



OCT 13 2014

Mr. Jonathan LeVan
Aera Energy LLC
PO Box 11164
Bakersfield, CA 93389

Re: Notice of Minor Title V Permit Modification
District Facility # S-1548
Project # 1143511

Dear Mr. LeVan:

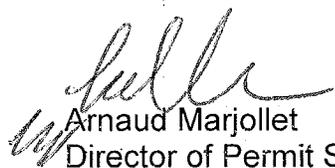
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-1548-134-7 into the Title V operating permit. The project authorizes replacement of sulfur emissions limits (ppmv S and lb SO_x/MMBtu) of a 625 MMBtu/hr limited use flare with conditions imposing daily and annual limits of SO_x as lb SO_x/day and lb SO_x/yr and recordkeeping of the calculation of these quantities.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-1548-134-7, 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 www.healthyliving.com

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-1143511

Engineer: Richard Edgehill
Date: October 7, 2014

Facility Number: S-1548
Facility Name: Aera Energy LLC
Mailing Address: PO Box 11164
Bakersfield, CA 93389

Reviewed by AP SWR AOE

Contact Name: Jonathan Le Van
JDLeVan@aeraenergy.com
Phone: (661) 665-4403
Responsible Official: R. A. Roeder

Title: Process Supervisor

I. PROPOSAL

Aera Energy LLC (Aera) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-1548-134-7. The project authorizes replacement of sulfur emissions limits (ppmv S and lb SO_x/MMBtu) of a 625 MMBtu/hr limited use flare with a condition imposing daily and annual limits of SO_x as lb SO_x/day and lb SO_x/yr. However, with this change, records of the calculation of daily and annual SO_x emissions must be kept.

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 flare is located within NW Section 2, Township 29S, Range 21E in Aera's light oil western stationary source.

III. EQUIPMENT DESCRIPTION

PTO S-1548-134-8: 625 MMBTU/HR LIMITED USE FLARE

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

A condition match between draft PTO S-1548-134-4 and '-134-8 is provided below.

Draft PTO S-1548-134-8	Current PTO S-1548-134-5	Comments
1	1	
2	2	deleted SOx lb/MMBtu limit from draft PTO
3		added lb SOx/day, lb SOx/yr limits
4-8	3-7	equipment, flared gas flow and pressure limits
	8	deleted sulfur concentration limit
9-11	9-11	
12	12	Draft PTO requires records of calculated SOx emissions

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

- I. Proposed Modified Title V Operating Permit
- II. Authority to Construct
- III. Application
- IV. Previous Title V Operating Permit

Attachment A
Proposed Title V draft PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-134-8

EXPIRATION DATE: 05/31/2016

SECTION: NW02 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

625 MMBTU/HR LIMITED USE FLARE

PERMIT UNIT REQUIREMENTS

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, as, or darker than, Ringlemann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emission rates from flare (lb/day and lb/yr demonstrated by compliance with flared volumes of combustion gas) shall not exceed any of the following: PM10: 0.008 lb/MMBtu (120.0 lb/day, 713 lb/yr), NO_x (as NO₂): 0.068 lb/MMBtu (1020.0 lb/day, 6063 lb/yr), VOC: 0.063 lb/MMBtu (945.0 lb/day, 5617 lb/yr), CO: 0.37 lb/MMBtu (5550.0 lb/day, 32,989 lb/yr). [District NSR Rule] Federally Enforceable Through Title V Permit
3. SO_x emissions shall not exceed 1089.2 lb/day nor 6,474 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Flare shall be equipped with two automatic, electronic pilots (model KEP-100 or equivalent) and gas flow detector for startup of automatic ignitors. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
5. Flare shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
6. Flare inlet pressure shall be no less than 6 psig. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
7. Total quantity of produced gas combusted in flare shall not exceed 89,160 mscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Flare shall be equipped with operational produced gas volume flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall measure and record produced gas sulfur content and calculate SO₂ emissions at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The gas sulfur content of combustion gas, purge gas, and pilot gas shall be determined using double GC for H₂S and mercaptans or any of ASTM test methods D-1072, D-3246, D-4346, or D-6228 or by the gas/propane supplier. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Each quarter in which the flare is operated for three (3) hours or more, the permittee shall perform a visible emissions inspection using either EPA Method 22 or EPA Method 9. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Permittee shall keep accurate daily and annual records of flare gas volumes, sulfur content, higher heating value of flared gas, and calculated SO_x emissions in units of lb/day and lb/yr, and such records shall be retained for a period of 5 years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Attachment B
Authority to Construct

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1548-134-7

ISSUANCE DATE: 09/10/2013

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
CA

SECTION: NW02 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 625 MMBTU/HR LIMITED USE FLARE: DELETE PPMV H2S AND LB SOX/MMBTU LIMITS

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. 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, as, or darker than, Ringlemann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emission rates from flare (lb/day and lb/yr demonstrated by compliance with flared volumes of combustion gas) shall not exceed any of the following: PM10: 0.008 lb/MMBtu (120.0 lb/day, 713 lb/yr), NOx (as NO2): 0.068 lb/MMBtu (1020.0 lb/day, 6063 lb/yr), VOC: 0.063 lb/MMBtu (945.0 lb/day, 5617 lb/yr), CO: 0.37 lb/MMBtu (5550.0 lb/day, 32,989 lb/yr). [District NSR Rule] Federally Enforceable Through Title V Permit
4. SOx emissions shall not exceed 1089.2 lb/day nor 6,474 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Flare shall be equipped with two automatic, electronic pilots (model KEP-100 or equivalent) and gas flow detector for startup of automatic ignitors. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
6. Flare shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
7. Flare inlet pressure shall be no less than 6 psig. [District Rules 2201 and 4311] 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

COPY

Arnaud Marjollet, Director of Permit Services

S-1548-134-7 Oct 6 2014 4:35PM -- EDGEHILR - Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

8. Total quantity of produced gas combusted in flare shall not exceed 89,160 mscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare shall be equipped with operational produced gas volume flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall measure and record produced gas sulfur content and calculate SO₂ emissions at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The gas sulfur content of combustion gas, purge gas, and pilot gas shall be determined using double GC for H₂S and mercaptans or any of ASTM test methods D-1072, D-3246, D-4346, or D-6228 or by the gas/propane supplier. [District Rule 1081] Federally Enforceable Through Title V Permit
12. Each quarter in which the flare is operated for three (3) hours or more, the permittee shall perform a visible emissions inspection using either EPA Method 22 or EPA Method 9. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Permittee shall keep accurate daily and annual records of flare gas volumes, sulfur content, higher heating value of flared gas, and calculated SO_x emissions in units of lb/day and lb/yr, and such records shall be retained for a period of 5 years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

Attachment B Application

5-1548-134-8

RECEIVED

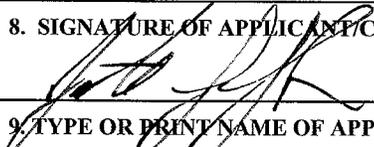
San Joaquin Valley Air Pollution Control District

AUG 25 2014

APPLICATION FOR TITLE V MODIFICATION:

SJVAPCD
Southern Region

- ADMINISTRATIVE AMENDMENT
- MINOR MODIFICATION
- SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: AERA ENERGY LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: CITY: P.O. BOX 11164 STATE: CA 9-DIGIT ZIP CODE: 93389-1164	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Light Oil Western (S-1548) CITY: NW 1/4 SECTION 02 TOWNSHIP 29S RANGE 21E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS:	
5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.): Convert ATC S-1548-134-7 to PTO with operating conditions incorporated into the Title V permit.	
(Use additional sheets if necessary)	
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? <input checked="" type="checkbox"/> YES <input 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: Compliance Assurance Specialist
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Jonathan Le Van	DATE: August 25, 2014
10. FAX NUMBER: (661) 665-7437	TELEPHONE NUMBER: (661) 665-4403

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ _____ /
	DATE PAID: _____
	PROJECT NO.: S-1143511 FACILITY REGION & ID: S-1548

San Joaquin Valley
Unified Air Pollution Control District

RECEIVED
AUG 25 2014
SJVAPCD
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

Convert ATC S-1548-134-7 to PTO with operating conditions incorporated into the Title V permit.

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 all circles for confirmation):

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

8-25-14
Date

R. A. Roeder
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

Attachment C
Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-134-5

EXPIRATION DATE: 05/31/2016

SECTION: NW02 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

625 MMBTU/HR LIMITED USE FLARE

PERMIT UNIT REQUIREMENTS

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, as, or darker than, Ringlemann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emission rates from flare (lb/day and lb/yr demonstrated by compliance with flared volumes of combustion gas) shall not exceed any of the following: PM10: 0.008 lb/MMBtu (120.0 lb/day, 713 lb/yr), SOx (as SO2): 0.07261 lb/MMBtu (1089.2 lb/day, 6474 lb/yr), NOx (as NO2): 0.068 lb/MMBtu (1020.0 lb/day, 6063 lb/yr), VOC: 0.063 lb/MMBtu (945.0 lb/day, 5617 lb/yr), CO: 0.37 lb/MMBtu (5550.0 lb/day, 32,989 lb/yr). [District NSR Rule] Federally Enforceable Through Title V Permit
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4. Flare shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
5. Flare inlet pressure shall be no less than 6 psig. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
6. Total quantity of produced gas combusted in flare shall not exceed 89,160 mscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Flare shall be equipped with operational produced gas volume flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Sulfur content of produced gas combusted shall not exceed 430 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall measure and record produced gas sulfur content and calculate SO2 emissions at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The gas sulfur content of combustion gas, purge gas, and pilot gas shall be determined using double GC for H2S and mercaptans or any of ASTM test methods D-1072, D-3246, D-4346, or D-6228 or by the gas/propane supplier. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Each quarter in which the flare is operated for three (3) hours or more, the permittee shall perform a visible emissions inspection using either EPA Method 22 or EPA Method 9. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Permittee shall keep accurate daily and annual records of flare gas volumes, sulfur content, and higher heating value of flared gas and such records shall be retained for a period of 5 years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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