



HEARING BOARD STAFF REPORT

TYPE: REGULAR VARIANCE

CASE NO: 2015-15-R

DATE: July 1, 2015

1.0 **GENERAL INFORMATION:**


- 1.1 **PETITIONER NAME:** ExxonMobil Production Company (ExxonMobil)
- 1.2 **EQUIPMENT LOCATION:** Petitioner operates the equipment described in the Petition at 12000 Calle Real, Goleta, CA
- 1.3 **PERMIT NUMBER(S):** Part 70/Permit to Operate 8092
- 1.4 **FACILITY NAME/ID:** POPCO, FID 03170
- 1.5 **FACILITY DESCRIPTION:** The Pacific Offshore Pipeline Company (POPCO) Gas Plant is part of the *Exxon – Santa Ynez Unit (SYU) Project* stationary source (SSID # 01482). The *Exxon – SYU Project* stationary source consists of five facilities: Platform Harmony (FID 08018), Platform Heritage (FID 08019), Platform Hondo (FID 08009), Las Flores Canyon Oil and Gas Plant (FID 01482), and POPCO Gas Plant (FID 03170). POPCO, a subsidiary of Exxon Mobil Corporation, owns the facility. ExxonMobil Production Company (ExxonMobil), an unincorporated division of Exxon Mobil Corporation, operates the facility. POPCO has operated the existing gas processing plant since 1984, processing raw sour gas produced from the SYU oil and gas field located in the Outer Continental Shelf. The POPCO Gas Plant facility currently includes a Sulfur Removal Unit, two 41.000 MMBtu/hr steam boilers, two tri-ethylene glycol reboilers, an electrically driven propane refrigerant gas treatment system, and a thermal oxidation unit. The facility also has many other permitted pieces of equipment including, but not limited to, storage tanks and four IC engines.
- 2.0 **REASON FOR THE VARIANCE REQUEST:** The facility's Stretford Unit tail gas H₂S analyzer (AE-405), has become faulty and is falsely reading above the permitted limits.

On May 23, 2015, the Petitioner commenced start-up operations following an extended shut down. Upon start-up, the Stretford tail gas H₂S analyzer exceeded the 100 ppm H₂S limit. The elevated reading was believed to be an analyzer error. As a result, multiple sorbent tube samples were taken; results indicated <1 ppm H₂S. Sorbent tube results confirmed the Stretford Unit tail gas analyzer was incorrectly reading the H₂S concentration. It is presumed the analyzer is reading another constituent as H₂S. The Petitioner has contacted the manufacturer of analyzer and is working with them to identify possible corrective actions or replacements for the unit. Several other analyzer manufacturers have also been contacted. The lead time for replacement equipment is a minimum of approximately 24 weeks. Once the analyzer is repaired or replaced, the Petitioner will no longer be in violation and require variance coverage. The requested variance only provides administrative coverage, not coverage for emission related exceedances. A full year of variance protection is requested, however, it is unlikely the full year will be needed.

- 3.0 **BACKGROUND:** Variance Order 2015-14-I was approved by Hearing Board Vice-Chair Larry Lavagnino on June 11, 2015. Coverage for the Interim Variance was granted from June 6, 2015 through September 3, 2015, or the date of decision of the Regular Variance, whichever occurs first. Due to the estimated lead time provided by the various manufacturers, a Regular Variance was requested.
- 4.0 **PERMITTING HISTORY:** The POPCO Gas Plant was permitted in two phases. The first phase was constructed 1980 under District Rule 205. While the second phase was constructed in 1984 and routine operations began. Modifications to the Sulfur Recovery Unit (SRU) were made in 1997.
- 5.0 **COMPLIANCE HISTORY:** The Stretford tail gas analyzer (AE-405) has historically operated in compliance with District rules and regulations.
- 6.0 **REGULATORY ANALYSIS:** The following permit conditions of Part 70 Permit to Operate 8092-R8 and rule requirements are applicable to the variance request:
- **Condition 9.C.7(a)(i) (Emission Limits)**
 - See section 7.0
 - **Condition 9.C.12 (CEM)**
 - *POPCO shall implement a CEM program for emissions and process parameters as specified in Section 4.11 and Tables 4.9 through 4.12 of this permit. POPCO shall implement the District-approved CEM Plan. The CEM monitors shall be in place and functional for the life of the project. The District shall use the CEM data alone, or in combination with other data, to verify and enforce project conditions. Excess mass emissions indicated by the CEM systems shall be considered a violation of the applicable mass emission limits.*
 - **Condition 9.C.12(a)**
 - *The monitoring devices shall meet the requirements set forth in District Rule 328 and 40 CFR 51 and 40 CFR 60. Monitors must be installed, maintained, and operated in accordance with District and EPA requirements, as specified in the CFR and the District approved CEM Plan with manufacturer's specifications.*
 - **Rule 328 (Continuous Emissions Monitoring)**
 - *Install, calibrate, operated and maintain in good working order equipment for continuously monitoring and recording emissions from a stationary source.*
- 7.0 **EMISSIONS ANALYSIS:** Excess emissions is not expected as a result of granting this variance.
- 8.0 **RESERVED**
- 9.0 **OTHER FACTORS:** none
- 10.0 **DISTRICT RECOMMENDATION:** The APCD supports the Petitioner's request and recommends the granting of a Regular Variance for ExxonMobil listed in the attached draft variance order.

11.0 ATTACHMENTS:

- Attachment 1 – Draft Regular Variance Order 2015-15-R



Aimee Long, Inspector
Compliance Division



Date