



# San Joaquin Valley Unified Air Pollution Control District

STATE OF CALIFORNIA  
AIR RESOURCES BOARD  
RECEIVED 4-6-93  
BY BOARD SECRETARY

April 5, 1993

4/8/93  
93-6-1

XC: Bud Moore  
JS mHS  
JD TSO  
JB Legal

Linda C. Murchison, Chief  
Stationary Source  
Emissions Inventory Branch  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: CALIFORNIA CLEAN AIR ACT AND ATMOSPHERIC ACIDITY ACT FEES

Dear Ms. Murchison:

As indicated in your March 24, 1993 letter, with respect to oil producing facilities, there seems to be some confusion over the definition of a source for the purpose of determining emissions subject to the above fees.

State law Section 90621, Title 17, California code of regulations requires that "holders of permits for sources which emitted 500 tons per year" to pay the specified fees. The sources are permitted and stationary sources are defined pursuant to the provisions of the District's New Source Review Rule. District rule 2201, Subsection 3.31.4, states that "light oil production, heavy oil production, and gas production shall constitute separate stationary sources." Therefore, after examining the state laws and the local regulations, it is our conclusion that the definition of a source for the purpose of determining these fees should be consistent with the definition used in the District's permitting practices consistent with New Source Review rule.

Enclosed is breakdown of facility emissions indicating the impact of this determination. Please incorporate these figures in setting the new fees by your Board on April 8, 1993.

If you have any further questions, please feel free to call me at (209) 497-1080.

Sincerely,

*Seyed Sadredin*  
Seyed Sadredin  
Director of Permit Services

Post-it™ brand fax transmittal memo 7671 # of pages 2

To: <i>Mr. Shimp</i>	From: <i>Seyed Sad.</i>
Co.:	Co.:
Dept.:	Phone #:
Fax #:	Fax #:

Dav

Executive Director/Air Pollution Control Officer

2001 K Street, Suite 200 • Fresno, CA 93721 • (209) 497-1000 • FAX (209) 232-2057

**DISTRIBUTION OF POLLUTANT TONNAGE  
WESTERN/CENTRAL AND HEAVY/LIGHT OIL PRODUCTION  
KERN COUNTY**

Based on 1991 emissions, with the Western and Central devices split by the Toxics group for the purposes of their billing.

Data listed in tons

FACILITY/ID #/POLLUTANT	WESTERN		CENTRAL		TOTAL
	HEAVY	LIGHT	HEAVY	LIGHT	
Santa Fe/#211/NOx	1189	---	<u>401</u> combined		1560
Santa Fe/#211/SOx	2378	---	<u>385</u> combined		2764
Mobil Oil/#247/NOx	837	<u>306</u>	---	---	942
Mobil Oil/#247/ROG	1311	<u>28</u>	---	---	1337
Chavron USA/#257/NOx	1073	---	<u>351</u> combined		1424
ARCO/#201/NOx	2228	---	<u>460</u> combined		2888
Shell West Coast/#331/NOx	<u>45</u>	---	577	---	622
Shell Kernridge/#204/NOx	2801	<u>88</u>	---	---	2899
Elk Hills Prod./#441/NOx	---	905	---	---	905
Texaco West/#332/NOx	<u>304</u>	<u>217</u>	---	---	521

Underlined numbers above represent tonnage that would no longer be included in the California Clean Air Act (CCAA) and Atmospheric Acidity Protection Act (AAPA) fee programs. The total is 2592 tons.

Only one company would completely drop out of the fee programs. (Texaco West)

For certain companies, the Central heavy and light tonnage is combined. Since the combined number is less than the 500 ton trigger for the CCAA/AAPA fee programs, the number given represents the total tonnage not subject to fees no matter how the emissions are split between heavy and light oil production.

Since the deadline for any change to the 1994 CCAA/AAPA billing (based on the 1991 inventory) is April 8, it would be extremely difficult to split these facilities at this time. Andy Delao of the ARB would know whether or not the split could be accomplished for the 1991 inventory. If the split is allowed for 1992, it is imperative that the Southern Region office know as soon as possible. Oil companies are in the process of completing their fuel use and emission surveys, and should still have time to segregate their data into Western/Central and heavy/light sections.