



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 17 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # S-1121804**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (S-1547-778-22) with a Certificate of Conformity to Aera Energy, LLC. Aera has proposed to designate steam generator S-1547-778 as a non-compliant dormant emissions unit.

Enclosed is a copy of the Authority to Construct. The application and proposal were sent to US EPA Region IX on 6/21/12. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures
SR

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 17 2012

Mr. Robert Beebout
Aera Energy, LLC
PO Box 11164
Bakersfield, CA 93389-1164

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # S-1121804**

Dear Mr. Beebout:

The Air Pollution Control Officer has issued an Authority to Construct (S-1547-778-22) with a Certificate of Conformity to Aera Energy, LLC. Aera has proposed to designate steam generator S-1547-778 as a non-compliant dormant emissions unit.

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on 6/21/12. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures
SR

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Date	8/15/12
Engineer Name	Steve Roeder
Engineer Initials	SR
Engineer's Regional Manager	Leonard Scandura
Facility Name	Aera Energy, LLC
Facility #	S-1547
Project #	S-1121804
Location	the Midway Sunset Field in Kern County
	The following should make sense: This facility is located at the Midway Sunset Field in Kern County.
More than 1 ATC's?	No
ATC's (i.e. ATC # S-1234-3-2)	S-1547-778-22
Modification Details (Complete Sentences)	Aera has proposed to designate steam generator S-1547-778 as a non-compliant dormant emissions unit.
Contact Receiving Proposed	Robert Beebout
Greeting Name (i.e. Mr. Doe)	Mr. Robert Beebout
Preliminary Notice Date	6/21/12
Mailing Address	PO Box 11164 Bakersfield, CA 93389-1164

** The letters below are editable; therefore, modify as required. **

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-778-22

ISSUANCE DATE: 08/15/2012

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A GIDEON MODEL MGW-63R1 LOW NOX BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, MOCO (#506) (SOUTH MIDWAY): DESIGNATE AS A COMPLIANT DORMANT EMISSIONS UNIT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

S-1547-778-22 : Aug 15 2012 9:10AM -- ROEDERS : Joint Inspection NOT Required

7. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
8. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H₂S: ASTM D6228 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
13. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
14. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
15. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
16. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBTu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBTu, NO_x (as NO₂): 0.0146 lb/MMBTu or 12 ppmv @ 3% O₂, or CO: 0.030 lb/MMBTu or 40 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
23. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
24. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 7994 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
25. Duration of startup and shutdown (as defined in Rule 4306) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
27. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
31. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR system in the closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
32. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
33. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
34. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
35. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
36. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
37. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
38. Formerly S-1511-135