

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**

4576 Telephone Road
Ventura, CA 93003
805/303-4005

DRAFT

PART 70 PERMIT

Number 00082

Permit Term: March 15, 2022 to December 31, 2023

Company Name / Address:

Crimson California Pipeline, L.P.
1900 Main Street, Suite 600
Irvine, CA 92614

Facility Name / Address:

Crimson California Pipeline, L.P. - Harbor Station
1200 Spinnaker Drive
Ventura, CA 93003

Responsible Official:

Ms. Mandy Kroetsch
President & CFO
Crimson California Pipeline, L.P.
1900 Main Street, Suite 600
Irvine, CA 92614
562/285-4137
mkroetsch@crimsonpl.com

Title V Contact:

Ms. Valerie Muller
Environmental Specialist
Crimson California Pipeline, L.P.
1900 Main Street, Suite 600
Irvine, CA 92614
562/285-4151
vmuller@crimsonpl.com

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.



Ali R. Ghasemi
Air Pollution Control Officer

August 29, 2023

PART 70 PERMIT NO. 00082
TABLE OF CONTENTS

1. Permit Cover Sheet	
a. Permit Revisions Table	1
b. Permit Summary and Statement of Basis	3
c. Periodic Monitoring Summary	10
2. Permitted Equipment and Applicable Requirements Table	16
3. Permitted Throughput and Consumption Limit Table	24
4. Permitted Emissions Table	27
5. Exempt Equipment List	30
6. Specific Applicable Requirements (Attachments)	32
a. Rule 71.2, Storage of Reactive Organic Compound Liquids (71.2N2)	33
b. Rule 71.4, Petroleum Sumps, Pits, Ponds and Well Cellars (71.4N1)	39
c. Rule 74.9, Stationary Internal Combustion Engines (74.9N3)	41
d. 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT) (40CFR63ZZZZN11)	44
7. Permit Specific Conditions (Attachments)	46
a. General Recordkeeping Requirements (PO00082PC1)	47
b. Natural Gas Only Requirement for Combustion Equipment (PO00082PC1)	47
c. Solvent Cleaning Additional Requirements (PO00082PC1)	47
d. Additional Permit Requirements for the 415 BHP Caterpillar Engine (PO00082PC2)	49
8. General Applicable Requirements (Attachments)	50
a. Rule 50, Opacity (50)	51
b. Rule 54.B.1, Sulfur Compounds - SO _x at Point of Discharge (54.B.1)	52
c. Rule 54.B.2, Sulfur Compounds - SO _x at or Beyond Property Line (54.B.2)	53
d. Rule 55, "Fugitive Dust" (55)	55
e. Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment (57.1)	57
f. Rule 64.B.1, Sulfur Content of Fuels - Gaseous Fuels (64.B.1)	58
g. Rule 74.6, Surface Cleaning and Degreasing (74.6)	60

h. Rule 74.10, Components at Crude Oil and Natural Gas Production and Processing Facilities (74.10)	68
i. Rule 74.11.1, Large Water Heaters and Small Boilers (74.11.1)	78
j. Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces (74.22)	80
9. General Requirements for Short-Term Activities (Attachments)	81
a. Rule 74.1, Abrasive Blasting (74.1)	82
b. Rule 74.2, Architectural Coatings (74.2)	84
c. Rule 74.26, Crude Oil Storage Tank Degassing Operations (74.26)	86
d. Rule 74.29, Soil Decontamination Operations (74.29N3)	90
e. 40 CFR Subpart M - Asbestos NESHAPS (40CFR61.M)	95
10. General Permit Conditions	96
a. Part 70 Permit General Conditions (Part 70 General)	97
b. Permit to Operate General Conditions (PO General)	101
11. Miscellaneous Federal Program Conditions	102
a. 40 CFR Part 68 - Accidental Release Prevention and Risk Management Plans (40CFR68)	103
b. 40 CFR Part 82 - Protection of Stratospheric Ozone (40CFR82)	104
c. Part 70 Permit Shield - 40 CFR Part 60, Subparts K, Ka, and Kb (SHIELD-K,Ka,Kb)	106
12. Part 70 Permit Application Package	107

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

1.a. PERMIT REVISIONS TABLE

Application No.	Issue Date	Description	Revised Permit Sections
00082-ADM1	03/08/00	Administrative Amendment to revise permitted emissions to reflect the use of standard calculation methods for natural gas engines and oil storage tanks	<ul style="list-style-type: none"> • Signature Cover Page • Table of Contents • Permit Revisions Table • Table No. 4 (Permitted Emissions)
00082-131	10/27/00	Administrative Amendment to change the Responsible Official and Title V Contact names	<ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table
00082-141	02/24/03	Administrative Amendment to change company name, Responsible Official, and Title V Contact	<ul style="list-style-type: none"> • Signature Cover Page • Table of Contents • Permit Revisions Table • Attachment PO0082PC1
00082-151	03/02/04	Permit Reissuance for Period January 1, 2004 to December 31, 2008	See “Stationary Source Description”
00082-161	03/08/05	Administrative Amendment to change the Title V Contact address	<ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table
00082-171	01/09/08	Administrative Amendment to change Responsible Official	<ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table
00082-191	10/13/08	Administrative Amendment to change ownership from ConocoPhillips to Crimson Pipeline LP	<ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table
00082-181	04/06/09	Permit Reissuance for Period Terminating December 31, 2013	See “Permit Summary and Statement of Basis”
00082-201	01/12/11	Administrative Amendment to change Title V Contact Name. Minor Part 70-Permit Modification, to reflect an exemption from testing the engines that are operated less than 200 hours per year	<ul style="list-style-type: none"> • Signature Cover Page, Section 1 • Permit Revisions Table, Section 1 • Attachment 74.9N3, Section 6 • Attachment PO00082PC2, Section 7

Application No.	Issue Date	Description	Revised Permit Sections
00082-211	09/11/13	Remove a 135,000 bbl Floating Roof Tank (Minor Modification), change the company mailing address, change of facility name, and change of Title V contact person (Administrative Amendment)	<ul style="list-style-type: none"> • Signature Cover Page, (Section 1) • Permit Revisions Table, (Section 1) • Permit Summary and Statement Of Basis (Section 1) • Table No. 2 (Section 2). • Table No. 3 (Section 3) • Table No. 4 (Section 4)
00082-221	08/01/14	Permit Reissuance for Period Terminating December 31, 2018	See “Permit Summary and Statement of Basis”
00082-231	05/31/16	Administrative Amendment to change Company Name and Title V Contact Person	<ul style="list-style-type: none"> • Signature Cover Page, (Section No. 1) • Permit Revisions Table, (Section No. 1)
00082-241	03/15/22	Permit Reissuance for Period Terminating December 31, 2023	<ul style="list-style-type: none"> • See “Permit Summary and Statement of Basis”
00082-251 00082-261	08/29/23	00082-251: Replace 25 square foot sump with 13 square foot sump – Minor Part 70 Permit Modification 00082-261: Administrative Amendment to change Responsible Official, Title V Contact Person, and Company address	<ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table • Statement of Basis • Table No. 2 • Table No. 3 • Table No. 4

1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is a crude oil storage and pipeline facility. This source has a Standard Industrial Classification (SIC) Code of 4612, Crude Petroleum Pipelines. The source operates one (1) 150,000 barrel capacity welded external floating roof crude oil storage tank. This stationary source receives crude oil from various nearby oil fields, stores the oil, and then pumps it through a dedicated pipeline to off-site tank farms or refineries. The source has two natural gas fired internal combustion engines to drive the oil pumps. This stationary source is subject to the Part 70 permit program based upon the potential to emit carbon monoxide (CO).

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. 5 of the permit. In addition, "Short Term Activities" as listed in Section No. 9 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" and Rule 55, "Fugitive Dust". 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 NO_x and 100 tons per year for PM, SO_x, and CO, pursuant to Rule 33.B.2 and Ventura County's "Serious" nonattainment classification with the federal ozone standard. Ventura County's nonattainment classification with the federal ozone standard has been in transition and is currently set at "Serious". This stationary source is subject to the Part 70 permit program based upon the carbon monoxide (CO) potential to emit in excess of the threshold as shown in Table No. 4 in Section No. 4 of this Permit to Operate. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NO_x, PM, SO_x, 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, NO_x, PM, SO_x, and CO) result from the combustion of natural gas in the two rich burn engines. ROC emissions result from the breathing and working

losses from the external floating roof crude oil storage tank and evaporative losses from the 25 square foot covered pit.

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. 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. 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 the program’s inception. 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 at the “intermediate” level. As an intermediate level facility, the stationary source is required to provide a toxics report every four years. The most recent submittal was received in 2009. This report stated that no changes had been made to the facility since the 1992 reporting year in which an extensive toxics report was conducted.

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.

An approximate CO_2e potential to emit for this stationary source has been calculated to be 3,710 tons per year. This potential to emit is based on the permitted annual combustion limits listed in Table No. 3 of the permit. The District has used an emission factor of 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. The calculation assumes a natural gas heating value of 1,050 BTU per cubic foot. Note that the emission factor is only based on carbon dioxide (CO_2) emission factor; and does not include nitrous dioxide (N_2O) or methane (CH_4) components. For this purpose, the N_2O and CH_4 components are negligible as compared to the CO_2 emissions. This CO_2 potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, “Exemptions from Permit”. Note that the emissions of greenhouse gases are not subject to Rule 42, “Permit Fees”, and are not included in Table No. 4, “Permitted Emissions”.

Starting in 2012, major GHG-emitting sources, such as electricity generation, and large stationary sources that emit more than 25,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year were required to comply with the California Air Resources Board GHG Cap-and-Trade Program. This program is regulated and implemented by the California Air Resources Board (CARB), and not the District. A list of these GHG Cap-and-Trade sources can be found on CARB's website.

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, 2013 to October 22, 2021, the facility received one (1) Notice of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 00082 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. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, 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. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "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 storage tank at this facility is post custody transfer and therefore subject to Rule 71.2, "Storage of Reactive Organic Compound Liquids". The tank is equipped with an external floating roof with primary and secondary seals to comply with Rule 71.2. This facility has one (1) 13 square foot covered pit to contain small leaks of crude oil from the pump stations. This pit complies with Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars". The two natural gas fired internal combustion engines are equipped with non-selective catalytic converters to comply with Rule 74.9, "Stationary Internal Combustion Engines". The engines are also subject to the maintenance requirements of the federal National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT – 40 CFR Part 63, Subpart ZZZZ).

Section No. 1

Statement of Basis (00082-251,261)

As this stationary source is by definition a pipeline transfer station, it is subject to the fugitive leak and inspection requirements of Rule 74.10, “Components at Crude Oil and Natural Gas Production and Processing Facilities”. This rule became applicable to this stationary source with the most recent version of this rule, adopted, March 10, 1998. The previous version of Rule 74.10, adopted June 16, 1992, did not apply to this facility.

This stationary source has stated that 40 CFR Part 68, “Chemical Accident Prevention Provisions”, is not an applicable requirement. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

This Part 70 Permit contains a permit shield for the external floating roof crude oil storage tank. This tank is shielded from the New Source Performance Standard (NSPS) requirements of 40 CFR Part 60, Subparts K, Ka, and Kb since construction of this tank commenced prior to the applicability dates.

The two natural gas internal combustion engines are not subject to 40 CFR, Part 64, “Compliance Assurance Monitoring” (CAM). The engines are equipped non-selective catalytic converters (NSCR) to comply with the NOx emission limit of Rule 74.9. However, the engines are not subject to CAM because the NOx emissions prior to control for each engine are less than the major source threshold of 50 tons per year. As noted above, Ventura County’s Nonattainment Classification is currently “Serious;” therefore, the NOx major source threshold is 50 tons per year. The NOx emissions prior to control are verified by source testing conducted on July 2, 2003.

Permit Revisions Summary

The Permit Revisions Table (Section No. 1) is a list of all permit revisions since Part 70 Permit No. 00082 was initially issued on January 1, 1999. A portion of the permit revisions are described in further detail below. The District’s Engineering Analysis for each application can also be consulted for further details.

Application No. 00082-151: Application No. 00082-151 is for the reissuance of Part 70 Permit No. 00082 for the period January 1, 2004 to December 31, 2008. The following items summarize the changes from the initial Part 70 Permit No. 00082 (January 1, 1999 to December 31, 2003):

- A permit attachment detailing the applicable requirements of Rule 74.11.1, “Large Water Heaters and Small Boilers”, has been added to the permit.
- Permit Condition No. 3 of Attachment PO00082PC1 which requires recordkeeping for solvent cleaning activities has been revised to reflect the November 11, 2003 revisions to Rule 23, “Exemptions from Permit”.

- The following District rules have been adopted, 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. 00082:
 - a) Rule 54, “Sulfur Compounds”
 - b) Rule 57, “Combustion Contaminants – Specific”
 - c) Rule 64, “Sulfur Content of Fuels”
 - d) Rule 74.1, “Abrasive Blasting”
 - e) Rule 74.2, “Architectural Coatings”
 - f) Rule 74.6, “Surface Cleaning and Degreasing”
 - g) Rule 74.9, “Stationary Internal Combustion Engines”
 - h) Rule 74.10, “Components at Crude Oil and Natural Gas Production and Processing Facilities”
 - i) Rule 74.29, “Soil Decontamination Operations”

Application No. 00082-181: Application No. 00082-181 is for the reissuance of Part 70 Permit No. 00082 for the five-year period terminating December 31, 2013. The following items summarize the changes to the permit for this reissuance:

- Permit Condition No. 3 of Attachment PO00082PC1 which required recordkeeping for solvent cleaning activities has been revised to reflect revisions to Rule 23, “Exemptions from Permit”.
- The following District rules have been adopted, 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. 00082:
 - a) Rule 52, “Particulate Matter – Concentration (Grain Loading)” *no longer applicable*
 - b) Rule 55, “Fugitive Dust” *new*
 - c) Rule 57.1, “Particulate Matter Emissions From Fuel Burning Equipment”
 - d) Rule 74.6, “Surface Cleaning and Degreasing”
 - e) Rule 74.9, “Stationary Internal Combustion Engines”
 - f) Rule 74.29, “Soil Decontamination Operations”

Application No. 00082-221: Application No. 00082-221 is for the reissuance of Part 70 Permit No. 00082 for the five-year period terminating December 31, 2018. The following items summarize the changes to the permit for this reissuance:

- A description and potential to emit of greenhouse gases has been included in the Permit Summary and Statement of Basis.
- A permit condition attachment for the requirements of 40 CFR Part 63, Subpart ZZZZ, “National Emission Standards for Hazardous Pollutants for Stationary Reciprocating Internal Combustion Engines”, has been added to the permit.
- The following rules have been adopted, 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. 00082:

- a) Rule 54, “Sulfur Compounds”
- b) Rule 74.2, “Architectural Coatings”
- c) Rule 74.11.1, “Large Water Heaters and Small Boilers”
- d) Rule 74.29, “Soil Decontamination Operations”

Application No. 00082-231: Application No. 00082-231 is an Administrative Amendment to change the company name and Title V contact person for the permit.

Application No. 00082-241: Application No. 00082-241 is for the reissuance of Part 70 Permit No. 00082 for the five-year period terminating December 31, 2023. The following items summarize the changes to the permit for this reissuance:

- The Responsible Official and Title V Contact persons have been updated.
- The discussion on Compliance Assurance Monitoring (CAM) in the Statement of Basis was updated to reflect the NOx major source threshold of 50 tons per year.
- The greenhouse gas discussion in the Permit Summary and Statement of Basis has been revised.
- The following rules have been adopted, 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. 00082:
 - a) Rule 50, “Opacity” (“routine surveillance” language removed)
 - b) Rule 54. “Sulfur Compounds” (01/14/2014 rule revision now adopted in SIP)
 - c) Rule 74.1, “Abrasive Blasting” (“routine surveillance” language removed)
 - d) Rule 74.2, “Architectural Coatings” (11/10/2020 rule revision)
 - e) Rule 74.6, “Surface Cleaning and Degreasing” (11/10/2020 rule revision)
 - f) Rule 74.26, “Crude Oil Storage Tank Degassing Operations” (“routine surveillance” language removed)
 - g) Rule 74.29, “Soil Decontamination Operations” (“routine surveillance language removed)

Application No. 00082-251: Application No. 00082-251 is a Minor Part 70 Permit Modification to permit a 13 square foot sump that replaces a 25 square foot sump pursuant to Authority to Construct No. 00082-250 (issued March 17, 2022).

Application No. 00082-261: Application No. 00082-261 is an Administrative Amendment to change the Responsible Official, Title V contact person, and company address for the permit.

M:\TITLEV\TV Permits\PO0082\Permit V\251\Statement of Basis-251.docx

NOV by Facility

Since January 1, 1996

Facility selected

00082

Facility No 00082 Crimson Ca Pipeline-Ventura Harbor

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
02/01/2017	23323	029.C	ICIS #CAVCAA65424 -EW Permit Condition Not Met - Oilfield	\$5,000.00	02/21/2017
Total for 1 NOVs				\$5,000.00	

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. 6 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.2N2	Rules 71.2.B.4, 71.2.C.1	<ul style="list-style-type: none">•Annual seal inspection at selected locations•Primary seal inspections along full circumference at designated frequency•Annual compliance certification.•Written notification of maintenance activities•Measure gap of primary seal upon installation or replacement, and every 10 years•Measure gap of secondary seal on annual basis	<ul style="list-style-type: none">•Records of gap inspections•Records of tank maintenance activities•Records of liquid stored in tank and mRVP ranges of liquids	None	<ul style="list-style-type: none">•Reid vapor pressure - ASTM Method No. D-323-82 Volume 5.01	
71.4N1	Rules 71.4.B.2, 71.4.C.2	<ul style="list-style-type: none">•Rule 74.10 inspections•Verbal notice of maintenance•Annual compliance certification verifying integrity of cover	<ul style="list-style-type: none">•Records of Rule 74.10 inspections•Records of maintenance	None	None	

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

74.9N3	Rules 74.9.B.1 and B.2	<ul style="list-style-type: none"> •Quarterly NOx and CO Emissions Screening •Biennial Source Test (ROC, NO_x, CO) •Annual compliance certification 	<ul style="list-style-type: none"> •Quarterly Emissions Screenings •Inspections •Maintenance 	<ul style="list-style-type: none"> •Actual annual usage •Summary of maintenance and testing •Biennial Source Test Report 	<ul style="list-style-type: none"> •ROC-EPA Method 25 or EPA Method 18 •NO_x-ARB Method 100 •CO-ARB Method 100 	
40CFR63ZZZN5	RICE MACT for non-emergency 4SRB ≤ 500 HP – oil change and inspections	<ul style="list-style-type: none"> •Maintenance records •Annual compliance certification 	<ul style="list-style-type: none"> •Maintenance 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. 7 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO0082PC1 - Condition No. 1	Rule 26 General Recordkeeping	<ul style="list-style-type: none">•Monthly records of throughput and consumption•Annual compliance certification	<ul style="list-style-type: none">•Monthly Records	None	None	
PO0082PC1 - Condition No. 2	Rule 26 Natural Gas Only	<ul style="list-style-type: none">•Annual compliance certification	None	None	None	
PO0082PC1 - Condition No. 3	Rule 29 Exempt Solvents	<ul style="list-style-type: none">•Maintain a list of any solvents in use and their permit exemption status	None	None	None	
PO0082PC2	Rules 26 and 74.9 BACT for Caterpillar engine	<ul style="list-style-type: none">•Monitor air:fuel ratio controller readings on a quarterly basis•Biennial source test (ROC, NOx, CO)•Annual compliance certification	<ul style="list-style-type: none">•Records of air:fuel ratio controller readings	None	<ul style="list-style-type: none">•ROC-EPA Method 25 or EPA Method 18•NO_x-ARB Method 100•CO-ARB Method100	

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. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> •Routine surveillance •Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> •All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units 	None	None	•General opacity requirements applicable to all units
54.B.1	Rule 54.B.1	<ul style="list-style-type: none"> •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 307-91, as appropriate	•Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	<ul style="list-style-type: none"> •Annual compliance certification •Determine ground or sea level concentrations of SO₂, 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 ₂ S and SO ₂	
55	Rule 55	•Annual compliance certification	•Specific activity records as applicable	None	•EPA Method 9	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> •Annual compliance certification •None for PUC-quality gas, propane, or butane •Annual test if gas is other than PUC-quality gas, propane, or butane (submit with annual compliance certification) 	•Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane	None	•SCAQMD Method 307-94	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.6	Rule 74.6	<ul style="list-style-type: none"> •Annual compliance certification •Maintain current solvent information •Routine surveillance of solvent cleaning activities •Upon request, solvent testing •Measurement of freeboard height and drain hole area for cold cleaners (as applicable) 	<ul style="list-style-type: none"> •Records of current solvent information 	None	<ul style="list-style-type: none"> •ROC content-EPA Test Method 24 •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 or other methods per Rule 74.6.G.5 •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	<ul style="list-style-type: none"> •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 	<ul style="list-style-type: none"> •Records of leak inspections in inspection log 	None	<ul style="list-style-type: none"> •Gas Leaks - EPA Method 21 •ROC Concentration of Process 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	<ul style="list-style-type: none"> •Annual compliance certification •Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> •Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> •Rule only applies to the installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> •Annual compliance certification •Maintain furnace identification records 	<ul style="list-style-type: none"> •Records of current furnace information 	None	None	<ul style="list-style-type: 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. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> •Annual compliance certification •Routine surveillance and visual inspections of abrasive blasting •Abrasive blasting records 	<ul style="list-style-type: none"> •Abrasive blasting records 	None	<ul style="list-style-type: none"> •Visible emission evaluation-Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> •Annual compliance certification •Routine surveillance •Maintain VOC records of coatings used 	<ul style="list-style-type: none"> •Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> •See Rule 74.2.G 	
74.26	Rule 74.26	<ul style="list-style-type: none"> •Annual compliance certification •Record vapor concentration and gas flow rate of control device •Record vapor concentration of tank •Routine surveillance to ensure proper operation •Vapor destruction or removal efficiency upon request •Insure subcontractor has valid permit for portable equipment, if applicable •Notification required for degassing 	<ul style="list-style-type: none"> •Vapor concentration and gas flow rate of control device •Vapor concentration of tank being degassed 	None	<ul style="list-style-type: 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 	
74.29N3	Rule 74.29	<ul style="list-style-type: none"> •Annual compliance certification •Weekly measurements of in-situ soil bioventing or bioremediation •Weekly measurements of soil aeration •Date and quantity of soil aerated •Routine surveillance •Notification required for excavation 	<ul style="list-style-type: none"> •Weekly measurements of soil decontamination operation vapor concentration •Date and quantity of soil aerated 	•None	<ul style="list-style-type: none"> •Vapor concentration- EPA Method 21 •Wt. % of contaminant in soil-EPA Method 8015B 	
40CFR.61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> •Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures 	<ul style="list-style-type: none"> •See 40 CFR Part 61.145 for recordkeeping procedures 	<ul style="list-style-type: none"> •See 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> •See 40 CFR Part 61.145 for test methods 	

M:\TITLEV\TV Permits\PO0082\Permit V\PerdcTbl-221.docx

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. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, 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. 8, "General Applicable Requirements;" Section No. 9, "General Requirements for Short-Term Activities;" Section No. 10, "General Permit Conditions;" and Section No. 11, "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. 6, "Specific Applicable Requirements," that contains the associated permit conditions. For example, code key "3" under Rule 74.9 indicates that the emission unit is required to comply with the requirements of Attachment 74.9N3 in Section No. 6.

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. For the purpose

of the Annual Compliance Certification, the owner or operator can identify the conditions that apply within the "PC#." The "PC#" also corresponds to the permit attachment in Section No. 7, "Permit Specific Conditions," that contains the permit specific requirements.

M:\TITLEV\Attachments updated\PERMIT2std.doc

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 00082 Permitted Equipment and Applicable Requirements					
Equipment	71.2	71.4	74.9	RICE MACT	Additional Requirements
1 - 415 HP Caterpillar NG Rich Burn Engine (S/N 72B01367) NSCR			3	11	PC1, PC2
1 - 465 HP Enterprise GSG-6 NG Rich Burn Engine (S/N 54050) NSCR			3	11	PC1
1 - 150,000 BBL COST, Welded External Floating Roof w/ Metallic Shoe Primary Seal, and H.M.T. Double Layer Wiper Secondary Seal (No. 150305)	2				PC1
1 - 13 sqft Covered Pit		1			
M:\TitleV\TV Permits\PO0082\Tables-00082-251					

TITLE V EQUIPMENT LIST DESCRIPTION KEY

The Permitted Equipment and Applicable Requirements Table and this Title V permit contain a number of terms, abbreviations, and acronyms that have been standardized. The following list describes and defines many of the terms in this permit:

APCD	Air Pollution Control District
APCO	Air Pollution Control Officer of the Ventura County APCD
ARB	The California Air Resources Board
ASTM	American Standards for Testing Materials
ATCM	Air Toxic Control Measures
BACT	Best Available Control Technology
BHP	The rating of an internal combustion engine as measured in brake horsepower
CARB	California Air Resources Board
CFH	Cubic feet per hour
CFM	Cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EPA	Environmental Protection Agency
FGR	Flue gas recirculation
FO	Fuel oil or diesel fuel
Gal	Gallon
HAP	Hazardous Air Pollutant
Lb ROC/Gal	Pound(s) of ROC per gallon
Lo-NOx	Device has equipment to control the emissions of NOx
LPG	Liquid petroleum gas
MMBTU/Hr	The heat input of a combustion device as measured in millions of British Thermal Units per hour

MW	The electrical output of a steam turbine, or gas turbine, as measured in megawatts
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NG	Indicates that the equipment is permitted to be fired on natural gas only
NH ₃	Ammonia
NO _x	Oxides of Nitrogen
NSCR	Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.
NSPS	New Source Performance Standards
OAI	Overfire air injection
PM	Particulate Matter
PSC	Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.
RICE MACT	National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines
Rich or Lean Burn	A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.
ROC	Reactive Organic Compound
SCAQMD	South Coast Air Quality Management District
SCFM	Standard cubic feet per minute
SCR	Engine or turbine that is equipped with selective catalytic reduction and ammonia injection for the control of NO _x to meet its Rule 74.9 or Rule 74.23 compliance requirements
SIP	State Implementation Plan
SO _x	Sulfur Oxides
1,1,1-TCA	Trichloroethane
TV AF	Title V application form

VOC	Volatile Organic Compound
VR	Vapor recovery system that is installed on a tank or other piece of process equipment

M:\TITLEV\Attachments updated\Glossary.docx

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 71.2, "Storage of Reactive Organic Compound Liquids"

1. Fixed roof tank requirements for storage tanks equal to or greater than 40,000 gallons for crude oil with a modified RVP of 0.5 psia or greater. (71.2.B.4) Vapor loss control device requirements for a vapor recovery system or condensation system that is connected to a gas pipeline distribution system. (71.2.C.3)
2. External floating roof tank requirements for storage tanks equal to or greater than 40,000 gallons for crude oil with a modified RVP of 0.5 psia or greater. (71.2.B.4) Vapor loss control device requirements for external floating roofs. (71.2.C.1) Requirements for all closure devices on external floating roof tanks in which an Authority to Construct was granted prior to October 4, 1989. (71.2.D) External floating roof requirements for welded tanks with primary metallic shoe seals and zero gap secondary seals. (71.2.E.1, 71.2.E.6, 71.2.E.7, 71.2.E.8)
3. Exemption from vapor loss control requirements for storage tanks

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"

1. Second and third stage sumps, pits, and ponds shall have an impermeable cover (71.4.B.2)
2. Exemption from cover requirement for emergency pits (71.4.C.1.b)
3. Exemption from cover requirement for sumps, pits, or pond if the ROC content of the liquid at the point of entry is less than 5 milligrams per liter (71.4.C.1.c)
4. Exemption from cover requirement for sumps, pits, or pond when a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.4.C.1.d)

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emissions limits for rich-burn engines (increments of progress have passed)
2. Pre-January 1, 2002 emissions limits for lean-burn engines (increments of progress have passed)
3. Natural gas-fired rich-burn engines (74.9.B.1 or 74.9.B.2)
4. Natural gas-fired lean-burn engines (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
5. Diesel engines. (74.9.B.1 or 74.9.B.2) with ammonia emission limit, 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)
10. Exemption from Rule 74.9 for diesel engines operated on San Nicolas Island. (74.9.D.10)

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 ≤ 300 HP – area source
5. Existing non-emergency diesel engines $300 \text{ HP} < X \leq 500 \text{ HP}$ – 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
10. Existing non-emergency spark-ignited four stroke lean burn engines > 500 HP at an area source of HAPs
11. Existing non-emergency spark-ignited four stroke rich burn engines ≤ 500 HP

M:\TITLEV\TV Permits\PO0082\Permit V\App Req Code Key-221.docx

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

M:\TITLEV\Attachments\PERMIT3std.docx

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT				
Permit to Operate No. 00082				
Permitted Throughput/Consumption Limits				
Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
1 - 415 HP Cat. NG Rich Burn Engine (S/N 72B01367) NSCR 1 - 465 HP Enter. GSG-6 NG Rich Burn Engine (S/N 54050) NSCR 1 - 150,000 BBL COST, Welded External Floating Roof w/ Metallic Shoe Primary Seal, and H.M.T. Double Layer Wiper Secondary Seal (No. 150305) 1 - 13 sqft Covered Pit	No Limit 25.9 MMCF/Yr 3,500,000 BBL/Yr	 F F	34.6 MMCF/Yr 25.9 MMCF/Yr 3,500,000 BBL/Yr	

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), NO_x (nitrogen oxides), PM (particulate matter), SO_x (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. 00082 Permitted Emissions										
Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
1 - 415 HP Cat. NG Rich Burn Engine (S/N 72B01367) NSCR	2.33	0.60	0.17	0.01	40.69	0.54	0.14	0.04	0.00	9.41
1 - 465 HP Enter. GSG-6 NG Rich Burn Engine (S/N 54050) NSCR	1.38	1.25	0.13	0.01	137.06	0.47	0.43	0.04	0.00	46.57
1 - 150,000 BBL COST, Welded External Floating Roof w/ Metallic Shoe Primary Seal, and H.M.T. Double Layer Wiper Secondary Seal (No. 150305)	1.41					0.33				
1 - 13 sqft Covered Pit	0.00					0.00				
Total Permitted Emissions	5.12	1.85	0.30	0.02	177.75	1.34	0.57	0.08	0.00	55.98
HAP Emissions Ref.: AB 2588 Air Toxics Report Reporting Year: 1992 Submittal Date: 5/94										
M:\Title\TV Permits\PO0082\Tables-00082-251										

5. 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. 8 of this permit may apply to these insignificant activities.

M:\TITLEV\Attachments updated\PERMIT5 std.docx

Ventura County Air Pollution Control District
INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)
Part 70 Permit No. 00082

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
None		

6. 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, State of California ATCM's, 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.

M:\TITLEV\Attachments updated\PERMIT6 std.docx

Ventura County Air Pollution Control District
Rule 71.2 Applicable Requirements
External Floating Roof Crude Oil Storage Tanks \geq 40,000 Gallons
For Which an Authority to Construct (AC) was Granted Before October 4, 1989
Welded Tanks with Primary Metallic Shoe Seals and Zero Gap Secondary Seals

Rule 71, “Crude Oil and Reactive Organic Compound Liquids”
Adopted 12/13/94, Federally-Enforceable

Rule 71.2, "Storage of Reactive Organic Compound Liquids”
Adopted 9/26/89 Federally-Enforceable

Applicability:

This attachment applies to external floating roof storage tanks which meet the following criteria:

- stores crude oil after custody transfer;
- stores crude oil with a modified Reid vapor pressure greater than 0.5 psia;
- tank capacity of equal to or greater than 40,000 gallons (952 bbl);
- tank was granted an Authority to Construct before October 4, 1989;
- tank is welded with primary metallic shoe seals and zero gap secondary seals

This attachment does not apply to any storage equipment subject to Rule 71.1, “Crude Oil Production and Separation”.

A storage tank is defined as any storage container, reservoir, or tank used for the storage of organic liquids. Custody transfer is defined as the transfer of produced crude oil and/or condensate, after separation and/or treatment in production operations, from storage tanks or automatic transfer facilities to pipelines or any other form of transportation. Modified Reid vapor pressure is the Reid vapor pressure measured at tank storage temperatures using Test Method for Vapor Pressure for Petroleum Products, ASTM D 323-82.

Conditions:

1. Pursuant to Rules 71.2.B.4 and 71.2.C.1, a tank subject to this attachment shall be equipped with an external floating roof consisting of a pontoon-type or double-deck-type cover that rests on the surface of the liquid contents and is properly installed, properly maintained, and in good operating order.
2. Pursuant to Rule 71.2.D, the closure device on the external floating roof tank shall meet the following criteria:
 - a. Pursuant to Rule 71.2.D.1, secondary seals shall extend from the roof to the tank

shell, shall not be attached to primary seals, and shall not be shoe-mounted.

- b. Pursuant to Rule 71.2.D.2, all openings in the roof, except pressure vacuum valves and automatic bleeder vents, shall provide a projection at least two (2) inches below the liquid surface to prevent belching of liquid and to reduce escaping vapors. All openings and fittings shall be covered and shall have gaskets at all times with no visible gap, except when in use.
- c. Pursuant to Rule 71.2.D.3, pressure vacuum valves shall be set to within 10 percent of the maximum allowable working pressure of the roof, and shall be properly installed, properly maintained, and in good operating order, and shall remain in a leak-free condition except when the operating pressure exceeds the valve set pressure.

Pursuant to Rule 71.B.14, a leak exists when (a) a reading in excess of 10,000 ppm, as methane, above background, is obtained using an appropriate portable hydrocarbon analyzer and when sampling is performed according to the procedures specified in EPA Method 21 - Appendix A 40 CFR section 3.2.1.; or (b) the dripping of liquid containing reactive organic compounds at a rate of more than three (3) drops per minute is observed. A "leak" is not a gaseous emission from pressure relief devices on tanks or ROC delivery vessels when the process pressure exceeds the limit specified for the device.

- d. Pursuant to Rule 71.2.D.4, solid sampling or gauging wells, and similar fixed projections through a floating roof such as an anti-rotational pipe, shall meet the following conditions:
 - 1. The well shall provide a projection at least two (2) inches below the liquid surface.
 - 2. The well shall be equipped with a cover, seal, or lid, which shall at all times be in a closed position with no gap exceeding 1/8 inch, except when the well is in use.
 - 3. The gap between the well and the roof shall be added to the gaps measured to determine compliance of the secondary seal and in no case shall exceed 1/2 inch.
- e. Pursuant to Rule 71.2.D.5, slotted sampling or gauging wells shall meet the following conditions:
 - 1. The well shall provide a projection at least two (2) inches below the liquid surface.
 - 2. The well shall have an internal float designed to minimize the gap between

the float and the well, provided that the gap in no case exceeds 1/2 inch.

3. The gap between the well and the roof shall be added to the gaps measured to determine compliance of the secondary seal and in no case shall exceed 1/2 inch.
- f. Pursuant to Rule 71.2.D.6, any emergency roof drain that drains back to the stored liquid shall be provided with a slotted membrane fabric cover, or equivalent, that covers at least 90 percent of the area of the opening.
3. Pursuant to Rule 71.2.E, the external floating roof shall meet the following conditions in addition to the requirements of Rule 71.2.D:
 - a. Pursuant to Rule 71.2.E.1, the external floating roof shall contain no holes or tears in, or openings in the seal or seal fabric which allow the emission of reactive organic compound vapors through the secondary seal or in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal.
 - b. Pursuant to Rule 71.2.E.6, welded tanks with primary metallic shoe seals and zero gap secondary seals shall meet the following requirements:
 1. No gap between the tank shell and the primary seal shall exceed 1-1/2 inches. No continuous gap in the primary seal greater than 1/8 inch shall exceed 10 percent of the circumference of the tank. The cumulative length of all primary seal gaps exceeding 1/2 inch shall be not more than 10 percent of the circumference and the cumulative length of all primary seal gaps exceeding 1/8 inch shall be not more than 40 percent of the circumference.
 2. No gap between the tank shell and the secondary seal shall exceed 0.06 inch. The cumulative length of all secondary seal gaps exceeding 0.02 inch shall be not more than five (5) percent of the circumference of the tank excluding gaps less than two (2) inches from vertical weld seams.
 - c. Pursuant to Rule 71.2.E.7, with respect to inspections of the primary seals at selected locations, the primary seal envelope shall be made available for unobstructed inspection by the District on an annual basis at four locations selected along its circumference at random by the District.
 - d. Pursuant to Rule 71.2.E.8, with respect to inspections of the primary seal along its full circumference, the primary seal envelope shall be made available for unobstructed inspection by the District for the full circumference at the following times:

1. Prior to the installation of the secondary seal.
2. At least every ten (10) years.
3. If the secondary seal is voluntarily removed by the owner or operator, it shall be made available for such inspection at that time. The owner or operator shall provide notification to the District no less than 72 hours prior to voluntary removal of the secondary seal.

4. Exemptions

- a. Pursuant to Rule 71.2.G.3, the provisions of Sections C, D, and E of Rule 71.2 shall not apply to out-of-service or empty storage tanks when undergoing cleaning, stock change, tank and roof repairs, or removal of contaminated stock provided that the following is accomplished:
 1. At least 72 hours prior to such work being done, written notice is received by the District Compliance Division.
 2. The tank is in compliance with these Rules prior to notification.
 3. When the floating roof is resting on the leg supports, the process of filling, emptying, and refilling shall be continuous and shall be accomplished as rapidly as possible. Emissions shall be minimized during the process of filling, emptying, and refilling.
 4. The District Compliance Division is notified when returning a tank to service after the above listed work has been completed.
- b. Pursuant to Rule 71.2.G.4, the provisions of Sections C, D, and E of Rule 71.2 shall not apply to in-service floating roof tanks undergoing preventive maintenance, including but not limited to roof repair, primary seal inspection, or removal and installation of a secondary seal, provided that the following conditions are met:
 1. At least 72 hours prior to such work being done, written notice is received by the District Compliance Division.
 2. The tank is in compliance with these Rules prior to notification.
 3. Product shall move neither in nor out of the storage tank and emissions shall be minimized.
 4. If an Authority to Construct is required, in accordance with Rule 10.A, then permittee shall obtain one prior to commencing work.

5. The time of exemption allowed under Rule 71.2.G.4 shall not exceed 72 hours.
5. Pursuant to Rule 71.2.H, the permittee shall record actual gap measurements of the primary and secondary seals at the following frequency:
 - a. For the primary seal, upon installation or replacement of the primary seal, and at least every ten (10) years thereafter.
 - b. For the secondary seal, on an annual basis.

The permittee shall submit the results of each inspection to the District Compliance Division within 30 calendar days after the inspection date.
6. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rules 71.2.B.4, 71.2.C.1, 71.2.D, and 71.2.E. This annual compliance certification shall include verifying that the tanks are meeting the external floating roof criteria presented in the conditions above.
7. Pursuant to Rule 71.2.I.1, the operator of any tank subject to Rule 71.2 shall maintain the following records:
 - a. Type of liquid stored in each tank, and the modified Reid vapor pressure ranges of such liquids.
 - b. Inspections reports required by Rule 71.2.H. Such records shall contain, at a minimum, the following information:
 1. Date of inspection and initials of inspector.
 2. Actual gap measurements between the tank shell and seals.
 3. Data, supported by calculations as necessary, to demonstrate compliance with the gap requirements of Rule 71.2.
 4. Any corrective actions or repairs taken to comply with the gap requirements of Rule 71.2 and the date these actions were taken.
 - c. The maintenance records where excess emissions occur during operations exempted by Rule 71.2.G.3 and Rule 71.2.G.4. These records shall contain, at a minimum, the following:
 1. Permit number, tank identification, type of vapor controls, and initials of personnel performing maintenance.

2. Description of specific maintenance procedure performed.
3. Estimate of excess emissions caused by maintenance procedure and how determined.
4. Start and finish times and dates of maintenance procedure.

These records shall be submitted to the District upon request.

8. Pursuant to Rule 71.2.J.1, the vapor pressure of petroleum products shall be measured using a Reid vapor pressure method at product storage temperature. The Reid Method is defined by the ASTM Method No. D-323-82 Volume 5.01, Section 5.

M:\TITLEV\Attachments updated\712N2.doc

Ventura County Air Pollution Control District
Rule 71.4.B.2 Applicable Requirements
Sumps, Pits, and Ponds With Covers

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"

Adopted 06/08/93, 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 second or third stage sumps, pits, and ponds at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored. The cover's sealing mechanism and other inlet and outlet 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".

A sump, pit, or pond 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". A pit is further defined as "used to receive intermittent flows of petroleum material or crude oil. Neither a sample box of less than two (2) square feet in horizontal surface area nor a containment berm shall be considered a pit". A pond is further defined as "used to contain produced water from petroleum production processes for disposal or re-use. Ponds are not used for oil/water separation or evaporation".

Conditions:

1. Pursuant to Rule 71.4.B.2, no person shall use a second or third stage sump, pit, or pond unless it is equipped with a properly installed and maintained cover which does not leak, which is impermeable to ROC vapors, and which covers at least 90 percent of the liquid surface area of the sump, pit, or pond. All covers shall be closed at all times except during sampling or attended maintenance operations.
2. Pursuant to Rule 71.4.C.2, the cover requirements of Rule 71.4.B.2 shall not apply during maintenance operations on sumps or pits 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. Pursuant to Rule 71.4.D.3, any person claiming an exemption from the cover requirements of Rule 71.4.B.2, based on Rule 71.4.C.2, shall maintain records of maintenance to justify the exemption and submit these records to the District upon request.

3. The cover's sealing mechanism and other inlet and outlet 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 sumps, pits, and ponds ensures compliance with the maintenance and leak-free requirements of Rule 71.4.B.2.
4. On an annual basis, permittee shall certify that sumps, pits, and ponds at the facility are complying with Rule 71.4.B.2. This annual compliance certification shall include verifying the integrity of the cover.

\\APCDBULLPEN\DivData\ENG\TITLEV\Attachments updated\714N1.doc

Ventura County Air Pollution Control District
Rules 74.9.B.1 and 74.9.B.2 Applicable Requirements
Stationary Natural Gas-Fired Rich-Burn Internal Combustion Engines

Rule 74.9, "Stationary Internal Combustion Engines"

Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to stationary natural gas-fired rich-burn internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations". A rich-burn engine is defined by Rule 74.9 to be a two or four-stroke spark-ignited engine where the manufacturer's original recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio is less than or equal to 1.1.

Conditions:

1. Pursuant to Rules 74.9.B.1 and 74.9.B.2, emissions from an applicable engine shall not exceed the following limits:
 - a. Oxides of Nitrogen (NO_x expressed as NO₂), Either:
 1. 25 ppmvd referenced at 15% oxygen; or
 2. A 96% reduction by volume, as measured concurrently across an emission control device.
 - b. Reactive Organic Compounds (ROC): 250 ppmvd referenced at 15% oxygen, expressed as methane
 - c. Carbon Monoxide (CO): 4500 ppmvd referenced at 15% oxygen

Compliance with this condition shall be verified by a biennial source test, conducted in accordance with Condition No. 2.

2. Pursuant to Rule 74.9.B.4, the permittee shall perform a biennial source test on an applicable engine utilizing the following methods as detailed in Rule 74.9.G:
 - a. NO_x ARB Method 100
 - b. CO ARB Method 100
 - c. ROC EPA Method 25 or EPA Method 18
 - d. Oxygen Content ARB Method 100
 - e. Gaseous Fuel Heating Value ASTM Method D1826-77

Source test data point intervals for ARB Method 100 tests shall be no greater than 5 minutes and data points shall be averaged over 15 consecutive minutes. Prior to conducting a biennial emissions test, the 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.

3. Pursuant to Rule 74.9.B.5, the permittee shall perform a screening analysis of NO_x and CO emissions on a quarterly basis unless:
 - a. The biennial source test specified above is required, or
 - b. The engine operated less than 32 hours in each of the three months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter.

The permittee shall notify the District Compliance Division by telephone 24 hours prior to any quarterly screening analysis.

4. Pursuant to Rule 74.9.C, the permittee shall maintain a District approved Engine Operator Inspection Plan. The plan shall include a specific emission inspection procedure to assure that the engine is operated in continual compliance with the provisions of Rule 74.9. The procedure shall include an inspection schedule. At a minimum, inspections shall be conducted quarterly unless the engine operated less than 32 hours in each of the three months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter.

The plan shall be updated after any change in operation. For new engines or modifications to existing engines, the plan shall be submitted to and approved by the District prior to issuance of the Permit to Operate.

5. Pursuant to Rule 74.9.E, Recordkeeping Requirements, the operator shall maintain an inspection log for each engine containing, at a minimum, the following data:
 - a. Identification and location of each engine subject to Rule 74.9;
 - b. Date and results of each screening analysis and inspection,
 - c. A summary of any emissions corrective maintenance taken, and
 - d. Any additional information required in the Engine Operator Inspection Plan.

For each engine exempt from quarterly screening analysis and quarterly inspection for operation less than 32 hours in each of the three months of the applicable quarter, the permittee shall record total hours of operation each month.

6. Pursuant to Rule 74.9.F, Reporting Requirements, the Annual Compliance Certification shall include the following information:

- a. Engine manufacturer, model number, operator identification number, and location.
- b. A summary of maintenance reports during the renewal period, including quarterly screening data if applicable.

\\APCDBULLPEN\DivData\ENG\TITLEV\Attachments updated\749N3 (11-08-05).doc

**Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Spark-Ignited 4SRB Engines \leq 500 HP**

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 non-emergency spark ignited four stroke rich burn (4SRB) engines less than or equal to 500 horsepower.

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. “Rich Burn engine” means any four-stroke ignited engine where the manufacturer’s recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio at full load conditions is less than or equal to 1.1.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than October 19, 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 1,440 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 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
 - c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

2. Pursuant to Section 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(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.
4. Pursuant to Section 63.6655, the permittee shall keep records of RICE engine maintenance (oil, spark plugs, hoses and belts) required by the engine operation and maintenance plan.
5. 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).

M:\TITLEV\Attachments updated\CFR63ZZZN11_existing NE SI less than 500 HP.docx

7. 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. 6.

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.

M:\TITLEV\Attachments updated\PERMIT7std.docx

Ventura County Air Pollution Control District
Part 70 Permit No. 00082
Additional Permit Requirements

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 the Ventura Pump Station. 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. (Rule 26)
2. Combustion equipment listed in the Section No. 2, “Permitted Equipment and Applicable Requirements Table”, and the Section No. 3, “Permitted Throughput and Consumption Limit Table”, as being fired on natural gas shall only burn natural gas and are not permitted to burn any other fuel. (Rule 26)
3. 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)

M:\TITLEV\TV Permits\PO0082\Permit IV\PC1-rev181.docx

**Ventura County Air Pollution Control District
Additional Permit Requirements
415 BHP Caterpillar Internal Combustion Engine**

Rule 74.9, "Stationary Internal Combustion Engines"

Adopted 11/08/05, Federally-Enforceable

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 415 BHP Caterpillar Internal Combustion Engine. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The emissions of oxides of nitrogen (NO_x as nitrogen dioxide) shall not exceed nine (9) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT (Best Available Control Technology) requirement of Rule 26 as detailed in Authority to Construct No. 0082-110. (Rule 26)
2. The emissions of reactive organic compounds (ROC) shall not exceed one hundred (100) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen, measured as methane. This is a BACT requirement of Rule 26 as detailed in Authority to Construct No. 0082-110. (Rule 26)
3. The emissions of carbon monoxide (CO) shall not exceed one thousand (1,000) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT requirement of Rule 26 as detailed in Authority to Construct No. 0082-110. (Rule 26)
4. The permittee shall have the engine source tested biennially (every two years) pursuant to Rule 74.9 to determine the NO_x, ROC, and CO emissions as detailed above and shall maintain the air to fuel ratio set point (or target) at the catalyst-out position in the range of 630 to 770 millivolts. This set point shall be monitored, measured, and recorded on a quarterly basis. Prior to conducting the source test, the permittee shall notify the APCD Compliance Division. Written notification shall be received 15 calendar days prior to the test. Additional monitoring, recordkeeping, reporting, and test method requirements for this unit are included in Attachment 74.9N3 in Section No. 6 of this permit. (Rule 26 and Rule 74.9)

M:\TITLEV\TV Permits\PO0082\Permit IV\PC2-rev181.docx

8. 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.

M:\TITLEV\Attachments updated\PERMIT8reissuestd.docx

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.

M:\TITLEV\Attachments updated\50 (03-13-2019).docx

**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.

M:\TITLEV\Attachments updated\54B1 (01-14-14).docx

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 99th 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 SO₂ concentration value and sort all these daily maximum hourly values by descending value. The 99th percentile is the 4th highest value for each modeled year. Calculate the average of the 99th 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 SO₂

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 SO₂ 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.

M:\TITLEV\Attachments updated\54B2 (01-14-14).docx

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.

M:\TITLEV\Attachments updated\55.docx

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.

M:\TITLEV\Attachments updated\64B1(4-13-99).docx

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

Rule 74.6, "Surface Cleaning and Degreasing"
Federally Enforceable Version Adopted 11/11/03
District Enforceable Version Adopted 11/10/20

This permit attachment lists the requirements of the November 10, 2020 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.6. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

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. On or before December 31, 2021, 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°C, as applied.
 - b. On or before December 31, 2021, 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. On or after January 1, 2022, Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 25 grams per liter, as applied.
 - d. On or after January 1, 2022, Solvents used for cleaning of electronic components, electrical apparatus, or aerospace components conducted in a degreaser shall not exceed an ROC content of 100 grams per liter, as applied.
 - e. On or after January 1, 2022, Solvents used for cleaning of medical devices and pharmaceuticals, including repair and maintenance of tools, equipment and machinery shall not exceed an ROC content of 800 grams per liter, as applied.
 - f. On or after January 1, 2022, Solvents used for the general work surface cleaning of medical devices and pharmaceuticals shall not exceed an ROC content of 600 grams per liter, as applied.
 - g. Solvents used for cleaning for purposes other than those listed in (a) through (f) 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 properly. Spent cleanup solvents may be classified as hazardous waste. The owner or operator shall obtain approval from applicable local, state, or federal water pollution control agency prior to disposing of spent solvents into the sewer or storm drain systems.
 - 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. 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

- f. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, ungluing), cured ink, or cured resin.
 - g. 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. 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). The ROC content of materials containing 50 g/l of ROC or less shall be determined by the most recent version of South Coast Air Quality Management District (SCAQMD) Method 313 (Determination of Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry) or any other alternative test methods approved by the U.S. EPA, CARB, and the District.
- 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. Rule 74.6.G.5, on or before December 31, 2021, 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.

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.

M:\TITLEV\Attachments updated\7410(3-10-98).docx

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.

M:\TITLEV\Attachments updated\7411.1 (9-11-12).docx

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.

9. 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.

M:\TITLEV\Attachments updated\PERMIT9reissuestd.docx

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.

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

Rule 74.2, "Architectural Coatings"

Federally Enforceable Version Adopted 01/12/10

District Enforceable Version Adopted 11/10/20

This permit attachment lists the requirements of the November 10, 2020 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.2. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving any person who markets, 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, to fields or lawns, 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 (as stipulated in Rule 74.2.F.2); do not apply to any aerosol coating product; and do not apply to colorants added at the factory or at the worksite (as stipulated in Rule 74.2.F.3).

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 50 grams per liter of coating.
 - c. The VOC content of nonflat-high gloss coatings shall not exceed 50 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 default coatings shall not exceed 50 grams per liter of coating. A default coating is any specialty coating (those other than flat or nonflat coatings) that is not defined in Section J of Rule 74.2 as any other coating category.

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 monitor each architectural coating operation 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. This information 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.

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.

In addition, permittee shall perform routine surveillance of the tank degassing operation to ensure that the equipment is properly operating.

- 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.

M:\TITLEV\Attachments updated\7426.doc

**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, 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 of 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 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.

M:\TITLEV\Attachments updated\7429N3(12-07-2017).docx

**Ventura County Air Pollution Control District
40 CFR Part 61, Subpart M Applicable Requirements
National Emission Standard for Asbestos**

**40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"
Federally Enforceable**

Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Conditions:

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos." The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation."
2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

M:\TITLEV\Attachments updated\CFR61M.docx

10. 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.

M:\TITLEV\Attachments updated\PERMIT10std.docx

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 required 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 shall submit a 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)

M:\TITLEV\Attachments updated\PART70GN (10-01-02).docx

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)

M:\TITLEV\Attachments updated\POGNCN.docx

11. 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.

M:\TITLEV\Attachments updated\PERMIT11std.docx

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.

M:\TITLEV\Attachments updated\CFR68.docx

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 CFR 82.152, *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."

M:\TITLEV\Attachments\CFR82 11-18-16.docx

**Ventura County Air Pollution Control District
Permit Shield - New Source Performance Standards
40 CFR Part 60, Subparts K, Ka, and Kb**

40 CFR Part 60, Subpart K, “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978”

40 CFR Part 60, Subpart Ka, “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984”

40 CFR Part 60, Subpart Kb, “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984”

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. The following discussion details the determination of this permit shield for the one (1) 150,000 barrel floating roof crude oil storage tank at this stationary source.

40 CFR Part 60 Subparts K, Ka, and Kb are not applicable to any emission units for which construction, reconstruction, or modification commenced prior to June 11, 1973 and after May 19, 1978; prior to May 18, 1978 and after July 23, 1984; and prior to July 23, 1984; respectively. The floating roof crude oil storage tank at this stationary source was constructed prior to 1973. No reconstructions or modifications have been made.

M:\TITLEV\TV Permits\PO0082\Permit V\Shield-K,Ka,Kb.docx

12. 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.

M:\TITLEV\Attachments updated\PERMIT12std.docx