



MAR 25 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 # 1130252**

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-1547-1181-2 into the Title V operating permit. The ATC is to designate a hydrochloric acid tank a dormant emission unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1547-1181-2, 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



**MAR 25 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 # 1130252**

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-1547-1181-2 into the Title V operating permit. The ATC is to designate a hydrochloric acid tank a dormant emission unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1547-1181-2, 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

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1130252

Engineer: David Torii  
Reviewing Engineer: Rich Karrs

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

RWK  
3-21-13

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

Responsible Official: Anthony Gurrola  
Title: Process Supervisor

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## I. PROPOSAL

Aera Energy, LLC (Aera) is proposing a Title V minor permit modification to incorporate ATC S-1547-1181-4 into their Title V operating permit. The ATC is to designate a hydrochloric acid tank a dormant emission unit (DEU).

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 10, township 29S, Range 21E in Plains' Heavy Oil Western stationary source, Kern County.

## III. EQUIPMENT DESCRIPTION

PTO S-1547-1181-2: 14,736.5 GALLON HYDROCHLORIC ACID TANK VENTED TO NEUTRALIZATION TANKS, T-205 AND T-205A

## 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.

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.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-1181-5

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

**SECTION:** 35 **TOWNSHIP:** 12N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 14,736.5 GALLON HYDROCHLORIC ACID TANK VENTED TO TWO NEUTRALIZATION TANKS, T-205 AND T-205A:

## PERMIT UNIT REQUIREMENTS

1. While dormant, the vessel shall be physically isolated from the process stream with placement of blinds in the inlet and outlet piping to ensure that it does not operate. The existing pressure relief device may remain connected and operable. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Vessel shall store only hydrochloric acid (HCl). [District Rule 4102]
6. Permittee personnel shall be present during all acid deliveries to verify storage vessel 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]
7. Vessel shall vent all HCl fumes to the liquid phase of the neutralization tanks on this permit (T-205 and T-205A) at all times. [District Rule 4102]
8. Permittee shall keep records of maintenance inspections, acid delivery dates and volumes delivered. [District Rule 4102]
9. The pH of both neutralization tanks shall be measured on a daily basis using a pH monitoring software and the pH shall not drop below a pH of 1. [District Rule 4102]
10. All acid vapor control systems shall be operated and maintained in good working condition. [District Rule 4102]
11. Neutralization tank T-205 shall not exceed 153,300 gallons of fluid flow in one day and 55,954,500 gallons in one year. [District Rules 4102]
12. Neutralization tank T-205A shall not exceed 121,968 gallons of fluid flow in one day and 44,518,320 gallons in one year. [District Rules 4102]
13. Neutralization tanks shall not be drained until they reach a pH of 5. [District Rules 4102]
14. Maximum throughput for the HCl tank is 4,912 gallons per day and 1,792,880 gallons per year. [District Rule 4102]
15. Daily records of pH from both neutralization tanks, throughput of both neutralization tanks and throughput of HCl tank shall be maintained. [District Rule 1070]

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

16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4102]

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

DRAFT

**ATTACHMENT B**  
Authority to Construct  
(S-1547-1181-4)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1547-1181-4

**ISSUANCE DATE:** 01/14/2013

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

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** 35 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 14,736.5 GALLON HYDROCHLORIC ACID TANK VENTED TO TWO NEUTRALIZATION TANKS, T-205 AND T-205A: DESIGNATE TANK AS COMPLIANT DORMANT EMISSION UNIT

### 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. While dormant, the vessel shall be physically isolated from the process stream with placement of blinds in the inlet and outlet piping to ensure that it does not operate. The existing pressure relief device may remain connected and operable. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. Vessel shall store only hydrochloric acid (HCl). [District Rule 4102]
7. Permittee personnel shall be present during all acid deliveries to verify storage vessel 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]

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

8. Vessel shall vent all HCl fumes to the liquid phase of the neutralization tanks on this permit (T-205 and T-205A) at all times. [District Rule 4102]
9. Permittee shall keep records of maintenance inspections, acid delivery dates and volumes delivered. [District Rule 4102]
10. The pH of both neutralization tanks shall be measured on a daily basis using a pH monitoring software and the pH shall not drop below a pH of 1. [District Rule 4102]
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15. Maximum throughput for the HCl tank is 4,912 gallons per day and 1,792,880 gallons per year. [District Rule 4102]
16. Daily records of pH from both neutralization tanks, throughput of both neutralization tanks and throughput of HCl tank shall be maintained. [District Rule 1070]
17. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4102]

# ATTACHMENT C

## Emissions Increases

**ATTACHMENT D**  
Previous Title V Operating Permit  
S-1547-1181-2

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-1181-2

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

**SECTION:** 35 **TOWNSHIP:** 12N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

14,736.5 GALLON HYDROCHLORIC ACID TANK VENTED TO TWO NEUTRALIZATION TANKS, T-205 AND T-205A

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Vessel shall store only hydrochloric acid (HCl). [District Rule 4102]
3. Permittee personnel shall be present during all acid deliveries to verify storage vessel 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]
4. Vessel shall vent all HCl fumes to the liquid phase of the neutralization tanks on this permit (T-205 and T-205A) at all times. [District Rule 4102]
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12. Daily records of pH from both neutralization tanks, throughput of both neutralization tanks and throughput of HCl tank shall be maintained. [District Rule 1070]
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4102]

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

# ATTACHMENT E

## Application



RECEIVED  
FEB 06 2013  
SJVAPCD  
Southern Region

January 21, 2013

HAND DELIVERED TO BAKERSFIELD OFFICE

Mr. Samir Sheikh  
San Joaquin Valley APCD  
1990 East Gettysburg Avenue  
Fresno, CA 93726-0244

SUBJECT: APPLICATION FOR TITLE V MODIFICATION  
FACILITY ID: S-1547  
IMPLEMENT ATC S-1547-1181-4

Dear Mr. Sheikh:

Aera Energy LLC (Aera) requests that the Title V permit for Facility S-1547 be modified to implement Authority to Construct (ATC) S-1547-1181-4 into the Title V permit. The ATC for the MOCO Hydrochloric acid tank was originally evaluated as District project number S-1124341

I have attached the appropriate application form, compliance certification form, and copy of the current Authority to Construct.

Thank you for your attention to this matter. Should you have any questions concerning this application or require additional information, please do not hesitate to contact me at (661) 665-3212 or via e-mail at [rmbeebout@aeraenergy.com](mailto:rmbeebout@aeraenergy.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert M. Beebout', is written over a light blue horizontal line.

Robert M. Beebout  
Environmental Advisor – Midway Sunset

Attachment

cc: Adean Valenzuela

# San Joaquin Valley Unified Air Pollution Control District

## TITLE V COMPLIANCE CERTIFICATION FORM

**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 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:

Anthony Gurrola  
Signature of Responsible Official

2/15/13  
Date

A.E. (Anthony) Gurrola  
Name of Responsible Official (please print)

Process Supervisor  
Title of Responsible Official (please print)

8. Vessel shall vent all HCl fumes to the liquid phase of the neutralization tanks on this permit (T-205 and T-205A) at all times. [District Rule 4102]
9. Permittee shall keep records of maintenance inspections, acid delivery dates and volumes delivered. [District Rule 4102]
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