



SEP 11 2018

Mr. Tim Alburger
Seneca Resources
4800 Corporate Court
Bakersfield, CA 93311

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Facility Number: S-3755
Project Number: S-1183113

Dear Mr. Alburger:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes revision to flare monitoring and recordkeeping requirements.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

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: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

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

Authority to Construct Application Review

Revision of monitoring and recordkeeping requirements for flare

Facility Name:	Seneca Resources Corporation	Date:	September 07, 2018
Mailing Address:	4800 Corporate Court Bakersfield, CA 93311	Engineer:	Richard Edgehill
Contact Person:	Timothy Alburger	Lead Engineer:	Richard Karrs
Telephone:	(661) 399-4270 ext. 3544		
Application #(s):	S-3755-10-9		
Project #:	S-1183113		
Deemed Complete:	July 27, 2018		

I. Proposal

Seneca Resources Corporation (Seneca) has requested an Authority to Construct (ATC) to revise sulfur recordkeeping requirements for a flare. Sulfur testing frequency will be changed from weekly to monthly and the flared gas flow rate measurements will be replaced by flared gas heat input.

Note that the flare has not been operated since September 2016. However, applicant has provided sulfur test results for 2015 and part of 2016. Draeger tube analyses for 2015 showed 0 ppmv minimum, 200 ppmv maximum, and 24 ppmv average. Quarterly laboratory results for 2015 and 2016 yielded 2.42 ppmv minimum, 125 ppmv maximum and 33.8 ppmv average. These sulfur concentrations are much less than the permit limit, 500 ppmv, indicating a large compliance margin. Therefore, the change from weekly to monthly sulfur records, with monthly measurements done by a third party laboratory, is justified.

Replacing record-keeping of flared (TEOR) gas flow rate (scfh) with flared gas heat input (MMBtu/hr) is convenient for emissions calculations since the flare emissions factors listed on the permit are in the units lb/MMBtu. The conversion from scfh to MMBtu/hr uses higher heating value that will be obtained with the sulfur laboratory analyses.

The specific changes to permit conditions are as follows:

Deleted Conditions

- ~~14. Weekly records of the produced (TEOR) gas sulfur content and daily records of produced (TEOR) gas flow rate shall be maintained. [District Rule 2201] Y~~
- ~~15. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H₂S and mercaptans or Draeger tube analysis. Sulfur content of produced~~

~~(TEOR) gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Y~~

Added Conditions:

Permittee shall determine sulfur content of gas flared monthly using ASTM method D3246 or double GC for H2S and mercaptans. [District Rules 1070 and 2201] Y

Permittee shall maintain accurate records of daily heat inputs to the flare in MMBtu/day. [District Rules 1070 and 2201] Y

Permittee shall maintain records of monthly measurements of total sulfur content of flared gas. [District Rules 1070 and 2201] Y

Note that the proposed changes to monitoring and recordkeeping conditions is not a NSR modification as there is no change in stringency of the sulfur or heat input emissions limits nor method of operation. Therefore, the project is not a NSR modification. BACT, offsets, and public notification analyses are not required.

Disposition of Outstanding ATCs

There are no outstanding ATCs for S-3755-10. The current PTO is included in **Attachment I**.

Seneca Facility S-3755 operates under a Title V permit.

This project authorizes a relaxation in monitoring requirements (reducing the sulfur content monitoring frequency from weekly to monthly). Because this change is a relaxation of a monitoring requirement, it does not meet the criteria for a Minor Permit Modification pursuant to Rule 2520 section 3.20. As such this change is a Title V Significant Modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Seneca must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16) – not applicable – project is not NSR Modification
Rule 2410	Prevention of Significant Deterioration (6/16/11) – not applicable – project is not NSR Modification and there is no change in emissions
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)- not applicable to S-3775 which is a non-major HAPs sources
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4311	Flares (6/18/09)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA
Guidelines

III. Project Location

The equipment will be located at South Midway-Sunset Maricopa, 25032 Western Minerals Road, Maricopa, CA 93252, within the NW/4 of Section 7, Township 11N, Range 23W. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Seneca has requested to revise the frequency of measurement of sulfur content of flare gas from weekly to monthly. Note that there is no change in frequency proposed for measurement of flare gas flow rate, which will be expressed as flare heat input for this project.

V. Equipment Listing

Pre-Project Equipment Description:

S-3755-10-8: 16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR

Proposed Modification:

S-3755-10-9: MODIFICATION OF 16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR: REVISE FLARED GAS SULFUR AND FLOW RATE MONITORING REQUIREMENTS

Post Project Equipment Description:

S-3755-10-9: 16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR

VI. Emission Control Technology Evaluation

The air assisted utility flare is expected to operate smokelessly with visible emissions not exceeding 5% opacity except for 3 minutes in any one hour. Sulfur removal equipment (S-3755-12) will be used as necessary to ensure that the flared gas sulfur content does not exceed 500 ppmv.

No change in equipment or control technologies is proposed.

VII. General Calculations

A. Assumptions

The project is not a NSR Modification and therefore formal calculations are not required. PE2 will be restated for inclusion in the PAS emission profile.

B. Emission Factors

Flare emissions factors are from FYI 89.

Flare Emission Factors – FYI 89		
	lb/MMBtu	Source
NO _x	0.068	Current permit
SO _x	0.13*	“
PM ₁₀	0.008	“
CO	0.37	“
VOC	0.063	“

*Sulfur, 500 ppm

$$500 \text{ ft}^3 \text{ S} / 10^6 \text{ ft}^3 \text{ gas} \times \text{lbmol S} / 379 \text{ ft}^3 \times 32 \text{ lb S} / \text{lbmol S} \times 64 \text{ lb SO}_x / 32 \text{ lb S} \times \text{ft}^3 / 650 \text{ Btu} \times 10^6 \text{ Btu} / \text{MMBtu} = 0.13 \text{ lb SO}_x / \text{MMBtu}$$

C. Calculations

Post Project Potential to Emit (PE2)

S-8984-7-0

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO _x	0.068	4.9	24	8.0
SO _x	0.13000	4.9	24	15.3
PM ₁₀	0.0080	4.9	24	0.9
CO	0.370	4.9	24	43.5
VOC	0.0630	4.9	24	7.4

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO _x	0.068	4.9	8,760	2,919
SO _x	0.13000	4.9	8,760	5,580
PM ₁₀	0.0080	4.9	8,760	343
CO	0.370	4.9	8,760	15,882
VOC	0.0630	4.9	8,760	2,704

Emissions Profiles are included in **Attachment II**.

VIII. Compliance Determination

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a “permit amendment that does not qualify as a minor permit modification or administrative amendment.”

Minor permit modifications do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions. The frequency of sulfur monitoring will be changed from weekly to monthly, which is a relaxation in monitoring conditions. Therefore, the proposed project constitutes a Significant Modification to the Title V Permit.

As discussed in the Proposal Section, the relaxation in monitoring is not expected to affect compliance status. Previous sulfur testing results have shown that the actual flared gas sulfur concentrations are less than 50% of the permit limit of 500 ppmv, which indicates that there is a larger compliance margin. Moreover, future sulfur testing will be done by a third party laboratory in contrast to current testing using Draeger tubes, which adds quality assurance to the results.

As discussed above, the facility has applied for a Certificate of Conformity (COC) and the District will forward to EPA, for a 45-day review period, this application review, which includes the proposed modified Title V permit [i.e. proposed ATC(s)] and the compliance certification form which demonstrates compliance with the minor permit modification requirements in Section 11.4. Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application

Seneca's Title V Compliance Certification form is included in **Attachment III**.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). The flare is currently operating in compliance with the rule and the project is not expected to affect compliance status. Continued compliance is expected.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4311 Flares

Rule 4311 applies to all operations involving the use of flares. The purpose of the Rule is to limit VOCs, NOx and SOx emissions from the operation of flares.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that there are no additional schools within ¼ mile of the emission source.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

Oil and gas operations in Kern County must comply with the *Kern County Zoning Ordinance – 2015 (C) Focused on Oil and Gas Local Permitting*. In 2015, Kern County revised the Kern County Zoning Ordinance Focused on Oil and Gas Activities (Kern Oil and Gas Zoning Ordinance) in regards to future oil and gas exploration, and drilling and production of hydrocarbon resource projects occurring within Kern County.

Kern County served as lead agency for the revision to their ordinance under the California Environmental Quality Act (CEQA), and prepared an Environmental Impact Report (EIR)

that was certified on November 9, 2015. The EIR evaluated and disclosed to the public the environmental impacts associated with the growth of oil and gas exploration in Kern County, and determined that such growth will result in significant GHG impacts in the San Joaquin Valley. As such, the EIR included mitigation measures for GHG.

The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). As a Responsible Agency, the District is limited to mitigating or avoiding impacts for which it has statutory authority. The District does not have statutory authority for regulating GHGs. The District has determined that the applicant is responsible for implementing GHG mitigation measures imposed in the EIR by the Kern County for the Kern County Zoning Ordinance.

District CEQA Findings

The proposed project is located in Kern County and is thus subject to the Kern County Zoning Ordinance – 2015 (C) Focused on Oil and Gas Local Permitting. The Kern County Zoning Ordinance was developed by the Kern County Planning Agency as a comprehensive set of goals, objectives, policies, and standards to guide development, expansion, and operation of oil and gas exploration within Kern County.

In 2015, Kern County revised their *Kern County Zoning Ordinance* in regards to exploration, drilling and production of hydrocarbon resources projects. Kern County, as the lead agency, is the agency that will enforce the mitigation measures identified the EIR, including the mitigation requirements of the Oil and Gas ERA. As a responsible agency the District complies with CEQA by considering the EIR prepared by the Lead Agency, and by reaching its own conclusion on whether and how to approve the project involved (CCR §15096). The District has reviewed the EIR prepared by Kern County, the Lead Agency for the project, and finds it to be adequate. The District also prepared a full findings document. The full findings document, *California Environmental Quality Act (CEQA) Statement of Findings for the Kern County Zoning Ordinance EIR* contains the details of the District's findings regarding the Project. The District's implementation of the Kern Zoning Ordinance and its EIR applies to ATC applications received for any new/modified equipment used in oil/gas production in Kern County, including new wells. The full findings applies to the Project and the Project's related activity equipment(s) is covered under the Kern Zoning Ordinance. To reduce project related impacts on air quality, the District evaluates emission controls for the project such as Best Available Control Technology (BACT) under District Rule 2201 (New and Modified Stationary Source Review). In addition, the District is requiring the applicant to surrender emission reduction credits (ERC) for stationary source emissions above the offset threshold.

Thus, the District concludes that through a combination of project design elements, permit conditions, and the Oil and Gas ERA, the project will be fully mitigated to result in no net increase in emissions. Pursuant to CCR §15096, prior to project approval and issuance of ATCs the District prepared findings.

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The revision to the *Kern County Zoning Ordinance* went through an extensive public process that included a Notice of Preparation, a preparation of an EIR, scoping meetings, and public hearings. The process led to the certification of the final EIR and approval of the revised *Kern County Zoning Ordinance* in November 2015 by the Kern County Board of Supervisors. As mentioned above, the proposed project will be fully mitigated and will result in no net increase in emissions. In addition, the proposed project is not located at a facility of concern; therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATC S-3755-10-9 subject to the permit conditions on the attached draft ATC in **Attachment IV**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-3755-10	3020-02-H	16,700 kBtu/hr	\$ 1183.00

Attachments

- I: Current PTO
- II: Emissions Profile
- III: Title V Compliance Certification form
- IV: Draft ATC

Attachment I
Current PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-3755-10-8

EXPIRATION DATE: 02/28/2022

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

EQUIPMENT DESCRIPTION:

16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR

PERMIT UNIT REQUIREMENTS

1. Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
2. Except for the pilot, the gas inlet to flare shall be equipped with recording flow rate meter. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
3. Operator shall demonstrate the heat input capacity of the flare daily by calculation, using the metered volume of the gas delivered to the flare and the most current measured heating value of the gas stream. Except for the pilot, heating value for the gas stream shall be determined at least once every six months by sample analysis. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
4. 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, Ringelmann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Air-assist blower shall be maintained and operated for smokeless combustion. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
6. Flare shall be equipped with continuous pilot fired solely on propane or natural gas consisting primarily of methane containing no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas and no more than 5% by weight hydrocarbons heavier than butane. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
7. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
8. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
9. Pilot gas flow rate to flare shall not exceed 100 scf per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
11. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
12. Sulfur content of produced (TEOR) gas combusted shall not exceed 500 ppmv. [District Rules 2201 and 4801] 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.

13. Emissions from this permit unit shall not exceed any of the following: PM10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMscf; or CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Weekly records of the produced (TEOR) gas sulfur content and daily records of produced (TEOR) gas flow rate shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H2S and mercaptans or Draeger tube analysis. Sulfur content of produced (TEOR) gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
16. All records, including required monitoring data and support information, shall be maintained and retained for a period of 5 years and made available for inspection at any time. [District Rules 1070 and 4311] Federally Enforceable Through Title V Permit

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

Attachment II Emissions Profile

Permit #: S-3755-10-9	Last Updated
Facility: SENECA RESOURCES	08/10/2018 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	2919.0	5580.0	343.0	15882.0	2704.0
Daily Emis. Limit (lb/Day)	8.0	15.3	0.9	43.5	7.4
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Attachment III
Title V Compliance Certification Form



San Joaquin Valley Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

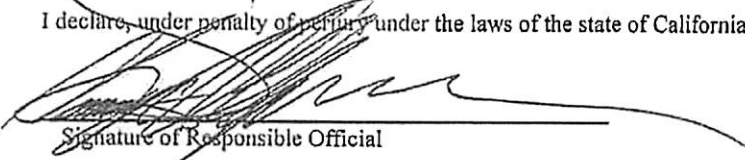
ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

COMPANY NAME: Seneca Resources		FACILITY ID: S-3755	
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:			
3. Agent to the Owner:			

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial applicable 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.
- For minor modifications, this application meets the criteria for use of minor permit modification procedures pursuant to District Rule 2520.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



07.26.18
Date

Signature of Responsible Official

Timothy R. Alburger
Name of Responsible Official (please print)

Senior Advisor, EHSQ

Title of Responsible Official (please print)

Attachment IV
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-3755-10-9

LEGAL OWNER OR OPERATOR: SENECA RESOURCES
MAILING ADDRESS: 4800 CORPORATE CT
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL WESTERN

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN 4.9 MMBTU/HR: REVISE FLARED GAS SULFUR AND FLOW RATE MONITORING REQUIREMENTS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
4. Except for the pilot, the gas inlet to flare shall be equipped with recording flow rate meter. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
5. Operator shall demonstrate the heat input capacity of the flare daily by calculation, using the metered volume of the gas delivered to the flare and the most current measured heating value of the gas stream. Except for the pilot, heating value for the gas stream shall be determined at least once every six months by sample analysis. [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.

Samir Sheikh, Executive Director / APCCO

DRAFT

Arnaud Marjolle, Director of Permit Services

SJ-3755-10-9 - Aug 14 2018 12:29PM - EDG:GIBLR : Joint Inspection NOT Required

6. 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, Ringelmann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Air-assist blower shall be maintained and operated for smokeless combustion. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
8. Flare shall be equipped with continuous pilot fired solely on propane or natural gas consisting primarily of methane containing no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas and no more than 5% by weight hydrocarbons heavier than butane. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
9. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
10. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
11. Pilot gas flow rate to flare shall not exceed 100 scf per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
13. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
14. Sulfur content of produced (TEOR) gas combusted shall not exceed 500 ppmv. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
15. Emissions from this permit unit shall not exceed any of the following: PM10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMscf; or CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall determine sulfur content of gas flared monthly using ASTM method D3246 or double GC for H2S and mercaptans. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate records of daily heat inputs to the flare in MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain records of monthly measurements of total sulfur content of flared gas. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. All records, including required monitoring data and support information, shall be maintained and retained for a period of 5 years and made available for inspection at any time. [District Rules 1070 and 4311] Federally Enforceable Through Title V Permit

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