 <p>air pollution control district SANTA BARBARA COUNTY</p>	Case No / Date	2025-14-E	07/10/2025
	Petitioner	Sable Offshore Corp.	
	Permit #	Part 70/PTO 5651-R7	
	Date Rec'd	06/30/2025	
	Time Rec'd	1649 hours	
	FOR OFFICIAL USE ONLY		

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

In the Matter of the Application of)
Sable Offshore Corp. for an)
Emergency Variance from District)
Rules 328.C.2, 328.I.5, 206, Part)
70/Permit to Operate 5651-R7,)
Conditions 9.C.8.a.i, 9.C.8.a.iii,)
9.C.8.c.iii., 9.C.d.v., 9.C.17, and)
9.C.37.o.

H.B. Case No. 2025-14-E

VARIANCE FINDINGS

AND ORDER

Sable Offshore Corp. (Petitioner) filed a Petition for an Emergency Variance on June 30, 2025. A hearing of the Emergency Variance Petition was held on July 10, 2025. Patrice Surmeier and Jim Nedry represented the Petitioner, Aimee Long represented the Santa Barbara County Air Pollution Control District (District), and Terence Dressler represented the Hearing Board for this Emergency Variance Hearing.

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

HEARING

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. A nuisance as defined in District Rule 303 is not expected to occur as a result of this Variance.
4. Pursuant to Health and Safety Code section 42359.5, "good cause" exists for the granting of the Petitioner's request for an Emergency Variance.
5. If, due to reasons beyond the control of the Petitioner, compliance is not achieved during this

Variance period, additional relief will be sought.

6. District staff supports the Petition as conditioned below.

BACKGROUND

1. The Petitioner operates the equipment described in the Petition at Sable Offshore Corp.'s (Sable) Las Flores Canyon Oil and Gas Processing Plant located approximately 25 miles northwest of the City of Santa Barbara, California.
2. The Petitioner's main operating permit, PT 70/PTO 5651-R7, authorizes the operation of equipment and processes located at the Las Flores Canyon Oil and Gas Plant (LFC), which is part of the Sable Santa Ynez Unit (SYU) Project. The SYU Project develops production from three platforms (Platforms Hondo, Harmony and Heritage) located offshore in the Santa Barbara Channel.
3. The Petitioner's onshore facility, LFC, is subdivided into the following plants: Oil Treating Plant (OTP), Stripping Gas Treating Plant (SGTP), Transportation Terminal (TT) and Cogeneration Power Plant (CPP).
4. The equipment listed in the petition is associated with the Stripping Gas Treating Plant (SGTP) which produces a sweet fuel gas for use in the onshore facilities. Natural gas liquids (NGL) and sulfur are also produced. Acid gases from the fuel gas amine system, NGL sweetening system, and OTP water treating system are treated in a Sulfur Recovery Unit (SRU). The SRU is a combination of the Claus and tail gas units. A small quantity of acid gas remaining after cleanup in the tail gas unit is incinerated at the Waste Gas Incinerator (EAL-4603).
5. The Waste Gas Incinerator (WGI) is designed to combust two sulfur-laden waste streams. A Continuous Emissions Monitoring System (CEMS) is installed to continuously monitor NOx and SOx emissions from the WGI.
6. On June 25, 2025, the Petitioner discovered the SOx analyzer on the WGI in the SGTP failed to meet the daily auto-calibration requirements specified in the Petitioner's permit.
7. The Petitioner states the violation was caused by the sample conditioning system for the SOx analyzer on the WGI because the sample conditioning system is scrubbing both the SOx calibration gas and the SOx sample gas extracted from the WGI exhaust stack.
8. In the past, the Petitioner experienced similar anomalies, however, they were corrected by cleaning the sample line and/or sample cooler. The Petitioner conducted the cleaning only to discover it provided a short-term effect before the problem returned.

9. As a result, the Petitioner requested coverage to troubleshoot the problem and implement appropriate corrective action.
10. No excess emissions are expected with the granting of this Variance request.

FINDINGS

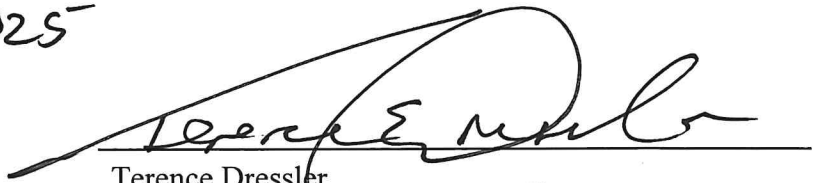
1. Without Variance coverage, the Petitioner will be in violation of District Rules 328.C.2, 328.I.5, 206, Part 70/Permit to Operate 5651-R7, Conditions 9.C.8.a.i, 9.C.8.a.iii, 9.C.8.c.iii., 9.C.d.v., 9.C.17, and 9.C.37.o.
2. Pursuant to Health and Safety Code section 42359.5, “good cause” exists for the granting of Petitioner’s request for an Emergency Variance.

THEREFORE, THE HEARING BOARD ORDERS, as follows:

That an Emergency Variance be granted for continued operation of the WGI without CEMS for SO_x, which is in violation of District 328.C.2, 328.I.5, 206, Part 70/Permit to Operate 5651-R7, Conditions 9.C.8.a.i, 9.C.8.a.iii, 9.C.8.c.iii., 9.C.d.v., 9.C.17, and 9.C.37.o. from June 30, 2025 through July 29, 2025, or the date compliance is achieved, whichever occurs first, with the following conditions:

1. Petitioner shall submit a written report to the Hearing Board and District, to variance@sbcapcd.org, by August 15, 2025. The report shall include the date compliance was achieved, corrective action taken and actual excess emissions (lb/day), if any, that occurred during the variance period.
2. Petitioner shall monitor, record, and quantify, on a daily basis, all emissions related to the granting of this Variance.
3. Petitioner shall retain the obligation to comply with all other local, state, and federal regulations not specifically referenced in the Order.
4. 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.
5. In accordance with District Fees Rule 210, the Petitioner shall pay excess emission fees for each additional ton of pollutant emissions, or portion thereof, allowed as the result of the issuance of this Variance.
6. The Environmental Protection Agency does not recognize California's Variance Program; therefore, this Variance does not protect the Petitioner from Federal Enforcement actions.
7. Each day during any portion of which a violation occurs is a separate offense.

DATED: July 10, 2025



Terence Dressler
Santa Barbara County Air Pollution Control District
Hearing Board