



JUN 07 2013

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-1547
Project # 1131665

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Aera Energy, LLC is proposing a Title V minor permit modification to modify Permit to Operate (PTO) S-1547-1027-5 of the facility's current Title V operating permit. Aera Energy, LLC (Aera) is proposing a Title V minor permit modification to remove a hydrochloric acid tank permit S-1547-1027 from their Title V operating permit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-1547-5, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura.

Sincerely,



David Warner
Director of Permit Services

Enclosures
cc: dbt, Permit Services

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
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



JUN 07 2013

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

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1547
Project # 1131665**

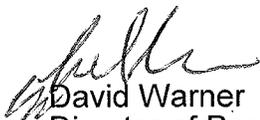
Dear Mr. Beebout:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Aera Energy, LLC is proposing a Title V minor permit modification to modify Permit to Operate (PTO) S-1547-1027-5 of the facility's current Title V operating permit. Aera Energy, LLC (Aera) is proposing a Title V minor permit modification to remove a hydrochloric acid tank permit S-1547-1027 from their Title V operating permit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-1547-5, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura.

Sincerely,



David Warner
Director of Permit Services

Enclosures
cc: dbt, Permit Services

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
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1131665

Engineer: David Torii
Reviewing Engineer: Allan Phillips *ASUPR ARE*

Facility Number: S-1547
Facility Name: Aera Energy, LLC
Mailing Address: PO Box 11164
Bakersfield, CA 93389-1164

JUN 04 2013

Contact Name: Robert Beebout
Phone: 661-665-3212

Responsible Official: Anthony Gurrola
Title: Process Supervisor

I. PROPOSAL

Aera Energy, LLC (Aera) is proposing a Title V minor permit modification to remove a hydrochloric acid tank permit from their Title V operating permit.

Hydrochloric acid tanks are not subject to any federally enforceable rules. Furthermore, none of facility S-1547's other hydrochloric acid tank permits are included in their Title V permit.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment is located in section 35, township 12N, Range 24W in Aera's Heavy Oil Western stationary source, Kern County.

III. EQUIPMENT DESCRIPTION

PTO S-1547-1027-5: WITH FUME SCRUBBER SHARED WITH S-1547-1103 -
SOUTH MIDWAY

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Changes in the original Permit to Operate and the implemented ATC are as follows

Condition # on <u>current</u> PTO S-1547-1027-5	Condition # on Proposed Permit S-1547-1027-9	Condition is New, Revised, or Removed	Reason for Change from Current PTO
1, 2, 3 and 4	1, 2, 3 and 4	revised	Change rule reference from Rule 2520 to Rule 4102 and make non-federally enforceable
10	10	revised	Change rule reference from Rule 1070 to Rule 4102 and make non-federally enforceable

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which

the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and

5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(S-1547-1027-9)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1027-9

EXPIRATION DATE: 05/31/2016

SECTION: 35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

21,000 GALLON HYDROCHLORIC ACID STORAGE TANK #206A WITH FUME SCRUBBER SHARED WITH S-1547-1103 - SOUTH MIDWAY

PERMIT UNIT REQUIREMENTS

1. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 4102]
2. Scrubber shall be operated and maintained in accordance with the manufacturer's recommendations. [District Rule 4102]
3. Fresh scrubber liquid (water) shall be added as necessary to maintain at least manufacture's listed scrubbing efficiency. [District Rule 4102]
4. Spent packed water column water shall be disposed of in a manner preventing acid emissions. [District Rule 4102]
5. Tank shall store only hydrochloric acid (HCl). [District Rule 4102]
6. Tank shall vent all HCl fumes to operational fume scrubber at all times during filling. [District Rule 4102]
7. Deliveries shall not exceed 15,000 gallons of hydrochloric acid per day. [District Rule 4102]
8. Tank throughput shall not exceed 1,800,000 gallons per year of HCl. [District Rule 4102]
9. Permittee personnel shall be present during all acid deliveries to verify storage tank has sufficient outage to receive the volume of acid to be delivered, that all acid unloading connections are secured, and that the unloading air pressure does not exceed 25 psig. [District Rule 4102]
10. Permittee shall keep records of maintenance inspections, acid delivery dates and volumes delivered. All records shall be retained for a minimum of five years. Records shall be made available for District inspection upon request. [District Rule 4102]
11. Formerly permit unit #S-1511-680.

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

ATTACHMENT B
Current Permit to Operate
(S-1547-1027-5)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1027-5

EXPIRATION DATE: 05/31/2016

SECTION: 35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

21,000 GALLON HYDROCHLORIC ACID STORAGE TANK #206A WITH FUME SCRUBBER SHARED WITH S-1547-1103 - SOUTH MIDWAY

PERMIT UNIT REQUIREMENTS

1. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
2. Scrubber shall be operated and maintained in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. Fresh scrubber liquid (water) shall be added as necessary to maintain at least manufacture's listed scrubbing efficiency. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Spent packed water column water shall be disposed of in a manner preventing acid emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. Tank shall store only hydrochloric acid (HCl). [District Rule 4102]
6. Tank shall vent all HCl fumes to operational fume scrubber at all times during filling. [District Rule 4102]
7. Deliveries shall not exceed 15,000 gallons of hydrochloric acid per day. [District Rule 4102]
8. Tank throughput shall not exceed 1,800,000 gallons per year of HCl. [District Rule 4102]
9. Permittee personnel shall be present during all acid deliveries to verify storage tank has sufficient outage to receive the volume of acid to be delivered, that all acid unloading connections are secured, and that the unloading air pressure does not exceed 25 psig. [District Rule 4102]
10. Permittee shall keep records of maintenance inspections, acid delivery dates and volumes delivered. All records shall be retained for a minimum of five years. Records shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Formerly permit unit #S-1511-680.

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

ATTACHMENT C

Emissions Increases

SSIPE (lb/yr)				
NOx	VOC	CO	SOx	PM10
0	0	0	0	0

ATTACHMENT D

Application



RECEIVED
APR 22 2013
SJVAPCD
Southern Region

April 25, 2013

HAND DELIVERED TO BAKERSFIELD OFFICE

Mr. Leonard Scandura, P.E.
Manager, Permit Services
San Joaquin Valley Unified APCD
2700 M Street, Suite 275
Bakersfield, CA 93301

Dear Mr. Scandura:

SUBJECT: APPLICATION FOR MINOR MODIFICATION
FACILITY ID: S-1547
PERMIT UNIT: S-1547-1027-5

Enclosed is Aera Energy LLC's (Aera's) application to make a Minor Modification to remove PTO S-1547-1027 from the Title V operating permit.

This permit unit is permitted solely for compliance with state nuisance regulations, and is not subject to federal rules or regulations. It appears this permit unit was included with the initial Title V permit as an oversight.

Enclosed please find the Permit application and a copy of the current PTO.

If you have any questions concerning this application, please contact me at (661) 665-3212.

Sincerely,

A handwritten signature in black ink that reads "Robert M. Beebout". The signature is written in a cursive, flowing style.

Robert M. Beebout
Environmental Advisor – Midway Sunset

Attachment

cc: Adean Valenzuela

San Joaquin Valley Air Pollution Control District

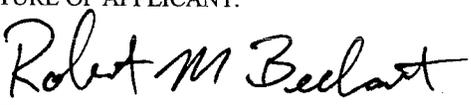
www.valleyair.org

RECEIVED
APR 22 2013

SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Aera Energy LLC</p>		
2. MAILING ADDRESS: STREET/P.O. BOX: <u>P O Box 11164</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93389</u>		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Heavy Oil Western Stationary Source</u> CITY: <u>Kern County, CA</u> <u> </u> ¼ SECTION <u>35</u> TOWNSHIP <u>12N</u> RANGE <u>23W</u>		INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Oil & Gas Production</p>		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Remove the MOCO Water Plant tank S-1547-1027 from the Title V permit: This permit unit is permitted solely for compliance with state nuisance regulations, and is not subject to federal rules or regulations. It appears this permit unit was included with the initial Title V permit as an oversight. Please remove this permit unit from the Title V operating permit.		
6. TYPE OR PRINT NAME OF APPLICANT: Robert M. Beebout		TITLE OF APPLICANT: Environmental Advisor
7. SIGNATURE OF APPLICANT: 	DATE: 4/18/2013	PHONE: (661) 665-3212 FAX: EMAIL: rmbeebout@aeraenergy.com

For APCD Use Only:

No Money

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>S-1131665</u> FACILITY ID: <u>S-1547</u>
------------	--

Title V - Minor Mod

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

RECEIVED

APR 22 2013

SJVAPCD
Southern Region

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1547
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Aera Energy LLC	
3. Agent to the Owner: N/A	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Anthony Gurrola
Signature of Responsible Official

April 18, 2013
Date

Anthony Gurrola
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

Remove S-1547-1027 from Title V permit.

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1027-5

EXPIRATION DATE: 05/31/2016

SECTION: 35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

21,000 GALLON HYDROCHLORIC ACID STORAGE TANK #206A WITH FUME SCRUBBER SHARED WITH S-1547-1103 - SOUTH MIDWAY

PERMIT UNIT REQUIREMENTS

1. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
2. Scrubber shall be operated and maintained in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. Fresh scrubber liquid (water) shall be added as necessary to maintain at least manufacture's listed scrubbing efficiency. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Spent packed water column water shall be disposed of in a manner preventing acid emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. Tank shall store only hydrochloric acid (HCl). [District Rule 4102]
6. Tank shall vent all HCl fumes to operational fume scrubber at all times during filling. [District Rule 4102]
7. Deliveries shall not exceed 15,000 gallons of hydrochloric acid per day. [District Rule 4102]
8. Tank throughput shall not exceed 1,800,000 gallons per year of HCl. [District Rule 4102]
9. Permittee personnel shall be present during all acid deliveries to verify storage tank has sufficient outage to receive the volume of acid to be delivered, that all acid unloading connections are secured, and that the unloading air pressure does not exceed 25 psig. [District Rule 4102]
10. Permittee shall keep records of maintenance inspections, acid delivery dates and volumes delivered. All records shall be retained for a minimum of five years. Records shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Formerly permit unit #S-1511-680.

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