



# San Joaquin Valley

## AIR POLLUTION CONTROL DISTRICT

February 12, 2007

Brent Winn  
Aera Energy LLC  
59231 Main Camp Road  
McKittrick CA 93251

Dear Mr. Winn,

The San Joaquin Valley Air Pollution Control District (District) wishes to thank you for taking the time to comment on one of the District's Compliance Department Policies. Your letter, dated December 4, 2006, commented on Draft Policy COM 2045, which is the policy that the Compliance Department uses to interpret/enforce District Rule 2020 – *EXEMPTIONS*.

In your letter you sought to include more clarification on the portion of the policy that references section 6.13 of Rule 2020. The policy on 6.13 currently states:

**6.13 Under normal situations, unvented pressure vessels associated with a unit that is permit-exempt, are also permit exempt, because their configuration doesn't allow venting of VOC's.**

You were concerned with that wording as you thought it left open to interpretation "vented" pressure vessels.

The intent of Rule 2020, section 6.13 is to provide an exemption for pressure vessels that are not vented in any manner only if they are not associated with another emission unit that requires a permit. To further clarify the Rule, the Compliance Department Policy will be rewritten to the following:

**6.13 Pressure vessels that are 1) not vented (except for emergency pressure relief valves) to the atmosphere or a vapor control system, 2) solely vented to a field gas gathering system, 3) used for temporary separation of gas from produced fluids; are exempt from a permit if they are not associated with another emission unit that requires a permit. Additionally, pressure vessels that serve as storage equipment, e.g. bullet tanks used to store natural gasoline or condensed petroleum (but not including liquefied gases), require individual permits if their capacity is greater than 100bbl.**

Should you have any further questions or comments, please send them to my attention.

Sincerely,

Patrick Houlihan  
Senior Air Quality Inspector