unit by the natural gas supplier. Alternate fuel use in this case shall not exceed the period of natural gas curtailment.

b. Alternate fuel use is required to maintain the alternate fuel system. Alternate fuel use in this case shall not exceed 50 hours per year.

6. The permittee shall record and maintain the following information:

a. Daily records of alternate fuel consumption as required by Rule 74.15.1.D.4. Each record shall include the type of fuel, the quantity of fuel, and the duration of the occurrence; and

b. Required source test reports.

c. Annual screening analysis logs and reports as required by Rule 74.15.1.D.3.

This information shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.15.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
Equipment Currently Shut Down and Not Operating

Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
Adopted 06/23/15, Federally-Enforceable

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a rated heat capacity equal to or greater than 1 MMBTU/Hr and less than 5 MMBTU/Hr that are currently shut down and not operating.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment that transfers heat from combustion gases to water or process streams. A process heater does not include any of the following combustion sources: kiln, oven, open heated tank, dehydrator, dryer, crematory, incinerator, calciner, cooker, roaster, furnace; unfired waste heat recovery heater that is used to recover sensible heat from the exhaust of any combustion equipment; fuel-fired degreasing or metal finishing equipment including parts washers and metal heat treating or metal furnaces; afterburner, vapor incinerator, thermal or catalytic oxidizers used as an emission control device; glass melting furnace; tenter frame, fabric, or carpet dryer. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Prior to operating an applicable emission unit, permittee shall:

   a. Notify the District Compliance Division; and
   b. Install a dedicated fuel meter pursuant to Rule 74.15.1.D.1. The meter shall be accurate to ± 1 percent, as certified by the manufacturer in writing.

2. Any applicable emission unit operated with an annual heat input rate of equal to or greater than 300 MMBTU and less than 1800 MMBTU shall comply with the tuning requirements of Rule 74.15.1.B.3.

3. Prior to operating any applicable emission unit with an annual heat input rate of equal to or greater than 1800 MMBTU, the permittee shall demonstrate by source testing, using ARB Method 100 as detailed in Rule 74.15.1.E, that the unit complies with the required nitrogen oxide (NOx) and carbon monoxide (CO) limits of either Rule 74.15.1.B.1 or Rule 74.15.1.B.2, as applicable. If the unit requires physical modifications in order to meet the emission limits, permittee shall apply for and receive an Authority to Construct and Permit to Operate for the modification.

5. The permittee shall annually certify that the subject equipment is shut down and not operating.

6. Upon operating an applicable emission unit, totalizing fuel meter records shall be compiled monthly into a rolling twelve (12) calendar month report. These records shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
California Airborne Toxic Control Measure For
Stationary Compression Ignition Engines
In-Use Emergency Fire Pump Assembly Engines

Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines
Effective 05/19/11

The District is required to implement and enforce the state ATCM. The ATCM is not federally-enforceable.

Applicability:

This attachment describes the requirements of California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition (CI) Engines that apply to in-use stationary diesel-fueled CI engines that drive fire pump assemblies. Section 93115.3(n) of the ATCM exempts such engines from the emission standards for stationary emergency standby diesel-fueled CI engines as listed in Section 93115.6(b)(3) of the ATCM. The exempt engines must only be operated the number of hours necessary to comply the testing requirements of National Fire Protection Association (NFPA) 25 – "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 2002 edition. An "in-use" engine is an engine that was installed at a facility prior to January 1, 2005. Pursuant to Section 93115.4(a)(8) CARB Diesel Fuel means any diesel fuel that meets the specifications of vehicular diesel fuel, as defined in title 13, CCR, sections 2281 and 2282. The Verification Procedure is defined in Section 93115.4(a)(78).

Conditions:

1. Pursuant to subsection 93115.5(a), as of January 1, 2006, the permittee shall not fuel the engine with any fuel unless the fuel is one of the following:

    a. CARB Diesel Fuel, or
    b. An alternative diesel fuel that is:
        1) biodiesel;
        2) a biodiesel blend that does not meet the definition of CARB diesel Fuel
        3) a Fischer-Tropsch fuel; or
        4) an emulsion of water in diesel fuel; or
    c. any alternative diesel fuel that is not identified in section 93115.5(a)(2) and meets the requirements of the Verification Procedure; or
    d. an alternative fuel; or
    e. CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure; or

f. any combination of the above.

2. Pursuant to subsection 93115.10(f)(1)(E), the permittee shall keep a monthly log of each engine's hours of operation to comply with the requirements of NFPA 25.

3. Pursuant to subsection 93115.5(f)(1)(H), the permittee shall document fuel use in the engines. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or for engines operated on any fuel other than CARB Diesel Fuel, the fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
For Stationary Reciprocating Internal Combustion Engines
Existing Emergency Diesel Engines at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)
RICE MACT Last Revised 01/30/13

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing emergency diesel engines at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

Pursuant to Section 63.6640(f) and Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. An emergency engine may also participate in an emergency demand response program under limited circumstances. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a non-emergency demand response program are not considered emergency stationary RICE.

For more up-to-date information regarding RICE NESHAP standards, please refer to the following link: https://www.epa.gov/stationary-engines/national-emission-standards-hazardous-air-pollutants-reciprocating-internal-0

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

   a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

   b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes

first, and replace as necessary.

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Pursuant to Table 2d, if an emergency RICE is operating during an emergency and it is not possible to perform the above maintenance or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the maintenance can be delayed and should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. All such maintenance delays shall be reported to the APCD Compliance Division.

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:

   a. There is no time limit on the use of emergency stationary RICE in emergency situations. An emergency can be the loss of grid power or the stationary source's own power production.

   b. The use of the engine is limited to 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, 5% or greater voltage or frequency deviation situations, and up to 50 hours per year for non-emergency situations as detailed in Section 63.6640(f)(4). The 50 hours are to be counted in the 100 hours limit.

   c. The emergency stationary RICE may be operated up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided above. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-

emergency demand response to generate income for a facility. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial agreement with another entity if all of the requirements of Section 63.6640(f)(4)(ii)(A–E) are met. The 50 hours per year limit is to be counted towards the 100 hours per year limit.

6. Pursuant to Sections 63.6655(e) and 63.6655(f), the permittee shall maintain the following records:

   a. Records of maintenance conducted on the stationary emergency RICE.

   b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

7. If the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(ii) the engine must use a diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel. This fuel is commonly known as ultra low sulfur diesel or ULSD. Any diesel fuel purchased (or otherwise obtained) prior to January 1, 2015 may be used until depleted. (Section 63.6604(b))

8. If the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(ii) the permittee is required to compile and submit a report as required by Section 63.6650(h). This report includes, but is not limited to, location information, engine information, hours of operation, and fuel requirement deviations. The first annual report must cover calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. As required by Section 63.6650(h)(3), the annual report must be submitted electronically via EPA's Central Data Exchange (CDX). (Section 63.6650(h))

9. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
For Stationary Reciprocating Internal Combustion Engines
Existing Emergency Spark Ignited Engines

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing emergency spark ignited engines at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

Pursuant to Section 63.6640(f) and Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. An emergency engine may also participate in an emergency demand response program under limited circumstances. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a non-emergency demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements on and after May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

   a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

   b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Pursuant to Table 2d, if an emergency RICE is operating during an emergency and it is not possible to perform the above maintenance or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the maintenance can be delayed and should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. All such maintenance delays shall be reported to the APCD Compliance Division.

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:

   a. There is no time limit on the use of emergency stationary RICE in emergency situations. An emergency can be the loss of grid power or the stationary source's own power production.

   b. The use of the engine is limited to 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, 5% or greater voltage or frequency deviation situations, and up to 50 hours per year for non-emergency situations as detailed in Section 63.6640(f)(4). The 50 hours are to be counted in the 100 hours limit.

   c. The emergency stationary RICE may be operated up to 50 hours per calendar year for peak shaving as part of a financial agreement to supply power into the grid, or as part of a non-emergency demand response program, until May 3, 2014. After May 3, 2014, the 50 hours per year for non-emergency situations can be used to supply power as part of a financial agreement if all of the requirements of Section

63.6640(f)(4)(ii) are met. The 50 hours per year limit is to be counted towards the 100 hours per year limit.

6. Pursuant to Sections 63.6655(e) and 63.6655(f), the permittee shall maintain the following records:

   a. Records of maintenance conducted on the stationary emergency RICE.

   b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

7. If the engine site rating exceeds 100 brake HP and operates or is contractually obligated to be available for more than 15 hours per year for purposes specified in Section 63.6640(f)(2)(ii) and (iii) or that operates for the purposes specified in Section 63.6640(f)(4)(ii) the permittee is required to compile and submit a report as required by Section 63.6650(h). The annual report must be submitted no later than March 31 of each year. (Section 63.6650(h))

8. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Additional Permit Requirements
Permit No. 00012

Rule 26, "New Source Review"

Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rules 26 and 29)

2. The permitted emissions authorized by this permit are based in part on the fugitive emissions from 70 oil wells. An Authority to Construct is required to be obtained from the District prior to drilling a new oil well. Emission offsets must also be provided with the submittal of any application to increase the number of wells beyond 70 wells. (Rule 29)

3. The following wells shall be shall be free flowing, operated on gas lift, or operated with electric motor driven artificial lift equipment:

   Chase C8, Chase E9, Chase D11, Chase F12, TransAmerica B5, TransAmerica C2, TransAmerica D10

   This condition is applied as Best Available Control Technology. (Rule 26)

4. Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants, for facility and building maintenance and repair is exempt from

permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per liter of ROC as used or applied, and no more than 5 percent by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound.

In order to substantiate the solvent use exemptions listed above, the permittee shall maintain a list of all exempt solvents used at the stationary source and a reference to the specific permit exemption status.

(Rule 29)

Ventura County Air Pollution Control District
Additional Permit Requirements
Nitrite Solution Vessels

Rule 29, "Conditions on Permits"
Adopted 03/14/06, District Enforceable Only

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to the nitrite solution vessels or nitrite solution buffer vessels located at this facility. These vessels are used to sweeten, or remove hydrogen sulfide from, gas produced from wells at this facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. All produced gas and casing gas shall be processed through the nitrite solution produced gas sweetening system. (Rule 64)

2. The produced gas and casing gas shall not be burned as fuel in the boilers, steam generators or process heaters if the gas contains sulfur compounds, calculated as hydrogen sulfide at standard conditions, in excess of 236 ppmv, or the equivalent 15 grains per 100 cubic feet. (Rule 29)

3. On a weekly basis, permittee shall test the hydrogen sulfide content of the gases downstream of the nitrite solution vessels or nitrite solution buffer vessels located throughout the facility. The tests shall be performed using detector tubes that measure hydrogen sulfide. Permittee shall maintain this test information and make it available to the District upon request. (Rule 64)

4. Permittee shall analyze the sulfur content of this fuel gas on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix. This annual fuel gas analysis shall satisfy the requirements of Permit Condition No. 2 above, as well as the requirements of Rule 64.B.1. Records of the test shall be maintained at the facility and the test results shall be provided to the District with the annual compliance certification. (Rule 64)

Ventura County Air Pollution Control District
Additional Permit Requirements
20 MMBTU/Hr Erie City Boiler

Rule 26, "New Source Review"

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/08/94, Federally-Enforceable

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 20 MMBTU/Hr Erie City boiler located at this facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The stack outlet concentrations of oxides of nitrogen (NOx measured as NO2) shall not exceed 36 parts per million by volume (ppmv) corrected to 3 percent oxygen. This is a requirement of Rule 26 as detailed in Authority to Construct No. 0012-110. (Rule 26)

2. Permittee shall operate the Erie City boiler at a flue gas recirculation (FGR) rate at or above a valve opening setting of 45%, and an excess oxygen rate between 0.5% and 3.0%. These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any deviation from the minimum FGR valve position of 45% or any deviation from the excess oxygen rate range shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the NOx emission limits specified in Permit Condition No. 1 above by emission testing pursuant to Rule 74.15. (Rule 26 and Rule 74.15)

3. Permittee shall have the boiler emissions tested no less than once every 24 months and shall maintain the external flue gas recirculation system (FGR) according to the parameters specified in Permit Condition No. 2 above. Additional monitoring, recordkeeping, reporting, and test method requirements for this unit are included in Attachment 74.15N1 in Section No. 7 of this permit. (Rule 26 and Rule 74.15)

Ventura County Air Pollution Control District
Additional Permit Requirements
20 MMBTU/Hr Natco Crude Oil Process Heater

Rule 26, "New Source Review"

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/08/94, Federally-Enforceable

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 20 MMBTU/Hr Natco crude oil process heater located at this facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The stack outlet concentrations of oxides of nitrogen (NOx measured as NO2) shall not exceed 34 parts per million by volume (ppmv) corrected to 3 percent oxygen. This is a requirement of Rule 26 as detailed in Authority to Construct No. 0012-110. (Rule 26)

2. Permittee shall operate the Natco crude oil process heater at a flue gas recirculation (FGR) rate at or above a valve opening setting of 50%, and an excess oxygen rate between 0.5% and 2.5%. These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any deviation from the minimum FGR valve position of 50% or any deviation from the excess oxygen rate range shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the NOx emission limits specified in Permit Condition No. 1 above by emission testing pursuant to Rule 74.15. (Rule 26 and Rule 74.15)

3. Permittee shall have the heater emissions tested no less than once every 24 months and shall maintain the external flue gas recirculation system (FGR) according to the parameters specified in Permit Condition No. 2 above. Additional monitoring, recordkeeping, reporting, and test method requirements for this unit are included in Attachment 74.15N1 in Section No. 7 of this permit. (Rule 26 and Rule 74.15)

Ventura County Air Pollution Control District
Additional Permit Requirements
20 MMBTU/Hr Steam Generators
(Steam Generator Nos. 0, 1, 2, 4, and 5)

Rule 26, "New Source Review"
Federally-Enforceable

Rule 29, "Conditions on Permits"
District Enforceable Only

Rule 54, "Sulfur Compounds"
Adopted 01/14/14, Federally-Enforceable

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/08/94, Federally-Enforceable

Applicability:

This attachment applies to the five (5) 20 MMBTU/Hr steam generators in service (Nos. 0, 1, 2, 4, and 5) located at this facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Permittee may burn fuel oil in Steam Generator Nos. 4 and 5 at a maximum rate of 118.2 gallons per hour during periods of mandatory natural gas curtailment by the natural gas supplier. Prior to obtaining approval to burn fuel oil at a higher rate during curtailment, permittee must demonstrate through source testing that these steam generators can meet an oxides of nitrogen (NOx measured as NO2) emission limit of 160 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen while burning fuel oil. (Rule 26)

   If the permittee desires to burn fuel oil during periods of time other than natural gas curtailment, compliance with the 40 ppmv NOx and 400 ppmv CO limits of Rule 74.15.B.1 shall be demonstrated prior to such fuel oil burning. (Rule 74.15)

2. PCL Industrial Services, Inc. 20.0 MMBTU/hr Steam Generator (Unit No. 0) Emission Limitations:

a. Oxides of nitrogen (NOx measured as NO2) emissions from the steam generator shall not exceed 5 ppmvd, corrected to 3% oxygen, when burning PUC natural gas.
b. Oxides of nitrogen (NOx measured as NO2) emissions from the steam generator shall not exceed 6 ppmvd, corrected to 3% oxygen, when burning PUC natural gas mixed with produced gas.
c. Carbon monoxide (CO) emissions from the steam generator shall not exceed 100 ppmvd, corrected to 3% oxygen.

The NOx limitations are applied as BACT (Best Available Control Technology). The CO limit is applied pursuant to Rule 29, "Conditions On Permits". The NOx and CO limits are more stringent than the Rule 74.15.B.1 emission limits. In order to demonstrate compliance with these emission limits, the permittee shall have the unit's emissions tested every 24 months. (Rules 26, 29, 74.15)

3. The PCL Industrial Services, Inc. steam generator (Unit No. 0) shall be fired on PUC natural gas or a mixture of PUC natural gas and produced gas that meets a hydrogen sulfide (H_2S) content limit of 20 ppmvd. This condition is applied as BACT (Best Available Control Technology) and Rule 54, "Sulfur Compounds", compliance.

All oilfield gas combustion shall comply with Rule 64, "Sulfur Content of Fuels". The sulfur content of the oilfield gas burned in the steam generator shall be monitored and recorded on an annual basis as required by Section D of Rule 64. The sulfur content of the oilfield gas shall be determined by SCAQMD Method 307-91.

4. The fuel to be burned during commercial operation of Steam Generator Nos. 1 and 2 shall be limited to utility natural gas only. Prior to obtaining approval to burn fuel oil during periods of mandatory natural gas curtailment by the natural gas supplier, permittee must demonstrate through source testing these steam generators can meet an oxides of nitrogen (NOx measured as NO2) emission limit of 160 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen while burning fuel oil. (Rule 26)

If the permittee desires to burn fuel oil during periods of time other than natural gas curtailment, compliance with the 40 ppmv NOx and 400 ppmv CO limits of Rule 74.15.B.1 shall be demonstrated prior to such fuel oil burning. (Rule 74.15)

5. The fuel oil to be burned in Steam Generator Nos. 4 and 5 shall be limited to a sulfur content not to exceed 0.25%, by weight, and a nitrogen content not to exceed 0.25%, by weight. In order to comply with this condition, permittee shall maintain fuel records, or certification from the fuel supplier, documenting the sulfur content and nitrogen content of each fuel delivery. (Rule 29)

6. A totalizing fuel meter shall be installed and dedicated to each steam generator. The meter shall be accurate to ± one percent and shall be maintained in proper operating condition. (Rule 29)

7. Permittee shall maintain the following flue gas recirculation (FGR) valve opening settings and excess oxygen trim rates:

Steam Generator No.	Valve Opening Setting	Excess Oxygen Rates
1	30 %	0.5 - 2.5 %
2	30 %	0.5 - 2.5 %
4	40 %	0.5 - 2.5 %
5	60 %	0.5 - 2.5 %

These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any FGR valve setting less than the FGR valve position setting above, or any deviation from the excess oxygen rates above shall be considered a violation of this condition, unless the permittee can demonstrate compliance with 40 ppmv NOx by emission testing pursuant to Rule 74.15. (Rule 26 and Rule 74.15)

8. Permittee shall have the steam generators' emissions tested no less than once every 24 months and shall maintain the external flue gas recirculation system (FGR) according to the parameters specified in Permit Condition No. 7 above. Additional monitoring, recordkeeping, reporting, and test method requirements for these units are included in Attachment 74.15N1 in Section No. 7 of this permit.

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Ventura County Air Pollution Control District
Additional Permit Requirements
Asphalt Loading Racks

Rule 51, "Nuisance"
Adopted 04/13/04, District Enforceable Only

Applicability:

This attachment applies to the asphalt loading racks located at this facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Pursuant to Rule 51, permittee shall operate and maintain a vapor collection and scrubbing system at the asphalt loading racks during all asphalt transfer operations in order to reduce any nuisance created by odor. The vapor collection and filtration system shall minimize displaced vapors from being released into the atmosphere during loading operations by collecting the displaced ROC vapors from the delivery vessel, and passing these vapors through a water scrubber and filtration system prior to release to the atmosphere.

2. The permittee shall annually certify that the vapor collection and scrubbing system is operating properly.

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Ventura County Air Pollution Control District
Additional Permit Requirements
Crude Oil and Gas Oil Loading Racks

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 06/16/92, Federally-Enforceable

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the crude oil loading racks located at the Transamerica Tank C-1 area, Texcon Tank C-2 and C-3 area, and the Main Facility Tank 2005-2006 area. This attachment also applies to gas oil loading rack at the Main Facility Tank 1501-1503 area. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Regardless of the applicability, requirements, or exemptions of Rule 71.3, permittee shall maintain a bottom-loaded vapor recovery system at the crude oil and gas oil loading racks during all transfer operations. The vapor recovery system shall prevent all displaced vapors during loading from being released into the atmosphere. The vapor recovery system shall be capable of collecting all ROC vapors; and shall have a vapor return system that routes all vapors to a continuously operating boiler firebox for incineration or to a gas pipeline recovery and distribution system. Additional monitoring, recordkeeping, reporting, and test method requirements for these units are included in Attachment 71.3N4 in Section No. 7 of this permit.

   This is a requirement of Rule 26 as detailed in Application No. 0011-008 for Emission Reduction Credits as a result of adding vapor recovery to these crude oil and gas oil loading racks.

Ventura County Air Pollution Control District
Additional Permit Requirements
Out of Service Emissions Units

Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to any emissions units on permit at this facility that are currently designated as "Out of Service" in Tables 2, 3, and 4 of this permit.

Conditions:

1. Any tank designated as "Out of Service" in Tables 2, 3, and 4 of this permit is shut down, shall not be operated, and shall not contain any liquids.

2. Any combustion unit designated as "Out of Service" in Tables 2, 3, and 4 of this permit is shut down, shall not be operated, and shall not be connected to a fuel source.

3. For emissions units designated as "Out of Service", compliance with other requirements in this permit, such as source testing, shall be at the discretion of VCAPCD personnel.

4. In order to ensure that compliance with this condition is being maintained, the permittee shall annually certify that an emissions unit designated as "Out of Service" is shut down and not being operated.

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Ventura County Air Pollution Control District
Additional Permit Requirements
Flare

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 54, "Sulfur Compounds"
Adopted 01/14/14, Federally Enforceable

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally Enforceable

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 06/16/92, Federally-Enforceable

Applicability:

This attachment applies to the following flare:

1 - 5 MMBTU/hr Flare, PROS, Inc., Model FLTR-1 (trailer mounted), 45 scf/hr Mactronic electric auto ignition pilot, 26' high, Coanda effect technology, equipped with sulfur pre-treatment system

The flare will be used for combustion of gases pursuant to Rules 71.1.B.1.a or 71.1.C.1 by burning excess gas that cannot be combusted in the steam generators or asphalt heaters.

These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. There is no annual gas consumption limit at the flare. Permitted emissions for the flare are based on 8,760 hours per year.

2. The flare shall be equipped with a functional, operating automatic ignition system equipped with a gas pilot to ensure combustion disposal of all excess produced or recovered gases. (Rules 71.1 and 71.3)

3. Permittee shall test the flare's ignition system monthly and shall maintain a monthly record of the flare's ignition system tests and maintenance activities, including the test date and operator's initials. (Rules 71.1 and 71.3)

4. The flare shall be smokeless. This condition is applied as BACT. (Rule 26)

5. Flare Oxides of Sulfur (SOx) Emission Requirements:

   a. The sulfur content of the gas entering each emergency flare shall not exceed 20 ppmvd, calculated as hydrogen sulfide (H_2S) at standard conditions.
   b. The flare gas sulfur pre-treatment system shall be operated whenever the flare is operated as necessary to comply with the 20 ppmvd limit above.
   c. Annual testing for sulfur compounds in the flare gas shall be conducted using H_2S detector tubes, SCAQMD Method 307-91, or EPA Method 16, as applicable.

   (Rules 26 and 54)

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9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"
Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.

2. Permittee shall perform periodic visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request. Records of zero percent visual emissions are not required.

3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

4. Upon District request, opacity shall be determined by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Emissions from
Combustion Operations at Point of Discharge

Rule 54, "Sulfur Compounds"
Adopted 01/14/14, Federally Enforceable

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

Conditions:

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds from any combustion operation, which would exist as a liquid or gas at standard conditions, in excess of the following limit at the point of discharge:

300 ppm by vol, on a dry basis, as sulfur dioxide (SO_2), at 3% oxygen	For sources subject to: Rule 74.11, "Natural Gas-Fired Water Heaters" Rule 74.11.1, "Large Water Heaters and Small Boilers" Rule 74.15, "Boilers, Steam Generators, and Process Heaters" Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters" (1 to 5 MMBTUs)
300 ppm by vol, on a dry basis, as sulfur dioxide (SO_2), at 15% O_2	For sources subject to: Rule 74.9, "Stationary Internal Combustion Engines" Rule 74.23, "Stationary Gas Turbines" Flares and all other combustion operations

2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.

3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-91 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds"
Adopted 01/14/14, Federally Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.

2. Pursuant to Rule 54.B.2.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in ground or sea level concentrations at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppm (Vol).

    a) For purposes of Subsection B.2.a, the design value is derived from the 3-year average of annual 99th percentile daily maximum 1-hour values. At the District's discretion, compliance with the ground or sea level concentration limit in Subsection B.2.a of this rule may be demonstrated using EPA-approved dispersion models or ambient air monitoring. If the District requires ambient air monitoring, the test method(s) listed in Subsection D.2 of this rule must be employed.

    b) To demonstrate compliance using dispersion modeling, the annual 99^{th} percentile daily maximum at each receptor is determined from model results as follows: for each year of meteorological data modeled, select from each day the maximum hourly modeled SO_2 concentration value and sort all these daily maximum hourly values by descending value. The 99^{th} percentile is the 4^{th} highest value for each modeled year. Calculate the average of the 99^{th} percentile values for three consecutive years of modeling data for each receptor. Compliance is demonstrated if this average value is less than or equal to the design value concentration limit in Subsection B.2.a of this Rule at each receptor.

    c) Compliance with the limit in subsection B.2.a may also be demonstrated using EPA-approved screen models. Compliance is demonstrated if the 1-hour SO_2

ground or sea level concentration does not exceed 0.075 ppm (Vol) at or beyond the property line.

d) If ambient air monitoring data is used to demonstrate compliance, the design value must be calculated in accordance with 40 CFR Part 50 Appendix T – Interpretation of the Primary National Ambient Air Quality Standards for Oxides of Sulfur (Sulfur Dioxide).

3. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.

4. Upon District request, ground or sea level concentrations of SO_2 shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide (July 20, 1994) with the following amendments:

a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.

b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements Version 2.0," EPA-454/B-08-002, March 2008.

c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

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Ventura County Air Pollution Control District
Rule 55 Applicable Requirements
Fugitive Dust

Rule 55, "Fugitive Dust"
Adopted 06/10/08, District-Enforceable

This permit attachment will become federally enforceable when Rule 55 is approved by EPA as part of the SIP.

Applicability:

This attachment applies to any operation, disturbed surface area, or man-made condition at this stationary source that is capable of generating dust. These operations may include bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

All definitions listed in Section H of Rule 55 are applicable to this attachment. The Rule 55 definition section includes the following definitions: "disturbed surface area", "bulk material", "earth moving activities", "construction/demolition activities", "storage piles", "paved road", "track-out", and "off-field agricultural operations". All exemptions listed in Section D of Rule 55 are applicable to this attachment.

Conditions:

1. Pursuant to Rule 55.B.1, the permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.

2. Pursuant to Rule 55.B.2, the Permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance. Compliance with the opacity limit shall be determined by using EPA Method 9 with the modifications listed in Section F of Rule 55.

3. Pursuant to Rule 55.B.3, the permittee shall not allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized: track-out area improvement, track-out prevention, or track-out removal. These control measures are detailed in Rule 55.B.3.a.

4. Pursuant to Rule 55.B.3.b, notwithstanding other track-out requirements, all track-out shall be removed at the conclusion of each workday or evening shift subject to the conditions listed in Section 55.B.3.b.

5. Pursuant to Rule 55.C, the permittee shall comply with the specific activity requirements detailed in Section C of Rule 55, for earth-moving, bulk material handling, and truck hauling activities, as applicable.

6. The permittee shall comply with the specific recordkeeping requirements listed in Section E of Rule 55, as applicable.

7. On an annual basis, the permittee shall certify that all applicable sources of dust at this stationary source are operating in compliance with Rule 55. The permittee may also certify annually that there are no operations, disturbed surface areas, or man-made conditions at this stationary source that are subject to Rule 55.

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Ventura County Air Pollution Control District
Rule 57.1 Applicable Requirements
Particulate Matter Emissions from Fuel Burning Equipment

Rule 57.1, "Particulate Matter Emissions from Fuel Burning Equipment"
Adopted 01/11/05, Federally Enforceable

Applicability:

This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

Conditions:

1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.

   Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced, and which is subject to Rule 54, "Sulfur Compounds."

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.

2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

   Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

   The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:

   a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.

   b. A stationary source is new.

   c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

   An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

   a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and

   b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

   This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.

2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

   The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 71.1.C Applicable Requirements
Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

Conditions:

1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:

   a. A fuel or sales gas system
   b. A flare that combusts reactive organic compounds

2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.

3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.

4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

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Ventura County Air Pollution Control District
Rule 71.4.B.1 Applicable Requirements
First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

Applicability:

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

Conditions:

1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.

2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

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Ventura County Air Pollution Control District
Rule 71.4.B.3 Applicable Requirements
Well Cellar Storage Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"
Adopted 06/08/93, Federally Enforceable

Applicability:

This attachment applies to any well cellar at this stationary source. This attachment addresses the requirements of Rule 71.4.B.3 which prohibits the storage of crude oil or petroleum material in a well cellar. Rule 71.4 applies to well cellars at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored.

A well cellar is a lined or unlined area around one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

Conditions:

1. Pursuant to Rule 71.4.B.3, no person shall store crude oil or petroleum material in a well cellar except during periods of equipment maintenance or well workover. In no case shall storage occur for more than five (5) calendar days.

2. Pursuant to Rule 71.4.C, the provisions of Rule 71.4 shall not apply to well cellars used in an emergency, if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.

3. Pursuant to Rule 71.4.D.2, any person storing crude oil in a well cellar during periods of equipment maintenance or well workover shall maintain records, which may include but are not limited to, workover invoice documents, indicating the date(s) the material was stored in the well cellar or the date(s) of workover activity. These records shall be submitted to the District upon request.

4. Pursuant to Rule 71.4.D.3, any person claiming exemption to this rule pursuant to emergency use (Condition No. 2 above), shall maintain records to justify the exemption.

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Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"
Adopted 11/11/03, Federally Enforceable

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

Conditions:

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:

    a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20^{o}C, as applied.

b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.

2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:

a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;

b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;

If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.

c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;

d. A properly used enclosed gun washer or low emission spray gun cleaner.

3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.

4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.

5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.

7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.

8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:

   a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.

   b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20°C.

   c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20°C.

   d. At least one of the following control devices, if high volatility solvent is used:

      1. A freeboard height such that the freeboard ratio is at least 0.75.
      2. A water cover if the solvent is insoluble in and heavier than water.

   e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:

a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.

c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.

d. A freeboard height of at least 6 inches (15.2 centimeters).

e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.

10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:

a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.

b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.

c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.

d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.

e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.

f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.

g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.

11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not

apply to:

a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.

b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.

c. Janitorial cleaning including graffiti removal.

d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.

e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).

f. Cleaning operations subject to any of the following rules:

Rule 74.3, Paper, Fabric and Film Coating Operations
Rule 74.5.1, Petroleum Solvent Dry Cleaning
Rule 74.5.2, Synthetic Solvent Dry Cleaning
Rule 74.19, Graphic Arts Operations
Rule 74.19.1, Screen Printing Operations
Rule 74.21, Semiconductor Manufacturing

g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, ungluing), cured ink, or cured resin.

h. The use of solvent for purposes other than solvent cleaning activities.

12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:

a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:

Rule 74.12, Surface Coating of Metal Parts and Products
Rule 74.13, Aerospace Assembly and Component Manufacturing Operations
Rule 74.14, Polyester Resin Material Operations
Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations
Rule 74.20, Adhesives and Sealants
Rule 74.24, Marine Coating Operations

Rule 74.24.1, Pleasure Craft Coating Operations
Rule 74.30, Wood Products Coatings

b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.

c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.

d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.

e. Removal of elemental sodium from the inside of pipes and lines.

f. Cleaning of mold release compounds from molds.

g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.

h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.

i. Cleaning of paper gaskets.

j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.

k. Cleaning of hydraulic actuating fluid from filters and filter housings.

l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.

m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

n. Cleaning of precision–lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

o. Facility wide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall

maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.

14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:

    a. Solvent name and manufacturer's description.

    b. All intended uses of the solvent at the facility, classified as follows:

        1. Cleanup, including application equipment cleaning, or
        2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
        3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).

    c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.

    d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

    This information shall be made available to District personnel upon request.

15. Permittee shall maintain the above records and conduct periodic facility inspections, and an annual compliance certification to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:

    a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).

    b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.

d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

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Ventura County Air Pollution Control District
Rule 74.10 Applicable Requirements
Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally Enforceable

Applicability:

This attachment applies to the crude oil and gas production facilities, pipeline transfer stations, and to natural gas processing facilities, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10.

A crude oil and gas production facility is defined as an onshore or offshore facility at which crude petroleum and natural gas production and handling are conducted, as defined in the SIC Code as Industry No. 1311, Crude Petroleum and Natural Gas. A pipeline transfer station is defined as a facility that handles the transfer or storage of crude oil in pipelines. A natural gas processing facility is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products, such as ethane, propane, butane, and natural gasoline. Excluded from the definition are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

Conditions:

1. Pursuant to Rule 74.10.B, the operator shall identify all leaking components that cannot be immediately repaired. This identification shall consist of readily visible labels, tags, or other such system approved by the APCO, in writing, that enables the District and the operator to locate and identify each leaking component. Identification tags and labels shall remain visible for at least one year from the date attached.

   As detailed in Rule 74.10.K.14, a leak is defined as any major gas leak, minor gas leak, major liquid leak or minor liquid leak. A leak is not a gaseous emission from a pneumatic control valve if it occurs when the valve is in the act of opening or closing. As detailed in Rule 74.10.K.3, a component is defined as any valve, stuffing box, dump lever arm, open ended line, fitting, pump seal, compressor seal, pressure relief valve, diaphragm, hatch, sight glass or meter. As detailed in Rule 74.10.K.16, a leak repair is any corrective action taken for the purposes of reducing a component leak to the lowest achievable level or at least below 1,000 ppmv for gas leaks and three drops per minute for liquid leaks using the best modern practices.

2. Pursuant to Rule 74.10.C.1, hatches shall be closed at all times except during sampling, adding of process material through the hatch, or attended maintenance operations.

3. Pursuant to Rule 74.10.C.2, no person shall use a component that emits a major gas leak, major liquid leak or minor liquid leak and the applicable maximum leak threshold for that component category, as listed in Attachment 1 of Rule 74.10, has been exceeded at the facility in any calendar quarter. The provisions of Rule 74.10.C.2 shall not apply to components that are tagged and repaired in accordance with Rules 74.10.D and 74.10.F.

   For the purpose of complying with the operating requirements in Rule 74.10.C.2, any fugitive emissions leak originating at a tank seam, broken pipe or any other nondesigned opening in a process unit shall be considered an "other component" leak for the purpose of Attachment 1 of Rule 74.10.

   A major gas leak, major liquid leak, and minor liquid leak are defined in Subsections K.17, K.18, and K.20 of Rule 74.10, respectively.

4. Pursuant to Rule 74.10.D.1, at natural gas processing plants, operators shall inspect with or without instrumentation all accessible operating pump seals, compressor seals, and pressure relief valves in service for leaks or indications of leaks once during every operating shift or every eight-hour period, whichever is greater.

5. Pursuant to Rule 74.10.D.2, at oil and gas production facilities and pipeline transfer stations, operators shall inspect with or without instrumentation all operating pump seals, compressor seals, pressure relief valves in service, and polished rod stuffing boxes for leaks or indications of leaks as follows:

   a. Inspection frequency at manned facilities shall be at least once per day except when operators do not report to work at a facility at any time during that day.

   b. Inspection frequency at unmanned facilities shall be at least once per week.

6. Pursuant to Rule 74.10.D.3, any gaseous leaks or indications of gaseous leaks discovered by inspection, that cannot be immediately repaired, shall be measured using EPA Method 21. The operator shall perform this leak measurement as follows:

   a. For leaks detected during normal business hours, the leak measurement shall be performed as soon as feasible but no later than 24 hours after detection. If this 24 hour deadline occurs on a weekend or holiday, then the deadline is shifted to the end of the next normal business day.

   b. For leaks detected during holidays, weekends or after business hours, the leak measurement shall be performed as soon as feasible but no later than the end of

the next normal business day.

7. Pursuant to Rule 74.10.D.4, immediately after being placed into service, an operator shall inspect all new, replaced or repaired fittings, including flanges and threaded connections, for leaks using EPA Method 21.

8. Pursuant to Rule 74.10.D.5, operators shall inspect all components, except for the following, at least every calendar quarter for gaseous leaks using EPA Method 21.

   a. Inaccessible components or unsafe to monitor components shall be inspected for leaks by the operator at least annually using EPA Method 21.

   b. Threaded connections and flanges shall be inspected for leaks by the operator using EPA Method 21 annually, unless the operator has designated them in the Operator Management Plan as exempt from all inspection requirements and subject to a zero leak threshold.

9. Pursuant to Rule 74.10.D.6, a pressure relief valve shall be inspected using EPA Method 21 within 3 calendar days after every known pressure release.

10. Pursuant to Rule 74.10.D.7, upon detection, operators shall affix a visible, weatherproof tag to all leaking components awaiting repair. The tag shall remain affixed until the component is repaired free of leaks as shown by re-inspection.

    If the leak is gaseous, the operator shall include the following on the tag: date and time of leak detection, date and time of leak measurement; and the concentration (ppmv) measured using EPA Method 21.

    If the leak is liquid, the operator shall include the following on the tag: date and time of leak detection; and whether leak is minor or major.

    A tag may also be some other system approved in writing by the APCO that demonstrates to District personnel that the operator has detected a component leak awaiting repair and contains all of the information required to be on tags by Rule 74.10.D.7.

11. Pursuant to Rule 74.10.D.8, notwithstanding the requirements of Rule 74.10.D.5, operators may inspect components annually instead of quarterly at a facility by satisfying all the following provisions, except that compressor seals, pressure relief valves, polished rod stuffing boxes, and pump seals shall not be eligible for this reduction in inspection frequency:

    a. During 4 consecutive calendar quarters, successfully operate and maintain all components at the facility so that no more than 0.5 percent of the total

components inspected, excluding polished rod stuffing boxes, have liquid leaks or major gas leaks that have not been immediately repaired.

b. A Notice of Violation from the District for a violation of Rule 74.10.C.2 was not received by the operator for the facility during the previous twelve months.

c. Submit a written request to the District for a reduction in inspection frequency. This request shall contain backup documentation including inspection reports that demonstrates that the above performance level in Rule 74.10.D.8.a has been achieved. Requests for a reduction in inspection frequency are not effective until written approval by the APCO is received by the operator.

12. Pursuant to Rule 74.10.D.9, an annual inspection frequency approved in Rule 74.10.D.8 shall revert to the inspection frequency specified in Rule 74.10.D.5 should the sum of liquid leaks and major gas leaks, not including leaks from polished rod stuffing boxes, exceed 0.5 percent of the total components inspected per inspection period or should the operator receive a Notice of Violation from the District for violation of Rule 74.10.C.2 for that facility.

13. Pursuant to Rule 74.10.E.1, each operator shall submit an Operator Management Plan to the APCO for approval. If the APCO fails to respond to the Plan in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of this rule. The Plan shall identify any component exempt from this rule or part of this rule, and describe the procedures which the operator intends to use to comply with the requirements of this rule. The Plan shall include:

a. Establishment of a data base of every leaking component that cannot be immediately repaired. The following parameters shall be included:

1) Identification number, name or code.

2) Component type, process unit and location.

3) Dates found leaking and repair description for each leak found.

This identification provision is for inspection, repair, replacement and recordkeeping purposes.

b. Identification of critical process units.

c. Identification of components for which exemption from Rule 74.10 is being claimed under Rule 74.10.G.1. Gaseous streams and liquid streams, exempted by

Rule 74.10, Subsections G.1.a, G.1.b, G.1.c, or G.1.e shall be verified by analysis of the ROC concentrations, and the results of such analyses shall be included.

d. Identification of liquid streams or components for which exemption is being claimed from the operator inspection requirements under Rule 74.10.G.3. The results of any testing used to qualify a stream for exemption shall be included.

e. Whether flanges or threaded fittings are exempt from all inspection requirements and subject to a zero leak threshold or whether flanges or threaded fittings are subject to annual inspection requirements and a one percent leak threshold as specified in Attachment 1 of Rule 74.10.

f. The inspection schedule to be followed.

g. Identification and description of any known hazard which may affect the safety of APCD personnel.

h. Identification of unmanned production facilities, if applicable.

14. Pursuant to Rule 74.10.E.2, the operator shall be required, upon written request by the APCO, to re-qualify, by analysis, the exemption(s) from the rule or part of the rule (Rule 74.10.G.1 and 74.10.G.3) if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Plan shall be submitted to the District within 90 calendar days after receipt of the District request.

15. Pursuant to Rule 74.10.E.3, if the exempt status of a component is affected by a revision to Rule 74.10, then the Plan shall be modified accordingly by June 10, 1998.

16. Pursuant to Rule 74.10.E.4, existing operator management plans shall be updated no later than September 10, 1998, to include any provision that is needed to show compliance with Rule 74.10.

17. Pursuant to Rule 74.10.E.5, beginning September 10, 1998, each operator shall submit to the APCO, for approval in writing, an annual report to update the Operator Management Plan by no later than January 30 of each year. This report shall include any changes to exemptions, inspection schedule, or any other changes to the inspection and maintenance program. If no changes to the Plan have occurred over the past 12 months, then the operator shall indicate this in the annual report.

If the APCO fails to respond to the Plan update in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of Rule 74.10.

18. Pursuant to Rule 74.10.F.1, the operator shall minimize all component leaks immediately if feasible but no later than 1 hour following detection during normal business hours. Component leaks detected during holidays, weekends and after business hours shall be immediately minimized if feasible but not later than the next normal business day.

19. Pursuant to Rule 74.10.F.2, any noncritical component found leaking shall be replaced or repaired to a leak free condition, within the time periods in Table 1 of Rule 74.10. For gaseous leaks, the repair period shall start at the time of leak measurement. For liquid leaks, the repair period shall start at the time of leak detection. If the Table 1 deadline for repairing any major gas leak or any liquid leak falls on a Saturday, Sunday or holiday, then the deadline shall be shifted to the next normal business day.

20. Pursuant to Rule 74.10.F.3, the operator shall re-inspect repaired or replaced components for leaks as soon as practicable using EPA Method 21, but not later than one calendar month after the date on which the component is repaired.

21. Pursuant to Rule 74.10.F.4, any component leak identified by District personnel shall be repaired and inspected as required by Rule 74.10.F.

22. Pursuant to Rule 74.10.F.5, any open-ended line found to be leaking shall be sealed with a blind flange, cap, plug, or a second closed valve at all times except during operations requiring process fluid flow through the open-ended line or valve. If a second closed valve is used, the process side valve shall be closed first, after the completion of any operations requiring flow through the open-ended valve.

23. Pursuant to Rule 74.10.F.6, for major gas leaks (>50,000 ppm) or major liquid leaks from any critical compressor seal, pump seal, pressure relief valve or valve that cannot be repaired within the repair periods set forth in Table 1 of Rule 74.10, the operator shall replace or retrofit the leaking component with Best Available Control Technology (BACT) equipment, as approved by the APCO in writing, within one year from the date of leak detection, or during the next critical process unit shutdown, whichever occurs first.

    For gas leaks less than or equal to 50,000 ppm or minor liquid leaks from critical components, or for leaks from critical components other than compressor seals, pump seals, pressure relief valves or valves, the owner or operator shall successfully repair or replace all leaking components within one year from leak detection or during the next critical process unit shutdown, whichever occurs first.

    The operator shall notify the District in writing within 3 months after detecting a major gas leak (> 50,000 ppm) or major liquid leak from a critical compressor seal, pump seal, pressure relief valve, or valve if such leak cannot be repaired within the repair periods set

forth in Table 1 of Rule 74.10.

24. Pursuant to Rule 74.10.F.7, for a compressor seal, pump seal, pressure relief valve or valve that emits a total of 5 major leaks within a continuous 12 month period, the operator shall replace or retrofit the leaking component with BACT equipment, as approved by the APCO in writing, within one year from date of leak detection. The operator shall notify the District in writing within 3 months after a compressor, pump, pressure relief valve, or valve has had 5 major leaks in the previous 12 months.

25. Pursuant to Rule 74.10.G.1, the requirements of Rule 74.10 shall not apply to the following components that are verified in the Operator Management Plan:

    a. Components, not at natural gas processing plants, with gaseous streams with ROC concentrations of 10 percent, by weight or less.

    b. Components at natural gas processing plants with gaseous streams with ROC concentrations of one percent, by weight or less.

    c. Components, not at natural gas processing plants, in liquid service, with ROC concentrations of 10 percent, by weight or less.

    d. Underground components.

    e. Components exclusively handling fluids if the fluid weight evaporated is 10 percent or less at 150 degrees Celsius.

26. Pursuant to Rule 74.10.G.2, the operator inspection requirements of Rule 74.10.D shall not apply to the following components. All other requirements of this rule shall still apply.

    a. Pump seals, compressor seals, and pressure relief valves that are equipped with a closed-vent system to a vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of one of the following:

        1) A system which directs all vapors to a fuel gas system, a sales gas system, or a flare that combusts ROC.

        2) Any other system that processes all vapors and has a ROC vapor destruction or removal efficiency of at least 90 percent, by weight.

    b. One-half inch and smaller stainless steel tube fittings that have been determined to be leak-free.

c. Components in vacuum service.

d. Flanges or threaded connections that are designated in the Operator Management Plan as subject to the zero leak threshold specified in Attachment 1 of Rule 74.10.

27. Pursuant to Rule 74.10.G.3, the operator inspection requirements of Rule 74.10, Subsections D.1, D.2, D.4 and D.5 shall not apply to components that are inspected with or without instrumentation on a quarterly basis and are at oil and gas production facilities or pipeline transfer stations that handle liquids with the following properties and specified vapor recovery systems:

a. Liquid having an API gravity of 20 degrees or less after the point of primary separation;

b. Liquid having an API gravity between 20 and 30 degrees which are located either:

1) Downstream of a wellhead equipped with a casing vapor recovery system, provided that the vapor recovery system is operated at a pressure of less than 10 psig; or

2) After the point of primary separation of oil and gas, provided the separation vessel is equipped with a vapor recovery system and is operated at a pressure of less than 25 psig.

28. Pursuant to Rule 74.10.G.4, an owner or operator may petition the APCO for exemption from the replacement or retrofit requirements in Rules 74.10.F.6 and 74.10.F.7 by submitting a cost evaluation for retrofitting or replacing a compressor, pump, pressure relief valve, or valve. Each petition shall include:

a. A cost-effectiveness evaluation conducted in accordance with "BACT Cost-Effectiveness Procedures and Screening Levels for Costs," adopted by the Air Pollution Control Board on December 20, 1988. The cost analysis shall be based on the retrofit cost of the component if a retrofit is feasible. If the component cannot be retrofitted, then the following control option with the lower cost shall be used in the cost analysis:

1) Component replacement with the lowest feasible cost BACT option.

2) Enclosing the component seal and venting to a vapor recovery system.

b. Evidence of costs with written bids from vendors, published price lists, or other verifiable cost information. The potential emission reduction from the component retrofit/replacement shall be based on the ROC emissions over the previous 12

months. ROC emissions from a critical process unit shutdown shall be included if those emissions are associated with a critical leaking component. APCO-approved emission factors or source tests shall be used to quantify emissions.

29. Pursuant to Rule 74.10.H.1, any person subject to Rule 74.10 shall maintain an inspection log. The inspection log shall contain at least the following:

    a. Location, type, description, and name or code of each leaking component inspected that cannot be immediately repaired, and name of associated operating unit.

    b. For liquid leaks that cannot be immediately repaired: Date and time of leak detection and whether leak is major or minor.

    c. For gaseous leaks that cannot be immediately repaired: Date and time of leak detection, date and time of leak measurement, analyzer reading (ppmv) of the leak, and whether the leak is major or minor.

    d. Date that leak referenced in Rule 74.10.H.1.b or Rule 74.10.H.1.c is repaired to a leak-free condition, description of repair action, and date and emission level of re-check.

    e. Identification of leak as critical if the component is critical.

    f. Maintenance and calibration records of appropriate analyzer used in the EPA Method 21 measurements.

30. Pursuant to Rule 74.10.H.2, where a functional pressure relief has been detected, the operator shall record:

    a. Location, operating unit identification, and date of detection.

    b. Date of inspection of the pressure relief device after it was detected, and analyzer reading from EPA Method 21.

31. Pursuant to Rules 74.10.H.3 and 74.10.H.4, the inspection log shall be retained by the operator and shall be made available upon request to District personnel.

32. Pursuant to Rule 74.10.I.1, gaseous leaks from components shall be inspected or determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration, maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.

33. Pursuant to Rule 74.10.I.2, the ROC concentration, by weight, of process streams shall be measured by ASTM E168-88 (General Techniques of Infrared Qualitative Analysis), ASTM E169-87 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-85 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.

34. Pursuant to Rule 74.10.I.3, weight percentage of evaporated compounds of liquids shall be determined using ASTM Method D 86-82.

35. Pursuant to Rule 74.10.I.4, the API gravity of crude oil shall be determined using ASTM Method D287.

36. Pursuant to Rule 74.10.J, the failure of a person to meet any requirements of Rule 74.10 shall constitute a violation of Rule 74.10. Each leak exceeding the applicable maximum leak threshold in Attachment 1 of Rule 74.10 discovered by District personnel will be considered to be a violation.

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Ventura County Air Pollution Control District
Rule 74.11.1 Applicable Requirements
Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers"
Adopted 09/11/12, Federally Enforceable

Applicability:

This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source. Note that units rated less than 1,000,000 BTU/hr are exempt from District permit requirements pursuant to Rule 23.C.1.

Conditions:

1. Pursuant to Rule 74.11.1.B.2, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:

   a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and

   b. The unit is certified in accordance with Rule 74.11.1.C.

   The oxides of nitrogen emission standard required above (Condition No. 1.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

2. Pursuant to Rule 74.11.1.B.4, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than 1,000,000 BTU/hr that does not meet the following criteria:

   a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and

   b. The unit is certified in accordance with Rule 74.11.1.C.

3. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and

process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

4. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.

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Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"
Adopted 11/09/93, Federally Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:

   a. with NOx (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)

   b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)

2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.

3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

Ventura County Air Pollution Control District
California Air Resources Board
Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4, Subarticle 13:

Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities, Effective date October 1, 2017

District enforceable only. The Ventura County APCD (VCAPCD) signed a Memorandum of Understanding (MOU) with the California ARB on June 12, 2018 to implement and enforce this regulation. Prior to June 12, 2018, this regulation was implemented and enforced only by California Air Resources Board (CARB). The regulation is not federally-enforceable.

Applicability:

This regulation applies to owners or operators of equipment and components listed in Section 95668 located within California, including California waters, that are associated with facilities in the sectors listed below, regardless of emissions level:

(1) Onshore and offshore crude oil or natural gas production; and,
(2) Crude oil, condensate, and produced water separation and storage; and,
(3) Natural gas underground storage; and,
(4) Natural gas gathering and boosting stations; and,
(5) Natural gas processing plants; and,
(6) Natural gas transmission compressor stations.

This regulation does not apply to the OCS Offshore Oil Platforms that the VCAPCD regulates because they are not in state territorial waters.

VCAPCD enforces this regulation through its existing permit system. As required below, facilities are required to register equipment with the California ARB on an initial and annual basis.

Conditions:

1. The facility shall be operated in compliance with all applicable requirements of Sections 95665 to 95677, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4, Subarticle 13 California Code of Regulations, "Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities". This includes, but is not limited to, the following requirements.

2. Separator and tank systems shall comply with Section 95668(a). Note that the GHG Regulation defines a separator as a tank or pressure vessel for separating oil, water, condensate, and natural gas. In VCAPCD terminology, a "Wash Tank" is a "Separator" in the GHG Regulation. VCAPCD LACT Tanks, COST Tanks, and Produced / Waste Water Tanks are "Tanks" in the GHG Regulation. Note that VCAPCD Rule 71.1, "Crude Oil Production and Separation" is far more stringent than the GHG Regulation in terms of requiring vapor recovery systems for Separator and Tank Systems. Flash testing is not required for new and existing tanks equipped with vapor recovery systems required by Rule 71.1.

3. Circulation tanks for well stimulation treatments shall comply with Section 95668(b).

4. Reciprocating natural gas compressors shall comply with Section 95668(c).

5. Centrifugal natural gas compressors shall comply with Section 95668(d).

6. Natural gas powered pneumatic devices and pumps shall comply with Section 95668(e).

7. Liquid unloading of natural gas wells shall comply with Section 95668(f).

8. Well casing vents shall comply with Section 95668(g).

9. Natural gas underground storage facilities shall comply with the monitoring requirements of Section 95668(h).

10. The facility shall comply with the leak detection and repair requirements of Section 95669. Critical components at critical process units shall comply with Section 95670.

11. Vapor collection systems and vapor control devices shall comply with Section 95671. These requirements do <u>not</u> apply to existing vapor collection systems and vapor control devices that are required by VCAPCD Rule 71.1, Section B for storage tanks and Rule 71.1, Section C for produced gas.

    The GHG Regulation defines "fuel gas system" and the VCAPCD considers it to be on-site combustion of natural gas in engines, boilers, heater treaters, steam generators, turbines, microturbines, glycol units, etc. Some oilfield facilities may sell gas to a party other than Southern California Gas (such as a nearby agricultural source). The VCAPCD considers these 3rd party gas sales to be a "sales gas system" in the GHG Regulation.

12. The facility shall comply with the record keeping requirements of Section 95672.

13. The facility shall comply with the reporting requirements of Section 95673.

14. The facility shall comply with the implementation requirements of Section 95674. The facility shall register equipment with the California Air Resources Board (ARB) on an initial basis as required by Section 95674(b)(2) and on an annual basis as required by Section 95674(b)(3).

The facility is not required to submit a permit application to the Ventura County APCD as a mechanism to comply with this regulation. This regulation, however, does not change the Ventura County APCD Rule 10 permitting requirements for new, modified, and replacement oil wells, gas wells, storage tanks, engines, loading racks, heaters, boilers, glycol units, flare, etc.

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10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"
Adopted 11/12/91, Federally Enforceable

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:

    a. Steel or iron shot/grit is used exclusively

    b. The item to be blasted exceeds eight feet in any dimension

    c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted

2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:

    a. Wet abrasive blasting

    b. Hydroblasting

    c. Vacuum blasting

    d. Dry blasting with California ARB certified abrasives

3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.

5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.

6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.

7. Permittee shall monitor each abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. For each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

   a. Date of operation

   b. Type of abrasive blasting media used

   c. Identity, size, and location of item blasted

   d. Whether operation was conducted inside or outside a permanent building

   e. California ARB certifications for abrasives used

   These records shall be maintained at the facility and submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"
Adopted 01/12/10, Federally Enforceable

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:

    a. The VOC content of flat coatings shall not exceed 50 grams per liter of coating.

    b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.

    c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

    Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

    Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.

5. Permittee shall conduct periodic facility inspections and an annual compliance certification of architectural coating operations to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. The VOC coating records shall be submitted to the District upon request.

6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

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Ventura County Air Pollution Control District
Rule 74.4.D Applicable Requirements
Cutback Asphalt - Road Oils

Rule 74.4, "Cutback Asphalt"
Adopted 07/05/83, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

Conditions:

1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500°F as determined by ASTM D402.

2. Permittee shall maintain a test report of oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.16 Applicable Requirements
Oilfield Drilling Operations

Rule 74.16, "Oilfield Drilling Operations"
Adopted 01/08/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving all oilfield drilling operations. Oilfield drilling operations are defined as activities powered by nonvehicular internal combustion engines for the purpose of drilling or redrilling oil wells, injection wells, or gas wells. For the purpose of Rule 74.16, drilling operations do not include any operations at any existing well where the derrick is a part of an oilwell production service unit, as defined in the California Vehicle Code. Rule 74.16 applies to drill rig engines over 50 HP including, but not limited to, engines supplying power to drawworks, rotary tables, mud pumps, mud mixers and auxiliary generators.

This attachment applies to an oil company, which Rule 74.16 defines as the person contracting the drilling rig and/or the person who applies for an Authority to Construct for the well. The APCD issues portable Permits to Operate to the owners of drilling rigs. If the drilling rig is registered with the California Air Resources Board Portable Equipment Registration Program (PERP), an APCD Permit to Operate is not required.

This permit does not authorize the operation of any non-vehicular engine of 50 BHP, or greater, for well drilling or workover operations. Prior to using such an engine, the engine owner shall obtain a Permit to Operate for the engine or shall use an engine that is registered with the California Air Resources Board PERP.

Conditions:

1. Pursuant to Rule 74.16.B.1, all drilling operations shall be powered by grid power, unless exempted by Rule 74.16.C.1. Grid power is defined as electricity conveyed by power lines connected physically and contractually to the Southern California Edison System, or any electricity generated by equipment permitted by the District and having permitted emissions commensurate with an emissions rate of not more than 1.0 pound of NO_x per megawatt-hour of electricity produced.

2. Pursuant to Rule 74.16.C.1, an oil company may petition the Air Pollution Control Officer for exemption from Rule 74.16.B.1 by submitting a cost evaluation for grid powered drilling. Best Available Control Technology cost guidelines shall be used to determine cost effectiveness. As detailed in APCD Rule 44, "Exemption Evaluation Fee", Rule 44.B.2 requires that any person requesting an exemption from Rule 74.16 that is based on a cost evaluation shall be assessed an evaluation fee of $450.00.

3. Pursuant to Rule 74.16.B.2.a, if a drilling operation is exempt from Rule 74.16.B.1, NOx emissions from drilling engines, or any exhaust stack of multiple engines permanently manifolded together, shall not exceed 515 ppmv corrected to 15% oxygen. As an alternate, pursuant to Rule 74.16.B.2.c, drilling engines certified by the manufacturer to emit 6.9 grams of NOx per brake horsepower-hour or less based on a California ARB approved heavy duty offroad engine testing procedure shall be deemed in compliance with Rule 74.16.B.2.a, and shall not be subject to the annual source test requirements in Rule 74.16.B.2.b.

   In order to comply with this condition, permittee shall ensure that the drilling rig utilized has a valid APCD Permit to Operate and that the drilling rig has demonstrated compliance with Rule 74.16.B.2.a in accordance with CARB Method 100 as detailed in Rule 74.16.E (Test Methods), or has demonstrated compliance with Rule 74.16.B.2.c. Alternatively, the permittee shall verify that the drilling rig is registered with the California Air Resources Board PERP.

4. In order to demonstrate compliance with Rule 74.16.B.2.a, the drilling rig company shall perform source testing on the drilling engine exhaust annually. Permittee shall obtain from the drilling rig company the most recent source test results for the exempt engines subject to Rule 74.16.B.2.a, or the engine manufacturer certification for engines subject to Rule 74.16.B.2.c. This information shall be made available on site and submitted to the District upon request.

   This condition does not apply to drilling rig engines registered with the California Air Resources Board PERP.

5. Upon District request, the NO_x emissions from the drilling engine exhaust shall be measured using CARB Method 100, in accordance with Rule 74.16.E (Test Methods).

6. In order to demonstrate compliance with Rule 74.16.C.1, permittee shall maintain documentation on the cost analysis as verification to the grid power exemption. This documentation shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.26 Applicable Requirements
Crude Oil Storage Tank Degassing Operations

Rule 74.26, "Crude Oil Storage Tank Degassing Operations"
Adopted 11/08/94, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving degassing of any aboveground crude oil or produced water storage tank that is equipped with a vapor recovery system and has a storage capacity greater than 2,000 barrels; or has a storage capacity of 2,000 barrels and stores a liquid having a modified Reid vapor pressure (mRVP) of 3.4 pounds per square inch (psi) absolute or greater. This attachment also applies to any external or internal floating roof crude oil tank that has a vapor space of 2,000 barrels or more when the tank's roof is resting on the tank's inner roof supports. Rule 74.26 does not apply to vessels rated and operated to contain normal working pressure of at least 15 psi gauge without vapor loss to the atmosphere.

Degassing is defined as the removal of organic vapors from a stationary storage tank for the purpose of cleaning, removing the tank, cleaning the tank's interior, or making repairs to the tank that would require the complete removal of product from the tank.

This permit does not authorize the operation of any air pollution control device for tank degassing operations. This includes, but is not limited to, a thermal or catalytic incinerator, a carbon adsorber, a condenser, or an internal combustion engine. Prior to using such a device, the owner of the air pollution control device shall obtain a Permit to Operate for the device.

Conditions:

1. Pursuant to Rule 74.26.B.1, no person shall conduct or allow the degassing of any storage tank subject to Rule 74.26, unless the emissions are controlled by one of the following options:

    a. Liquid displacement into a vapor recovery system, flare, or fuel gas system (Rule 74.26.B.1.a). Liquid displacement is defined as the removal of ROC vapors from within a storage tank drained of liquid product by introducing into the tank a liquid having an ROC modified Reid vapor pressure (mRVP) of less than 0.5 psi absolute until at least 90 percent of the tank's vapor volume has been displaced, with the mRVP determined using ASTM Method D 323-82 conducted at 68 degrees Fahrenheit (Rule 74.26.F.10). or

    b. An air pollution control device that has a vapor destruction and removal efficiency of at least 95 percent until the vapor concentration in (Rule 74.26.B.1.b):

1. Aboveground crude oil or produced water tanks equipped with a vapor recovery system, is less than 10 percent of the tank's initial vapor concentration determined immediately prior to the tank degassing, or less than 10,000 ppmv, measured as methane, or

2. Floating roof tanks, is less than 10,000 ppmv, measured as methane.

Fugitive emissions that do not qualify as a leak shall be allowed around tank openings such as a manhole during a tank degassing operation performed in compliance with Rule 74.26.

Pursuant to Rule 74.26.E.3, compliance with the above limits shall require that the tank vapor concentration remain at or below 10,000 ppmv for at least one hour as demonstrated by measuring the vapor concentration at least four times at 15-minute intervals. The monitoring instrument used to measure the vapor concentration shall meet the specifications of EPA Method 21.

2. Pursuant to Rule 74.26.B.2, any receiving vessel used during a tank cleaning operation shall either be bottom loaded or shall be loaded by submerged fill pipe. Any vapors emitted from such vessels during a tank degassing operation shall be controlled with an air pollution control device as required by Rule 74.26.B.1.b. As defined in Rule 74.26.F.14, a receiving vessel is a vessel used to receive liquids or sludge material removed from an ROC liquid storage tank during a tank degassing operation.

3. Pursuant to Rule 74.26.B.3, except during an emergency, the District Enforcement Section shall be notified verbally or in writing at least 48 hours prior to starting any tank degassing operation. Such notification shall include an identification of the tank(s) to be degassed and the air pollution control method employed. If a tank degassing operation was required due to an emergency, the District Enforcement Section shall be notified as soon as reasonably possible but no later than four hours after completion of the operation. An emergency is defined as an unplanned and unexpected event that, if not immediately attended to, presents a safety or public health hazard or an unreasonable financial burden.

4. In order to demonstrate compliance for air pollution control devices used to comply with Rule 74.26.B, operator shall record:

a. The vapor concentration in parts per million (ppm) and gas flow rate in cubic feet per minute (cfm) entering and exiting the device (except for a flare) upon beginning use of the device and every thirty minutes thereafter. The instrument used to measure vapor concentration shall meet the specifications of EPA Method 21, and

b. The tank's vapor concentrations determined in accordance with Rule 74.26.E.3, and

c. If a refrigerated condenser is used, permittee shall record the condenser temperature in degrees Fahrenheit upon beginning use of the condenser and every thirty minutes thereafter. These records shall be maintained and shall be submitted to the District upon request.

5. Pursuant to Rule 74.26.D.3, any person claiming an exemption for a storage tank based on mRVP shall provide records that demonstrate that the liquid stored in the tank has a mRVP less than 3.4 psi absolute, as determined by ASTM Method D 323-82.

6. Pursuant to Rule 74.26.E.2, methods for determining vapor destruction or removal efficiency include vapor flow through the pipes, measured using EPA Method 2A; and the vapor concentration entering and exiting the device, measured using EPA Method 25A. This testing shall be performed upon District request.

7. Pursuant to Rule 74.26.E.3, the monitoring instrument used to measure the tank vapor concentration specified in Subsection B.1.b shall meet the specifications of EPA Method 21 and shall contain a probe inlet located one foot above the bottom of the tank or one foot above the surface of any sludge material on the bottom of the tank. For upright, cylindrical aboveground tanks, the probe inlet shall be (1) located at least 2 feet away from the inner surface of the tank wall and (2) if samples are withdrawn from a manhole, inserted in an opening of no more than one inch diameter on a flexible or inflexible material that is impermeable to reactive organic compound (ROC) vapors, secured over the manhole.

8. In order to comply with the above conditions, permittee shall insure that any tank degassing subcontractor utilized has a valid APCD Permit to Operate for portable tank degassing emission control equipment and that the control equipment complies with Rule 74.26, in accordance with Rule 74.26.E (Test Methods) when necessary.

9. Pursuant to Rule 74.26.C.2, the provisions of Section B of Rule 74.26 shall not apply to in-service tanks undergoing maintenance, including but not limited to repair of regulators, fittings, deck components, hatches, valves, flame arrestors, or compressors, or any leaks found pursuant to the operator inspection requirements in Rule 74.10, provided that (1) the operation will take no longer than 24 hours to complete and (2) the maintenance operation does not require the complete draining of product from the tank.

Ventura County Air Pollution Control District
Applicable Requirements for Soil Aeration Operations
Rule 74.29, Soil Decontamination Operations

Rule 74.29, "Soil Decontamination Operations"
Adopted 04/08/08, Federally Enforceable

Applicability:

This attachment applies to short-term activities involving soils that contain gasoline, diesel fuel, or jet fuel. Rule 74.29 does not apply to soil that contains only crude oil or was contaminated by a leaking storage tank used in an agricultural operation engaged in the growing of crops or the raising of fowl or animals.

Specifically, this attachment applies to the aeration of soil that contains gasoline, diesel fuel, or jet fuel. Aeration is defined as the exposure of excavated soil, containing diesel fuel, gasoline, or jet fuel, to the atmosphere without the use of air pollution control equipment or vapor extraction, bioremediation, or bioventing system.

Remediation equipment, such as a vapor extraction system, bioremediation system, or bioventing system, for contaminated soil requires an APCD permit. Rule 74.29 requirements for such remediation equipment would be addressed in another permit attachment, if applicable. As detailed in APCD Rule 23.F.23, any soil aeration project exempt from the soil aeration limit in Rule 74.29 pursuant to Subsection C.1 or C.2 of Rule 74.29 is exempt from the requirement to obtain a permit for the soil aeration project. Also, pursuant to APCD Rule 23.F.24, any soil remediation project where collected vapors are not emitted to the atmosphere by any means is exempt from the requirement to obtain a permit.

Conditions:

1. Pursuant to Rule 74.29.B.1.a, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration emits reactive organic compounds (ROC) as measured by a certified vapor analyzer, in excess of 50 parts per million by volume (ppmv) above background, as hexane, except nonrepeatable momentary readings. In determining compliance, a portion of soil measuring three inches in depth and no less than six inches in diameter shall be removed from the soil surface and the probe inlet shall be placed near the center of the resulting hole, level with the soil surface surrounding the hole.

   For each soil decontamination operation where soil aeration occurs, the permittee shall determine compliance with Rule 74.29.B.1.a on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

2. Pursuant to Rule 74.29.B.1.b, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration causes a nuisance, as defined in the California Health and Safety Code Section 41700 and APCD Rule 51, "Nuisance." In addition, offsite aeration is prohibited.

3. Pursuant to Rule 74.29.B.2, no person shall excavate an underground storage tank and/or transfer piping currently or previously used to store an applicable compound, or excavate or grade soil containing an applicable compound, unless ROC emissions are monitored with a certified organic vapor analyzer at least once every 15 minutes during the excavation period commencing at the beginning of excavation or grading. Soil with emission measurements in excess of 50 parts per million by volume (ppmv), as hexane, a shall be considered contaminated.

   During excavation, all inactive exposed contaminated soil surfaces shall be treated with a vapor suppressant or covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions of ROC to the atmosphere. Covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate.

4. Pursuant to Rule 74.29.B.5, the owner or operator of any applicable underground storage tank shall notify the District Compliance Division at least 24 hours prior to the beginning the excavation of the said storage tank and/or transfer piping.

5. Pursuant to Rule 74.29.B.6, contaminated soil in active storage piles shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions of ROC to the atmosphere. Covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate. For any active storage pile, the surface area not covered by plastic sheeting or other covering shall not exceed 6,000 square feet. An "active" storage pile is defined as a worksite to which soil is currently being added or from which soil is being currently being removed. Activity must occur within one hour to be current.

6. Pursuant to Rule 74.29.B.7, contaminated soil in inactive storage piles shall be with covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions to the atmosphere. The covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate.

7. Pursuant to Rule 74.29.B.8, if not removed within 30 days of excavation, on-site treatment to remove contamination from contaminated soil at an excavation or grading site shall be initiated. The treatment of contaminated soil shall be subject to all applicable District Rules and Regulations. This includes, but is not limited to,

compliance with Rule 10, "Permits Required," and Rule 51, "Nuisance."

8. Pursuant to Rule 74.29.B.9, trucks used to transport contaminated soil must meet the following requirements:

   a. The truck and trailer shall be tarped prior to leaving the site. Contaminated material shall not be visible beyond the tarp and shall not extend above the sides or rear of the truck or trailer; and

   b. The exterior of the truck, trailer and tires shall be cleaned prior to leaving the site.

9. Pursuant to Rule 74.29.C.2, the soil aeration requirements of Rule 74.29.B.1.a shall not apply to:

   a. Soil excavation activities necessary for the removal of in-situ soil such as in the removal of an underground storage tank, pipe or piping system, provided the exposed soil is covered as specified in Condition No. 6 while inactive; or

   b. Soil moving, loading, or transport activities performed for the sole purpose of complying with local, state, or federal laws, provided the soil is handled in accordance with such laws; or

   c. Soil excavation or handling occurring as a result of an emergency as declared by an authorized health officer, agricultural commissioner, fire protection officer, or other authorized agency officer. Whenever possible, the District Compliance Division shall be notified prior to commencing such excavation; or

   d. Any soil aeration project involving less than 1 cubic yard of contaminated soil; or

   e. Situations where the soil contamination which resulted from a spill or release of less than five (5) gallons of diesel fuel, jet fuel, or gasoline; or

   f. Contaminated soil used as daily cover at permitted Class III Solid Waste Disposal Sites if such soils do not have a gasoline concentration exceeding 100 parts per million by weight (ppmw) or a diesel fuel concentration exceeding 1,000 ppmw, as determined by the method specified in Rule 74.29.F.1. Daily cover is defined as soil that is applied on a daily basis or less frequently as a covering over landfill waste.

      The permittee shall maintain records of the gasoline concentration and diesel fuel concentration of any contaminated soil used as daily cover that need to qualify for this exemption.

10. Pursuant to Rule 74.29.F.1, the percent by weight of contaminant in soil samples shall be determined by EPA Method 8015B. Samples shall be introduced using Method 5035 (Purge and Trap) and shall be taken in accordance with the Los Angeles Regional Water Quality Control Board's guidelines for contaminated soil sampling. Standards shall be the same as the contaminant believed to be in the soil. If the soil is contaminated with methanol 85 (M85) the standard used shall be M85.

11. Pursuant to Rule 74.29.F.3, the ROC concentration measurements required in Subsections B.1 and B.2 of the rule (Condition Nos. 1 – 3 above) shall be made using an organic vapor analyzer certified according to the requirements of EPA Method 21.

12. Pursuant to Rule 74.29.D, for any soil aeration project subject to Rule 74.29, the permittee shall record each date that the soil was disturbed and the quantity of soil disturbed on each date. These records shall be maintained at the facility and submitted to the District upon request.

13. For any soil decontamination project subject to Rule 74.29, other than a soil aeration project, the following information shall be made available to the District upon request:

    a. All dates that soil was disturbed and the quantity of soil disturbed on each date.

    b. Reasons for excavation or grading.

    c. Cause of VOC soil contamination and history of the site.

    d. Description of tanks or piping associated with the soil contamination.

    e. Description of mitigation measures employed for dust, odors and ROC emissions.

    f. Details of treatment and/or disposal of ROC contaminated soil, including the ultimate receptor.

    g. Description of monitoring equipment and techniques.

    h. All ROC emission measurements shall be recorded on a continuous permanent strip-chart or in a format approved by the Air Pollution Control Officer (APCO).

    i. A map showing the facility layout, property line, and surrounding area up to 2500 feet away, and including any schools, residential areas or other sensitive receptors such as hospitals or locations where children or elderly people live or work.

14. The permittee shall monitor each soil aeration operation or underground gasoline storage tank excavation operation to ensure that compliance with Rule 74.29.B.1 and/or

74.29.B.2 is being maintained. This monitoring requirement shall include ensuring that proper operation requirements are being met and shall include the recordkeeping required above.

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11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

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Ventura County Air Pollution Control District
General Part 70 Permit Conditions

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)

2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.

3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)

4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)

5. All applicable records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)

6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:

   a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and

   d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

   (40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)

9. A Part 70 permit shall be reopened under the following conditions:

   a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

   b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or

d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)

11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)

12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)

13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)

14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)

15. Permittee must submit certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance

was continuous or intermittent since the last certification, and the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

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Ventura County Air Pollution Control District
General Permit to Operate Conditions

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)

2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)

3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)

4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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Ventura County Air Pollution Control District
Permit Shield - New Source Performance Standards
Part 70 Permit No. 00012

40 CFR Part 60, Subpart J, "Standards of Performance for Petroleum Refineries"

40 CFR Part 60, Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture"

40 CFR Part 60, Subpart GGG, "Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries"

40 CFR Part 60, Subpart QQQ, "Standards of Performance for VOC Emissions From Petroleum Refinery Wastewater Systems"

Permit Shield:

The New Source Performance Standards listed above have been reviewed and it has been determined that they are not applicable to this stationary source. Subpart J, Subpart GGG, and Subpart QQQ apply to affected facilities located at petroleum refineries. Subpart UU applies to affected facilities at asphalt processing plants, petroleum refineries, and asphalt roofing plants. This stationary source is not a petroleum refinery, asphalt roofing plant, or asphalt processing plant as defined in these New Source Performance Standards, and therefore these standards do not apply to this stationary source.

This stationary source is primarily a crude oil production facility. Steam and petroleum diluent are injected into heavy crude oil wells. The wells then produce a mixture of heavy crude oil, natural gas, diluent, and water. The mixture is initially separated by gravity, aided by heat. In order to recover the diluent, final separation is done in an atmospheric distillation tower.

The heavy crude oil is then sold as various grades of asphalt, and the diluent is recycled back into the oil wells. To balance the process on a seasonal basis, diluent is sold or purchased as necessary.

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Ventura County Air Pollution Control District
Permit Shield - New Source Performance Standards
Part 70 Permit No. 00012

40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units"

Permit Shield:

The New Source Performance Standard listed above has been reviewed and it has been determined that it is not applicable to this stationary source. The following discussion details the determination of this permit shield for specific emission units at the stationary source. All of the units below burn natural gas as the primary fuel and burn fuel oil only during natural gas curtailment.

Six (6) 20.0 MMBTU/Hr Steam Generators (Unit Nos. 0, 1, 2, 3, 4, 5)
Five of these six steam generators were originally constructed prior to June 9, 1989. Authority to Construct No. 0010-100, issued on March 25, 1991, allowed for modifications to each of these steam generators to meet the emission limitations of Rule 74.15, "Boilers, Steam Generators, and Process Heaters". Pursuant to 40 CFR Part 60.14.e.5, this change did not fit the definition of a modification subject to New Source Performance Standards since this was "the addition or use of any system or device whose primary function is the reduction of air pollutants." The 20 MMBTU/hr Steam Generator No. 0 was installed after July 9, 1989; however, the unit operates on natural gas or a mixture of natural gas and produced gas. There are no applicable requirements in the Subpart for units operated on natural gas. This includes recordkeeping requirements.

One (1) 20.0 MMBTU/Hr Erie City Boiler
This boiler was originally constructed prior to June 9, 1989. Authority to Construct No. 0012-110, issued on August 13, 1990, allowed for modifications to this boiler to meet the emission limitations of Rule 74.15, "Boilers, Steam Generators, and Process Heaters". Pursuant to 40 CFR Part 60.14.e.5, this change did not fit the definition of a modification subject to New Source Performance Standards since this was "the addition or use of any system or device whose primary function is the reduction of air pollutants."

One (1) 20.0 MMBTU/Hr Natco Crude Oil Heater
This crude oil heater was originally constructed after June 9, 1989. Authority to Construct No. 0012-110, issued on August 13, 1990, allowed for the installation of this unit as a replacement for two existing units as a strategy to meet the emission limitations of Rule 74.15, "Boilers, Steam Generators, and Process Heaters". The Natco Crude Oil Heater does not fit the definition of a steam generating unit as detailed in 40 CFR Part 60.41c. This unit does not heat water or any other heat transfer medium. Nor is it a process heater that heats a material to initiate or

promote a chemical reaction. It is, rather, a process heater that heats a mixture of heavy crude oil and diluent to promote their physical separation.

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Ventura County Air Pollution Control District
Standards of Performance (NSPS) for
Crude Oil and Natural Gas Production, Transmission and Distribution

40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015"

Applicability:

This NSPS was replaced by 40 CFR Part 60, Subpart OOOOa that now applies to affected oil and gas facilities after September 18, 2015.

This NSPS applies to all well completions, pneumatic controllers, equipment leaks from natural gas processing plants, reciprocating compressors, centrifugal compressors and storage vessels which are constructed, modified or reconstructed after August 23, 2011, and on or before September 18, 2015, as discussed in more detail below. Well completions subject to the NSPS are limited to the flowback period following hydraulic fracturing operations at an applicable gas well. These applicable completions include those conducted at newly drilled and fractured gas wells, as well as completions conducted following refracturing operations that may occur at various times over the life of the gas well. When a gas well is refractured, the applicability of this NSPS does not by itself trigger applicability beyond the well head to other ancillary components that may be at the well site such as existing storage vessels, compressors, pneumatic controllers, process vessels, separators, dehydrators or any other components or apparatus. Note that the NSPS does not apply to gas wells located on offshore oil platforms in Ventura County. This document summarizes the requirements of the NSPS and is not intended to supersede or conflict with the requirements of the NSPS.

Note that the issuance of this NSPS now includes, incorporates, and / or revises the requirements of 40 CFR Part 60 Subpart KKK, "Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants", and 40 CFR Part 60 Subpart LLL, "Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions". These NSPS now each have sunset dates of August 23, 2011 and their requirements are now contained in 40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission and Distribution".

Conditions:

1. Gas wells undergoing hydraulic fracturing subject to this NSPS shall comply with Section 60.5375. A gas well or natural gas well is defined as an onshore well drilled principally for production of natural gas. The NSPS requires the use of reduced emissions completions (REC) also known as green completions.

The drilling of all new oil wells and all new gas wells requires a Ventura County APCD Authority to Construct. In addition, an Authority to Construct shall be obtained prior to refracturing an existing gas well.

2. Centrifugal compressors subject to this NSPS shall comply with Section 60.5380. A centrifugal compressor is defined as any machine for raising the pressure of a natural gas by drawing in low pressure natural gas and discharging significantly higher pressure natural gas by means of mechanical rotating vanes or impellers. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors as defined in this NSPS. The NSPS requires the operators of affected centrifugal compressors to reduce VOC emissions from each centrifugal compressor wet seal fluid degassing system by 95.0 percent or greater. Compressors located past the point of custody transfer in the gas transmission and storage segments are not covered by this NSPS. A compressor located at a well site, or an adjacent well site and servicing more than one well site, is not covered by this NSPS.

   The Ventura County APCD does not require permits for natural gas compressors, but does require permits for an internal combustion engine (in lieu of an electric motor) powering a natural gas compressor (Rule 23.F.18). Therefore, this condition authorizes the installation of the equipment necessary to comply with these centrifugal compressor requirements provided that the permittee comply with all the requirements of Section 60.5380, including the required notification, recordkeeping and reporting requirements.

3. Reciprocating compressors subject to this NSPS shall comply with Section 60.5385. A reciprocating compressor is defined as a piece of equipment that increases the pressure of a process gas by positive displacement, employing linear movement of a drive shaft. The NSPS requires the operators of affected reciprocating compressors to replace the rod packing every 26,000 hours or 36 months from the date of initial startup of the reciprocating compressor affected facility. Compressors located past the point of custody transfer in the gas transmission and storage segments are not covered by this NSPS. A compressor located at a well site, or an adjacent well site and servicing more than one well site, is not covered by this NSPS.

   The Ventura County APCD does not require permits for natural gas compressors, but does require permits for an internal combustion engine (in lieu of an electric motor) powering a natural gas compressor (Rule 23.F.18). Therefore, this condition authorizes the work necessary to comply with these reciprocating compressor requirements provided that the permittee comply with all the requirements of Section 60.5385, including the required notification, recordkeeping and reporting requirements.

4. Pneumatic controllers subject to this NSPS shall comply with Section 60.5390. A pneumatic controller is defined as an automated instrument used for maintaining a

process condition such as liquid level, pressure, delta-pressure and temperature. The requirements apply to natural gas-driven pneumatic controllers located (a) in the oil production segment between the wellhead and the point of custody transfer to an oil pipeline; or (b) in the natural gas production segment between the wellhead and the point at which the gas enters the transmission and storage segment. This NSPS requires each pneumatic controller affected facility at a natural gas processing plant to have a natural gas bleed rate of zero standard cubic feet per hour. Each pneumatic controller affected facility between the wellhead and a natural gas processing plant, or between the wellhead and the point of custody transfer to an oil pipeline, must have a natural gas bleed rate of less than or equal to 6 standard cubic feet per hour. Note that a natural gas processing plant is defined as any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. A Joule-Thompson valve, a dew point suppression valve, or an isolated or stand-alone Joule-Thompson skid is not a natural gas processing plant.

The Ventura County APCD does not require permits for the installation and operation of pneumatic controllers and other components such as valves and flanges. Therefore, this condition authorizes the work necessary to comply with these pneumatic controller requirements provided that the permittee comply with all the requirements of Section 60.5390, including the required notification, recordkeeping and reporting requirements.

5. Storage vessels subject to this NSPS shall comply with Section 60.5395. A storage vessel is defined as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. Note that pressure vessels designed to operate in excess of 204.9 kilopascals (29.7 psi) and without emissions to the atmosphere are not considered to be storage vessels. Also, process vessels such as surge control vessels, bottoms receivers, and knockout vessels are not considered to be process vessels.

The NSPS requires that individual storage vessels with VOC emissions equal to or greater than 6 tons per year achieve at least 95.0 percent reduction in VOC emissions. These requirements do not apply to storage vessels subject to and controlled in accordance with the requirements for storage vessels in 40 CFR Part 60, Subpart Kb, or 40 CFR Part 63, Subparts G, CC, HH, or WW.

The Ventura County APCD does require permits for the installation and operation of storage vessels such as crude oil storage tanks, wash tanks, and produced water storage tanks. In addition, these tanks must comply with the vapor recovery requirements of Rule 71.1, "Crude Oil Production and Separation". If a tank that complies with Rule 71.1 has VOC emissions of 6 tons per year or more, the permittee shall apply for, and obtain, an APCD Authority to Construct for the equipment necessary to comply with Section 60.5395 of the NSPS.

6. All process units, except compressors, located at an onshore natural gas processing plant subject to this NSPS shall comply with Section 60.5400. A process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products or other operations associated with the processing of natural gas products.

   The NSPS requires a leak detection and repair program for components such as pressure relief devices, pumps and valves that reflects the procedures and leak thresholds established in 40 CFR Part 60, Subpart VVa, the NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (that is, this NSPS OOOO references out to NSPS VVa). For certain components, a leak is defined as 500 ppm or greater and a first attempt at a repair must be made no later than 5 calendar days after a leak is detected.

   The Ventura County APCD does not require permits for the installation and operation of components such as pressure relief devices, pumps, valves and flanges. Therefore, this condition authorizes any work necessary to comply with these leak detection and repair requirements provided that the permittee comply with all the requirements of Section 60.5400, including the required notification, recordkeeping and reporting requirements. Any onshore natural gas processing plant at this facility subject to this NSPS will be specifically addressed elsewhere in this permit, as applicable.

7. Sweetening units at onshore natural gas processing plants subject to this NSPS shall comply with Section 60.5405. A sweetening unit is defined as a process device that removes hydrogen sulfide and / or carbon dioxide from the sour natural gas stream. To qualify as a sweetening unit, there must be sulfur recovery technology with a liquid sulfur accumulation rate. These requirements do not apply to sweetening units located on offshore oil platforms in Ventura County. The requirements also do not apply to devices that remove hydrogen sulfide or carbon dioxide that use replaceable media or units that use membrane separation technology.

   The NSPS requires that the sweetening unit achieve a minimum SO2 reduction efficiency that varies from approximately 74.0% to 99.9% depending on the hydrogen sulfide content of the acid gas and the sulfur feed rate.

   The Ventura County APCD does require an Authority to Construct for the installation of a sweetening unit at both onshore natural gas plants and offshore natural gas plants. Any sweetening unit at this facility subject to this NSPS will be specifically addressed elsewhere in this permit, as applicable.

Ventura County Air Pollution Control District
Standards of Performance (NSPS) for
Crude Oil and Natural Gas Facilities

40 CFR Part 60, Subpart OOOOa, "Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015"

Applicability:

This NSPS establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG). The greenhouse gas standard in this NSPS is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after September 18, 2015. This NSPS also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. The effective date of the NSPS is August 2, 2016.

This NSPS applies to all onshore well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, process units for the extraction or fractionation of natural gas liquids from field gas, sweetening units, pneumatic pumps, and fugitive emissions from well sites and compressor stations which are constructed, modified or reconstructed after September 18, 2015, as discussed in more detail below. Note that this NSPS does not apply to offshore oil platforms in Ventura County.

Well completions subject to the NSPS are limited to the flowback period following hydraulic fracturing operations at an applicable oil or gas well. These applicable well completions include those conducted at newly drilled and fractured wells, as well as completions conducted following refracturing operations that may occur at various times over the life of the well.

Note that the issuance of this NSPS now includes, incorporates, and / or revises the requirements of 40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission and Distribution". 40 CFR Part 60, Subpart OOOO now has an effective date of August 23, 2011 to September 18, 2015 and its requirements are now contained in 40 CFR Part 60, Subpart OOOOa. This document summarizes the requirements of the NSPS and is not intended to supersede or conflict with the requirements of the NSPS.

Conditions:

1. Wells undergoing hydraulic fracturing or hydraulic refracturing subject to this NSPS shall comply with Section 60.5375a. A well is defined as an onshore well drilled for the purpose of producing oil or natural gas, or a well into which fluids are injected. During

the flowback period following hydraulic fracturing or refracturing, the NSPS requires the recovery of flowback liquids and the control of flowback gas. Note that the NSPS has specific requirements for wildcat wells and delineation wells, non-wildcat low pressure gas wells or non-delineation low pressure gas wells, and wells with less than 300 scf of gas per stock tank barrel of oil produced.

The drilling of all new oil wells and all new gas wells requires a Ventura County APCD Authority to Construct. In addition, an Authority to Construct shall be obtained prior to refracturing an existing oil or gas well.

2. Centrifugal compressors subject to this NSPS shall comply with Section 60.5380a. A centrifugal compressor is defined as any machine for raising the pressure of a natural gas by drawing in low pressure natural gas and discharging significantly higher pressure natural gas by means of mechanical rotating vanes or impellers. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors as defined in this NSPS. The NSPS requires the operators of affected centrifugal compressors to reduce methane and VOC emissions from each centrifugal compressor wet seal fluid degassing system by 95.0 percent or greater. Compressors located at or past the point of custody transfer are not covered by this NSPS. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this NSPS.

   The Ventura County APCD does not require permits for natural gas compressors, but does require permits for an internal combustion engine (in lieu of an electric motor) powering a natural gas compressor (Rule 23.F.18). Therefore, this condition authorizes the installation of the equipment necessary to comply with these centrifugal compressor requirements provided that the permittee comply with all the requirements of Section 60.5380a, including the required notification, recordkeeping and reporting requirements.

3. Reciprocating compressors subject to this NSPS shall comply with Section 60.5385a. A reciprocating compressor is defined as a piece of equipment that increases the pressure of a process gas by positive displacement, employing linear movement of a drive shaft. The NSPS requires the operators of affected reciprocating compressors to replace the rod packing every 26,000 hours or 36 months from the date of initial startup, or last rod packing replacement, of the reciprocating compressor affected facility. As an alternative to rod packing replacement, the NSPS requires that operators collect the methane and VOC emissions from the rod packing using a rod packing emissions collection system that operates under negative pressure and route the rod packing emissions to a process through a closed vent system. Compressors located at or past the point of custody transfer are not covered by this NSPS. A compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this NSPS.

The Ventura County APCD does not require permits for natural gas compressors, but does require permits for an internal combustion engine (in lieu of an electric motor) powering a natural gas compressor (Rule 23.F.18). Therefore, this condition authorizes the work necessary to comply with these reciprocating compressor requirements provided that the permittee comply with all the requirements of Section 60.5385a, including the required notification, recordkeeping and reporting requirements.

4. Pneumatic controllers subject to this NSPS shall comply with Section 60.5390a. A pneumatic controller is defined as an automated instrument used for maintaining a process condition such as liquid level, pressure, delta-pressure and temperature. This NSPS requires each pneumatic controller affected facility at a natural gas processing plant to have a natural gas bleed rate of zero standard cubic feet per hour. Each pneumatic controller affected facility, at a location other than at a natural gas processing plant, must have a natural gas bleed rate of less than or equal to 6 standard cubic feet per hour. Note that a natural gas processing plant is defined as any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. A Joule-Thompson valve, a dew point suppression valve, or an isolated or stand-alone Joule-Thompson skid is not a natural gas processing plant.

   These requirements do not apply if it is determined that the use of a pneumatic controller affected facility with a bleed rate greater than the applicable standard is required based on functional needs, including but not limited to response time, safety and positive actuation. However, an applicable pneumatic controller must be tagged with the month and year of installation, reconstruction or modification, and identification information that allows traceability to the records for that pneumatic controller.

   The Ventura County APCD does not require permits for the installation and operation of pneumatic controllers and other components such as valves and flanges (Rule 23.J.9). Therefore, this condition authorizes the work necessary to comply with these pneumatic controller requirements provided that the permittee comply with all the requirements of Section 60.5390a, including the required notification, recordkeeping and reporting requirements.

5. Pneumatic pumps subject to this NSPS shall comply with Section 60.5393a. For natural gas processing plants, each pneumatic pump affected facility is a single natural gas-driven diaphragm pump. For well sites, each pneumatic pump affected facility is a single natural gas-driven diaphragm pump. A single natural gas-driven diaphragm pump that is in operation less than 90 days per calendar year is not an affected facility under this subpart provided the owner/operator keeps records of the days of operation each calendar year and submits such records to the EPA Administrator (or delegated enforcement authority) upon request.

This NSPS requires each pneumatic pump affected facility at a natural gas processing plant to have a natural gas bleed rate of zero standard cubic feet per hour. A pneumatic pump affected facility located at a well site must reduce natural gas emissions by 95.0 percent, except as provided in paragraphs (b)(3) and (4) of this section for a well site at a greenfield site, and except as provided in paragraphs (b)(3), (4) and (5) of this section for a well site not located at a greenfield site. Greenfield site is defined as a site, other than a natural gas processing plant, which is entirely new construction. Natural gas processing plants are not considered to be greenfield sites, even if they are entirely new construction.

The Ventura County APCD does not require permits for the installation and operation of pneumatic pumps and other components such as valves and flanges (Rule 23.J.9). Therefore, this condition authorizes the work necessary to comply with these pneumatic pump requirements provided that the permittee comply with all the requirements of Section 60.5393a, including the required notification, recordkeeping and reporting requirements.

6. Storage vessels subject to this NSPS shall comply with Section 60.5395a. A storage vessel is defined as a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water, and that is constructed primarily of non-earthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support. A well completion vessel that receives recovered liquids from a well after startup of production following flowback for a period which exceeds 60 days is considered a storage vessel under this NSPS. Note that pressure vessels designed to operate in excess of 204.9 kilopascals (29.7 psi) and without emissions to the atmosphere are not considered to be storage vessels. Also, process vessels such as surge control vessels, bottoms receivers, and knockout vessels are not considered to be storage vessels.

   The NSPS requires that individual storage vessels with VOC emissions equal to or greater than 4 tons per year achieve at least 95.0 percent reduction in VOC emissions. These requirements do not apply to storage vessels subject to and controlled in accordance with the requirements for storage vessels in 40 CFR Part 60, Subpart Kb, and 40 CFR Part 63, Subparts G, CC, HH, or WW.

   The Ventura County APCD does require permits for the installation and operation of storage vessels such as crude oil storage tanks, wash tanks, and produced water storage tanks. Pressure vessels without routine emissions to the atmosphere are not required to be listed on the permit. In addition, these tanks must comply with the vapor recovery requirements of Rule 71.1, "Crude Oil Production and Separation", which in most cases is more stringent than this NSPS.

7. Fugitive emissions from well sites and compressor stations, except compressors located at a well site or compressors located at an onshore natural gas processing plant, subject to

this NSPS shall comply with Section 60.5397a.

The NSPS requires a leak detection and repair program for fugitive emissions components such as valves, connectors, pressure relief devices, open-ended lines, flanges, certain covers and closed vent systems, thief hatches or other openings on a controlled storage vessel (not subject to Section 60.5395a), compressors, instruments, and meters. An emissions monitoring plan is required and emission monitoring surveys are required at least semiannually for well sites and a least quarterly for compressor stations. "Difficult-to-monitor" components must be monitored at least once per calendar year and "unsafe-to-monitor" components must be monitored on a schedule, as included in the monitoring plan.

Fugitive emissions are defined as: a) any visible emission from a fugitive emissions component observed using optical gas imaging, or b) an instrument reading 500 ppm or greater using EPA Method 21.

Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after the detection of the fugitive emissions, except as provided for specified repairs and replacements in the NSPS.

The Ventura County APCD does not require permits for the installation and operation of components subject to the fugitive emissions requirements of this NSPS. Therefore, this condition authorizes any work necessary to comply with these leak detection and repair requirements provided that the permittee comply with all the requirements of Section 60.5397a, including the monitoring, repair, replacement, recordkeeping and reporting requirements.

8. All process units, except compressors, located at an onshore natural gas processing plant subject to this NSPS shall comply with Section 60.5400a. A process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products or other operations associated with the processing of natural gas products.

   The NSPS requires a leak detection and repair program for components such as pressure relief devices, pumps and valves that reflects the procedures and leak thresholds established in 40 CFR Part 60, Subpart VVa, the NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (that is, this NSPS OOOO references out to NSPS VVa). For specified components, a leak is defined as 500 ppm or greater as measured by EPA Method 21, and a first attempt at a repair must be made no later than 5 calendar days after a leak is detected. The leak must be repaired as soon as practicable, but no later than 15 days after detection.

9. Sweetening units at onshore natural gas processing plants subject to this NSPS shall

comply with Section 60.5405a. A sweetening unit is defined as a process device that removes hydrogen sulfide and / or carbon dioxide from the sour natural gas stream. To qualify as a sweetening unit, there must be sulfur recovery technology with a liquid sulfur accumulation rate. These requirements do not apply to sweetening units located on offshore oil platforms in Ventura County. The requirements also do not apply to devices that remove hydrogen sulfide or carbon dioxide that use replaceable media or units that use membrane separation technology.

The NSPS requires that the sweetening unit achieve a minimum SO2 reduction efficiency that varies from 74.0% to 99.9% depending on the hydrogen sulfide content of the acid gas and the sulfur feed rate.

The Ventura County APCD does require an Authority to Construct for the installation of a sweetening unit at both onshore natural gas plants and offshore natural gas plants. Any sweetening unit at this facility subject to this NSPS will be specifically addressed elsewhere in this permit, as applicable.

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12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) __" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans

40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

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Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally Enforceable (last revised 11/18/16)

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners," and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction."

As stated in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As stated in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person maintaining, servicing, or repairing appliances containing class I, class II, or non-exempt substitute refrigerants. This subpart also applies to persons disposing of such appliances (including small appliances and motor vehicle air conditioners), refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recovery and/or recycling equipment, approved recovery and/or recycling equipment testing organizations, and persons buying, selling, or offering to sell class I, class II, or non-exempt substitute refrigerants.

As defined in 40 CFR82.152, *appliance* means any device which contains and uses a class I or class II substance or substitute as a refrigerant and which is used for household or commercial purposes, including any air conditioner, motor vehicle air conditioner, refrigerator, chiller, or freezer. For a system with multiple circuits, each independent circuit is considered a separate appliance. *Refrigerant* means, for purposes of this subpart, any substance, including blends and mixtures, consisting in part or whole of a class I or class II ozone-depleting substance or substitute that is used for heat transfer purposes and provides a cooling effect.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable

requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners."

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction."

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13. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.

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