

**PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

PETITIONER: The Termo Company

CASE NO: 3014-23

FACILITY ID: 083508

SOUTH COAST AQMD
CLERK OF THE BOARD
2025 MAR 26 AM 11:15

FACILITY ADDRESS:

4.5 Miles from Sesron Blvd / Tampa Ave Intersection
Palo Sola Truck Road
Lat: 34.317922, Long: -118.573038
Chatsworth, CA 91311

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☐ INTERIM ☒ SHORT ☐ REGULAR ☐ EMERGENCY ☐ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Ralph Combs

Brenna Junkermier

Manager of Regulatory and Government Affairs

Regulatory & Environmental Compliance Specialist

P.O. Box 2767

P.O. Box 2767

Long Beach, CA Zip 90801

Long Beach, CA Zip 90801

☎ (562) 595-7401 Ext. 255

☎ (562) 595-7401 Ext. 228

Fax (562) 279-1955

Fax (562) 279-1928

E-mail RalphC@termoco.com

E-mail BrennaJ@termoco.com

3. RECLAIM Permit ☐ Yes ☒ No
FID: _____

Title V Permit ☒ Yes ☐ No
FID: 083508

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

5. Briefly describe the type of business and processes at your facility.

The Aliso Canyon Facility is a crude oil and natural gas production facility consisting of 8 wells and associated crude oil, gas, and produced water processing and storage equipment. The mixed fluid stream, composed of crude oil, produced water, and associated produced gas (natural gas consisting primarily of methane), is separated into its three components on-site. Crude oil and produced water are stored in tanks, all of which are equipped with vapor recovery systems. The produced gas, along with gas captured by the vapor recovery system, is combined with gas from the Oat Mountain Facility, which is routed to Aliso Canyon through a dedicated pipeline. The combined gas stream is then sent to SoCalGas' gas processing system, located in the Aliso Canyon Gas Storage Field, for further processing and sale.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
See Attachment A - List of Equipment & Relevant Permit Sections			

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

Termo's Aliso Canyon Facility is connected via pipelines to its Oat Mountain Facility, which ties into the SoCalGas pipeline system for gas sales. Termo relies on SoCalGas' takeaway capacity to operate its oil production facilities with efficient gas recovery for beneficial use. Termo uses vapor recovery systems on its production tanks and during tank truck loading to prevent VOC and methane emissions from escaping into the atmosphere. The gases captured by vapor recovery are combined with produced gas and sent to SoCalGas for sale. This vapor recovery process is required by permit during normal tank and truck loading operations.

With SoCalGas' glycol unit shut down, Termo's Aliso Canyon and Oat Mountain facilities will be forced to cease operations, as the gas sales connection is essential for continued production. During shut-ins, Termo halts production to minimize excess emissions from permitted equipment. When necessary, Termo loads crude oil and water trucks to remove produced fluids from the tanks. This curtailment is expected to result in minimal to no uncontrolled emissions.

Please see Attachment B - Aliso Canyon and Oat Mountain Gas Connection map for further reference.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Monthly and Quarterly

Date of last maintenance and/or inspection: 2/24/2025

Describe the maintenance and/or inspection that was performed.

Termo conducts monthly Rule 1148.1 OGI inspections and quarterly Rule 1173 LDAR inspections on all its equipment. Maintenance is conducted as needed. All previous maintenance indicates the equipment is in proper operating condition when the vapor recovery system is in operation.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
See Attachment C – List of Rules & Conditions	

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

SoCalGas (SCG) has notified Termo of upcoming maintenance work on the Aliso Canyon Gas Storage Facility Gas Dehydration Station, which will prevent SCG from receiving Termo's produced gas. Since Termo's Aliso Canyon Facility is directly connected to SCG's gas processing system, this shutdown will force Aliso Canyon to cease operations.

With no gas sales capacity, VOC or methane emissions may be released to the atmosphere from the tanks normally under vapor recovery if pressures within the tanks and pipelines exceed the vent setpoints. This would be beyond Termo's control, as the inability to control gas would directly impact Termo's compliance with the applicable District Rule(s).

Please see Attachment D - Email from SCG indicating the notification and shut-in requirement.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

On Monday, March 10, 2025, at 11:35 am SoCalGas notified Termo's Area Superintendent, Dan Murry, of the proposed shut in and the requirement for Termo to cease sending SCG gas effective 4/29/2025.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

Termo will plan to cease all oil and gas production effective 4/28/2025 and will remain shut in until SCG finishes their planned maintenance, which is anticipated to be 5/15/2025.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses:

Number of employees laid off (if any): N/A

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

In addition to declaring a Breakdown state and the filing of a Variance application, Termo will cease production from all oil wells, shut in casings, and take all safe steps possible to control the natural gas within the system.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
VOC (Al so Canyon)	1.6772	---	1.6772

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No. 19 or explain why there will be no excess emissions.

Casing gas is controlled at the well head by a pressure device which will prevent emissions. Because there is capacity within the tank headspace to accept ("pack") vapor that would otherwise go to vapor recovery, significant VOC emissions are not expected from transfers from storage tanks. In addition, no venting is expected from tank hatches since the tanks have available capacity to store returned vapors at pressures within the design specification of the hatch. If emissions do occur, it would be a result of the pressure relief valves (PRV's) activating on tanks that require pressure relief for safety reasons.

Attachment 2 provides VOC emission calculation for releases to atmosphere from the potential venting of tank headspace (i.e., Standing Losses). If this does occur, the system would vent until normal operating pressures are achieved, then all pressure relief valves would automatically be closed again, and no further emissions would occur.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Mitigation may be achieved by shutting down wells and closing casing gas valves. We will work to maintain correct pressure settings on tank pressure relief valves and hatches. Pressures will be monitored regularly by field staff and operations. However, without the gas takeaway capacity from SoCalGas, pressure could build to where a pressure relief device or tank hatch release, as designed for safety, would be inevitable. Once the pressure is reduced within the individual vessel, release will stop. Devices that have released may be monitored to ensure proper functionality.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Termo will monitor system pressure in the tank and pipeline pressures that could result in triggering a release.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

This current situation is out of Termo's control.

24. State the date you are requesting the variance to begin: April 29, 2025; and the date by which you expect to achieve final compliance: May 15, 2025.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here: N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Ext. _____


Ext. _____

If the petition was completed by someone other than the petitioner, please provide their name and title below.

<u>Ralph Combs</u>	<u>The Termo Company</u>	<u>Manager, Regulatory Affairs</u>
Name	Company	Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on March 24, 2025, at Long Beach, California



Signature

Ralph E. Combs

Print Name

Title: Manager of Regulatory and Government Affairs for The Termo Company

Attachment A – List of Equipment and Activity Subject to Petition

Aliso Canyon Facility (FID 083508)

Equipment / Activity	Application / Permit No.	RECLAIM Device No.	Relevant Pages & Conditions from Permit
STORAGE TANK, FIXED ROOF, NO. 11344, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT	A/N: 621918 PERMIT NO.: G63582	D4	Section D Page 1 Condition: E193.2, H23.2
STORAGE TANK, FIXED ROOF, WASTE WATER, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT	A/N: 621918 PERMIT NO.: G63582	D5	Section D Page 1 Condition: E193.2, H23.2
STORAGE TANK, FIXED ROOF, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 400 BBL; DIAMETER: 12 FT; HEIGHT: 20 FT	A/N: 621918 PERMIT NO.: G63582	D44	Section D Page 2 Condition: E193.2, H23.2
STORAGE TANK, FIXED ROOF, NO. 11357, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT	A/N: 621919 PERMIT NO.: G63583	D10	Section D Page 3 Condition: E193.2, H23.2
STORAGE TANK, FIXED ROOF, NO. 11354, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT	A/N: 621919 PERMIT NO.: G63583	D14	Section D Page 3 Condition: E193.2, H23.2
STORAGE TANK, FIXED ROOF, STANDBY, WASTE WATER, VENTED TO VAPOR RECOVERY SYSTEM, 250 BBL; DIAMETER: 12 FT; HEIGHT: 15 FT	A/N: 621919 PERMIT NO.: G63583	D11	Section D Page 3 Condition: E193.2, H23.2
COMPRESSOR, INJECTION/SALES, ARIEL, MODEL JGJ4, 350 HP	A/N: 621920 PERMIT NO.: G63584	D60	Section D Page 4 Condition: H23.1
COMPRESSOR, STANDBY, SALES, CORKEN, MODEL D791, 50 HP	A/N: 621920 PERMIT NO.: G63584	D61	Section D Page 4 Condition: H23.1

Attachment A – List of Equipment and Activity Subject to Petition

Aliso Canyon Facility (FID 083508)

Equipment / Activity	Application / Permit No.	RECLAIM Device No.	Relevant Pages & Conditions from Permit
COMPRESSOR, ELECTRIC, VAPOR RECOVERY, CORKEN, MODEL FT-591, 15 HP	A/N: 621920 PERMIT NO.: G63584	D62	Section D Page 5 Condition: H23.1
BULK MATERIAL LOADING STATION, STAND PIPE, 4-INCH DIA., TRUCK LOADING, CRUDE OIL, SERVING DEL ALISO/ORCUTT AND ROOSA LEASES, VENTED TO VAPOR RECOVERY SYSTEM	A/N: 627558 PERMIT NO.: G67000	D8	Section D Page 5 Condition: E193.1
VAPOR RETURN LINE, HOSE, 3 INCH DIAMETER, CONNECTED TO VAPOR RECOVERY SYSTEM	A/N: 627558 PERMIT NO.: G67000	D49	Section D Page 5 Condition: E193.1
FUGITIVE EMISSIONS, COMPRESSORS	A/N: 627558 PERMIT NO.: G67000	D18	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, VALVES	A/N: 627558 PERMIT NO.: G67000	D19	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, FITTINGS	A/N: 627558 PERMIT NO.: G67000	D20	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, FLANGES	A/N: 627558 PERMIT NO.: G67000	D21	Section D Page 6 Condition: H23.1
FUGITIVE EMISSIONS, PRV	A/N: 627558 PERMIT NO.: G67000	D22	Section D Page 6 Condition: H23.1



FACILITY PERMIT TO OPERATE THE TERMO COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CRUDE OIL/GAS PRODUCTION					
System 1: DEL ALISO/ORCUTT CRUDE OIL /GAS/WATER SEPARATION					
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, HEIGHT: 11 FT ; DIAMETER: 2 FT 6 IN A/N: 621918	D1				
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, HEIGHT: 8 FT ; DIAMETER: 2 FT 6 IN A/N: 621918	D3				
HEATER, HEATER TREATER, NATIONAL, MODEL TYPE IWP, WITH NATCO BURNER, PROCESS GAS, 0.375 MMBTU/HR A/N: 621918	D12			CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 55 PPMV (5) [RULE 1146.2, 5-5-2006; RULE 1146.2, 12-7-2018]; PM: (9) [RULE 404, 2-7-1986]; PM10: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.1, H23.6
HEATER, HEATER TREATER, NATCO, WITH MAXON XPO BURNER, PROCESS GAS, 1 MMBTU/HR A/N: 621918	D46			CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 20 PPMV (5) [RULE 1146.2, 5-5-2006; RULE 1146.2, 12-7-2018]; PM: (9) [RULE 404, 2-7-1986]; PM10: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.1, H23.6
STORAGE TANK, FIXED ROOF, NO. 11344, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 621918	D4	D8			E127.1, E193.2, H23.2
STORAGE TANK, FIXED ROOF, WASTE WATER, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 621918	D5				E127.1, E193.2, H23.2

- * (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CRUDE OIL/GAS PRODUCTION					
STORAGE TANK, FIXED ROOF, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 400 BBL; DIAMETER: 12 FT ; HEIGHT: 20 FT A/N: 621918	D44	D8			E127.1, E193.2, H23.2, H23.11
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, SERVING HEATER D46, HEIGHT: 3 FT ; DIAMETER: 10.5 IN A/N: 621918	D51				
PUMP, HYDRA-CELL DIAPHRAGM, MODEL D-35-SEALLESS, WATER INJECTION, 30 HP A/N: 621918	D52				
POT, DRAIN, SERVING HEATER D46, HEIGHT: 3 FT 6 IN; DIAMETER: 1 FT A/N: 621918	D53				
System 2: ROOSA/GARDETT CRUDE OIL /GAS/WATER SEPARATION					
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, HEIGHT: 16 FT ; DIAMETER: 3 FT A/N: 621919	D31				
HEATER, HEATER TREATER, NATIONAL, MODEL TYPE VFH-S, WITH NATCO BURNER, PROCESS GAS, 0.38 MMBTU/HR A/N: 621919	D30			CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 55 PPMV (5) [RULE 1146.2, 5-5-2006; RULE 1146.2, 12-7-2018]; PM: (9) [RULE 404, 2-7-1986]; PM10: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.1, H23.6
HEATER, HEATER TREATER, NATCO, WITH MAXON XPO BURNER, PROCESS GAS, 1 MMBTU/HR A/N: 621919	D47			CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 20 PPMV (5) [RULE 1146.2, 5-5-2006; RULE 1146.2, 12-7-2018]; PM: (9) [RULE 404, 2-7-1986]; PM10: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.1, H23.6

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CRUDE OIL/GAS PRODUCTION					
STORAGE TANK, FIXED ROOF, NO. 11357, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 621919	D10	D8			E127.1, E193.2, H23.2
STORAGE TANK, FIXED ROOF, NO. 11354, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 621919	D14	D8			E127.1, E193.2, H23.2
STORAGE TANK, FIXED ROOF, STANDBY, WASTE WATER, VENTED TO VAPOR RECOVERY SYSTEM, 250 BBL; DIAMETER: 12 FT ; HEIGHT: 15 FT A/N: 621919	D11				E127.1, E193.2, H23.2, H23.11
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, SERVING HEATER D47, HEIGHT: 3 FT ; DIAMETER: 10.5 IN A/N: 621919	D54				
PUMP, STANDBY, CRUDE OIL, TRANSFER, 3 HP A/N: 621919	D55				
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, HEIGHT: 17 FT 8 IN; DIAMETER: 1 FT A/N: 621919	D63				
System 4: (Gas Collection) Vapor Recovery System					
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, HEIGHT: 8 FT ; DIAMETER: 2 FT 6 IN A/N: 621920	D2				

- * (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
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- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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Process 1: CRUDE OIL/GAS PRODUCTION					
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, BALL TRAP, DIAMETER: 4 FT A/N: 621920	D32				
OIL/GAS/WATER SEPARATOR, SUCTION SCRUBBER, HEIGHT: 5 FT ; DIAMETER: 1 FT 4 IN A/N: 621920	D33				
OIL/GAS/WATER SEPARATOR, DISCHARGE SCRUBBER, PRESSURE VESSEL, HEIGHT: 3 FT 6 IN; DIAMETER: 1 FT A/N: 621920	D34				
OIL/GAS/WATER SEPARATOR, GAS/LIQUID, HEIGHT: 3 FT 6 IN; DIAMETER: 1 FT A/N: 621920	D56				
OIL/GAS/WATER SEPARATOR, SUCTION SCRUBBER, HEIGHT: 5 FT 4 IN; DIAMETER: 8.5 IN A/N: 621920	D57				
OIL/GAS/WATER SEPARATOR, SUCTION SCRUBBER, HEIGHT: 5 FT 4 IN; DIAMETER: 8.5 IN A/N: 621920	D58				
OIL/GAS/WATER SEPARATOR, DISCHARGE SCRUBBER, HEIGHT: 5 FT ; DIAMETER: 1 FT 2 IN A/N: 621920	D59				
COMPRESSOR, INJECTION/SALES, ARIEL, MODEL JG4, 350 HP A/N: 621920	D60				H23.1, H23.11
COMPRESSOR, STANDBY, SALES, CORKEN, MODEL D791, 50 HP A/N: 621920	D61				H23.1, H23.11

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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Process 1: CRUDE OIL/GAS PRODUCTION					
COMPRESSOR, ELECTRIC, VAPOR RECOVERY, CORKEN, MODEL FT-591, 15 HP A/N: 621920	D62				H23.1, H23.11
OIL/GAS/WATER SEPARATOR, SCRUBBER, HEIGHT: 3 FT ; DIAMETER: 10 IN A/N: 621920	D64				
System 5: TANK TRUCK LOADING OPERATION					
BULK MATERIAL LOADING STATION, STAND PIPE, 4-INCH DIA., TRUCK LOADING, CRUDE OIL, SERVING DEL ALISO/ORCUTT AND ROOSA LEASES, VENTED TO VAPOR RECOVERY SYSTEM A/N: 627558	D8	D4 D10 D14 D44 D48 D49			B22.1, C1.1, C1.2, E193.1
LOADING ARM, BOTTOM, TANK TRUCK, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, DIAMETER: 3 IN A/N: 627558	D48	D8			B22.1, C1.1, C1.2
VAPOR RETURN LINE, HOSE, 3 INCH DIAMETER, CONNECTED TO VAPOR RECOVERY SYSTEM A/N: 627558	D49	D8			E193.1
Process 2: FUGITIVE EMISSIONS					
FUGITIVE EMISSIONS, COMPRESSORS A/N: 621920	D18				H23.1, H23.11
FUGITIVE EMISSIONS, VALVES A/N: 621918	D19				H23.1
FUGITIVE EMISSIONS, FITTINGS A/N: 621918	D20				H23.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
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- (2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE THE TERMO COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 2: FUGITIVE EMISSIONS					
FUGITIVE EMISSIONS, FLANGES A/N: 621918	D21				H23.1
FUGITIVE EMISSIONS, PRV A/N: 621918	D22				H23.1
FUGITIVE EMISSIONS, PUMPS A/N: INACTIVE	D23				H23.1
FUGITIVE EMISSIONS, DRAINS A/N: 621918	D24				H23.4
Process 3: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE SPECIFIC RUL					
RULE 219 EXEMPT EQUIPMENT, WELL HEADS AND PUMPS, OIL AND GAS	E25				H23.9
RULE 219 EXEMPT EQUIPMENT, SMALL BOILERS, WATER HEATERS AND PROCESS HEATERS, >1 MMBTU/HR AND ≤ 2 MMBTU/HR	E26			PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	H23.5
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E27			VOC: (9) [RULE 1113, 2-5-2016; RULE 1171, 2-1-2008; RULE 1171, 5-1-2009]	K67.1
RULE 219 EXEMPT EQUIPMENT, EXEMPT HAND WIPING OPERATIONS	E28			VOC: (9) [RULE 1171, 2-1-2008; RULE 1171, 5-1-2009]	

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE THE TERMO COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E127.1 The operator shall keep gauge/sample hatches closed except during actual gauging/sampling operations.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D4, D5, D10, D11, D14, D44]

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

The organic vapor displaced during tank truck loading shall be returned to the storage tank from which it is loaded.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D8, D49]

E193.2 The operator shall operate and maintain this equipment according to the following requirements:

This equipment shall be vented to the vapor recovery system which is in full use and which has been permitted by the Executive Officer.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D4, D5, D10, D11, D14, D44]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:



FACILITY PERMIT TO OPERATE THE TERMO COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173

[RULE 1173, 2-6-2009]

[Devices subject to this condition : D18, D19, D20, D21, D22, D23, D60, D61, D62]

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

[RULE 463, 11-4-2011]

[Devices subject to this condition : D4, D5, D10, D11, D14, D44]

H23.4 This equipment is subject to the applicable requirements of the following rules or regulations:

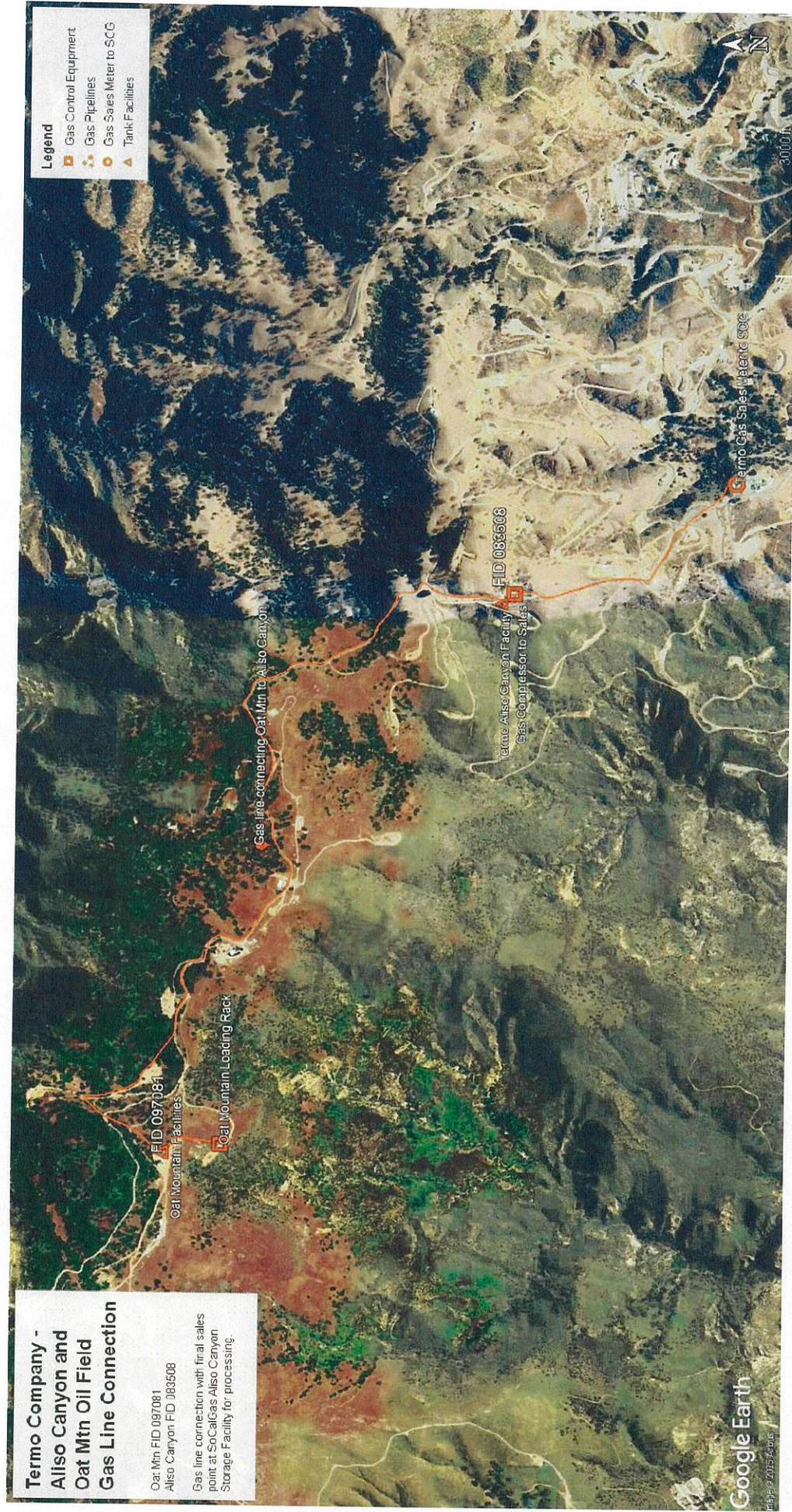
Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[RULE 1176, 9-13-1996]

[Devices subject to this condition : D24]

H23.5 This equipment is subject to the applicable requirements of the following rules or regulations:

Attachment B - Aliso Canyon and Oat Mountain Gas System Connection Map



Attachment C - List of Rules and/or Permit Conditions for Variance Relief

Aliso Canyon Facility (FID 083508)

List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief. Briefly explain how you are or will be in violation of each rule or condition.

Aliso Canyon Field, Facility ID: 083508

Rule(s) and/or Permit Condition	Explanations
Rules 203(b) & 3002(c)(1)	<p>Rule 203(b) and 3002(c)(1) require that the permitted equipment shall not be operated contrary to the conditions specified in the permit to operate, and in the facility's Title V permit.</p> <p>During the shutdown, some of the permit conditions will be violated as explained below.</p>
<p>Rule 463(d)(3)</p> <p>Condition: H 23.2</p>	<p>Rule 463(d) requires organic liquid storages tanks with a capacity of more than 75,000 liters (19,815 gallons) to be equipment with Vapor Recovery.</p> <p>Condition H 23.2 requires compliance with Rule 463.</p> <p>The shutting in of the gas take-away capacity means that VOC or methane may be released to the atmosphere from the tank(s) normally under vapor recovery if pressures within the tanks and pipelines exceed the vent setpoints.</p>
Rule 1148.1(d)(8)	<p>Rule 1148.1(d)(8) states that the operator of an oil and gas production facility shall not allow natural gas or produced gas to be vented into the atmosphere.</p> <p>The shutting in of the gas take-away capacity means that VOC or methane may be released to the atmosphere from the tank(s) normally under vapor recovery if pressures within the tanks and pipelines exceed the vent setpoints.</p>
<p>Rule 1173(m)(1)</p> <p>Condition: H 23.1</p>	<p>Rule 1173(m)(1) states that prior to January 1, 2026, the owner or operator of a facility shall be in violation of this rule if South Coast AQMD personnel detects a Light Liquid and Gas/Vapor component exceeding 50,000 ppm.</p> <p>Condition H 23.1 requires compliance with Rule 1173.</p> <p>When there is enough vapor built up in the tank and force the tank hatch to open release pressure for safety, there is potential VOC release with reading more than 50,000 ppm.</p>
<p>Condition: E 193.1</p> <p>Condition: E 193.2</p>	<p>Condition E 193.1 states that the organic vapor displaced during tank truck loading shall be returned to the storage tank from which it is loaded.</p> <p>Condition E 193.2 states that storage tanks shall be vented to the vapor recovery system which is in full use and which has been permitted by the Executive Officer.</p> <p>The shutting in of the gas take-away capacity means that VOC or methane may be released to the atmosphere from the tank(s) normally under vapor recovery if pressures within the tanks and pipelines exceed the vent setpoints.</p>

Attachment D - Email from SCG to Termo

From: [Dan Murry](#)
To: [Chris Cacek](#); [Bill Buss](#); [Paul Castillo](#)
Cc: [Ralph Combs](#)
Subject: Fw: Planned Shut In
Date: Tuesday, March 11, 2025 8:14:03 AM
Attachments: [image001.png](#)

Dates of So Cal gas planned Shut in.

Dan

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From: Garcia, Gonzalo <GGarcia9@socalgas.com>
Sent: Monday, March 10, 2025 11:35 AM
To: Dan Murry <DanM@termoco.com>
Subject: Planned Shut In

Good day Dan,

Sorry for the delay in getting back to you on the shut in. We are planning on doing maintenance work on the glycol contactor on our Dehydration station (Dehy-3). This is the Dehy that cleans the gas we get from your company. We would need you to shut in from 4/29 to 5/15, as we would not be able to receive your gas. Please let me know if you have any other questions or concerns. Feel free to give me a call if you wish. Appreciate your patience. Thanks.

Low inventory Shut in 4/29/2025 - 5/15/2025

Gonzalo Garcia
Aliso Canyon
Station Operations Manager
Southern California Gas Company
Cell 747-237-0054
GGarcia9@socalgas.com

