Santa Barbara County
Air Pollution Control District

Our Vision Clean Air

H.B. Case No.:	2016-23-M1
Petitioner:	ExxonMobil
Permit No.:	8092
Date Rec'd:	07/27/17
Time Rec'd:	12:17
Filing Fee Paid:	$1,291.00

PETITION FOR VARIANCE

Type of Variance Requested:

Emergency _____ Interim[1] _____ 90-Day _____ Regular X

Length of Variance Requested: Start Date Order extension from 9/30/17

End Date 9/29/19

[1] A 90-Day or Regular Variance must be filed concurrently with an Interim Variance

I. 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 I.A.

Name: Jing Wan
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 and Platform Heritage. The plant is approximately 25 miles northwest of Santa Barbara, California. Platform Heritage is located offshore in the Santa Ynez Unit on lease tract P-0812 in the Santa Barbara Channel approximately 25 miles west of the city of Santa Barbara.

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

PTO and Part 70 Operating Permits 8092 and 9102-R5

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

POPCO's Las Flores Canyon Gas Treatment Plant is a natural gas sweetening process and sulfur recovery unit (SRU). The purpose of this process is to remove H_2S and CO_2 from natural gas. The H_2S is removed from natural gas and converted into elemental sulfur by the SRU. Any residual H_2S contained in the SRU tail gas is incinerated and converted to SO_2 in one of the two 40 MMBTU/hr boilers, which are located downstream of the SRU. The POPCO Continuous Emission Monitoring system (CEMs) has been designed to provide continuous monitoring data to the SBCAPCD Central Data Acquisition System (CDAS) to facilitate enforcement of permit conditions. The program is described in detail in the SBCAPCD –approved POPCO CEMS monitoring plan which is incorporated by reference in the operating permit for the facility. The facility receives raw natural gas from three platforms including Platform Heritage.

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.

The facility will be in violation of APCD Permit 8092 Conditions related to Rules 206, 311, 331, 328, 359, and 342 and APCD Permit 9102-R5 conditions related to Rules 206 and 331. See the attached table for a detailed description of the permit conditions that the facility cannot or are impractical to meet during the facility shut down.

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.

Information in italics provides details submitted in the petition for Variance Order 2015-26-R. This order was extended for one year by Variance Order 2016-23-R. During the original petition timeframe, the extent of the facility impact was not clear. The failure has since caused an extended suspension of operations at ExxonMobil's Santa Ynez Unit. Facility equipment has been preserved to manage its integrity over the longer term due to the uncertainty around the recommencement timing of production operations. The facility may be preserved for an extended period while AAPL reestablishes pipeline operations.

There are currently 4 POPCO orders related to impacts of the AAPL Pipeline 901 failure. ExxonMobil is requesting that Variance Orders 2016-23-R and 2016-32-R be consolidated into a single order to ease administration. These orders cover similar conditions and are in effect until the orders expire or until the facility resumes platform gas processing (whichever is lessor). Petition 2016-32-R is provided as Attachment A to this petition.

As provided by California Health and Safety Code §42357, ExxonMobil is requesting a modification to the final compliance date of Variance Orders 2016-23-R and 2016-32-R for good cause. Permit conditions listed herein and in the attached Petition 2016-32-R are either infeasible or impractical until processing resumes. Startup is not within the control of the petitioner.

As a result of the failure of the Plains All American Pipeline's Line 901 on May 19, 2015 ExxonMobil experienced facility impacts. Due to these impacts, SYU onshore and offshore facilities are temporarily ceasing operations. On June 16, 2015 incoming platform gas to the POPCO facility terminated and on June 24, operations began depressurizing the facility. The boilers have not been in service since July 22, 2015. Preservation plans for the facility are still in progress. Line 901 remains shut down, and Plains continues to work with local and federal government agencies to understand the nature of the failure and repair options. At this time it is unclear when restart of the facility may occur.

ExxonMobil (acting on behalf of POPCO) is requesting a variance to allow the suspension of certain permit requirements specified in the attached table until the facility returns to normal operations. Upon resumption of platform gas processing, all conditions suspended under the terms of the variance will resume as described in the current Part 70/PTO 8092 and Part 70/Part PTO 9102-R5.

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.

POPCO has no means of immediately complying with certain rules and permit conditions cited in the attached table. Other conditions are impractical to comply with during this temporary

shutdown period. The attached table provides further information of these conditions. This unanticipated shut down of the facility was not within our control.

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.

POPCO has no means of immediately complying with certain rules and permit conditions cited in the attached table. Other conditions are impractical to comply with during this temporary shutdown period. The attached table provides further information of these conditions. This unanticipated shut down of the facility was not within our control.

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.

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: _____ Time: _____

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

C. Please provide a description of the "breakdown condition", including equipment involved and the cause to the extent it is known.

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.

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 equipment subject to this variance 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: 7/25/17 SIGNATURE:

TITLE: Operations Asset Manager

PRINT NAME: Jing Wan

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
12000 Calle Real
Goleta, California 93117

ExxonMobil Production

RECEIVED
AUG 16 2017
SBCAPCD

July 27, 2017

Petition for Regular Variance
Extension Final Compliance Date
Variance Orders 2016-23-R and 2016-32-R
PTO 8092-R8

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 Regular Variance Petition for Pacific Offshore Pipeline Facility (POPCO). We understand that the variance, if granted, will extend the final compliance date of the subject orders and combine Orders 2016-23-R and 2016-32-R into a single order.

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 at patrice.a.surmeier@exxonmobil.com.

Sincerely,

Jack Jones
Senior Operations Superintendent

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

Attachment

cc: Mike McKay, SBCAPCD

ExxonMobil
Production

Attachments:

- Variance Extension and Consolidation Petition
- 2016-23-R Variance Condition Table
- 2016-32-R Variance Petition with Conditions Table

POPCO Permit (8092) Variance 2015-26-R

Area	Condition	Condition Language	Other information
Boiler	9.C.1(c)	The Utility Boilers in this section are subject to all the monitoring requirements listed in Table 4.10 and District Rule 342.E, G and I.	Table 4.10 specifies continuous monitoring of many points that are currently not in operation. Petitioner requests relief from monitoring lines with no flow, operation of process monitors for systems not processing, and operation of CEMs analyzers for boiler stacks while the boilers are temporarily out of service.
Boiler	9.C.1(c)(iv)	*CEMS* - POPCO shall monitor the emission and process parameters listed in Table 4.10 for the life of the project POPCO and shall maintain and operate continuous in stack monitoring equipment for the Utility Boilers for emissions of nitrogen oxides (as NO2) and sulfur oxides (as SO2) consistent with District Rule 328, the District-approved CEMS Plan for the POPCO facility and Table 4.1 0.	Table 4.10 specifies continuous monitoring of many points that are currently not in operation. Petitioner requests relief from monitoring lines with no flow, operation of process monitors for systems currently not processing, and operation of CEMs boiler analyzers while the boilers are currently not in operation.
Boiler	9.C.1(c)(v), HHV plan	HHV plan requires quarterly CGA of sales gas analyzer, calibrations schedules specified in Process Monitoring Plan.	Boilers are currently not in operation. Sales gas and in plant fuel are not being generated. Petitioner requests relief from all requirements related to monitoring of boiler fuel gas and sales gas. Further, relief is sought from performance of CGA and other calibrations of sales gas analyzer because these calibrations are unnecessary while the analyzer is offline.
SRU	9.C.7(a)	The emissions, after control, from the SRU shall not exceed the BACT limits listed below and in Table 4.5 (BACT. Sulfur· Recovery Unit (SRU)). Compliance shall be based on the use of process monitors, analyzers and CEMS as detailed in Table 4.5 and Table 4.9	Table 4.5 notes certified and calibrated inlet flow and H2S meter, off gas H2S and flow meters and SO2 analyzer. Table 4.9 specifies continuous monitoring of many points that currently not in operation. Petitioner requests relief from monitoring lines with no flow, operation of process monitors for systems not processing, operation of CEMs analyzers for boiler stacks while the boilers are temporarily out of service, calibration of analyzers and monitors and telemetry of data to APCD during the temporary shutdown.

SRU	9.C.7(c)	POPCO shall monitor the emission and process parameters listed in Tables 4.9 through 4.12 for the life of the project.	These tables 4.9, 4.10 and 4.12 contain boiler, and sulfur related monitoring parameters. Petitioner requests relief from monitoring lines with no flow, operation of process monitors for systems not processing, operation of CEMs analyzers for boiler stacks while the boilers are temporarily out of service, calibration of analyzers and monitors and telemetry of data to APCD during the temporary shutdown.
SRU	9.C.7(c)(i)	*Process Monitors* - POPCO shall install and maintain in-plant process monitors as shown in Figure 4.1 and Table 4.9 for the life of the project.	This figure and table list boiler, inlet and off gas sulfur related monitors. Petitioner requests relief from monitoring lines with no flow, operation of process monitors for systems not processing, operation of CEMs analyzers for boilers while the boilers are temporarily out of service, calibration of analyzers and monitors as specified in the process monitoring plan.
CEM	9.C.12	The CEM monitors shall be in place and functional for the life of the project.	Petitioner requests relief from all CEMs monitoring plan requirements for all temporarily shutdown equipment.
CEM	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 and with manufacturer's specifications.	Petitioner requests relief from all CEMs monitoring plan requirements for all temporarily shutdown equipment.
CEM	9.C.12(f)	POPCO shall maintain and operate continuous in stack monitoring equipment for the mass emissions (lb./hr. basis) of nitrogen oxides (as N02) and sulfur oxides (as S02) from each Utility Boiler (B-80 1 A and B). POPCO shall compute and telemeter the sliding hourly average for nitrogen oxide emissions (lb./hr.) and sulfur oxide emissions (lb./hr.) individually from Utility Boiler B-80 1 A and B.	Petitioner requests relief from all CEMs monitoring plan requirements including telemetry for all temporarily shutdown equipment.
CEM	CEMS plan	8.4.4 2-pt calibration is required on pollutant monitors daily	Petitioner requests relief from all requirements of CEMs monitoring requirements for all temporarily shutdown equipment.
Data telemetry	9.C.13	POPCO shall telemeter monitoring data to the District as specified by Condition C.12	Petitioner requests relief from telemetering data for all temporarily shutdown equipment.
Process monitoring plan	9.C.20	All facility process monitoring devices listed in Section 4.11.2 of this permit shall be properly operated and maintained according to manufacturer recommended specifications. POPCO shall implement the District approved Process Monitor Calibration and Maintenance Plan for the life of the project.	Petitioner requests relief from specific maintenance schedules for process monitors for equipment currently not in service.

Fuel Gas Sulfur Plan	9.C.21	Fuel Gas Sulfur and HHV Reporting Plan.	Boilers are currently not in operation. Sales gas and in plant fuel are not being generated. Petitioner requests relief from all requirements related to monitoring of boiler fuel gas and sales gas. Further relief is sought from performance of CGA and other calibrations of sales gas analyzer because these calibrations are unnecessary while the analyzer is offline.
Fugitive emissions monitoring	9.C.3(c)(i)	Requires enhanced fugitive emissions monitoring in order to generate emission credits.	Petitioner requests relief from this enhanced monitoring while equipment requiring ERCs is temporarily out of service.
Fugitive emissions monitoring	Heritage PTO 9102-R5 9.C.4(c)(i)	Requires enhanced fugitive emissions monitoring in order to generate emission credits.	Petitioner requests relief from this enhanced monitoring while equipment requiring ERCs is temporarily out of service.

Attachment A

Santa Barbara County
Air Pollution Control District

Our Vision Clean Air

H.B. Case No.:	2016-32-R
Petitioner:	Exxon Mobil
Permit No.:	8092
Date Rec'd:	10/11/16
Time Rec'd:	12:18
Filing Fee Paid:	$580.00

PETITION FOR VARIANCE

Type of Variance Requested:

Emergency _____ Interim[1] _____ 90-Day _____ Regular X

Length of Variance Requested: Start Date 11/2/16

End Date 11/1/17

[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: Jing Wan
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 Permits 8092

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

POPCO's Las Flores Canyon Gas Treatment Plant is a natural gas sweetening process and sulfur recovery unit (SRU). The purpose of this process is to remove H_2S and CO_2 from natural gas. The H_2S is removed from natural gas and converted into elemental sulfur by the SRU. Any residual H_2S contained in the SRU tail gas is incinerated and converted to $S0_2$ in one of the two 40 MMBTU/hr boilers, which are located downstream of the SRU.

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.

The facility will be in violation of APCD Permit 8092 Conditions related to Rules 206, 311, 331, 328, 325, 359, and 342. See the attached table for a detailed description of the permit conditions that the facility cannot or are impractical to meet until the facility resumes natural gas processing.

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.

As a result of the failure of the Plains All American Pipeline's (AAPL) Line 901 on May 19, 2015, ExxonMobil's SYU onshore and offshore facilities are temporarily suspending operations. On June 16, 2015 incoming platform gas to the POPCO facility terminated and on

June 24, 2015 operations began depressurizing the facility. The boilers have not been in service since July 22, 2015. Facility equipment is being preserved to manage its integrity over the longer term due to the uncertainty around the recommencement timing of production operations. The facility may be preserved for an extended period while AAPL reestablishes pipeline operations. This petition requests relief from a number of conditions that are infeasible or impractical to meet during this period. This petition is submitted separately but concurrently with a petition covering other POPCO conditions because the proposed final compliance date differs.

Once preservation activities are complete, the operation of the thermal oxidizer will no longer be necessary until production operations recommence. Process vessels have been purged with N_2 and steamed as necessary to remove residual hydrocarbons and sulfur compounds. Equipment will be preserved with a N_2 blanket at pressures significantly below normal operating pressures. ExxonMobil (acting on behalf of POPCO) is requesting a variance to allow the suspension of certain permit requirements related to the operation of the thermal oxidizer as specified in the attached table.

This petition also requests relief from a number of conditions that cannot be met during the current preservation status. These conditions are specified in the attached table and are related primarily to the measurement and/or recordkeeping of process parameters that do not exist during preservation. Under normal operations these conditions would be temporarily suspended without variance during regular maintenance periods when, similarly, process streams are not available. However due to the extended nature of this event, a variance petition is being submitted to clarify the situation.

The petition also requests relief from weekly monitoring and annual carbon canister change out for the Tank T-601. This tank normally stores water which may contain small amounts of organic liquid. Most recent source tests during operations measured an average emissions of 0.4 ppm H2S and less than 0.00003 lb/hr ROC. During the preservation period this vessel will store water from sources such as rain and wash down which are unlikely to contain significant organics. Because of the reduced possibility of hydrocarbons in this water, ExxonMobil is requesting relief from requirements which provide no air quality benefit during preservation. Monitoring on a monthly basis and carbon change out as needed based on those results will ensure adequacy of control system.

ExxonMobil is requesting a variance to allow the suspension conditions as specified in the attached table until the facility returns to normal operations. Upon commencement of platform gas processing, all conditions suspended under the terms of the variance will resume as described in the current Part 70/PTO 8092.

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.

POPCO has no means of immediately complying with certain rules and permit conditions cited in the attached table. Other conditions are impractical to comply with during this temporary preservation period. The attached table provides further information of these conditions. This unanticipated state was not within ExxonMobil's control.

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.

POPCO has no means of immediately complying with certain rules and permit conditions cited in the attached table. Other conditions are impractical to comply with during this temporary preservation period. The attached table provides further information of these conditions. This unanticipated state was not within ExxonMobil's control.

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.

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: _____ Time: _____

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

C. Please provide a description of the "breakdown condition", including equipment involved and the cause to the extent it is known.

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.

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 equipment subject to this variance 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: 10/11/16 SIGNATURE:

TITLE: Operations Asset Manager

PRINT NAME: Jing Wan

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.

POPCO Permit (8092) Variance Petition - October 2016

Area	Condition	Condition Language	Other information
CEM (Rule 328)	9.B.12	POPCO shall comply with the requirements of Section C, F, G, H, and I of Rule 328. Compliance shall be based on monitoring, recordkeeping, and reporting requirements of this permit as well as on-site inspections.	Petitioner requests relief from all CEMs monitoring, recordkeeping, and reporting requirements for all equipment that will temporarily not be in service.
Boiler	9.C.1(b)(iii)(2)(a)	*Utility Boiler- Fuel Gas Usage Limits* - POPCO shall use the most recent heating value analysis in conjunction with the fuel gas meter reading to calculate the heat input to each boiler.	The condition specifies measuring of a process parameter that is temporarily not in operation. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(b)(iv)(1)	*Utility Boiler -TGU Tailgas Input Limits* - POPCO shall use the most recent heating value analysis in conjunction with the TGU tailgas meter readings to calculate the heat input to the boilers.	The condition specifies measuring of a process parameter that is temporarily not in operation. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(c)(i)	*Utility Boiler Fuel Meters*- The amount of fuel gas combusted in each Utility Boiler shall be measured using a permanently installed District-approved in-line fuel meter.	The condition specifies measuring of a process parameter that is temporarily not in operation. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(c)(ii)	*TGU Tailgas Meters*- The volume of TGU tailgas directed to each Utility Boiler shall be metered using District-approved meters.	The condition specifies measuring of a process parameter that is temporarily not in operation. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(c)(v)	*Boiler Fuel Gas Data* - POPCO shall monitor the total sulfur content of the plant fuel gas used in the Utility Boilers by (a) weekly sorbent tube (or equivalent District approved) readings of hydrogen sulfide, and (b) quarterly gas samples for third party lab analyses for hydrogen sulfide, total reduced sulfur compounds and higher heating value (HHV). POPCO shall utilize the District-approved Fuel Gas Sulfur and HHV Reporting Plan.	The boilers are temporarily not in operation and there is no in-plant generated fuel to measure weekly or quarterly. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(c)(vi)	*Sales (PUC Quality) Fuel Gas Data* - POPCO shall continuously monitor the hydrogen sulfide content (as H2S) of the sales (PUC Quality) fuel gas used in the TEG Reboilers and Forced Air Furnace using one District-approved monitor. This monitor shall adhere to the District's CEMS Protocol document and District Rule 328 requirements regarding CEMS. On a quarterly basis, POPCO shall take gas samples for third party lab analyses for: hydrogen sulfide content, total reduced sulfur compounds and the higher heating value (HHV). POPCO shall utilize the District-approved Fuel Gas Sulfur and HHV Reporting Plan.	There is no sales gas for inline analyses or quarterly samples. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(c)(vii)	*TGU Tailgas Data* - POPCO shall monitor the higher heating value of the TGU tailgas combusted in the Utility Boilers by taking quarterly gas samples for third party lab analyses for the higher heating value (HHV). POPCO shall utilize the District-approved Fuel Gas Sulfur and HHV Reporting Plan.	There is no off gas to analyze quarterly. Petitioner requests relief from monitoring lines that will temporarily not be in service.

POPCO Permit (8092) Variance Petition - October 2016

Boiler	9.C.1(c)(viii)	POPCO shall monitor the steam delivery pressure to Utility Boilers B-801A and B-801B burner steam injection wand using a dedicated pressure gauge.	There is no steam delivery to the Boilers at this time. Petitioner requests relief from monitoring lines that will temporarily not be in service.
Boiler	9.C.1(d) & 9.C.1(d)(i) -(viii)	The Utility Boilers listed in this section are subject to the recordkeeping requirements listed in Table 4.10 and Rule 342 POPCO shall record the emission and process parameters listed in Table 4.10. The Recordkeeping requirements in sections 9.C.1(d)(i)-9.C.1(d)(viii) also specify recordkeeping for the Utility Boiler Fuel Gas Use, TGU Tailgas Input, Boiler Fuel Gas Data, Sales (PUC Quality) Fuel Gas Data, TGU Tailgas Data, Steam Injection, Maintenance and Calibration Logs, and H2S Monitors.	Boilers have not been operational since July. Petitioner requests relief from recordkeeping requirements on equipment that is temporarily not in service.
ThOx	9.C.2(c)	POPCO shall monitor the emissions and process parameters listed in Table 4.11 and Rule 359.G for the life of the project.	Table 4.11 specifies monitoring of points that will temporarily not be in operation. Petitioner requests relief from monitoring lines that will temporarily not be in service.
ThOx	9.C.2(c)	*Flare Event Volumes* - The volumes of gas flared during each event shall be monitored by use of District-approved flare header flow meters.	Petitioner requests relief from monitoring lines that will temporarily not be in service.
ThOx	9.C.2(c)(ii)	*Purge/Pilot Gas* POPCO shall monitor the total sulfur and hydrogen sulfide content of the sales gas used in the thermal oxidizer as purge and pilot gas by (a) on an inline continuous hydrogen sulfide analyzer for the POPCO sales, and (b) quarterly gas samples for third party lab analyses for hydrogen sulfide, total reduced sulfur compounds and higher heating value (HHV)	Petitioner requests relief from specific monitoring and measurements for purge/pilot fuel gas for equipment temporarily not in service.
ThOx	9.C.2(c)(iii)	POPCO shall continuously monitor the combined pilot gas flow to the thermal oxidizer using a District-approved meter.	Petitioner requests relief from specific monitoring for pilots that are planned to temporarily not be in service.
ThOx	9.C.2(c)(iv)	*Hydrocarbon and Acid Gas Meters*- POPCO shall continuously monitor the flare gas volumes in the hydrocarbon and acid gas flare headers using the District-approved Flare Volume Metering System meters. Six-minute average instantaneous flow rates (in units of scfh) and one-hour average flow rates shall be telemetered to the District's DAS.	Petitioner requests relief from monitoring hydrocarbon and acid gas flares headers temporarily not in service. Petitioner requests relief from telemetry requirement. Note that relief from Condition 9.C.13 Data Telemetry has already been obtained for equipment that is temporarily not in service (Hearing Board Order 2016-23-R).

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ThOx	9.C.2(c)(v)	The four (4) Flare Volume Meters and the Thermal Oxidizer Pilot Fuel Gas Meter shall be calibrated and maintained in accordance with the meter manufacturer's procedures and frequency.	Petitioner requests relief from specific calibrations for meters temporarily not in service. Note that relief from Condition 9.C.20 - Process Monitoring Systems - Operation and Maintenance has already been obtained for equipment that is temporarily not in service (Hearing Board Order 2016-23-R).
ThOx	9.C.2(c)(vi) and (vii)	POPCO shall operate the District-approved gas flow meters for measuring compressor seal leakage flow rates. POPCO shall operate the District-approved flow indicator meters for measuring all purge gas flow to the hydrocarbon and acid gas flare headers.	Petitioner requests relief from operating meters temporarily not in service.
ThOx	9.C.2(c)(x)	*Flaring Sulfur Content Correction*- During non-flaring events, POPCO shall sample, on a weekly basis, the hydrocarbon and acid gas flare headers to determine the hydrogen sulfide content using sorbent tubes. On an annual basis, gas samples shall be obtained from each flare header for third party lab analyses of hydrogen sulfide and total reduced sulfur compounds.	Petitioner requests relief from sampling requirements on streams temporarily not in service.
ThOx	9.C.2(d) & 9.C.2(d)(i)-(v) & 9.C.2(d)(vii)-(viii)	*Recordkeeping:* The equipment listed in this section is subject to all the recordkeeping requirements listed in Table 4.11 and Rule 359.H. POPCO shall record the emission and process parameters listed in Table 4.11. The Recordkeeping requirements in sections 9.C.2(d)(i)-9.C.2(d)(viii) specify additional recordkeeping related to Flare Event Logs, Pilot Gas Volumes/Mass Emissions, Purge Gas Volumes/Mass Emissions, Compressor Seal Leakage Gas Volumes/Mass Emissions, Baseline System Leakage Gas Volumes/Mass Emissions, Maintenance and Calibration Logs and Rule 359 Planned Monthly Volumes.	Petitioner requests relief from recordkeeping requirements on equipment that is temporarily not in service.
ThOx	9.C.2(d)(vi)	POPCO shall telemeter both 6-min average instantaneous and clock-hour average instantaneous flow rates to District's DAS.	Petitioner requests relief from telemetry requirement. Note that relief from Data Telemetry (9.C.13) has already been obtained for equipment that is temporarily not in service.
Fugitive Hydrocarbon Emissions Components	9.C.3(b)(i)	VRS Use - The vapor recovery and gas collection (VR & GC) systems at the POPCO Gas Plant shall be in operation when equipment connected to these systems are in use. These systems include piping, valves, and flanges associated with the VR & GC systems.	Petitioner requests relief from this condition because equipment connected to these systems will not meet Rule 331 applicability thresholds during the preservation period.
SRU	9.C.7(b)(ii)	*Operational Limits:* POPCO shall use the most recent heating value analysis in conjunction with the TGU tailgas meter readings to calculate the heat input to the boilers.	Petitioner requests relief from monitoring lines temporarily not in service.

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SRU	9.C.7(b)(v)	Minimum Boiler Incineration Temperature- The average daily temperature of the gas leaving the boiler's combustion zone when tail gas is being incinerated shall be at or above 919 op at all times. Compliance shall be based on at least 96 evenly spaced measurements of the combustion zone temperature over each 24 hour period and telemetry of that data to the District's DAS.	Petitioner requests relief from monitoring equipment temporarily not in service. Petitioner requests relief from telemetry requirement. Note that relief from Condition 9.C.13 Data Telemetry has already been obtained for equipment that is temporarily not in service (Hearing Board Order 2016-23-R).
SRU	9.C.7(d) & (d)(i)	POPCO shall record the emission and process parameters listed in Tables 4.9 through 4.12. The Recordkeeping requirements in sections 9.C.7(d)(i)-9.C.7(d)(ii) specify additional recordkeeping related to the Sulfur Recovery Unit/Stretford Tailgas Unit.	Petitioner requests relief from recordkeeping requirements on equipment that is temporarily not in service.
Throughput Rates	9.C.8 (f)	POPCO shall track in a log, on a daily basis, the actual usage data of the parameters limited by this condition	Petitioner requests relief from recordkeeping requirements on equipment that is temporarily not in service.
CVR	9.C.10 (a), (b), (d), (g), (j), (k)(5)-(8)	Conditions provide details of CVR report related to External Combustion, Thermal Oxidizer, Pigging, Sulfur Recovery Unit/Stretford Tailgas Unit and Facility Throughput Data.	Petitioner requests relief from reporting requirements on equipment that is temporarily not in service. Petitioner requests that CVR reporting for equipment temporarily not in service be limited to notification of the operating status of the unit.
Central DAS	9.C.14	This system shall receive and analyze continuous emissions data from POPCO CEMs (as specified in Condition C.12), and odor monitoring (as specified in Condition C.16) and any other data necessary to evaluate observed and potential air quality impacts either site-specific or regional.	Petitioner requests relief from receiving and analyzing data utilizing the DAS for all equipment temporarily not in service.
Offsets and Consistency with the Clean Air Plan.	9.C.17	POPCO shall provide the following offsets: (a) POPCO shall offset the net emission increase (NEI) resulting from operation of the Las Flores Canyon facility as detailed in Section 7 and Tables 7.1, 7.2, 7.3 and 7.4. (b) If offsets are not in place as required by this permit, POPCO shall provide replacement offsets and shall obtain variance relief.	Offsets are provided for POPCO sources from enhanced inspection of fugitive emission sources. This enhanced inspection program is not required while the fugitive components are not in ROC service. Notwithstanding POPCO's inability to perform enhanced inspection, the emission reduction requirements of this condition are satisfied. Emissions reductions exceed the emissions liability from the facility during this variance period. POPCO emissions subject to the offsetting provisions are fully mitigated.
Process Sampling	9.C.19	POPCO shall quarterly sample the Feed Gas, Boiler Fuel Gas, the sales gas and the tail gas. Also weekly sorbent tube from boiler gas.	Petitioner requests relief from sampling lines that will temporarily not be in service.

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Wastewater Tank.	9.C.25 (b)	ExxonMobil shall replace the carbon in the canisters serving wastewater Tank T-601 at least annually. Other portions of the condition specify replacement within specified periods following detection of performance issues.	During preservation Tank 601 is only receiving water from sources such as area drains and rain. Petitioner is only requesting to relief from the requirement to change carbon annually. As required by other portions of the condition, carbon would be changed as necessary within specified timeframes when a performance issue is detected.
Wastewater Tank.	9.C.25 (c)(i)	ExxonMobil shall monitor the exhaust of each carbon canister serving wastewater Tank T-601 once per week in accordance with EPA Method 21, or other APCD approved methods.	During preservation Tank 601 is only receiving water from sources such as area drains and rain. Petitioner is requesting a reduction in exhaust sampling to once a month based on the temporary limited use.
Wastewater Tank.	9.C.25 (c)(ii)	ExxonMobil shall monitor the exhaust of the final carbon canister once per week for hydrogen sulfide using Draeger tubes.	During preservation Tank 601 is only receiving water from sources such as area drains and rain. Petitioner is requesting a reduction in exhaust sampling to once a month based on the temporary limited use.
NGL Loading Rack	9.C.27(a)	The NGL Loading rack shall be equipped with a vapor return system. Such vapor return system shall be capable of returning all vapors generated during loading to the NGL storage tanks.	Petitioner requests relief from this requirement while the facility is temporarily suspending operations.
NGL Flowline	9.C.27(b)	A monthly summary of the total volume (e.g., gallons) of NGL transferred from POPCO to the ExxonMobil facility shall be recorded and reported to the District.	Petitioner requests relief from reporting NGLs while there are no NGLs being transferred.
PDS/TDS/SDS/Pig Receiver Eductor Vapor Recovery System	9.C.28	The PDS/TDS/SDS eductor system shall be equipped with a high pressure alarm set to alarm at 5.5 psig. Any high-pressure alarm indicated by this sensor shall be recorded by the plant Distributed Control System (DCS) and be reported to the District.	Petitioner requests relief from having this high-pressure alarm set and recording to the DAS while the facility is temporarily suspending operations.
Visible Emissions-Rule 302	9.C.36 (b)	Boilers (B-801A & B-801B): Once per calendar quarter, ExxonMobil shall perform a visible emissions inspection for a one-minute period from each boiler.	Petitioner requests relief from this requirement while the boilers are temporarily not in service.
External Combustion	9.D.3(c)	Monitoring: The volume of natural gas (in units of standard cubic feet) used by Sulfinol TEG Reboiler E-251 shall be reported as permitted annual heat input limit for the unit (Btu/year) divided by the District-approved heating value of the fuel (Btu/set).	Petitioner requests relief from this requirement while the reboiler is temporarily not in service.