

H.B. Case No.:	<u>2020-13-R</u>
Petitioner:	<u>Southern California Gas Company,</u> <u>LLC</u>
Permit No.:	<u>9584-R6</u>
Date Rec'd:	<u>5/18/2020</u>
Time Rec'd:	<u>1504 hours</u>
Filing Fee Paid:	<u>\$1,377.00</u>

PETITION FOR VARIANCE

Type of Variance Requested:	
Emergency _____	Interim ¹ _____
	90-Day <input checked="" type="checkbox"/> Regular _____
Length of Variance Requested:	Start Date <u>06/08/2020</u>
	End Date <u>9/05/2020</u>
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: Southern California Gas Company
 Address: 1171 More Ranch Road
Goleta, CA 93117
 Phone Number: (805) 681-8072 (Andrew Longworth)

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: Southern California Gas Company
 Address: P.O. Box 818
Goleta, CA 93116
 Phone Number: (805) 681-8072 (Andrew Longworth)

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

Part 70 and APCD Permit to Operate No. 9584-R6.

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

Internal Combustion Engines Tag # - Main Unit #5, which is a 650 BHP natural gas fueled engine, driving an integral compressor.

The permit equipment number for this engine is 001202.

5. **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.

Violation of permit conditions #9.C.1(a) (Emission Limits), 9.C.1(b)(iv) (I & M Plan), 9.C.1(b)(v) (Catalyst), 9.C.1(b)(viii)A (AFRC Control) 9.C.1(b)(viii)(C) (I&M Plan) and SBCAPCD Rule #333 E.1.a, (Emission Limits), if we were to operate this engine for “break-in” purposes after recent overhaul. The break-in period will occur between June 8, and September 5, 2020.

- 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.

The engine that we are seeking a variance for has been out of service and not operating since August 18, 2018 due to an engine and compressor overhaul. In order to return this engine to service, it is necessary to operate it under no load and light load (less than 500 bhp) conditions in order to check, adjust, tune-up and “break-in” the equipment after the overhaul. We estimate that this post overhaul run and maintenance work can be completed in less than 150 hours of intermittent engine operation. The Air/Fuel Ratio Controller (AFRC) is not capable of controlling throughout such a wide range of horsepower (0 bhp to

650 bhp) and will have to be shut off until the engine is capable of and operating at or near its normal load and temperatures. During the less than 150 hours of operation, the engine exhaust will pass through muffler, but the catalytic converter element will be removed to prevent oil fouling. Operating the engine with the catalyst in place but without the AFRC would not result in a corresponding reduction in emissions as the correct operating conditions (such as temperature) for the catalyst would not be maintained. Additionally, the likely oil fouling of the catalyst would render them ineffective and necessitate their replacement at an estimated cost of over \$10,000. Upon completion of these post overhaul checks, adjustments and “break-in” run period, the catalytic converter element will be reinstalled, the Air Fuel Ratio Controller will be placed back in service and the engine will be operated at normal loads while our Mobile Emissions Lab will “dial in” the exhaust for compliance with emissions concentration limits. All of this work would be completed within the timeframe that we are seeking for this variance. SoCalGas will record runtime hours and fuel consumed during the variance period.

SoCalGas has considered curtailing operations in lieu of obtaining this variance, but this would require the engine/compressor to be permanently removed from service.

This variance will not result in excess emissions of ROC, CO, SOx, or PM10. No more than 2131lbs of excess NOx emissions are expected to result from the requested 150 uncontrolled run hours. Excess emissions are calculated by subtracting controlled emissions that are calculated using the Permit emission factor from uncontrolled emissions that are calculated using the AP-42 uncontrolled emission factor.

Efforts will be made to reduce emissions during the break-in period to the maximum extent feasible.

A nuisance as defined by District Rule 303 is not expected to occur as a result of this variance and resuming operation of the engine is not likely to create an immediate threat or hazard to public health and safety.

- 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.

Variance is being requested in order to break in engine after overhaul to avoid equipment damage.

- 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.

See item “B” above.

- E. Please describe what consideration you have given to curtailing of operations in lieu of obtaining a variance.

See item “B” above.

- F. Please describe what steps and measures you will take to reduce excess pollutant emissions the maximum extent feasible during the requested variance period.

**Break in runtime will be limited to less than 150 hours.
See item “B” above.**

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.

SoCalGas will record runtime hours and fuel consumed. Emissions can be calculated using AP-42 emission factors for an uncontrolled engine of this type, size that is fueled on natural gas.

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?

No

8. Please state whether or not any civil or criminal case involving the equipment subject to this variance is pending any court.

None

The undersigned is authorized to submit the above Petition on behalf of the Petitioner and further states under penalty of perjury that the above Petition, including any attachments and the items therein set forth, are true and correct.

DATE: May 22, 2020

SIGNATURE: _____



TITLE: _____

Principal Environmental Specialist

PRINT NAME: _____

Andrew Longworth