

ORIGINAL

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

SOUTH COAST AQMD
CLERK OF THE BOARDS

SV 6/6/24

2024 MAY 21 PM 4: 24

PETITIONER: CHEVRON PRODUCTS COMPANY CASE NO: 831-402
FACILITY ADDRESS: 324 W. El Segundo Blvd. FACILITY ID: 800030
City, State, Zip: El Segundo, CA 90245

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

Andre West		Christopher H. Norton, Esq.	
Chevron Products Company		Latham & Watkins LLP	
324 W. El Segundo Blvd.		650 Town Center Drive, #2000	
El Segundo, CA	Zip 90245	Costa Mesa, CA	Zip 90245
☎ (310) 615-5508	Ext.	☎ (714) 755-8084	Ext.
Fax ()		Fax (714) 755-8290	
E-mail AndreWest@chevron.com		E-mail chris.norton@lw.com	

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)

The good cause finding should not be needed in this matter.

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

The subject equipment is located at the El Segundo Refinery, 324 W. El Segundo Blvd. in El Segundo, California (Refinery). The Refinery, owned and operated by Chevron Products Company (Chevron or Petitioner), is a major producer of fuel. Processes include refining of crude oil and intermediates for gasoline, diesel and jet fuel.

The subject equipment of this variance request includes the caustic scrubber vessels V-3 and V-4 (Process 20, System 2, Device ID's C1738 and C1739) (Caustic Scrubbers), the Resid Tank T425 (Device ID D1313), along with Tank T426 (Device ID 01282) and Tank T430 (D1283) (Hot Tanks). Collectively, the subject equipment is referred to as the Vent Gas Recovery Pad at the Refinery.

Petitioner requests to take the subject equipment out of service for maintenance and repairs. The work will take fourteen (14) days and is needed to ensure the reliable operation of the Caustic Scrubbers. There is no period when Chevron could perform the repairs to the Caustic Scrubbers without a variance. During the repair period, a fully permitted, portable scrubber will be rented from Envent Corporation (Envent Scrubber) to control emissions. There should be no excess emissions in this matter with use of the portable Envent Scrubber.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, 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)*
Scrubber, V-3 (D1738), Caustic. Connected to D1313, D1282, D1283 (Hot Tanks)	414105	C1738	Not Applicable
Scrubber, V-4 (D1739), Caustic. Connected to D1313, D1282, D1283 (Hot Tanks)	414105	C1739	Not Applicable
Storage Tank, Fixed Roof, Heated, No 425, with Agitators, 150000 BBL.; Diameter: 138 FT; Height: 56 FT (Hot Tank)	A78255	D1313	Not Applicable
Storage Tank, Fixed Roof, Heated, No 426, with Agitators, 200000 BBL.; Diameter: 150 FT; Height: 64 FT (Hot Tank)	A78254	D1282	Not Applicable
Storage Tank, Fixed Roof, Heated, No 430, with Agitators, 125000 BBL.; Diameter: 138 FT 6 IN; Height: 47 FT 7.5 IN (Hot Tank)	A394003	D1283	Not Applicable

*Attach copy of denial letter

The facility RECLAIM Permit No. 800030, dated January 16, 2024 (Facility Permit), copies of which are attached to this Petition as Exhibit 1, further identifies and describes this equipment. The Refinery is a Title V facility.

A representative schematic of a typical Caustic Scrubber is attached to the Petition as Exhibit 2.

A representative schematic of the Vent Gas Recovery Pad is attached to the Petition as Exhibit 3.

Photographs of the subject Caustic Scrubbers as installed are attached to the Petition as Exhibit 4.

A copy of Chevron's Proposed Short Variance Conditions is attached to the Petition as Exhibit 5.

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.

Petitioner requests to take the subject equipment out of service for maintenance and repairs. The work will require fourteen (14) days and is needed to ensure the safe and reliable operation of the Caustic Scrubbers.

The Vent Gas Recovery Pad at the Refinery includes the V-3 and V-4 caustic scrubbers (Device ID C1738 and C1739) (Caustic Scrubbers). These Caustic Scrubbers include the American Petroleum Institute (API) scrubbers which are designed to strip vent gases of H₂S prior to release to the atmosphere.

Each Caustic Scrubber consists of a caustic reservoir and a circulation pump. This setup provides opposite flow contact between the caustic and the sour vent gases and is designed to remove H₂S. The Caustic Scrubbers are operated such that the Refinery has one unit in service and the other Caustic Scrubber is on stand-by. The Caustic Scrubbers are switched once per day to maintain the reliability of the units while in operation.

The Hot Tanks and Caustic Scrubbers are essential to Refinery operations. The Hot Tanks are used as surge storage vessels between the Crude Units and the Coker to reduce feed curtailment to core plant shutdowns.

The Caustic Scrubbers control emissions from the Hot Tanks. The Hot Tanks cannot be operated at the Refinery in compliance with applicable District rules and regulations without the Caustic Scrubbers in service. A short variance is needed to take the subject equipment out of service for maintenance and repairs.

Petitioner expects that the reliability and flexibility of Caustic Scrubber operations will be improved with the project. As part of the maintenance and repairs, Petitioner plans to add level transmitters to the Caustic Scrubbers. This will allow for the installation of low-level alarms and piping on the units. When completed, the work should provide flexibility for any pump to remove spent caustic while the other pumps are circulating caustic.

During the maintenance and repair period, a fully permitted, portable scrubber will be rented from Envent Corporation (Envent Scrubber) to control emissions from the Hot Tanks. The portable Envent Scrubber will be connected to the Hot Tanks vent line to ensure emissions are controlled. The Envent Scrubber will be connected to the Hot Tanks vent line at all times that the V-3 and V-4 Caustic Scrubbers are out of service. There will be no excess emissions associated with the outage of the Caustic Scrubbers with the use of the Envent Scrubber.

The repair period is expected to take no more than fourteen (14) days. Chevron will inform District personnel and the Hearing Board at least 24 hours prior to the time when the Caustic Scrubbers are taken out of service to initiate the requested short variance period.

A representative schematic of a typical Caustic Scrubber (V-3 and V-4) is attached to the Petition as Exhibit 2.

A schematic of the Vent Gas Recovery Pad is attached to the Petition as Exhibit 3.

Photographs of the Caustic Scrubbers as installed are attached to the Petition as Exhibit 4.

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

If yes, how often: Periodic based on condition. Date of last maintenance and/or inspection: November 2014

Describe the maintenance and/or inspection that was performed.

In November of 2014, the Caustic Scrubbers were inspected, maintained and repaired pursuant to a Short Variance received from the District (Case No. 831-373).

At that time, Petitioner cleaned and inspected the Caustic Scrubbers at the Vent Gas Recovery Pad. During the maintenance and repair period, Petitioner repaired corrosion that had been identified in the piping systems around the Caustic Scrubbers. Petitioner also repaired and replaced valves in the piping systems due to deterioration.

The need for the variance is not the product of operator error or neglect. The subject equipment has been properly inspected and maintained. The maintenance work will give operations better indication of the caustic level in the scrubbers and will allow for more reliable operation of the pumps.

9. List all District rules, and/or permit conditions 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, Example #2).

Rule	Explanation
District Rules 203(b), 2004(f)(1) and 3002(c)(1)	District Rule 203(b) states that permitted equipment shall not be operated contrary to the conditions specified in the permit to operate. Rule 3002(c)(1) requires compliance with all Title V permit conditions. The Refinery is a Title V facility. The Facility Permit includes equipment specific and administrative conditions concerning the operation of the subject equipment. A variance is needed to perform maintenance and repair work at the Caustic Scrubbers.

Facility Permit Condition No. C8.8 (Section D)	Permit Condition C8.8 states, in part, that the "operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 10 gpm." The Caustic Scrubbers will be temporarily taken out of service for repairs. A variance is needed to perform maintenance and repair work at the Caustic Scrubbers.
Administrative Condition No. 2 (Section E)	Administrative Condition No 2. States that the operator shall maintain all equipment that ensures proper operation of the equipment. The Caustic Scrubbers will be temporarily taken out of service for repairs. A variance is needed to perform maintenance and repair work at the Caustic Scrubbers.

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
831-400	4/10/2024	6/4/2024	A variance was needed to perform maintenance and repairs at the No.4 Separator at the Refinery. The Hearing Board granted the petition. The proposed work under variance is continuing with compliance expected by or before June 4, 2024.

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):

It is beyond Chevron's reasonable control to comply with all applicable District's rules and Facility Permit conditions when the Caustic Scrubbers are taken out of service for repairs. Petitioner cannot complete the necessary repairs and remain in compliance with the Facility Permit.

The Caustic Scrubbers are used to control emissions from the Hot Tanks. The Facility Permit describes the Caustic Scrubbers as connected to the Hot Tanks (Device ID D1313, 01282, and 01283). The Caustic Scrubbers cannot be repaired while remaining operational and connected to the listed equipment. The repair work is necessary and cannot be performed while the Caustic Scrubbers are in service.

If the work is not performed, then a sudden and unforeseen shutdown of the Hot Tanks may occur which would result in the subsequent curtailment or shutdown of the Crude Units and the Coker. An extended loss of the subject equipment may result in the shutdown of the entire Refinery.

A temporary scrubber rented from Envent will be connected to the Hot Tanks at all times during the outage. The Envent Scrubber is guaranteed to have equivalent or better emissions removal efficiency as the V-3 and V-4 Caustic Scrubbers. The Envent Scrubber will be tested to ensure it is in good working order prior to bypassing

the Caustic Scrubbers and will be monitored by an Envent technician during the variance period. There will be no increase in emissions associated with the temporary outage of the Caustic Scrubbers.

The granting of the variance benefits the environment. The subject equipment has experienced degradation that a health and environmental risk may result if the repairs are not performed. A sudden and unforeseen shutdown of the Hot Tanks may result in flaring from shutdown of the Crude Units or the Coker. An upset condition could result in safety risks, economic harm to Petitioner, and potential environmental impacts.

To keep the equipment operating reliably, the work should be completed soon and before the end of the year. There is no period when Petitioner could perform the repairs to the Caustic Scrubbers without a variance. There is not time in which the Crude Units are taken out of service for major maintenance such that the repairs could be completed without the need for relief. As such, a short variance is needed to perform the work.

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)?

The subject equipment is currently in compliance but will need to be removed from service for repairs. The Caustic Scrubbers must be taken out of service for repairs to prevent a potential failure and upset condition.

16. What actions have you taken since that time to achieve compliance?

The Caustic Scrubbers are in compliance with applicable District rules and permit conditions. However, the Caustic Scrubbers need to be taken out of service for repair resulting in a period of noncompliance.

Chevron has located a District permitted Envent Scrubber to control emissions from the Hot Tanks while the work is being performed. The Envent Scrubber is at least as efficient as the Caustic Scrubbers.

As such, there should be no excess emissions in the matter during the repair period.

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: Economic losses to the Refinery are estimated as in excess of \$1,000,000 per day

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).

The Caustic Scrubbers are an integral component of the Refinery. The subject equipment prevents the venting of H₂S from the Hot Tanks to the atmosphere. Without the Scrubbers, the Hot Tanks could not be operated in compliance with the Facility Permit. A sudden and unforeseen shutdown of the Hot Tanks may result in the shutdown of other key Refinery process units and may potentially result in the shutdown of the Refinery.

The shutdown of the Refinery would result in an immediate financial penalty to Chevron in excess of \$1,000,000 per day in lost production and sales. Furthermore, a permanent shutdown would result in the loss of large numbers of permanent jobs and would greatly depreciate the capital invested in the Refinery. A permanent shutdown of the Refinery may also have a significant impact on regional petroleum markets.

A shutdown of the Hot Tanks could result in potential environmental impacts associated with increased flaring and wastewater discharges due to the shutdown and subsequent startup of the Refinery. There are no excess emissions in this matter. As such, the granting of the variance may benefit the environment.

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

Petitioner has considered curtailing or terminating Refinery operations in lieu of obtaining a variance. However, Chevron cannot operate the subject equipment and remain in compliance with permit conditions while the Caustic Scrubbers are being repaired. Achieving compliance through curtailment is not an option in this matter.

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, 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)
Not Applicable (NA)	NA	NA	NA

* Column A minus Column B = Column C

Excess Opacity: N/A %

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

There will be no excess emissions in this matter. An Envent Scrubber will be connected to the Hot Tanks at all times during the Scrubbers outage. The Envent Scrubber has a District permit and is guaranteed to be at least as effective at controlling emissions as the Caustic Scrubbers. There will be no increase in emissions from the Hot Tanks during the variance period.

See also Chevron's Proposed Short Variance Conditions attached to the Petition as Exhibit 5.

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 in this matter due to the use of the Envent Scrubber.

See Paragraph 20 above.

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.**

Chevron shall monitor emission levels from the subject equipment during the variance period. For example, hydrogen sulfide (H₂S) will be monitored from the Envent Scrubber using a continuous monitoring system.

See also Chevron's Proposed Short Variance Conditions attached to the Petition as Exhibit 5.

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.

Chevron intends to achieve compliance with the applicable provisions of District Rules and Regulations by working to minimize the maintenance period and returning the subject equipment back into service.

Final compliance will be achieved when the Scrubbers are reconnected to the Acid Tank Equipment.

24. State the date by which you expect to achieve final compliance: within fourteen (14) days

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, Example #3).

List Increments of Progress here: Not Applicable

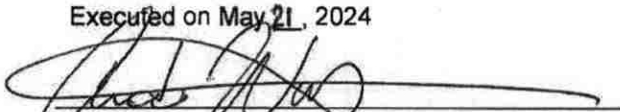
25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

District Inspector Jentry Kear _____ Ext. 7015 _____

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 May 21, 2024

at El Segundo, California


Signature _____

Andre West _____
Print Name

Environmental Compliance Specialist _____
Title

EXHIBIT 1

FACILITY PERMIT TO OPERATE CHEVRON PRODUCTS CO.

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 20: AIR POLLUTION CONTROL					P42.2
System 2: HOT TANKS VAPOR DISPOSAL SYSTEM					
MIST ELIMINATOR, HYDROCARBON, V-1, HEIGHT: 10 FT 8 IN; DIAMETER: 17 FT A/N: 414105	D1736				
DRUM, SURGE, V-2, LIQUID, LENGTH: 4 FT ; DIAMETER: 2 FT A/N: 414105	D1737				
✓ SCRUBBER, CAUSTIC, V-3, HEIGHT: 14 FT 6 IN; DIAMETER: 1 FT 6 IN A/N: 414105	C1738	D1282 D1283 D1313			C8.8
✓ SCRUBBER, CAUSTIC, V-4, BACK-UP, HEIGHT: 14 FT 6 IN; DIAMETER: 1 FT 6 IN A/N: 414105	C1739	D1282 D1283 D1313			C8.8
BLOWER, K-1, WITH PACKED GLAND AND MOTOR DRIVE A/N: 414105	D3485				
BLOWER, K-1A, (SPARE), WITH PACKED GLAND AND STEAM TURBINE DRIVE A/N: 414105	D3486				
System 3: FCCU FLARE					S13.2, S58.6
FLARE, ELEVATED WITH STEAM INJECTION, F-309, WITH A 42" F.S. SMOKELESS FLARE TIP ASSEMBLY, HEIGHT: 150 FT ; DIAMETER: 7 FT A/N: 577921	C1746			HAP: (10) [40CFR 63 Subpart CC, #7, 11-19-2020]	B61.11, D12.14, D323.2, H23.46, H23.49
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 577921	D3675			HAP: (10) [40CFR 63 Subpart CC, #5A, 11-19-2020]	H23.19
System 7: LSFO FLARE					S7.4, S13.2, S31.20, S58.6

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|--|---|
| * (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 CHEVRON PRODUCTS CO.

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 16: STORAGE TANKS					P13.1
✓ STORAGE TANK, FIXED ROOF, HEATED, NO.425, WITH AGITATORS, 150000 BBL; DIAMETER: 138 FT ; HEIGHT: 56 FT A/N: A78255	D1313	C1738 C1739		HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	H23.10, K67.67
STORAGE TANK, FIXED ROOF, NO.282, EXTERNAL HEATER, 34916 BBL; DIAMETER: 95 FT 6 IN; HEIGHT: 28 FT 3 IN A/N: 393998	D1315			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	K67.67
STORAGE TANK, FIXED ROOF, NO.288, INTERNAL HEATER, 61252 BBL; DIAMETER: 114 FT 6 IN; HEIGHT: 34 FT 11.25 IN A/N: 393999	D1316			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	K67.67
STORAGE TANK, FIXED ROOF, NO.196, 2 INTERNAL HEATERS, 90000 BBL; DIAMETER: 120 FT ; HEIGHT: 45 FT 11 IN A/N: 393991	D1317			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	K67.67
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 393979	D3665			HAP: (10) [40CFR 63 Subpart CC, #5A, 11-19-2020]	H23.3
System 2: INTERNAL FLOATING ROOF TANKS					S13.3

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| <ul style="list-style-type: none"> * (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 | <ul style="list-style-type: none"> (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 |
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** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE CHEVRON PRODUCTS CO.

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 16: STORAGE TANKS					P13.1
STORAGE TANK, FIXED ROOF, HEATED, NO.292, 113000 BBL; DIAMETER: 140 FT ; HEIGHT: 47 FT 4.5 IN A/N: 394001	D1280			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	B22.6, D90.36, K67.67
✓ STORAGE TANK, FIXED ROOF, HEATED, NO.426, WITH AGITATORS, 200000 BBL; DIAMETER: 150 FT ; HEIGHT: 64 FT A/N: A78254	D1282	C1738 C1739		HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	H23.10, K67.67
✓ STORAGE TANK, FIXED ROOF, HEATED, NO.430, WITH AGITATORS, 125000 BBL; DIAMETER: 138 FT 6 IN; HEIGHT: 47 FT 7.5 IN A/N: 394003	D1283	C1738 C1739		HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	H23.10, K67.67
STORAGE TANK, FIXED ROOF, NO.439, 130000 BBL; DIAMETER: 120 FT ; HEIGHT: 64 FT A/N: C19334	D1284			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	B59.4, C1.46, D90.34, H23.12
STORAGE TANK, FIXED ROOF, NO.463, 61773 BBL; DIAMETER: 115 FT ; HEIGHT: 34 FT 8.75 IN A/N: 394004	D1286			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	B22.6, D90.36, K67.67
STORAGE TANK, FIXED ROOF, HEATED, NO.467, 60000 BBL; DIAMETER: 100 FT ; HEIGHT: 47 FT 4.63 IN A/N: 394005	D1287			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	B22.7, D90.36, K67.67
STORAGE TANK, FIXED ROOF, NO.487, 79051 BBL; DIAMETER: 120 FT ; HEIGHT: 40 FT 11.5 IN A/N: 394011	D1288			HAP: (10) [40CFR 63 Subpart CC, #2, 11-19-2020]	B22.6, D90.36, K67.67

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| <ul style="list-style-type: none"> * (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 | <ul style="list-style-type: none"> (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 CHEVRON PRODUCTS CO.

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 407, 4-2-1982]

[Devices subject to this condition : C3752]

- ✓ C8.8 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 10 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the recirculating caustic solution.

The operator shall determine and record the parameter being monitored once every 1 day.

The operator shall also replace the scrubbing solution with fresh solution one time during each day that the scrubber is in use.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 407, 4-2-1982]

[Devices subject to this condition : C1738, C1739]

- C8.9 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 10 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the recirculating sodium bisulfite solution.

The operator shall determine and record the parameter being monitored once a day.

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

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 407, 4-2-1982]

FACILITY PERMIT TO OPERATE CHEVRON PRODUCTS CO.

SECTION E: ADMINISTRATIVE CONDITIONS

The operating conditions in this section shall apply to all permitted equipment at this facility unless superseded by condition(s) listed elsewhere in this permit.

1. The permit shall remain effective unless this permit is suspended, revoked, modified, reissued, denied, or it is expired for nonpayment of permit processing or annual operating fees. [201, 203, 209, 301]
 - a. The permit must be renewed annually by paying annual operating fees, and the permit shall expire if annual operating fees are not paid pursuant to requirements of Rule 301(d). [301(d)]
 - b. The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless a Permit to Construct extension has been granted by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment, in which case the Permit to Construct serves as a temporary Permit to Operate. [202, 205]
 - c. The Title V permit shall expire as specified under Section K of the Title V permit. The permit expiration date of the Title V facility permit does not supercede the requirements of Rule 205. [205, 3004]
- ✓ 2. The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. [204]
3. This permit does not authorize the emissions of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules and Regulations of the SCAQMD. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other governmental agencies. [204]
4. 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. [204]

EXHIBIT 2

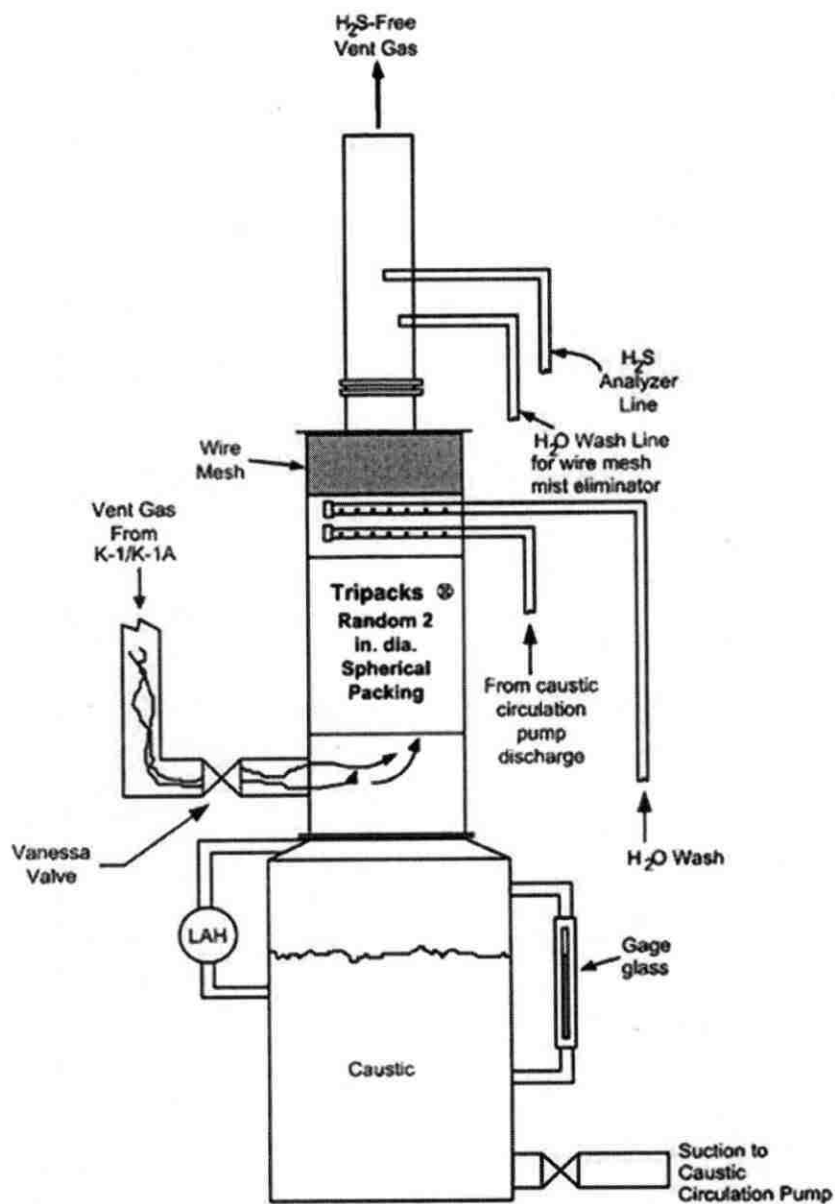
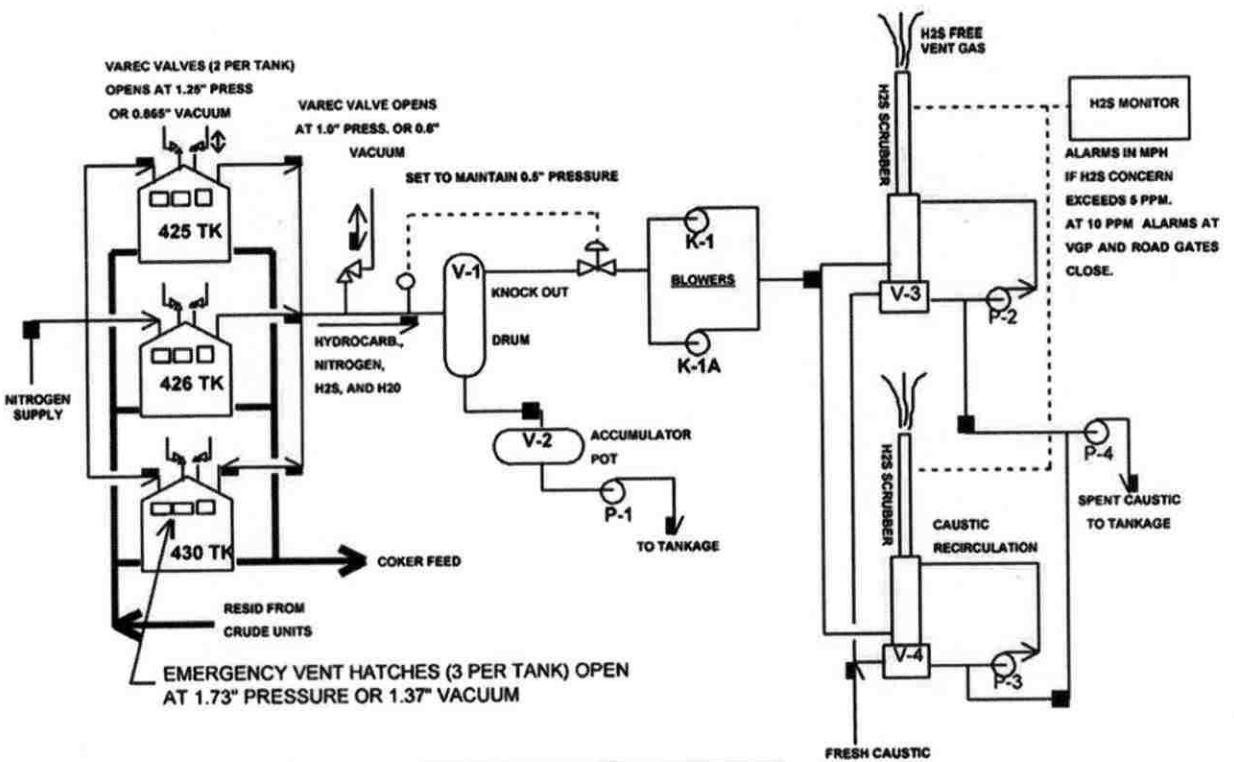


Figure 5-9: Typical Caustic Scrubber V-3 and V-4

EXHIBIT 3



ALL PRESSURE AND VACUUM ARE IN
UNITS OF INCHES OF H2O

VENT GAS PAD SYSTEM DRAWING
SKETCH NO. JSP-032991

EXHIBIT 4

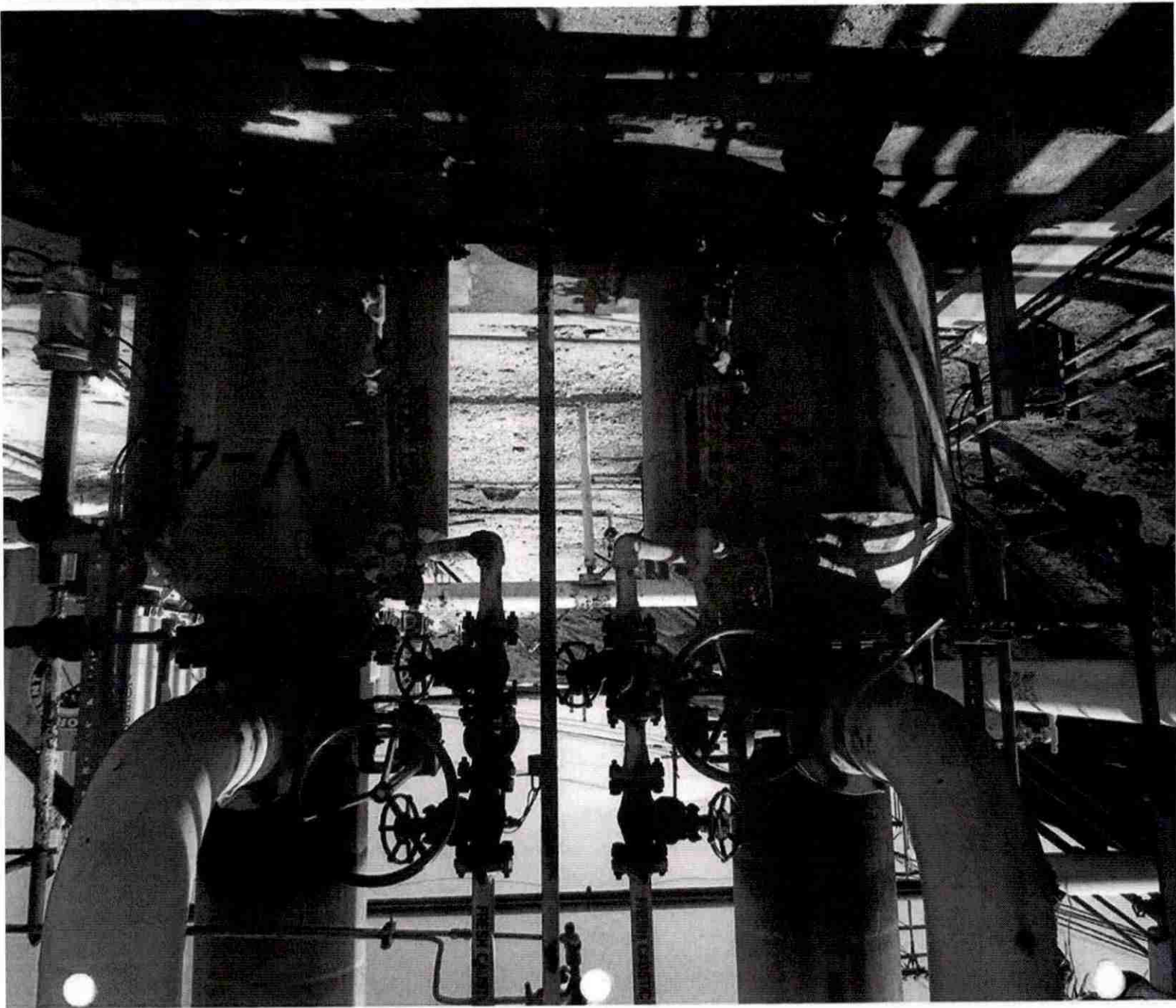


EXHIBIT 5

**CHEVRON PRODUCTS COMPANY
CASE NO. 831-402
PROPOSED SHORT VARIANCE CONDITIONS**

1. Petitioner shall inform South Coast Air Quality Management District (District) Compliance personnel and the Clerk of the Hearing Board at least twenty-four (24) hours prior to the temporary shutdown of the Hot Tanks vapor disposal system by calling 1-800-CUT-SMOG.
2. Petitioner shall temporarily install the permitted portable scrubber to control emissions from the three subject Hot Tanks listed in Process 16, System 1 (Device ID Nos. D1282, D1283, and D1313). The portable scrubber shall be operated by Envent Corporation according to the terms and conditions of the permit to operate.
3. If the portable scrubber operated by Envent Corporation should fail for any reason, Petitioner shall temporarily install and use an equivalent permitted portable scrubber to control the emissions.
4. Petitioner shall not exceed a flow rate of 1,000 scfm through the permitted portable scrubber during the variance period.
5. Petitioner shall have the emissions of hydrogen sulfide (H₂S) from the permitted portable scrubber monitored once per day by the vendor using Colorimetric Detector Tubes.
6. Petitioner shall have the emissions of volatile organic compounds (VOCs) from the permitted portable scrubber monitored once per shift by the vendor during the variance period.
7. Petitioner shall make its monitoring records available to the District for inspection upon request.
8. Petitioner shall notify the Clerk of the Hearing Board by email upon achieving final compliance in this matter.
9. Petitioner shall pay all applicable fees, if any, by _____, 2024 or this variance shall be invalidated pursuant to Rule 303(m)(2).