



**Santa Barbara County
Air Pollution Control District**

H.B. Case No.:	<u>2015-14-1 / 2015-15-R</u>
Petitioner:	<u>Exxon Mobil</u>
Permit No.:	<u>8092-R8</u>
Date Rec'd:	<u>6-5-15</u>
Time Rec'd:	<u>18:01</u>
Filing Fee Paid:	<u>\$563 / \$563</u>

PETITION FOR VARIANCE

Type of Variance Requested:	
Emergency _____	Interim ¹ <u> x </u>
90-Day _____	Regular <u> x </u>
Length of Variance Requested:	Start Date <u> 6/6/15 </u>
	End Date <u> 6/5/16 </u>
¹ A 90-Day or Regular Variance must be filed concurrently with an Interim Variance	

1. PETITIONER INFORMATION

A. Please provide the name, address and phone number of the Petitioner.

Name: ExxonMobil Production Company
 (a division of Exxon Mobil Corporation)

Address: P. O. Box 4358
Houston, TX 77210-4358

Phone Number: (281) 654-6317

B. Please provide the name, address and phone number of the person authorized to receive correspondence regarding this Petition if different from response in 1.A.

Name: Kartik Garg

Address: 12000 Calle Real
Goleta, CA 93117

Phone Number: (805) 961-4078

C. The Petitioner is (please check one):

- 1) An Individual ()
- 2) Partnership ()
- 3) Corporation (X)
- 4) Public Agency ()
- 5) Other Entity (please describe)

2. Location of equipment for which the variance is requested if different from response in 1.A.

The equipment is located at POPCO's gas processing plant. The plant is approximately 25 miles northwest of Santa Barbara, California

3. List any District permits that are applicable to the equipment subject to this variance request.

PTO and Part 70 Operating Permit 8092

4. Briefly describe the equipment that is the subject of this Petition.

The Stretford Unit tail gas H₂S analyzer (AE-405) was designed by Ametek/Western Research. It continuously measures the H₂S concentration in the Stretford tail gas using UV light sources and photomultiplier tubes. The operation and maintenance is described in detail in the POPCO SBCAPCD-approved *Continuous Emission Monitoring Plan* which is incorporated by reference in the operating permit for the facility. The tail gas from the Stretford unit is incinerated in Boilers B-801 A and B and is limited to 100 ppm H₂S.

FINDINGS REQUIRED FOR THE GRANTING OF A VARIANCE

In order for the Hearing Board to grant a variance to a Petitioner authorizing the operation of a source in violation of any rule, regulation or order of the District, the Hearing Board is required to make "findings" in accordance with the requirements specified in California Health and Safety Code §42352, et. seq. and District rules and regulations. The Hearing Board's variance decision will take into consideration information you provide in this Petition. Please ensure your responses are complete and thorough. Please use additional pages as necessary.

A. Please state 1) what District rule, regulation or order you either are or will be in violation of, and 2) the date said violation will or did occur. Include as appropriate the applicable permit conditions for which variance relief is being sought.

SBCAPCD Rule 206, Permit 8092, Condition 9.C7(a)(i) except during startup and shut down operations, H₂S residual concentration in the Stretford tail gas is limited to 100 ppmvd. Compliance with this limit shall be determined via the DAS on a six-minute basis.

Analyzer AE-405 occasionally reads very high when compared to a sample measure by sorbent tube or third party laboratory. At times the analyzer reads well over 100 ppm when the H₂S concentration measured by the other means is in single digits or not detectable.

SBCAPCD Rule 206, Permit 8092, Condition 9.C.12 and 9.C.12 (a) POPCO shall implement the APCD-approved CEM plan and meet the requirements set forth in APCD Rule 328 and 40 CFR 51 and 40CFR 60.

B. Please describe how compliance with the District rule, regulation or order listed in Section A above is beyond your reasonable control. In addition to any other relevant factors, please include in your discussion

1) what actions you have taken to comply or seek a variance, which were timely and reasonable under the circumstances.

On May 23, 2015 startup operations at the POPCO facility commenced following an extended shut down. Unexpected Stretford tail gas H₂S readings over 100 ppm H₂S were measured. It was believed that these readings were related to an analyzer error and multiple absorbent tube samples were taken that verified that the H₂S concentration was in the <1 ppm range. Instrumentation technicians inspected the analyzer but could not find any mechanical issue with the equipment. The concentration spiked several times but decreased as the facility reached steady state. The readings again spiked on June 2, 2015. During that spike a sorbent tube reading was obtained which also indicated <1 ppm H₂S. An off gas sample was taken during the spike and was analyzed by an outside laboratory. Those results confirmed 0 ppm H₂S in the tail gas during an analyzer reading of 101 ppm H₂S.

Although the analyzer is consistently passing weekly calibration checks it appears that constituents in the tail gas stream are being falsely read as H₂S during certain operating conditions. POPCO has contacted the manufacturer of the analyzer and is working with them to identify possible corrective actions or replacements for the unit. Several other analyzer manufacturers are also being contacted. It appears that the lead time for replacement equipment is at least 24 weeks.

The analyzer is providing verification that the H₂S in the tail gas stream is below 100 ppm H₂S during most operating ranges. However, POPCO permit requires that compliance with the concentration limit be determined via the DAS on a six-minute basis. The H₂S limit during these periods is being met as measured by the sorbent tube readings; however the analyzer is not continuously verifying this permit condition during these spikes.

The analyzer is still in service and is providing H₂S readings that are slightly higher than actual values but is verifying compliance during most periods except for the spikes. During the spikes the analyzer readings far exceed the actual H₂S. During periods where AE-405 exceeds 100 ppm ExxonMobil will take a sorbent tube sample to determine actual tail gas concentration if the event lasts at least 60 minutes.

- C. Please describe how you would be impacted if you were required to immediately comply with the District rule, regulation or order the subject of this variance request. In addition to any other relevant factors, please discuss why such impacts would result in 1) an arbitrary or unreasonable taking of property, or 2) the practical closing and elimination of a lawful business.

Immediate compliance with the rule and permit condition cited earlier would require POPCO to completely shut down of the facility. This would result in a loss of revenues of approximately \$475,000 per day in natural gas and oil sales.

- D. If you were required to immediately comply with the District rule, regulation or order the subject of this variance request, please describe what impact, if any that would have on air contaminants.

Immediate compliance with the rule and permit condition cited earlier would require POPCO to completely shut down the entire facility causing considerable emissions at both POPCO and LFC facilities. If granted, there would be no excess emissions associated with this variance.

- E. Please describe what consideration you have given to curtailing of operations in lieu of obtaining a variance.

Curtailing operations would not result in compliance and would not remove the need for a variance.

- F. Please describe what steps and measures you will take to reduce excess pollutant emissions the maximum extent feasible during the requested variance period.

There will be no excess emissions associated with this variance.

- G. If requested to do so by the District, please describe how you will monitor or otherwise quantify and report to the District any pollutant emissions associated with the granting of your variance.

There will be no excess emissions associated with this variance. The analyzer will continue to be in service except when necessary maintenance is performed. This will provide data to demonstrate continued compliance with the H₂S tail gas concentration limitation of 100 ppm except for spike periods. Any incidents lasting over one hour will be sampled to verify H₂S concentration. Within 7 days following the variance period, POPCO will provide a written report to the Hearing Board and District staff reporting the cause of the analyzer error, the corrective action taken and the date and time that compliance was achieved.

6. **SUPPLEMENTAL FINDINGS IF APPLYING FOR AN EMERGENCY VARIANCE PURSUANT TO RULE 506 (EMERGENCY VARIANCE FOR BREAKDOWNS)**

- A. Please provide the date and time the breakdown was reported to the District

Date: 6/3/15 Time: 08:33

- B. Breakdown number (as provided by the District): 10745

- C. Please provide a description of the "breakdown condition", including equipment involved and the cause to the extent it is known. **Analyzer AE-405 is reading tail gas concentrations in excess of 100 ppm. Sorbent tube samples indicate very low (<=1) ppm H₂S.**

- D. Please describe why the continued operation of your facility in a "breakdown condition" is not likely to cause an immediate threat or hazard to public health or safety and will not interfere with the attainment or maintenance of any primary national ambient air quality standard. **This analyzer failure will not result in any excess emissions and, therefore, will not cause a standard violation or a threat or hazard to public safety or health. The analyzer will remain in service, except during maintenance, to confirm that tail gas H₂S limitation of 100 ppm is met.**

7. Will the operation of the equipment subject to this variance result in violation of District Rule 303, Nuisance? **The granting of this variance will not result in injury, detriment, nuisance, or annoyance to the public, and will not endanger the health or safety of the public or cause injury or damage to business or property.**
8. Please state whether or not any civil or criminal case involving the equipment subject to this variance is pending any court. **No case involving the same or identical equipment is pending in any court, civil or criminal, for which ExxonMobil is aware.**

The undersigned is authorized to submit the above Petition on behalf of the Petitioner and further states under penalty of perjury under the laws of the State of California, that the above Petition, including any attachments and the items therein set forth, are true and correct.

DATE: 6/5/15

SIGNATURE: _____



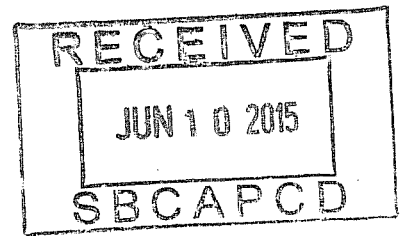
TITLE: _____

Operations Superintendent

PRINT NAME: Kartik Garg

Variance Filing Fees: All variance Petitions must be accompanied by the requisite filing fee at the time of filing or include a letter from the Petitioner on company letterhead authorizing the District to debit the filing fee from the company's reimbursable account. You may also pay your filing fees by credit card using the attached form. Current variance filing fees may be found under Rule 210, schedule F, Sections 12a and 12b at <http://www.sbcapcd.org/fees.htm>.

ExxonMobil Production Company
U.S. Production - Santa Ynez Unit
P.O. Box 1207
Goleta, California 93116-1207



ExxonMobil
Production

June 5, 2015

Petition for Interim and Regular Variance
PTO 8092
Stretford Tail Gas Analyzer AE-405

Ms. Sara Hunt
Santa Barbara County
Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, California 93110-1315

Dear Ms. Hunt:

Attached please find the referenced Interim and Regular Variance Petition for the Pacific Offshore Pipeline Facility (POPCO). We understand that the variance, if granted, will provide protection from violation of PTO 8092 Permit Condition 9.C.7(a)(i) and 9.C.12 as they relate to the operation of the Stretford Tail Gas H₂S Analyzer AE-405. There would be no excess emissions associated with this variance.

Please instruct the SBCAPCD to charge the applicable filing fees to ExxonMobil's reimbursable agreement with the District. If you have any questions or need further information, please contact Patrice Surmeier at (805) 961-4297 or Sandra Combe at (805) 271-2633.

Sincerely,

A handwritten signature in black ink that reads "Kartik".

Kartik Garg
Operations Superintendent

Santa Ynez Unit Project
ExxonMobil Production Company
(a division of Exxon Mobil Corporation)

Attachment
KG:pas

cc: Mike McKay, SBCAPCD