



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

JAN 19 2010

T.L. Parcel
Aera Energy LLC
P O Box 11164
Bakersfield, CA 93389-1164

**Re: Administrative Amendment to Title V Operating Permit
District Facility # C-1121
Project # C-1094952**

Dear Mr. Parcel:

In accordance with District Rule 2520, Federally Mandated Operating Permits, the District reviewed the Aera Energy LLC application and has administratively amended the requirements for their Title V operating permit. This administrative amendment incorporates the requirements of ATC# C-1121-116-9, which was issued with Certificate of Conformity after EPA review into the Title V permit for this facility. The change is to add 50 wells and lower the VOC content of the vapors to less than 10% by weight. Condition 20 of the permit has been revised to correctly reference condition 4 of the Title V permit. This amended Title V permit is being sent to you as a final action.

Your cooperation in this matter was appreciated. Should you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

DW:TM

cc: Gerardo Rios, EPA Region IX

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)
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Southern Region
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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1121-116-9

EXPIRATION DATE: 12/31/2006

SECTION: 31 TOWNSHIP: 19S RANGE: 15E

EQUIPMENT DESCRIPTION:

MS-717, VAPOR RECOVERY PLANT, FOR WELL CASING HEAD HYDROCARBON VAPOR RECOVERY, UTILIZING THE FOLLOWING EQUIPMENT: A CONDENSATE KO DRUM AND CONDENSATE PUMP SERVING 190 WELLS, RECOVERED VAPOR LINE CONNECTED TO RECOVERED VAPOR LINES OF PERMIT UNITS C-1121-39 AND C-1121-114

PERMIT UNIT REQUIREMENTS

1. Maximum VOC content of the gas in the casing collection system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling of CVR vapors prior to compressor inlet. If gas samples are 10% VOC by weight or less for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
3. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
4. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
5. The operator shall maintain monitoring records of the date and well identification where steam injection or well steam stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
6. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the quantity specified in District Rule 4401 Section 5.6 at any time. [District Rule 4401, 5.6] Federally Enforceable Through Title V Permit
7. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
8. When a leak is detected, operator shall comply with the requirements of District Rule 4401, Section 5.9.4 through 5.9.7, within the timeframe specified for that type of leak. [District Rule 4401, 5.9.4] Federally Enforceable Through Title V Permit
9. Operator shall not use any component with a leak as defined in Section 3.0 of District Rule 4401, or that is found to be in violation of the provisions of Section 5.6.2, unless such a leaking component is identified with a tag for repair, has been repaired, or is awaiting inspection after being repaired. [District Rule 4401, 5.7.1] 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.

10. Each hatch shall be closed at all times except during sampling or addition of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are carried out as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
11. Operator shall comply with the requirements of Section 6.7 of District Rule 4401 if there is any change in the description of major or critical components. [District Rule 4401, 5.7.3] Federally Enforceable Through Title V Permit
12. Operator shall maintain an inspection log which includes the following information: 1) the total number of components inspected and the total number and percentage of leaking components found by component type, 2) the location, type, and name or description of each leaking component and description of any unit where the leaking component is found, 3) the date and method of leak detection, 4) the size of the leak (in ppmv for gaseous leaks, and major or minor for liquid leaks), 5) the date the leaking component is repaired, replaced, or removed from service, 6) the identity and location of essential or critical components found leaking that cannot be repaired until the next regular process unit turnaround or not later than one year after leak detection, whichever comes later, 7) the methods used to minimize the leak from essential or critical components, 8) the date of reinspection and the leak concentration (in ppmv) after the component is repaired or replaced, 9) the inspector's name, mailing address, and business telephone number, and 10) the date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.1.5 and 6.4] Federally Enforceable Through Title V Permit
13. Operator shall maintain records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including: 1) a copy of the current calibration gas certification from the vendor, 2) the date of calibration, 3) concentration of calibration gas, 4) instrument reading of calibration gas before adjustment, 5) instrument reading of calibration gas after adjustment, 6) calibration gas expiration date, and 7) calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
14. Operator shall implement and maintain a program to train employees to inspect and repair components and properly maintain records of those inspection and repair activities. Operator shall maintain copies of the training program records. [District Rule 4401, 6.1.7 and 6.5] Federally Enforceable Through Title V Permit
15. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
16. VOC content of gas shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
17. Non-condensibles shall be exhausted into a working steam generator firebox or flare for combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a well roster listing all wells connected to the well vent vapor recovery system. The well roster shall be kept on site and shall be made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit Condition 4 on the Title V permit shall be deemed compliance with efficiency specification which have been waived by exhausting non-condensibles into a working steam generator firebox or flare for combustion. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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22. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Annual performance tests for hydrocarbon must be conducted and reported in accordance with the test methods set for the in 40 CFR 60, Part 60.8 and Appendix A. Performance tests for hydrocarbon shall be conducted using procedures approved in advance by the EPA in writing. The EPA and APCO must be notified in writing at least 30 day prior to conduction such tests. [PSD 4-4-8, SJ77-45 condition IX.H.1 and IX.H.2] Federally Enforceable Through Title V Permit

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