



FEB 06 2012

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-1548
Project # S-1110530

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 incorporate the recently issued S-1548-498-3 into the Title V operating permit. This modification authorizes the storing of crude oil in a clarifier tank connected to vapor control.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1548-498-3, emission increases, 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 at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures

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



FEB 06 2012

John Haley
Aera Energy, LLC
P.O. Box 11164
Bakersfield, CA 93389-1164

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1548
Project # S-1110530**

Dear Mr. Haley:

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-1548-498-3 into the Title V operating permit. This modification authorizes the storing of crude oil in a clarifier tank connected to vapor control.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1548-498-3, 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.

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

Sincerely,

David Warner
Director of Permit Services

Enclosures

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-1110530

Engineer: Kris Rickards
Date: February 2, 2012

Facility Number: S-1548
Facility Name: Aera Energy, LLC
Mailing Address: P.O. Box 11164
Bakersfield, CA 93389-1164

Reviewed by AP SURAQE

FEB 03 2012

Contact Name: John Haley
Phone: 661-665-7424

Responsible Official: T.A. Bivens
Title: Process Supervisor

I. PROPOSAL

Aera Energy, LLC is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) number S-1548-498-3 into the Title V operating permit. This ATC authorizes the storing of crude oil in a fixed roof clarifier tank (connected to vapor control).

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

Light Oil Western Stationary Source in Kern county, NW/4 of Section 20, Township 29S, Range 21E.

III. EQUIPMENT DESCRIPTION

S-1548-498-4: 40,000 BBL FIXED-ROOF CRUDE OIL/PRODUCED WATER STORAGE TANK T-200A VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)

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

Conditions 1-3 on the draft PTO were added to clarify operation and testing requirements:

- When in service, the tank shall vent only to the vapor control system listed in S-1548-144, except during periods of vessel cleaning. [District Rules 2201 and 4623]
- All components attached to this tank shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.), pump seals, valves with visible actuators, and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid, light oil and heavy oil. [District Rule 2201]
- Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District Rule 2201]

Condition 5 on the current PTO was modified as follows and appears as condition 8 on the draft PTO:

- VOC emission rate from components in gas and light oil crude service associated with this emission unit shall ~~be less than~~ not exceed 9.2 lb/day. [District Rule 2201]

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 S-1548-498-4
- B. Authorities to Construct S-1548-498-3
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit S-1548-498-2

ATTACHMENT A

Proposed Modified Title V Operating Permit
(S-1548-498-4)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-498-4

EXPIRATION DATE: 05/31/2016

SECTION: NW20 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

40,000 BBL FIXED-ROOF CRUDE OIL/PRODUCED WATER STORAGE TANK T-200A VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)

DRAFT

PERMIT UNIT REQUIREMENTS

1. When in service, the tank shall vent only to the vapor control system listed in S-1548-144, except during periods of vessel cleaning. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All components attached to this tank shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.), pump seals, valves with visible actuators, and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid, light oil and heavy oil. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All piping, valves and fittings shall be constructed and maintained in a leak-free (<10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) condition except as provided below. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
5. For leak detection and repair (LDAR) monitoring, a leak is defined as a reading in excess of 500 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free (<10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) cover which shall be closed at all times except during gauging or sampling. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
7. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from EPA Publication 453/R-95-017 Protocol for Equipment Leak Emission Estimates Table 2-4 Oil and Gas Production Operations Average Emission Factors (lb/hr/source). [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emission rate from components in gas and light oil crude service associated with this emission unit shall not exceed 9.2 lb/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.

DRAFT

9. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
10. For the purposes of company conducted inspections, if any of the tank components are found to be leaking (>500 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21), operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
11. Leaks measuring > 500 ppmv and <10,000 ppmv, or leaks measuring >10,000 ppmv from components within five feet of the tank that have been discovered by the operator and have been immediately tagged and repaired within the deadlines specified in the Emissions Minimization requirements, shall not constitute a violation of this permit. However, leaking components > 10,000 ppmv discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the deadlines specified in the Emissions Minimization requirements, shall constitute a violation. [District Rule 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaks >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane, the operator shall: (a) Eliminate the leak within 8 hours after detection; or (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; (c) Eliminate the leak within 48 hours after minimization; and (d) In no event that the total time to eliminate the leak shall exceed 56 hours after detection. [District Rules Rule 4623] Federally Enforceable Through Title V Permit
13. If a component type for a given tank is found to leak above the 10,000 ppmv during an annual inspection, then quarterly inspections of that component type on the tank or system shall be conducted for four consecutive quarters. After four successful quarterly inspections in which the component type is found to leak less than 10,000 ppmv, inspections interval may revert to annual. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Operator shall maintain an inspection log containing the following (1) type of component leaking; (2) date of leak detection, and method of detection; (3) date and emission level of recheck after leak is repaired; (4) method used to minimize the leak to lowest possible level within 8 hours after leak detection. [District Rule 2520] Federally Enforceable Through Title V Permit
15. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
16. Permittee shall conduct cleaning and maintenance operations in accordance with District approved procedure as described in Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
17. Tank may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall notify the District Compliance division in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623] Federally Enforceable Through Title V Permit
19. Operator shall notify the EPA and District of the date construction is commenced postmarked no later than 30 days after such date. Notification shall include the District-approved Operating Plan. [40 CFR 60.113b(c)(1)] Federally Enforceable Through Title V Permit
20. Operator shall notify the EPA and the District of the actual date of initial startup postmarked within 15 days of such date. [40 CFR 60.7(a)(3)] 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.

21. All records shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct
(S-1548-498-3)

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1548-498-3

ISSUANCE DATE: 01/31/2011

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
CA

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40,000 BBL FIXED-ROOF CLARIFIER TANK T-200A VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20); MODIFY EQUIPMENT DESCRIPTION FROM "CLARIFIER TANK" TO "CRUDE OIL/PRODUCED WATER STORAGE TANK"

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. When in service, the tank shall vent only to the vapor control system listed in S-1548-144, except during periods of vessel cleaning. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. All components attached to this tank shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.), pump seals, valves with visible actuators, and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid, light oil and heavy oil. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District Rule 2201] 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

5. All piping, valves and fittings shall be constructed and maintained in a leak-free (<10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) condition except as provided below. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
6. For leak detection and repair (LDAR) monitoring, a leak is defined as a reading in excess of 500 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free (<10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) cover which shall be closed at all times except during gauging or sampling. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
8. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from EPA Publication 453/R-95-017 Protocol for Equipment Leak Emission Estimates Table 2-4 Oil and Gas Production Operations Average Emission Factors (lb/hr/source). [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC fugitive emissions from the vapor control components associated with this unit shall not exceed 9.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
11. If any of the tank components are found to be leaking (>500 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21), operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
12. Leaks measuring > 500 ppmv and < 10,000 ppmv, or leaks measuring > 10,000 ppmv from components within five feet of the tank that have been discovered by the operator and have been immediately tagged and repaired within the deadlines specified in the Emissions Minimization requirements, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the deadlines specified in the Emissions Minimization requirements, shall constitute a violation. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Upon detection of any leaks >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane, the operator shall: (a) Eliminate the leak within 8 hours after detection; or (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; (c) Eliminate the leak within 48 hours after minimization; and (d) In no event that the total time to eliminate the leak shall exceed 56 hours after detection. [District Rules Rule 4623] Federally Enforceable Through Title V Permit
14. If a component type for a given tank is found to leak above the 10,000 ppmv during an annual inspection, then quarterly inspections of that component type on the tank or system shall be conducted for four consecutive quarters. After four successful quarterly inspections in which the component type is found to leak less than 10,000 ppmv, inspections interval may revert to annual. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Operator shall maintain an inspection log containing the following (1) type of component leaking; (2) date of leak detection, and method of detection; (3) date and emission level of recheck after leak is repaired; (4) method used to minimize the leak to lowest possible level within 8 hours after leak detection. [District Rule 2520] Federally Enforceable Through Title V Permit
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. Permittee shall conduct cleaning and maintenance operations in accordance with District approved procedure as described in Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
18. Tank may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall notify the District Compliance division in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623] Federally Enforceable Through Title V Permit
20. All records shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

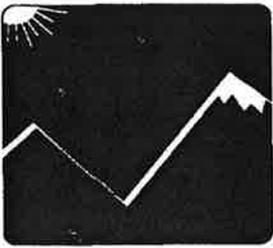
ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1548-498	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application

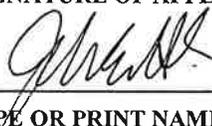


San Joaquin Valley Unified Air Pollution Control District

APPLICATION FOR TITLE V MODIFICATION:

- ADMINISTRATIVE AMENDMENT
 MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

RECEIVED
FEB 18 2011
 SJVAPCD
 Southern Region

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Aera Energy LLC</p>	
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: Light Oil Western Stationary Source CITY: _____ NW 1/4 SECTION 20 TOWNSHIP 29S RANGE 21E	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-1548-498-3 into the Title V permit for the Light Oil Western Stationary Source. <p style="text-align: center;"><i>S-1110024</i></p> <p style="text-align: right;"><small>(Use additional sheets if necessary)</small></p>	
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: 	TYPE OR PRINT TITLE OF APPLICANT: Environmental Engineer
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: John E. Haley	DATE: <i>2/16/11</i>
10. FAX NUMBER: (661) 665-7437	TELEPHONE NUMBER: (661) 665-7424

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ _____ /
	DATE PAID: _____
	PROJECT NO.: S-1110530 FACILITY REGION & ID:

S-1548
JVMM

San Joaquin Valley Unified Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

RECEIVED

FEB 18 2011

SJVAPCD
Southern Region

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1548
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 each circle for confirmation):

- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will continue to comply with the applicable federal requirement(s) which the emission units are in compliance.
- Based on information and belief formed after reasonable inquiry, the emission units 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:

T.A. Bivens 821866
Signature of Responsible Official

2-16-11
Date

T.A. Bivens
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
(S-1548-498-2)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-498-2

EXPIRATION DATE: 05/31/2016

SECTION: NW20 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

40,000 BBL FIXED-ROOF CLARIFIER TANK T-200A VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)

PERMIT UNIT REQUIREMENTS

1. All piping, valves and fittings shall be constructed and maintained in a leak-free (<10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) condition except as provided below. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
2. For leak detection and repair (LDAR) monitoring, a leak is defined as a reading in excess of 500 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
3. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free (<10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) cover which shall be closed at all times except during gauging or sampling. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
4. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from EPA Publication 453/R-95-017 Protocol for Equipment Leak Emission Estimates Table 2-4 Oil and Gas Production Operations Average Emission Factors (kg/hr/source). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC emission rate from components in gas and light crude oil service associated with this emission unit shall be less than 9.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. [District Rule 4623 and 40 CFR 60.112b(a)(3)(i)] Federally Enforceable Through Title V Permit
7. For the purposes of company conducted inspections, if any of the tank components are found to be leaking (>500 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21), operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 4623 and 40 CFR 60.112b(a)(3)(i)] 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.

8. Leaks measuring > 500 ppmv and <10,000 ppmv, or leaks measuring >10,000 ppmv from components within five feet of the tank that have been discovered by the operator and have been immediately tagged and repaired within the deadlines specified in the Emissions Minimization requirements, shall not constitute a violation of this permit. However, leaking components > 10,000 ppmv discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the deadlines specified in the Emissions Minimization requirements, shall constitute a violation. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Upon detection of any leaks >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane, the operator shall: a. Eliminate the leak within 8 hours after detection; or b. If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; c. Eliminate the leak within 48 hours after minimization; and d. In no event that the total time to eliminate the leak shall exceed 56 hours after detection. [District Rules Rule 4623] Federally Enforceable Through Title V Permit
10. If a component type for a given tank is found to leak above the 10,000 ppmv during an annual inspection, then quarterly inspections of that component type on the tank or system shall be conducted for four consecutive quarters. After four successful quarterly inspections in which the component type is found to leak less than 10,000 ppmv, inspections interval may revert to annual. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Operator shall maintain an inspection log containing the following 1) type of component leaking; 2) date of leak detection, and method of detection; 3) date and emission level of recheck after leak is repaired; 4) method used to minimize the leak to lowest possible level within 8 hours after leak detection. [District Rule 2520] Federally Enforceable Through Title V Permit
12. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
13. Permittee shall conduct cleaning and maintenance operations in accordance with District approved procedure as described in Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Tank may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall notify the District Compliance division in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623] Federally Enforceable Through Title V Permit
16. Operator shall notify the EPA and District of the date construction is commenced postmarked no later than 30 days after such date. Notification shall include the District-approved Operating Plan. [40 CFR 60.113b(c)(1)] Federally Enforceable Through Title V Permit
17. Operator shall notify the EPA and the District of the actual date of initial startup postmarked within 15 days of such date. [40 CFR 60.7(a)(3)] Federally Enforceable Through Title V Permit
18. All records shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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