San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUN 04 2015

Ms. Adean Valenzuela
Aera Energy LLC
PO Box 11164
Bakersfield, CA 1164

Re: Notice of Minor Title V Permit Modification
District Facility # C-1121
Project # 1151498

Dear Ms. Valenzuela:

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 C-1121-74-3 (under project C-1151383) into the Title V operating permit. The project authorized an addtional location of operation of a tank.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-1121-74-3, 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

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

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San Joaquin Valley Air Pollution Control District
Title V Application Review

Project # C-1121, C-1151498

Facility Name:	Aera Energy, LLC	Date:	May 26, 2015
Mailing Address:	PO Box 11164 Bakersfield, CA 93389	Engineer:	Richard Edgehill
		Lead Engineer:	Richard Karrs RWK 6-3-15
Contact Person:	Adean Valenzuela		
Office Telephone:	661-665-5335 (office)		
Email:	alvalenzuela@aeraenergy.com		
Responsible Official:	J. S. Joseph		
Title:	Operations Manager		

I. Proposal

Aera Energy, LLC (Aera) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-1121-74-3 into the Title V Permit. The ATC authorized an additional location of operation of a Baker tank.

II. Facility Location

The Baker tank is authorized to operate at Section 32, T19S, R15E and Section 14, T20S, R14E in Aera's heavy oil production stationary source, Fresno County.

III. Equipment Description

C-1121-74-4: #T-1, 500 BBL BAKER TANK USED TO STORE BRINE OR OIL AND WATER FROM OIL PRODUCTION

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. Description of Proposed Modifications

A condition match between the draft PTO and current PTO is provided below.

Draft PTO	Current PTO	Comments
1-3		New location related conditions
4-12	1-9	

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: C-1121-74-4 **EXPIRATION DATE:** 12/31/2016

SECTION: 32 **TOWNSHIP:** 19S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
#T-1, 500 BBL BAKER TANK USED TO STORE BRINE OR OIL AND WATER FROM OIL PRODUCTION

PERMIT UNIT REQUIREMENTS

1. Tank is authorized to operate at Section 32, T19S, R15E and Section 14, T20S, R14E. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Unit shall not be located within 1,000 feet of any K-12 school. [CH&SC 42301.6]
3. Permittee shall notify District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
4. {2587} True vapor pressure of the petroleum liquid stored shall be less than 0.5 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
5. {2588} Permittee shall conduct True Vapor Pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
6. {2589} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
7. {2590} For other organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. As an alternative to using ASTM D 323, the TVP of crude oil with an API gravity range of greater than 26 degrees up to 30 degrees may be determined by using other equivalent test methods approved by APCO, ARB and EPA. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
10. Operator shall maintain records of TVP and API gravity testing. These records shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

DRAFT

11. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

12. The operator shall keep accurate records of types, storage temperature and TVP of liquids stored to verify continued exemption from District Rule 4623 (amended 12/17/92). [District Rule 4623, Section 6.1] Federally Enforceable Through Title V Permit

DRAFT

Attachment B

Authority to Construct

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1121-74-3 **ISSUANCE DATE:** 05/12/2015

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: 10000 MING AVE
P O BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 14 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF #T-1, 500 BBL BAKER TANK WITH P/V VALVE USED TO STORE BRINE OR OIL AND WATER FROM OIL PRODUCTION: AUTHORIZE OPERATION AT SECTION 14, T20S, R14E (AOQ LEASE)

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. Tank is authorized to operate at Section 32, T19S, R15E and Section 14, T20S, R14E. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Unit shall not be located within 1,000 feet of any K-12 school. [CH&SC 42301.6]
4. Permittee shall notify District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
5. True vapor pressure of the petroleum liquid stored shall be less than 0.5 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Permittee shall conduct True Vapor Pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

Arnaud Marjollet, Director of Permit Services
C-1121-74-3 : May 26 2015 9:02AM -- EDGEHILR : Joint Inspection NOT Required

7. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit

8. For other organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. As an alternative to using ASTM D 323, the TVP of crude oil with an API gravity range of greater than 26 degrees up to 30 degrees may be determined by using other equivalent test methods approved by APCO, ARB and EPA. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit

9. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit

10. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit

11. Operator shall maintain records of TVP and API gravity testing. These records shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

13. The operator shall keep accurate records of types, storage temperature and TVP of liquids stored to verify continued exemption from District Rule 4623 (amended 12/17/92). [District Rule 4623, Section 6.1] Federally Enforceable Through Title V Permit

Attachment C
Application

RECEIVED
MAY 12 2015
SJVAPCD
Southern Region

San Joaquin Valley Air Pollution Control District
San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: Aera Energy LLC	FACILITY ID: C - 1121
1. Type of Organization:[X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] 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):

(JS) Based on information and belief formed after reasonable inquiry, the emissions units identified in this application will continue to comply with the applicable federal requirement(s).

(JS) Based on information and belief formed after reasonable inquiry, the emissions units identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(JS) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(JS) 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

Date 5/12/15

J. S. Joseph
Name of Responsible Official (please print)

Operations Manager
Title of Responsible Official (please print)

Implement ATC number C-1121-74-3 into the Title V permit.

C-1121-74-4

San Joaquin Valley Air Pollution Control District

RECEIVED
MAY 12 2015
SJVAPCD
Southern Region

APPLICATION FOR TITLE V MODIFICATION:

[ ] ADMINISTRATIVE AMENDMENT
[X] MINOR MODIFICATION
[ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Aera Energy LLC

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: Heavy Oil Western Stationary Source
CITY: Fresno County, CA
_____ 1/4 SECTION 14 TOWNSHIP 20S RANGE 14E

INSTALLATION DATE:

4. GENERAL NATURE OF BUSINESS: Oil & Gas Production

5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.):

Implement ATC number C-1121-74-3 into the Title V permit.

(Use additional sheets if necessary)

6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? [ ] YES [X] NO

7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? [ ] YES [X] NO NOV/NTC No.: _____

8. SIGNATURE OF APPLICANT/CONTACT PERSON: A Valenzuela

TYPE OR PRINT TITLE OF APPLICANT: Compliance Assurance Specialist

9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Adean Valenzuela

DATE: 5/12/15

10. FAX NUMBER: (661) 665-5202

TELEPHONE NUMBER: (661) 665-5335

FOR APCD USE ONLY: NO $

DATE STAMP	FILING FEE RECEIVED: $ _____ / DATE PAID: _____ PROJECT NO.: C-1151498 FACILITY REGION & ID: C-1121

Attachment D

Previous Title V Operating Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1121-74-2 **EXPIRATION DATE:** 12/31/2016

SECTION: 32 **TOWNSHIP:** 19S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
#T-1, 500 BBL BAKER TANK USED TO STORE BRINE OR OIL AND WATER FROM OIL PRODUCTION.

PERMIT UNIT REQUIREMENTS

1. True vapor pressure of the petroleum liquid stored shall be less than 0.5 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
2. Permittee shall conduct True Vapor Pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
3. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
4. For other organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. As an alternative to using ASTM D 323, the TVP of crude oil with an API gravity range of greater than 26 degrees up to 30 degrees may be determined by using other equivalent test methods approved by APCO, ARB and EPA. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
7. Operator shall maintain records of TVP and API gravity testing. These records shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
8. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The operator shall keep accurate records of types, storage temperature and TVP of liquids stored to verify continued exemption from District Rule 4623 (amended 12/17/92). [District Rule 4623, Section 6.1] Federally Enforceable Through Title V Permit