

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

PETITIONER: The Termo Company

CASE NO: 3014-24

FACILITY ID: 097081

FACILITY ADDRESS:

6 Miles from Sesnon Blvd / Tampa Ave Intersection

Palo Sola Truck Road

Lat: 34.328228, Long: -118.595146

Chatsworth, CA 91311

SOUTH COAST AIR QM DISTRICT
CLERK OF THE BOARD
2025 MAR 26 AM 11:15

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

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Long Beach, CA Zip 90801

Long Beach, CA Zip 90801

☎ (562) 595-7401 Ext. 255

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E-mail RalphC@termoco.com

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3. RECLAIM Permit Yes No
FID: 097081

Title V Permit Yes No
FID:

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 Oat Mountain Facility is a crude oil and natural gas production facility consisting of 10 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, combined with gas from the vapor recovery system, is routed to the Aliso Canyon Facility through a dedicated pipeline. From there, it is combined with Aliso Canyon's produced gas and sent to SoCalGas for 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 Oat Mountain Facility is connected via a pipeline to its Aliso Canyon Facility, which then routes to the SoCalGas processing 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 SoCal Gas' glycol unit shut down, Termo's Oat Mountain and Alis Canyon 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 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 B – 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. Furthermore, because Oat Mountain is tied into Aliso Canyon via a dedicated pipeline, it will also be shut down, as it relies on Aliso Canyon's connection to SCG for gas takeaway.

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 the attached 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 (Oat Mountain)	0.0647	---	0.0647

* 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 SoCal Gas, pressure could build to where a pressure relief device or tank hatch release, as designed for safety, would be inevitable. Once the pressures 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 wil 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.

Ralph Combs The Termo Company Manager, Regulatory Affairs
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

Oat Mountain Facility (FID 097081)

Equipment / Activity	Application / Permit No.	RECLAIM Device No.	Relevant Pages & Conditions from Permit
STORAGE TANK, FIXED ROOF, SHIPPING, CRUDE OIL, VENT TO VAPOR RECOVERY, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT	A/N: 505271 PERMIT NO.: G7302	D16	Section D Page 3 Condition: E127.1
STORAGE TANK, FIXED ROOF, SHIPPING, CRUDE OIL, VENT TO VAPOR RECOVERY, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 15 FT	A/N: 505271 PERMIT NO.: G7302	D17	Section D Page 3 Condition: E127.1
STORAGE TANK, FIXED ROOF, CRUDE OIL, VENT TO VAPOR RECOVERY, 500 BBL; WIDTH: 8 FT; HEIGHT: 12 FT; LENGTH: 36 FT	A/N: 505271 PERMIT NO.: G7302	D38	Section D Page 3 Condition: E127.1
STORAGE TANK, FIXED ROOF, CRUDE OIL, VENT TO VAPOR RECOVERY, 500 BBL; WIDTH: 8 FT; HEIGHT: 12 FT; LENGTH: 36 FT	A/N: 505271 PERMIT NO.: G7302	D39	Section D Page 3 Condition: E127.1
TANK, PRODUCED WATER, FIXED ROOF, VENT TO VAPOR RECOVERY, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT	A/N: 505271 PERMIT NO.: G7302	D14	Section D Page 3 Condition: E127.1
TANK, SLOP OIL, FIXED ROOF, VENT TO VAPOR RECOVERY, 250 BBL; DIAMETER: 15 FT 3 IN; HEIGHT: 8 FT	A/N: 505271 PERMIT NO.: G7302	D15	Section D Page 3 Condition: E127.1
LOADING ARM, BOTTOM, TANK TRUCK, CRUDE OIL, CONNECTED TO VAPOR RECOVERY SYSTEM, DIAMETER: 3 IN	A/N: 509480 PERMIT NO.: G27802	D1	Section D Page 4 Condition: E57.1
LOADING ARM, BOTTOM, TANK TRUCK, CRUDE OIL, CONNECTED TO VAPOR RECOVERY SYSTEM, DIAMETER: 3 IN	A/N: 509480 PERMIT NO.: G27802	D2	Section D Page 4 Condition: E57.1
VAPOR RETURN LINE, HOSE, 3 INCH DIAMETER, WITH 0.37 INCH DIA. ORIFICE PLATE AND A 2-PEN BARTON RECORDER, MODEL 202A	A/N: 509480 PERMIT NO.: G27802	D44	Section D Page 4 Condition: E57.1

Attachment A – List of Equipment and Activity Subject to Petition

Oat Mountain Facility (FID 097081)

Equipment / Activity	Application / Permit No.	RECLAIM Device No.	Relevant Pages & Conditions from Permit
FUGITIVE EMISSIONS, VALVES	A/N: 505271 PERMIT NO.: G7302	D5	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, PRV	A/N: 505271 PERMIT NO.: G7302	D6	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, FLANGES	A/N: 505271 PERMIT NO.: G7302	D7	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, PUMPS	A/N: 505271 PERMIT NO.: G7302	D8	Section D Page 5 Condition: H23.1
FUGITIVE EMISSIONS, COMPRESSORS	A/N: 452355 PERMIT NO.: G7304	D10	Section D Page 5 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 2: CRUDE OIL/GAS PRODUCTION					
STORAGE TANK, FIXED ROOF, SHIPPING, CRUDE OIL, VENT TO VAPOR RECOVERY, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 505271	D16				E127.1
STORAGE TANK, FIXED ROOF, SHIPPING, CRUDE OIL, VENT TO VAPOR RECOVERY, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 505271	D17				E127.1
STORAGE TANK, FIXED ROOF, CRUDE OIL, VENT TO VAPOR RECOVERY, 500 BBL; WIDTH: 8 FT; HEIGHT: 12 FT; LENGTH: 36 FT A/N: 505271	D38				E127.1
STORAGE TANK, FIXED ROOF, CRUDE OIL, VENT TO VAPOR RECOVERY, 500 BBL; WIDTH: 8 FT; HEIGHT: 12 FT; LENGTH: 36 FT A/N: 505271	D39				E127.1
TANK, PRODUCED WATER, FIXED ROOF, VENT TO VAPOR RECOVERY, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 505271	D14				E127.1
TANK, SLOP OIL, FIXED ROOF, VENT TO VAPOR RECOVERY, 250 BBL; DIAMETER: 15 FT 3 IN; HEIGHT: 8 FT A/N: 505271	DI5				E127.1
System 2: PROCESS HEATERS (EXTERNAL COMBUSTION)					

- * (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.



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: CRUDE OIL/GAS PRODUCTION					
HEATER, LINE HEATER, PROCESS GAS, 0.5 MMBTU/HR A/N: 505271	D4		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 130 LBS/MMSCF PROCESS GAS (1) [RULE 2012, 5-11-2001; RULE 2012, 12-5-2003]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.1
System 3: VAPOR RECOVERY SYSTEM					
SCRUBBER, SUCTION, HEIGHT: 6 FT ; DIAMETER: 1 FT 4 IN A/N: 452355	D40				
SCRUBBER, DISCHARGE, HEIGHT: 4 FT ; DIAMETER: 1 FT A/N: 452355	D41				
SCRUBBER, SALES GAS, HEIGHT: 12 FT ; DIAMETER: 3 FT A/N: 452355	D42				
Process 3: PETROLEUM MARKETING					
LOADING ARM, BOTTOM, TANK TRUCK, CRUDE OIL, CONNECTED TO VAPOR RECOVERY SYSTEM, DIAMETER: 3 IN A/N: 509480	D1				C1.3, E57.1
LOADING ARM, BOTTOM, TANK TRUCK, CRUDE OIL, CONNECTED TO VAPOR RECOVERY SYSTEM, DIAMETER: 3 IN A/N: 509480	D2				C1.3, E57.1
VAPOR RETURN LINE, HOSE, 3 INCH DIAMETER, WITH 0.37 INCH DIA. ORIFICE PLATE AND A 2-PEN BARTON RECORDER, MODEL 202A A/N: 509480	D44				E57.1

- | | |
|--|---|
| * (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:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FUGITIVE EMISSIONS					
FUGITIVE EMISSIONS, VALVES A/N: 505271	D5				H23.1
FUGITIVE EMISSIONS, PRV A/N: 505271	D6				H23.1
FUGITIVE EMISSIONS, FLANGES A/N: 505271	D7				H23.1
FUGITIVE EMISSIONS, PUMPS A/N: 505271	D8				H23.1
FUGITIVE EMISSIONS, DRAINS A/N: 505271	D9				H23.2
FUGITIVE EMISSIONS, COMPRESSORS A/N: 452355	D10				H23.1

* (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.



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:

a). If the total facility emissions for any of the specified pollutant amounts are in exceedance in any 12 consecutive calendar-month period, or if the facility operator fails to comply with the following requirements, the Facility Permit holder shall submit a Title V Permit application package and obtain a Title V permit pursuant to the requirements specified in Rule 3003. To ensure compliance with the emission limit(s) of this condition, the facility operator shall:

i). determine emissions according to the requirements of Rule 2011 for SO_x emissions and Rule 2012 for NO_x emissions, as applicable;

ii). in addition to complying with all applicable monitoring, recordkeeping and reporting requirements of Regulation XX, monitor and record on a monthly basis the total facility emissions, excluding emissions identified in Rule 3000(b)(28)(D) and (E), for each 12 consecutive month period, and

iii). for any 12 consecutive month period in which emissions do not comply with an emission limit in this condition, submit to AQMD within 15 days a report of noncompliance and the total subject emissions from the facility for the preceding 12 consecutive calendar-month period.

b). For the purpose of determining compliance with the emission limit(s), the total emissions from this facility shall be equal to the emissions recorded each month by the facility, including any corrections as allowed by Rule 2004, and including any corrections resulting from an AQMD audit of this facility.

c). The provisions of this condition are the sole method of determining compliance with the facility emission limit(s) of this condition.

SYSTEM CONDITIONS

S13.1 All devices under this system are 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	463
VOC	District Rule	1149

[RULE 1149, 7-14-1995; RULE 463, 3-11-1994]

[Systems subject to this condition : Process 2, System 1]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B61.1 The operator shall not use process gas containing the following specified compounds:

Compound	ppm by volume
sulfur compound calculated as hydrogen sulphide	greater than 40

[RULE 431.1, 5-6-1983]

[Devices subject to this condition : D4]

C. Throughput or Operating Parameter Limits

C1.3 The operator shall limit the loading rate to no more than 990 barrel(s) in any one day.



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:

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

The operator shall maintain the crude oil transfer equipment such that there are no overfills and no liquid or vapor leaks during disconnect operation.

The operator shall maintain records of daily tank truck loading, in gallons per day, back pressure of the vapor recovery system in inches of water column, differential pressure drop data from the recorder and those records required by Rule 462 shall be kept and maintained for a minimum period of two years, and made available to District personnel upon request.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 462, 5-14-1999]

[Devices subject to this condition : D1, D2]

E. Equipment Operation/Construction Requirements

E57.1 The operator shall vent this equipment to a vapor recovery system which has been issued a permit to operate by the Executive Officer whenever tank trucks are loaded.

The back pressure in the vapor recovery system shall not exceed 18 inches of water column pressure. A gauge shall be installed and maintained to indicate and record in inches of water column the back pressure in the vapor recovery line which vents the tank truck loading system.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : D1, D2, D44]

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



**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:

[RULE 463, 3-11-1994]

[Devices subject to this condition : D14, D15, D16, D17, D38, D39]

H. Applicable Rules

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

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173

[RULE 1173, 5-13-1994]

[Devices subject to this condition : D5, D6, D7, D8, D10]

H23.2 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 : D9]

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



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

Oat Mountain Facility (FID 097081)

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.

Oat Mountain Field, Facility ID: 097081

Rule and / or Permit Condition	Explanation
Rule 203(b)	<p>Rule 203(b) states that the equipment permit unit shall not be operated contrary to the conditions specified in the permit to operate.</p> <p>During the shut down, some of the permit conditions will be violated as explained below.</p>
<p>Rule 204</p> <p>Condition: E57.1</p> <p>Section E(4)</p>	<p>Rule 204: To assure compliance with all applicable regulations, the Executive Officer may impose written conditions on any permit.</p> <p>Condition E57.1 states that the operator shall vent this equipment to a vapor recovery system which has been issued a permit to operate by the Executive Officer whenever tank trucks are loaded. The back pressure in the vapor recovery system shall not exceed 18 inches of water column pressure. A gauge shall be installed and maintained to indicate and record in inches of water column the back pressure in the vapor recovery line which vents the tank truck loading system.</p> <p>Section E(4) of the permit states that the operator shall not use equipment identified in this facility permit as being connected to air pollution control equipment unless they are so vented to the identified air pollution control equipment which is in full use and which has been included in this permit.</p>
<p>Rule 463(d)(3)</p> <p>Condition: S13.1</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 S13.1 requires compliance with Rules 463 and 1149.</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: H23.1</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 H23.1 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>

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

Get [Outlook for iOS](#)

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

