

This declaration is submitted pursuant to South Coast AQMD Hearing Board Rule 4.

I, ZACHARY OHNSTAD, state:

1. I am the Cogen Supervisor for Shadow Wolf Energy, LLC. If called as a witness, I could and would testify to the following based on personal knowledge.

2. Shadow Wolf Energy, LLC operates a co-generation facility as part of a crude oil production facility and is located at 25121 N. Sierra Highway, in Santa Clarita, California. The business provides electricity and steam to the crude oil production field intermittently and provides electrical power to the grid when demanded.

3. The equipment that is the subject of this petition is Turbine No. 1 (Device D1) operated pursuant to Permit to Operate No. 196103 (the "Equipment"). The Equipment is used to provide electricity and steam.

4. The Equipment is in violation of District Rules 203(b), 1134(d)(3), 2004(f)(1), and 3002(c)(1), because it failed to demonstrate compliance with Rule 1134(d)(3) on and after January 1, 2024, and will be in violation until compliance achieved by upgrading the catalyst and performing a source test on the unit.

5. In March 2023, Petitioner was notified that a NOx catalyst necessary to meet Rule 1134 requirements was behind by approximately nine months due to supply chain delays. Petitioner submitted a purchase order to the catalyst manufacturer; however, this purchase order was obstructed due to management conflict that had to be resolved through court actions.

6. In August 2023, court resolution occurred, and the Petitioner was able to issue the purchase order for the needed catalyst.

7. On November 30, 2023, Petitioner was notified by South Coast AQMD staff that a reduction in ammonia slip would also be required in addition to the reduction in NOx.

8. Petitioner immediately contacted the catalyst manufacturer and was informed that the reduction in ammonia slip required a change in the type of catalyst to be installed. Petitioner ordered the necessary catalyst, which will be delivered and installed in March 2024.

9. Shadow Wolf Energy, LLC was ultimately unable to comply with the District Rules because catalyst delivery was delayed due to supply chain issues and Petitioner had to wait until a court resolution with the management conflict was finalized to purchase the catalyst.

10. Currently, Turbine No. 1 is operating under a contract with the electric utility to provide electricity to the grid in high demand situations. The Turbine does not operate more than 240 hours per month.

11. Shadow Wolf Energy, LLC anticipates that the catalyst will be delivered in March 2024, assuming no delays in shipment. Upon receipt of the catalyst, Petitioner will retrofit Turbine 1 within thirty (30) days. Within thirty (30) days of completing the retrofit, a source test will be performed to demonstrate compliance with District Rules. Therefore, Shadow Wolf Energy, LLC is requesting that this variance last until September 1, 2024.

12. Shadow Wolf Energy, LLC has complied with conditions imposed as part of the interim variance granted on December 28, 2023.

13. On December 28, 2023, during the hearing on the interim variance, I appeared and provided testimony, which is hereby incorporated by this reference, based upon the agreement and stipulation of the parties.

14. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

BY:



Zachary Ohnstad, Cogen Supervisor

DATED:

1/18/2024