



JUL 09 2014

Mr. Robert Beebout
Aera Energy LLC
P.O. Box 11164
Bakersfield, CA 93389

Re: Notice of Minor Title V Permit Modification
District Facility # S-1135
Project # S-1142022

Dear Mr. Beebout :

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-1135-345-0 into the Title V operating permit. The ATC authorizes a new 500 bbl fixed roof crude oil storage tank #251296 with p/v vent, which is a routine replacement for crude oil storage tank S-1135-344-0.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1135-345-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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
www.valleyair.org

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-1142022

Engineer: Robert Rinaldi
Date: July 1, 2014

RR 7/2/14

Facility Number: S-1135
Facility Name: Aera Energy LLC
Mailing Address: P.O. Box 11164
Bakersfield, CA 93389

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

Responsible Official: B.D. (Brett) Stockton
Title: Process Supervisor

I. PROPOSAL

Aera Energy LLC is proposing a Title V minor permit modification to incorporate the recently issued S-1135-345-0 into the Title V operating permit. Aera is installing a new 500 bbl fixed roof crude oil storage tank #VWI with p/v vent as a routine replacement for existing crude oil storage tank S-1135-344-0.

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

Heavy Oil Western Stationary Source at Section 35 Township 31S Range 23E

III. EQUIPMENT DESCRIPTION

S-1135-345-0:

500 BBL FIXED ROOF CRUDE OIL STORAGE TANK #251296 WITH P/V VENT

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

Aera Energy LLC (Aera) has requested an Authority to Construct (ATC) for the routine replacement of a crude oil storage tank S-1135-344-0.

Routine replacement is defined as the routine replacement in whole or part of any article, machine, equipment, or other contrivance with a valid District Permit to Operate provided that all of the following conditions are met:

1. There is no increase in permitted emissions from the Stationary Source.
2. There is no increase in design capacity, unless an old part is no longer available in which case the replacement can result in a design capacity increase of up to 10%.
3. The replacement equipment performs the same function as the equipment being replaced.
4. The replacement does not constitute a Reconstructed Source (as defined by this rule) or Reconstruction (as defined by any applicable New Source Performance Standard).
5. When the entire emissions unit is replaced as a routine replacement action, the emissions unit shall either have been addressed by a BARCT rule or shall be equipped with a control device capable of at least 85% emission control.

The replacement tank meets the requirements of Items #1 through #4 above and satisfies the Rule 4623 (BARCT) requirement of P/V valve (# 5)

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.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-1135-345-1
- B. Authorities to Construct No. S-1135-345-0
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. S-1135-344-0

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(S-1135-345-1)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-345-1

EXPIRATION DATE: 05/31/2016

SECTION: 9 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

500 BBL FIXED ROOF CRUDE OIL STORAGE TANK #251296 WITH P/V VENT

PERMIT UNIT REQUIREMENTS

1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
2. Tank throughput shall not exceed 500 Bbl. per day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
6. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
7. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Permittee shall maintain monthly records of average daily crude oil throughput. Monthly measurement of the tank level is an approved method of determining the average daily throughput. [District Rule 2201]
10. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authorities to Construct No.
(S-1135-345-0)



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1135-345-0

ISSUANCE DATE: 04/22/2014

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

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
MIDWAY-SUNSET
KERN COUNTY, CA

SECTION: 9 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:
500 BBL FIXED ROOF CRUDE OIL STORAGE TANK #VWI WITH P/V VENT

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
3. Tank throughput shall not exceed 500 Bbl. per day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] 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

6. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
7. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
10. Permittee shall maintain monthly records of average daily crude oil throughput. Monthly measurement of the tank level is an approved method of determining the average daily throughput. [District Rule 2201]
11. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
12. Upon implementation of this Authority to Construct, Permit to Operate S-1135-344-0 shall be cancelled. [District Rule 2080]

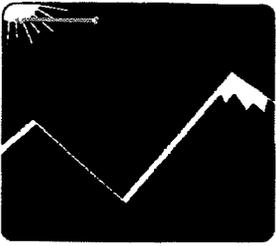
ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1135-345-0	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application



San Joaquin Valley Unified Air Pollution Control District

S-1135-345-1

RECEIVED

APR 30 2014

SJV/APCD
Southern Region

APPLICATION FOR TITLE V MODIFICATION:

- ADMINISTRATIVE AMENDMENT
- MINOR MODIFICATION
- SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Aera Energy LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. Box 11164 CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93389-1164	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Heavy Oil Western Stationary Source CITY: Kern County, CA 1/4 SECTION <u> 9 </u> TOWNSHIP <u> 31S </u> RANGE <u> 22E </u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production	
5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.): Implement Authority to Construct S-1135-345-0 into the Title V permit for the Heavy Oil Western Stationary Source.	
(Use additional sheets if necessary)	
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NOV/NTC No.: _____	
8. SIGNATURE OF APPLICANT/CONTACT PERSON: <i>Robert M. Beebout</i>	TYPE OR PRINT TITLE OF APPLICANT: Environmental Advisor
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Robert M. Beebout	DATE: April 30, 2014
10. FAX NUMBER: (661) 665-3222	TELEPHONE NUMBER: (661) 665-3212

No \$

FOR APCD USE ONLY:

<p>DATE STAMP: RECEIVED APR 30 2014 SJV/APCD Southern Region</p>	<p>FILING FEE RECEIVED: \$ <u> 0 </u></p> <p>DATE PAID: _____</p> <p>PROJECT NO.: <u>S-1142000</u> FACILITY REGION & ID: <u>S-1135</u></p>
---	--

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

TITLE V COMPLIANCE CERTIFICATION FORM

RECEIVED

APR 30 2014

S.J.V.A.U.C.D.
Stockton, CA

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1135
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 equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment 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:


Signature of Responsible Official

4-30-14
Date

B.D. (Brett) Stockton
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit No.'s
(S-1135-344-0)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-344-0

EXPIRATION DATE: 05/31/2016

SECTION: 09 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

1,000 BBL FIXED ROOF PETROLEUM STORAGE TANK #VWI

PERMIT UNIT REQUIREMENTS

1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623]
2. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623]
3. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
4. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
6. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
7. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
8. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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