

NOV 14 2018

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

Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)
Facility Number: S-3755
Project Number: S-1183113

Dear Mr. Alburger:

The Air Pollution Control Officer has issued Authority to Construct (ATC) S-3755-10-9 with a Certificate of Conformity to Seneca Resources Corporation at western Kern County. The project authorizes revision to flare monitoring and recordkeeping requirements. Enclosed are the ATC and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ATC was published on September 14, 2018. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on September 11, 2018. No comments were received following the District's preliminary decision on this project.

Prior to operating with the modifications authorized by the ATC, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms are found on the District's website at www.valleyair.org/permits/TVforms.

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
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

Mr. Tim Alburger
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

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

Facility # S-3755
SENECA RESOURCES COMPANY, LLC
4800 CORPORATE CT
BAKERSFIELD, CA 93311

AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Modify Your Title V Permit.** Prior to operating the equipment authorized under this ATC, submit an application to modify your Title V permit. See application forms at <http://www.valleyair.org/permits/TVforms>.
3. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
4. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
5. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
6. **Source Test:** Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source_testing.htm for source testing resources.
7. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at
any of the telephone numbers listed below.**

Samir Sheikh

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AUTHORITY TO CONSTRUCT

PERMIT NO: S-3755-10-9

ISSUANCE DATE: 11/07/2018

LEGAL OWNER OR OPERATOR: SENECA RESOURCES COMPANY, LLC
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. 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. 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 / APCO

Arnaud Marjollet, Director of Permit Services

S-3755-10-9 : Nov 7 2018 10:39AM - EDGEHLR : 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; NO_x (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