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5 BEFORE THE HEARING BOARD OF THE
6 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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8 **In the Matter of**

9 The Termo Company
10 [Facility I.D. No. 083508]

11 Petitioner,

12 v.

13 SOUTH COAST AIR QUALITY
14 MANAGEMENT DISTRICT.

15 Respondent.
16
17

Case No. 3014-23

DECLARATION OF RALPH COMBS

**RE SHORT VARIANCE PETITION;
FILED IN SUPPORT OF CONSENT
CALENDAR**

Hearing Date: April 22, 2025
Time: 9:30 a.m.
Place: South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

18 I, Ralph Combs, declare:

19 1. I am the Manager of Regulatory, Community, and Government Affairs for The Termo
20 Company “Termo”, which operates Aliso Canyon Facility (“Facility”). If called as a witness, I
21 could testify to the following based on personal knowledge.

22 2. I am familiar with and have reviewed the petition filed in Case No. 3014-23, and I am
23 familiar with the issues presented in the petition related to the vapor recovery systems
24 requirements of the Facility’s permit, including Permit Conditions H23.2, H23.1, E193.1, and
25 E193.2 on Facility Permit No. 083508.

26 3. For the past 12 years I have served as Manager of Regulatory, Community, and
27 Government Affairs for Termo, which operates the Facility. On Monday, March 10, 2025, at
28 11:35 am Southern California Gas Company (SoCalGas) notified Termo’s Area Superintendent,
Dan Murry, of upcoming maintenance work on the Aliso Canyon Gas Storage Facility Gas

1 Dehydration Station, which will prevent SoCalGas from receiving Termo's produced gas and
2 "shut in" the Facility. SoCalGas notified Termo that they would cease sending SoCalGas gas
3 effective 4/28/2025. SoCalGas has notified Termo of upcoming maintenance work on the Aliso
4 Canyon Gas Storage Facility Gas Dehydration Station, which will prevent SoCalGas from
5 receiving Termo's produced gas. Since Termo's Aliso Canyon Facility is directly connected to
6 SoCalGas's gas processing system, this shutdown will force Aliso Canyon to cease operations.
7 With no gas sales capacity, VOC or methane emissions may be released to the atmosphere from
8 the tanks normally under vapor recovery if pressures within the tanks and pipelines exceed the
9 vent setpoints. This would be beyond Termo's control, as the inability to control gas would
10 directly impact Termo's compliance with the applicable District Rule(s).

11 4. Termo is unable to meet District Rules 203(b), 3002(c)(1), 463(d)(3), 1148.1(d)(8),
12 and 1173(m)(1) and Permit Conditions H23.2, H23.1, E193.1, and E193.2 during the planned
13 SoCalGas maintenance commencing April 28, 2025, through May 15, 2025.

14 5. Pressure control devices on well heads and tanks will minimize emissions during the
15 variance period. Casing gas is controlled at the well head by a pressure device which will prevent
16 emissions. Because there is capacity within the tank headspace to accept ("pack") vapor that
17 would otherwise go to vapor recovery, significant VOC emissions are not expected from transfers
18 from storage tanks. In addition, no venting is expected from tank hatches since the tanks have
19 available capacity to store returned vapors at pressures within the design specification of the
20 hatch. If emissions do occur, it would be a result of the pressure relief valves (PRV's) activating
21 on tanks that require pressure relief for safety reasons. If this does occur, the system would vent
22 until normal operating pressures are achieved, then all pressure relief valves would automatically
23 be closed again, and no further emissions would occur.

24 6. Termo will conduct weekly leak detection using a hydrocarbon monitor and follow US
25 E.P.A. Method 21 on all potential fugitive emission components. Termo will track and record
26 operated main gas line pressure between facilities and prior to the gas sales compressor as a
27 measure of pressure management. Termo will keep records of such monitoring which can be
28 made available to the South Coast AQMD upon request.

7. The team at the Facility, including myself, have worked diligently to determine the appropriate course of action in light of these facts.

8. Terno will cease all oil and gas production effective April 28, 2025, and will remain shut in until SoCalGas finishes their planned maintenance, which is anticipated to be May 15, 2025.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this day of April 22, 2025, at City of Long Beach, California.

PC

Ralph Combs