



**DEC 19 2013**

John Ludwick  
Aera Energy LLC  
PO Box 11164  
Bakersfield, CA 93389

**Re: Notice of Final Action - Minor Title V Permit Modification  
District Facility # S-1543  
Project # 1133539**

Dear Mr. Ludwick:

The Air Pollution Control Officer has modified the Title V permit for Aera Energy LLC by incorporating Authority to Construct (ATC) S-1543-33-13. The ATC authorized replacement of the ppmv sulfur emissions limit of a 3600 MMBtu/hr flare with lb SOx/day and lb SOx/yr emissions limits.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on September 19, 2013. 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

DW:rue

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email  
Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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**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](http://www.valleyair.org) [www.healthyairliving.com](http://www.healthyairliving.com)

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1543-33-14

**EXPIRATION DATE:** 05/31/2016

**SECTION:** SE32 **TOWNSHIP:** 28S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

3,600 MMBTU/HR KALDAIR INDAIR LIMITED USE PRODUCED GAS FLARE WITH COANDA EFFECT FLARE TIP

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Flare shall be equipped with recording, volumetric flow meters that shall be used to individually monitor and record the volumes of produced gas, pilot gas and sweep gas combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
4. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare. The pilot need not be present when the flare is isolated for required flare maintenance. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
5. Flare shall be equipped with a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device capable of continuously detecting at least one pilot flame or the flare flame is present. The flame detection device shall be kept operational at all times except during flare maintenance and unforeseen or necessary planned power outages. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
6. Sulfur content of pilot gas and sweep gas shall not exceed 15 ppmv (as H<sub>2</sub>S). [District Rule 2201, District Rule 4801, 3.1, and Kern County Rule 407] Federally Enforceable Through Title V Permit
7. Maximum amount of gas combusted shall not exceed 60,000 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum amount of gas combusted shall not exceed 90,000 MMBtu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. SO<sub>x</sub> emissions shall not exceed 8400 lb/day nor 12,614 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the flare shall not exceed any of the following limits (based on total gas combusted): NO<sub>x</sub> (as NO<sub>2</sub>): 0.068 lb/MMBtu; PM<sub>10</sub>: 0.008 lb/MMBtu; CO: 0.37 lb/MMBtu; or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total quantity of pilot gas and sweep gas combusted in the flare shall not exceed 15 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Compliance with fuel sulfur limit(s) can be demonstrated either by weekly monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration in flare, or by weekly monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
13. Permittee shall keep records of daily and annual flow rates to flare, and calculated SOx emissions in units of lb/day and lb/yr on a calendar year basis. [District Rules 1081 and 2201]
14. Permittee shall measure the sulfur content of the produced gas combusted in the flare and the H2S concentration of the pilot/sweep gas by District witnessed, or authorized, sample collection by ARB certified testing laboratory annually. [District Rules 1081, 7.2 and 2201] Federally Enforceable Through Title V Permit
15. The sulfur content of flared gas shall be determined using ASTM test methods D-1072, D-3246, D-6228, double GC for H2S and Mercaptans, or Draeger tube. H2S concentration (ppmv) of the pilot/sweep gas shall be determined using ASTM test methods D-1072 or D-4084, using Draeger tube, or by gas supplier test data consistent with the natural gas fuel sulfur content test method listed in this permit. [District Rules 1081 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. A trained observer, as defined in EPA Method 22, shall check visible emissions at least once a year for a period of 15 minutes. If visible emissions are detected at any time during this period, the observation period shall be extended to two hours. A record containing the results of these observations shall be maintained, which also includes company name, process unit, observer's name and affiliation, date, estimated wind speed and direction, sky condition, and the observer's location relative to the source and sun. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. The higher heating value of the pilot gas, sweep gas, and flared gas shall be monitored at least quarterly. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Measured heating value and quantity of flared gas shall be used to determine compliance with heat input limits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The operator shall maintain all records of required monitoring data and support information for District inspection at any time. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
20. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Permittee shall maintain accurate records of the daily quantities of produced gas and pilot and sweep gas combusted in the flare. [District Rules 2201 and Rules 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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