

 <p>Santa Barbara County Air Pollution Control District</p>	Case No / Date	2016-28-E	09/15/16
	Petitioner	ExxonMobil Production Company	
	Permit #	Part 70/PTO 8092	
	Date Rec'd	09/14/16	
	Time Rec'd	16:31	
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**BEFORE THE HEARING BOARD
OF THE SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT**

In The Matter of the Application of)
ExxonMobil Production Company for an)
Emergency Variance from District Rules)
359.D.1.a and 206, Condition 9.C.2(b)(iv))
of Part 70/Permit to Operate 8092)

H.B. Case No. 2016-28-E

VARIANCE FINDINGS

AND ORDER

ExxonMobil Production Company filed a Petition for an Emergency Variance on September 14, 2016. A hearing regarding the above-entitled matter was held on September 15, 2016 with Mike McKay appearing for the Santa Barbara County Air Pollution Control District.

This matter having been fully presented and duly considered, the Hearing Board makes the following findings and gives the following reasons for its decision.

1. Notice of the Hearing was duly given in the manner and for the time required by law.
2. Sworn testimony and argument on behalf of the Petitioner and the Air Pollution Control Officer were made, received and considered.
3. The Petitioner operates the equipment described in the Petition at POPCO's gas processing plant located approximately 25 miles northwest of the City of Santa Barbara, California.
4. The POPCO Thermal Oxidizer (A-803) was designed by John Zink Company and installed in 1983. The thermal oxidizer is located in the northwest section of the POPCO gas processing plant. The thermal oxidizer consists of two distinct systems: the Zink Thermal Oxidizer Flare (ZTOF) and the Linear Relief Gas Oxidizer (LRGO). The thermal oxidizer is designed to combust flared gas from maintenance purging and plant upsets or malfunctions in one or more of four stages. As a result of the Plains All American Pipeline failure, the POPCO facility is temporarily ceasing operations. Preservation of the facility is ongoing. As a part of that process, Slug Separators V-50 A/B, Feed Gas Water Separators V-100 A/B, and Main Separators V-102A/B were steamed and purged to remove residual hydrocarbons. The vessels were recently tested and found to contain H₂S above the allowable purge limit. Flaring related to this activity

is limited to 239ppm H₂S. The Petitioner is requesting this Emergency Variance to allow the flaring of gas containing greater than 239ppm H₂S so that the vessels can be brought to a preserved state. It is anticipated that purging the vessels may generate approximately 6.2lbs of SO₂, assuming the vessels are purged three times before they are below the permitted limit.

5. A nuisance as defined in District Rule 303 is not expected to occur as a result of this variance and continued operation is not likely to create an immediate threat or hazard to public health or safety.
6. The District staff supports the Petition as conditioned below.
7. Pursuant to Health and Safety Code section 42359.5, I find that "good cause" exists for the granting of Petitioner's request for an Emergency Variance.

THEREFORE, THE HEARING BOARD ORDERS, as follows:

That a 30-Day Emergency Variance be granted for the operation of the Thermal Oxidizer (A-803) in violation of the 239 ppm_v H₂S limit of Rules 359.D.1.a and 206, Condition 9.C.2(b)(iv) of Part 70/Permit to Operate 8092 from September 15, 2016 through October 14, 2016 with the following conditions:

1. Petitioner shall submit a written report to the Hearing Board and District by October 21, 2016. The report shall include the date compliance was achieved together with a description of the corrective action taken and the dates, times, flare volumes and actual emissions that occurred during the variance.
2. Petitioner shall retain the obligation to comply with all other local, state and federal regulations not specifically referenced in the Order.
3. Failure to abide by all conditions of this Order shall subject the Petitioner receiving the variance to penalties set forth in Health and Safety Code section 42402.
4. Each day during any portion of which a violation occurs is a separate offense.

DATED: 9/15/16



Don Ward, Chair
Santa Barbara County Air Pollution Control District
Hearing Board