



**Santa Barbara County
Air Pollution Control District**

Case No / Date	2017-11-E	02/17/17
Petitioner	ExxonMobil Production Company	
Permit #	Part 70/PTO 5651	
Date Rec'd	02/14/17	
Time Rec'd	10:11	

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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)
Rule 206, Conditions 9.C.2(c) and)
9.C.2(c)(iv) of Part 70/Permit to)
Operate 5651.)

H.B. Case No. 2017-11-E

VARIANCE FINDINGS

AND ORDER

ExxonMobil Production Company filed a Petition for an Emergency Variance on February 14, 2017. A hearing regarding the above-entitled matter was held on February 17, 2017 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 the Las Flores Canyon (LFC) oil and gas processing plant located approximately 25 miles northwest of the City of Santa Barbara, California.
4. On February 10, 2017 at approximately 14:30 maintenance work was initiated on the flare sampling system. It appeared the sample being drawn into the flare system was not representative of what was being flared. Because LFC is in the final stages of preservation, the flare headers, as well as any flare events, have high concentrations of nitrogen (N₂) and little purchased fuel. Samples of the flare line upstream of the sampler contain approximately 74 and 23 percent N₂ and CH₄ respectively, based on in house Gas Chromatograph (GC) analysis. Samples taken directly from the sampler inlet line were measured at the same percentages. Concentrations within the sample container were

measured at 1 and 92 percent N₂ and CH₄ respectively, indicating contamination of the sample with fuel gas. Technicians are working with manufacturer representatives to isolate and correct the problem. They have been unsuccessful to date.

Flaring is occurring routinely due to atmospheric-related thermal expansion of the oil storage tanks. Blanket gas to the tanks as well as purges within the facility have been converted to N₂. Because of the preservation state of the facility flare concentrations are consistent over the course of this flaring and have low H₂S concentrations. During the day there may be several discrete “flare events” as weather and temperature fluctuate. Because these individual events may be short in duration, unpredictable, and unevenly spaced, it is not feasible to manually capture a sample from each “flare event” that occurs during the day. Until the sampler malfunction can be corrected, ExxonMobil proposes to take one daily sample from the flare header during the daily breathing. Due to the status of the facility, flare composition will remain steady over all the events and one sample a day will be representative. There are no expected excess emissions related to the granting of this variance. H₂S samples for each flaring event will continue to be calculated until the sampling equipment can be repaired.

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 15-Day Emergency Variance be granted for the continued operation of the Petitioner's facility in violation of Rule 206, Conditions 9.C.2(c) and 9.C.2(c)(iv) of Part 70/Permit to Operate 5651 from February 14, 2017 through February 28, 2017 with the following conditions:

1. Petitioner shall submit a written report to the Hearing Board and District by March 17, 2017. 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 the 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: 2 (17) 17



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