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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. 097081]

11 Petitioner,

12 v.

13 SOUTH COAST AIR QUALITY  
14 MANAGEMENT DISTRICT.

15 Respondent.  
16  
17

**Case No. 3014-24**

**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 Oat Mountain 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. 3014-24, 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 South Coast AQMD Rules 203(b), 204, 463(d)(3),  
25 1148.1(d)(8), and 1173(m)(1), and Permit Conditions E57.1, H23.1, S13.1, and Section E(4).

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

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Declaration of Ralph Combs

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. Since Termo's Oat Mountain Facility is directly connected to SoCalGas's  
4 gas processing system via its connection to Aliso Canyon, this shutdown will force Oat Mountain  
5 to cease operations. With no gas sales capacity, VOC or methane emissions may be released to  
6 the atmosphere from the tanks normally under vapor recovery if pressures within the tanks and  
7 pipelines exceed the vent setpoints. This would be beyond Termo's control, as the inability to  
8 control gas would directly impact Termo's compliance with the applicable District Rule(s).

9 4. Termo is unable to meet District Rules 203(b), 3002(c)(1), 463(d)(3), 1148.1(d)(8),  
10 and 1173(m)(1) and Permit Section D, Conditions E57.1, H23.1, S13.1, and Section E(4) during  
11 the planned SoCalGas maintenance commencing April 28, 2025, through May 15, 2025.

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

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

27 7. The team at the Facility, including myself, have worked diligently to determine the  
28 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