

SOUTH COAST AIR QUALITY  
CLERK OF THE BOARD  
2025 FEB 27 AM 11:07

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

PETITIONER: EQUILON ENTERPRISES LLC DBA SHELL OIL PRODUCTS US CASE NO: 4982-137

CARSON TERMINAL FACILITY ID: 800372

FACILITY ADDRESS: 20945 S. WILMINGTON AVENUE  
*[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]*

City, State, Zip: CARSON, CA 90810

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).

Jacob P. Duginski, Legal Counsel

Christopher Sherman, Environmental Advisor

Beveridge & Diamond, P.C.

Equilon Enterprises LLC dba Shell Oil Products US

333 Bush Street, Suite 1500

20945 S. Wilmington Avenue

San Francisco, CA 94104

Carson, CA Zip 90810

(415) 262-4018

(661) 391-2413 Ext.

Fax

Fax

E-mail jduginski@bdlaw.com

E-mail Christopher.sherman@shell.com

*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](mailto: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]**

3. RECLAIM Permit  Yes  No Title V Permit  Yes  No

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)

Not applicable.

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

The Equilon Enterprises LLC dba Shell Oil Products US, ("Shell") Carson Terminal is a bulk storage and loading terminal. The facility receives bulk petroleum and chemical products by pipeline and rail, stores these products onsite in bulk storage tanks, and transfers products offsite via pipeline and tank truck. No petroleum product manufacturing occurs onsite.

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)*
John Zink Afterburner H-7015, 22 MMBtu/hr	A/N 632173	C764	Not Applicable
Vapor Tank 7011	A/N 632173	D330	Not Applicable
Vapor Tank 7012	A/N 632173	D763	Not Applicable

\*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.

The Carson terminal is a bulk storage and loading terminal. The facility receives bulk petroleum products by pipeline and rail, and stores these products onsite in bulk storage tanks. The facility also loads diesel, biodiesel, and renewable diesel into tank trucks. Tanks 7011 and 7012 (D330 and D763) are vapor tanks that receive vapors from organic liquid loading and storage operations, including loading operations from the neighboring facility, Univar (see the simplified schematic provided in Attachment 1 and the location diagram in Attachment 2). Vapors from these processes are routed to a John Zink afterburner control device (C764). The afterburner and permit conditions associated with it are the subject of this variance petition. The facility's Title V/RECLAIM permit, Condition E336.3 and the "Connected To" column of D330 & D763 require that all vent gases from Tanks 7011 and/or 7012 to be routed to the existing, permitted afterburner (C764).

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

If yes, how often: Quarterly. Date of last maintenance and/or inspection: 2/3/2025

Describe the maintenance and/or inspection that was performed.

The afterburner is inspected quarterly as part of the routine maintenance program. Routine quarterly inspections do not require the afterburner to be shut down. However, the maintenance that necessitates this variance is not part of the routine quarterly maintenance schedule and requires the unit to be out of service for an extended period of time.

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
Condition E336.3 (Rule 1303, R1401 & Rule 462) Connected To Column D330, D763 to C764	Condition applies BACT, which requires all vent gases from vapor tanks 7011 (D330) and 7012 (D763) to vent to the afterburner (C764). The afterburner will need to be taken offline to allow for necessary maintenance. A portable thermal oxidizer will be used in its place while this maintenance occurs.
Rule 203(b), 2004(f)(1), 3002(c)(1)	The vapor tanks and afterburner must be operated in compliance with the permit terms and conditions at all times. When using the portable thermal oxidizer, the Title V permit requirements specified above will be violated.

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.

Based on recommendations from the afterburner's Original Equipment Manufacturer (OEM), John Zink, components of the afterburner are nearing the end of their design life and require replacement and/or modification in order to keep the unit operating safely and reliably. To perform this work, the afterburner must be shut down to allow for the safe retrofit of internal parts of the unit. The afterburner is used to control vapors and comply with the applicable VOC emission limits. Therefore, Shell will rent a portable thermal oxidizer that operates under a Various Locations Permit issued by the South Coast AQMD, which will operate in place of Shell's afterburner. As listed above, use of the portable thermal oxidizer will violate Condition E336.3 and the "Connected To" column for the respective vapor tanks and afterburner (see Item 9). However, use of the portable thermal oxidizer will not result in excess emissions or the exceedance of applicable emission limits.

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).

Shell submitted a permit application to conduct the above-described maintenance on the afterburner in March 2022 and received the permit on November 22, 2024. Shell has been performing the necessary planning activities for the maintenance and currently anticipates performing this work during the week of March 24, 2025.

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

N/A

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: Significant, see below.

Number of employees laid off (if any): 0

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

Denial of the variance petition would require Shell to cease multiple facility operations. This includes delivery of chemicals into storage tanks and loading of diesel, renewable diesel, and biodiesel into tank trucks. In addition, the vapor tanks (D330 and D763) and the afterburner (C764) receive and process vapors from the neighboring facility's, Univar's, operations. Shell is contracted to process vapors from Univar's operations and failure to do so risks violating contract terms between the two entities. Ceasing these operations would result in a significant loss of chemical and fuel supplies to the area and significant economic losses without any corresponding environmental benefit, as use of a portable thermal oxidizer in lieu of the afterburner is expected to result in no excess emissions.

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

Shutting the facility down or otherwise curtailing operations would not mitigate all emissions, as storage tanks will continue to vent breathing losses passively to vapor holding tanks 7011 (D330) and/or 7012 (D763). If a temporary portable thermal oxidizer is not used, the vapor holding tanks will eventually overpressure and vent to the atmosphere, causing excess emissions. Granting of this variance will allow Shell to continue to control vapors within permitted limits, therefore ensuring the safety of workers onsite and the general public, all while continuing operations.

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)
N/A	0	0	0

\* Column A minus Column B = Column C

Excess Opacity: 0 %

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

The purpose of using a portable thermal oxidizer is to continue controlling vapors while the afterburner is down for maintenance. Usage of a portable thermal oxidizer ensures no excess emissions will be released because the portable thermal oxidizer will achieve greater than the afterburner's required 99% control efficiency.

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.

There will be no excess emissions if a portable thermal oxidizer is used during the planned maintenance activities. The portable thermal oxidizer, which operates under a Various Locations Permit issued by the South Coast AQMD, is expected to meet the emission limits and control efficiency requirements of Shell's Title V permit.

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.**

The portable thermal oxidizer operates under a Various Locations Permit issued by South Coast AQMD. This permit contains monitoring and recordkeeping requirements, and the contractor will monitor per the terms and conditions of the Various Locations Permit. The contractor that operates the portable thermal oxidizer will provide a report to Shell after completion of the project that details the results of the required monitoring. Shell will make these reports available to the District.

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.

Upon completion of the maintenance activities, the afterburner (C764) will return to normal operation and by doing so, Shell will return to compliance. Maintenance activities are expected to take approximately one week. However, based on Shell's direct experience in performing maintenance operations, it is possible that equipment installation, inspection, component deliveries, and trouble-shooting of the unit may require additional time to ensure the safe operation of the afterburners. For this reason, Shell is requesting a short variance for 90 days, ensuring a sufficient interval to address these potential contingencies.

24. State the date you are requesting the variance to begin: 3/24/2025 and the date by which you expect to achieve final compliance: 6/22/2025.

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: Not applicable.

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.

Joseph Liaw (909) 396 - 3651 Ext. \_\_\_\_\_

Khang Nguyen (909) 396 - 3210 Ext. \_\_\_\_\_

Phillip Chen (909) 396-2878 Ext. \_\_\_\_\_

\_\_\_\_\_ Ext. \_\_\_\_\_

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

Name	Company	Title
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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 2/26/2025, at Carson, California

Christopher Sherman  
Signature

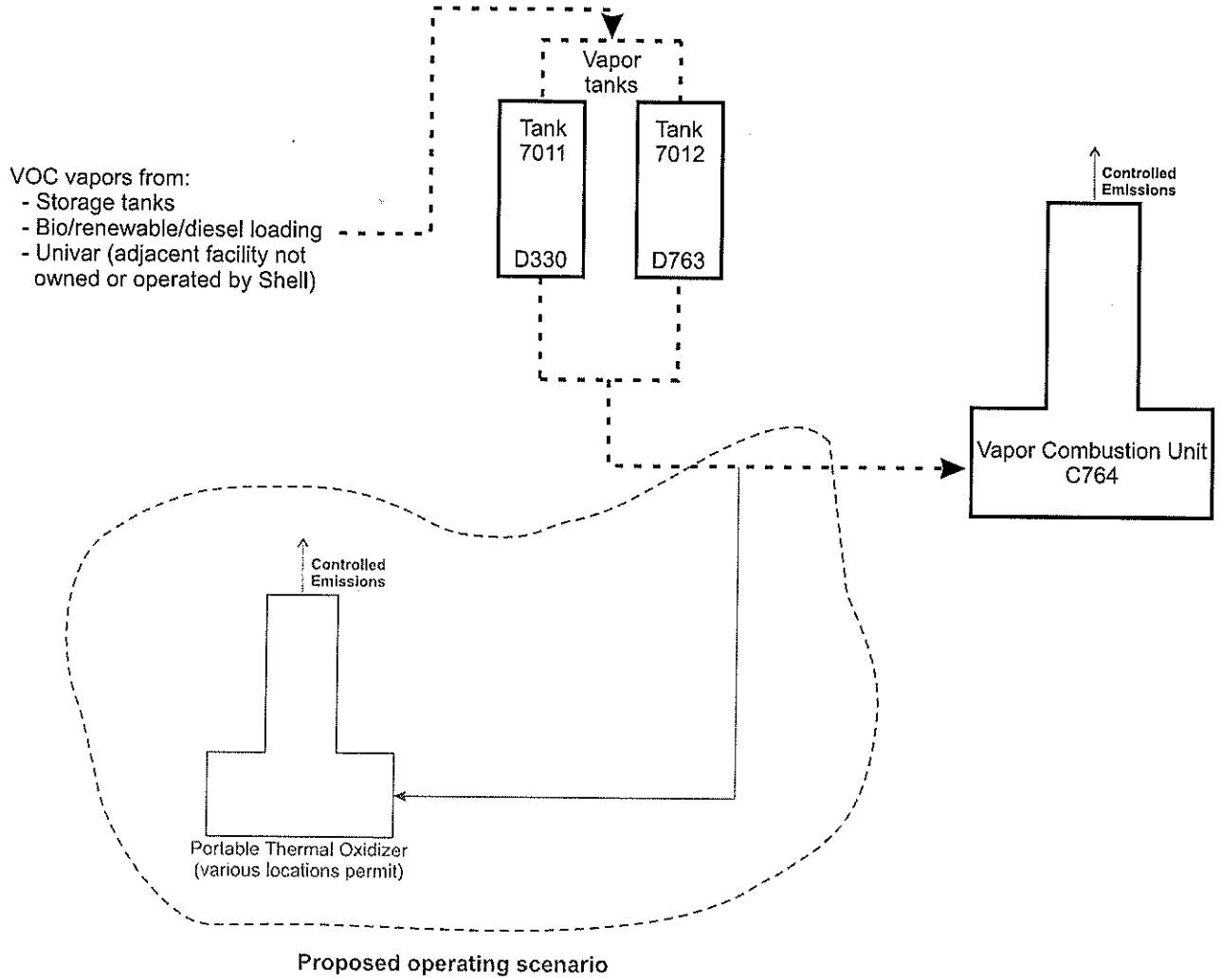
Christopher Sherman  
Print Name

Title: Environmental Advisor

**Attachment 1**

Process Flow Diagram

# Attachment 1: Process Flow Diagram

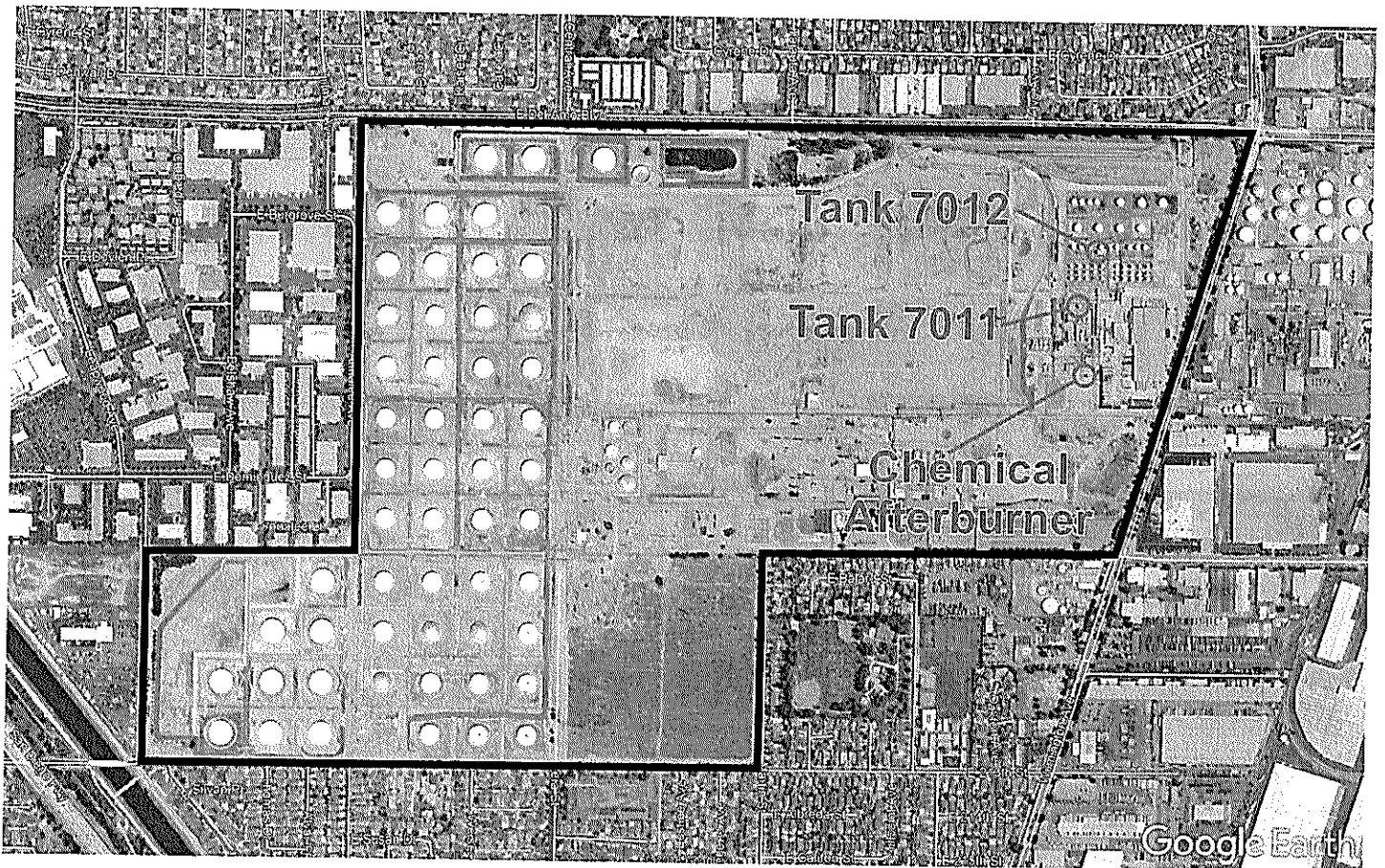




**Attachment 2**

Location Diagram

## Attachment 2: Location of Afterburner and Vapor Holding Tanks



**Attachment 3**

Copy of NTC E44591



**South Coast Air Quality Management District**  
21865 COPLEY DR., P.O. Box 4941, DIAMOND BAR, CA 91765-0941

12 / 13 / 24

DATE OF INSPECTION

# NOTICE TO COMPLY

Facility Name: EQUILON ENTER. LLC, SMELL OIL PROD. US		Facility ID: BC0372	Sector: LA
Location Address: 20145 S WILMINGTON		City: CARSON	Zip: 90810
Mailing Address: 20145 S WILMINGTON AVE		City: CARSON	Zip: 90810

This Notice to Comply is being issued to:

- Request additional information needed to determine compliance with clean air requirements.  
 Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

**YOU ARE HEREBY DIRECTED TO COMPLY WITH:**

#	AQMD RULE / CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
1	2004(e)	FACILITY FAILED TO SUBMIT QUARTER 1 QCEM COMPLIANCE (FORM 160E) WITHIN RECALCULATION PERIOD FOR QUARTER 1, INCURRED QCEM (1-3), C764 NOX LARGE SOURCE & SOX PROCESS SOURCE EMISSIONS NOT ACCOUNTED FOR.	10/30/23	8/27/24
2	2004(b)(4)	INVALIDATE APEP - C764 NOX LARGE SOURCE & SOX PROCESS SOURCE EMISSION NOT ACCOUNTED FOR.	8/29/24	8/30/24
3	2012(d)(2)(B)	FAILED TO ELECTRONICALLY REPORT C764 NOX LARGE SOURCE (NLS) TO SOUTH COAST AQMD CENTRAL STATION (Q1-4).	7/31/23	6/1/23
4	2011(A)(2)(B)	FAILED TO ELECTRONICALLY REPORT C764 SOX PROCESS SOURCE (SPS) TO SOUTH COAST AQMD CENTRAL STATION (Q1-4).	7/31/23	8/1/23
5				
6				

Served To: CHRISTOPHER SHEERMAN		Served By: Philip Chen		
Title: ENVIRONMENTAL ADVISOR		Date Served: 12/11/24 12/17/24	Phone: 709-396-2878	Fax:
Email Address: CHRISTOPHER.SHEERMAN@SHELL.COM	Phone: 661-204-5199	Email Address: PCHEN	@aqmd.gov	Forms / Applications / Info available at: www.aqmd.gov

**Instructions:**

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the Inspector named above.

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL \_\_\_\_\_ TITLE \_\_\_\_\_ SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

**NOTICE#: E 44591**

FILE COPY (Blue)

FACILITY COPY (Gold)

INSPECTOR COPY (White)

**Attachment 4**

Relevant Sections of Title V Permit

## FACILITY PERMIT TO OPERATE EQUILON ENTER. LLC, SHELL OIL PROD. US

### 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
<b>Process 8: AIR POLLUTION CONTROL SYSTEM</b>					
TANK, HOLDING, T-7011, VAPOR, 5600 CU.FT.; DIAMETER: 15 FT 6 IN; HEIGHT: 32 FT A/N: 632173	D330	D33 C764 D829 D835 D836 D838 D840			C6.5, E193.1, E336.3
TANK, HOLDING, T-7012, VAPOR, 7500 CU.FT.; DIAMETER: 18 FT ; HEIGHT: 34 FT A/N: 632173	D763	D33 C764 D829 D835 D836 D838 D840			C6.5, E193.1, E336.3
AFTERBURNER, H-7015, JOHN ZINK, MODEL ZTOF/TC, NATURAL GAS, WASTE GAS, 22 MMBTU/HR WITH A/N: 632173  BURNER, 2 TOTAL, ONE NATURAL GAS ONLY, ONE WASTE GAS AND NATURAL GAS	C764	D330 D763	NOX: LARGE SOURCE**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 78 PPMV (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]; VOC: 0.08 LBS/1000 GAL (5) [RULE 462, 5-14-1999]	C1.36, C1.44, C8.2, D12.4, D12.5, D29.4, D328.1, E193.2, E193.13, E448.10, I297.7, I297.8
STACK, HEIGHT: 35 FT ; DIAMETER: 6 FT A/N: 632173	S1064				
<b>System 6: SOIL VAPOR EXTRACTION AND TREATMENT SYSTEM</b>					S13.4

\* (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 EQUILON ENTER. LLC, SHELL OIL PROD. US

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the SCAQMD to demonstrate compliance with all applicable requirements specified in this condition and 40CFR Part 64.9 for a minimum of five years.

**[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR Part 64, 10-22-1997]**

[Devices subject to this condition : C887]

E336.1 The operator shall vent the vent gases from this equipment as follows:

All nitrogen blowing of the unloading coupling and transfer hose shall be directed to tanks D162, D164 or D165 for a duration not to exceed 1 minute per disconnect. The opened hose shall then be capped.

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

[Devices subject to this condition : D835]

E336.2 The operator shall vent the vent gases from this equipment as follows:

All vent gases shall be vented to vapor holding tank T-7011 (D330) and/or vapor holding tank T-7012 (D763).

This equipment shall not be operated unless the vapor holding tank(s) are in full use and have a valid permit to receive vent gases from this equipment.

**[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; RULE 1401, 9-10-2010; RULE 462, 5-14-1999]**