

 <p><b>Santa Barbara County Air Pollution Control District</b></p>	<b>Case No / Date</b>	<b>2017-19-E</b>	<b>08/17/17</b>
	<b>Petitioner</b>	<b>Venoco, LLC</b>	
	<b>Permit #</b>	<b>7904</b>	
	<b>Date Rec'd</b>	<b>08/15/17</b>	
	<b>Time Rec'd</b>	<b>16:05</b>	
<b>FOR OFFICIAL USE ONLY</b>			

**BEFORE THE HEARING BOARD  
OF THE SANTA BARBARA COUNTY  
AIR POLLUTION CONTROL DISTRICT**

In The Matter of the Application of )  
 Venoco, LLC for an Emergency )  
 Variance from District Rule 206, )  
 Condition 9.C.2(c)(v) of Part 70/Permit )  
 to Operate 7904. )

**H.B. Case No. 2017-19-E  
VARIANCE FINDINGS  
AND ORDER**

Venoco, LLC filed a Petition for an Emergency Variance on August 15, 2017. A hearing regarding the above-entitled matter was held on August 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 Ellwood Onshore Facility (EOF) located approximately 14 miles west of the City of Santa Barbara, CA.
4. On August 14, 2017, the Petitioner discovered the flare monitoring device on V-221 was not calibrating properly. This device monitors H<sub>2</sub>S limits of gas combusted in the Thermal Oxidizer. The Petitioner immediately filed Breakdown #11416 and began planning repair efforts. They soon discovered a manufacturer representative would be required to perform the repairs. The Petitioner expects the analyzer to be repaired after

the breakdown protection has expired; therefore, they filed an Emergency Variance Petition to request additional coverage while the analyzer is repaired. During this time, the Petitioner will continue to monitor for H<sub>2</sub>S by taking hourly detection tube readings of the flare gas downstream of V-221 and recording those readings into their V-221 H<sub>2</sub>S log. Current readings have shown H<sub>2</sub>S levels to be 0ppm.

5. If repairs take longer than the variance period allows, the Petitioner will need to submit an Interim and 90-Day variance petition in order to request continued variance protection.
6. Without variance coverage, the Petitioner would be in violation of District Rule 206, Condition 9.C.2(c)(v) of Part 70/Permit to Operate 7904.
7. There are no expected excess emissions related to the granting of this variance.
8. 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.
9. The District staff supports the Petition as conditioned below.
10. 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.

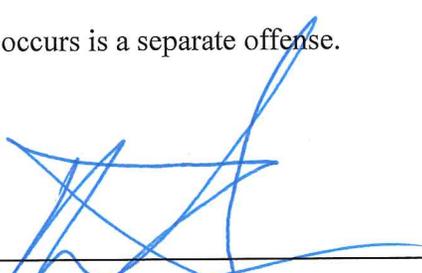
**THEREFORE, THE HEARING BOARD ORDERS,** as follows:

That an Emergency Variance be granted for the continued operation of Elwood Onshore Facility in violation of District Rule 206, Condition 9.C.2(c)(v) of Part 70/Permit to Operate 7904 from August 18, 2017 through September 01, 2017, or the date the facility returns to compliance, whichever occurs first, with the following conditions:

1. Petitioner shall submit a written report to the Hearing Board and District by September 15, 2017. The report shall include the date compliance was achieved together with a description of the corrective action taken and the dates, times, and emissions (if any) 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: \_\_\_\_\_

8/17/17

  
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Robert Saperstein, Member  
Santa Barbara County Air Pollution Control District  
Hearing Board