

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

PETITIONER: CHEVRON PRODUCTS COMPANY CASE NO: 831-397

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

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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 of this variance request is the No. 3 Separator at the Effluent Treatment Plant (ETP) located at the El Segundo Refinery 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.

Chevron is seeking a short variance to remove oil, emulsion and solids from the No. 3 Separator for maintenance. Materials accumulate in oil/water separators over time and periodically need to be removed to ensure proper operation, particularly during storm events. Maintenance of the No. 3 Separator is needed to assure compliance with discharge limits in the Refinery NPDES permit. While the subject equipment can be isolated while the maintenance work is being performed, Chevron will be out of compliance when the cells are opened.

Typically, the initial 72 hours following the opening of cells in the No. 3 Separator would not be included in a variance. Under Rule 1176(f)(3), wastewater systems with excess emissions that are a result of active inspection, maintenance, sampling or repair are subject to a 72-hour safe harbor. However, as a condition of this variance, twenty four (24) hours prior to removal of concrete covers, Petitioner shall ensure that the vapor space of the No.

3 Separator will be under a vacuum and routed to the HPC Vapor Control System. To make this condition enforceable, the variance period should start twenty four (24) hours prior to the removal of concrete covers.

There will be no net excess emissions in this matter with mitigation. Chevron estimates approximately 20.4 pounds of VOC emissions (total) may be emitted from the No. 3 Separator during the variance period. In comparison, Chevron will conduct additional inspections and repairs of the PRDs, ETP drains and loop seals at the Refinery during the variance period, providing VOC reductions estimated at 20.89 pounds (total). As such, there should be no excess emissions in this matter with the consideration of the VOC reductions. With mitigation, Chevron estimates net zero excess emissions of VOCs during the variance period.

Petitioner expects to open the covers at the No. 3 Separator on Wednesday, May 31, 2023. As a condition of the variance, twenty four (24) hours prior to removal of concrete covers, Petitioner shall ensure that the vapor space of the No. 3 Separator will be under a vacuum and routed to the HPC Vapor Control System. With a 45-day project schedule and accounting for unanticipated delays, Petitioner requests a short variance for the No. 3 Separator beginning on May 31, 2023 and ending on July 14, 2023.

The relevant sections of the facility RECLAIM Permit No. 800030, dated February 2, 2023 ("Facility Permit"), copies of which are attached to this Petition as Exhibit 1, further identifies and describes this equipment.

Photographs of the No. 3 Separator illustrating the maintenance work are attached to the Petition as Exhibit 2.

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	Applicati on/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
OIL WATER SEPARATOR, FIXED COVER, WIDTH: 12 FT 4 IN; DEPTH: 5 FT 8 IN; LENGTH: 103 FT 2 IN	405761	D1232	N/A

*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 No. 3 Separator is an American Petroleum Institute (API) water-oil separator used for primary treatment of wastewater at the Refinery. The No. 3 Separator accepts water from the segregated drainage system which consists of a series of drains and manholes connected by piping or channels to the subject equipment.

The No. 3 Separator removes entrained oil from the wastewater and provides a path for lower contaminant waste streams, including rainwater, wash down water and some process water. As such, the subject equipment serves to reduce contamination in wastewater processed at the Refinery. Essentially, the No. 3 Separator is used to clean-up the wastewater prior to discharge, and, thus, maintain compliance with the Refinery National Pollutant Discharge Elimination System (NPDES) permit. The No. 3 Separator consists of the following equipment:

- Oil Water Separator Box - incorporates a single cell, with a capacity of approximately 900 barrels.
- Cells - serves as the oil/solids/water separation area of the No.
- P-1/2 - pumps used to route water to No.4 or No.2 Separator
- T-30 - #3 separator overflow diversion sump
- P-5/6 - pumps that take suction on T-30 and discharges water to tank489.

The No. 3 Separator serves as an integral part of the Refinery's Effluent Treatment Plant. The subject equipment is needed to process wastewater at the Refinery and is essential for the proper operation of the Refinery. The

No. 3 Separator is subject to an NPDES permit which allows for discharge of the wastewater following treatment directly into the Santa Monica Bay. Petitioner is responsible for maintaining compliance with effluent limits in the NPDES permit. As such, it is important that the No. 3 Separator function properly at all times. An upset condition could lead to a violation of the discharge limits on the Refinery NPDES permit for wastewater disposal.

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

If yes, how often: Quarterly VOC inspections. Date of last maintenance and/or inspection: March of 2023.

Describe the maintenance and/or inspection that was performed.

The No. 3 Separator is subject to quarterly VOC inspections and periodic inspection and maintenance depending on the volume of accumulated materials. The water, oil and solids are removed, and the separators cleaned, inspected and repaired. Materials accumulate in separators at the Refinery and need to be periodically cleaned out. The equipment is at risk for carryover during heavy flow conditions, particularly during storm events. In addition, maintenance of the No. 3 Separator is needed to assure compliance with discharge limits in the Refinery NPDES permit.

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 Rule 464(b)(1)(A)	District Rule 464(b)(1)(A) states that a person shall not use any compartment operated for the recovery of oil from effluent water unless the compartment has a solid cover, sealed and totally enclosing the liquid contents of the compartment. Since the equipment needs to be open for maintenance, Chevron cannot comply with this rule during the variance period.
District Rule 464(b)(2)	District Rule 464(b)(2) states that gauging and sampling covers shall be closed at all times with no visible gaps. Since the equipment needs to be open for maintenance, Chevron cannot comply with this rule during the variance period.
District Rule 464(b)(3)	District Rule 464(b)(1)(3) requires that all wastewater forebays shall be closed at all times. Since the equipment needs to be open for maintenance, Chevron cannot comply with this rule during the variance period.
District Rule 1176(e)(1)	District Rule 1176(e)(1) requires that wastewater systems shall not emit VOCs greater than 500 ppmv above background levels. It will be difficult to control VOC emissions while materials are being removed. Even with mitigation, Chevron cannot guarantee that emissions will be below 500 ppm.
District Rule 1176(e)(2)	District Rule 1176(e)(2) states that wastewater separators shall be equipped with a fixed cover equipped with a closed vent system vented to an APC device. Cover material shall be impermeable to VOCs and free from holes, tears and openings, and the perimeter of the cover shall form a seal free of gaps. Since the equipment needs to be open for maintenance, Chevron cannot comply with this rule during the variance period.
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. Similarly, RECLAIM Rule 2004(f)(1) requires compliance with all facility permit conditions. In addition, Rule 3002(c)(1) requires compliance with all Title V permit conditions; the Refinery is now a Title V facility. The Facility Permit includes administrative conditions concerning the operation of the subject equipment.

Administrative Condition 2
(Section E)

Administrative Condition No. 2 states that the operator shall maintain all equipment that ensures proper operation of the equipment. Because the No. 3 Separator will need to be opened to remove accumulated materials, Chevron cannot comply with this condition during the variance period.

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):

The incident is beyond Chevron's reasonable control. Materials accumulate in oil/water separators over time and periodically need to be cleaned out. In fact, the cell in the No. 3 Separator have accumulated both oil and solids emulsion and require maintenance. The sludge-like material in the bottom of the Separator measures between 2 and 3 feet deep. The oil and solids emulsion need to be removed to ensure proper operation of the equipment, particularly during storm events. The risk of process upset at the No. 3 Separator is higher during storm events.

The No. 3 Separator is subject to a NPDES permit which allows for discharge of the wastewater following treatment directly to Santa Monica Bay. Petitioner is responsible for maintaining compliance with effluent limits in the NPDES permit. As such, it is important that the No. 3 Separator function properly at all times. An upset condition could lead to a violation of the discharge limits on the Refinery NPDES permit for wastewater disposal.

While the subject equipment can be isolated while the maintenance work is being performed, Chevron cannot maintain compliance while the No. 3 Separator is open. Certain District rules require that the cell of the No. 3 Separator remain closed. However, the equipment must be open for the work to be performed. As such, it is beyond Chevron's reasonable control to comply with District rules and permit conditions.

If the variance is granted, Petitioner expects to pull covers at the No. 3 Separator on Wednesday, May 31, 2023. As a condition of the variance, twenty four (24) hours prior to removal of concrete covers, Petitioner shall ensure that the vapor space of the No. 3 Separator will be under a vacuum with the vapors routed to the HPC Vapor Control System. With a 45-day project schedule and accounting for unanticipated delays, Petitioner requests a short variance for No. 3 Separator beginning on May 31, 2023 and ending on July 14, 2023.

The separators at the Refinery can only be taken out of service during "non-rain" periods which range from late Spring to early Fall. If the work is not performed soon and the materials remain inside, the No. 3 Separator may not function properly. Oil and other materials can carryover during heavy flow conditions, such as storm events, and be released to the environment (i.e., Santa Monica Bay). It is important for the variance to be granted today so that Chevron can perform the maintenance work at the No. 3 Separator during these "non-rain" periods.

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)?

Currently, the No. 3 Separator is in compliance with relevant District rules and permit conditions. Chevron has determined, however, that the No. 3 Separator needs to be opened for maintenance, inspection, and repairs. A variance is needed to open the covers on the No. 3 Separator to allow access for the maintenance work.

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

Chevron has made arrangements to perform the required work. Petitioner plans to dewater the separator as much as possible prior to entry. Petitioner will work on cleaning out one area at a time and will be removing one cover at a time. The covers are large and heavy, manufactured from cement, and require a crane for removal.

A vacuum truck will be used to pull free floating oil and remaining water and will be vented to carbon canisters. When the free oil and water are removed, a vacuum truck will be used to remove the remaining oil and sludge. Hoses will be inserted into the vapor space and pull a vacuum to the HPC Vapor Control System.

As needed, Chevron will use wood and plastic sheeting to create a temporary cover for the Separator to reduce VOC emissions. Chevron will need to place personnel into the No. 3 Separator for final cleaning, inspection, and repairs. The wood and plastic sheeting cover will be removed to provide atmosphere for breathing and to provide visual contact for the men in the pit. The covers will remain off while the cell is inspected.

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 No. 3 Separator is at risk of carryover due to the accumulation of oil and solids emulsion. This may impact the environment if the maintenance is not performed. The subject equipment needs to be maintained, inspected and potentially repaired to keep the No. 3 Separator in good operating condition.

If the Hearing Board denies this petition, Chevron may be unable to process wastewater and thus operate the Refinery. The shutdown of the Refinery results in an immediate financial penalty to Chevron of up to \$1,000,000 per day in lost production and sales. The wastewater treatment system is essential to Refinery operations.

Furthermore, a permanent shutdown would result in the loss large numbers of permanent jobs, greatly depreciate the capital invested in the Refinery facility, and would have a significant impact on regional petroleum markets and the ability of the region to obtain adequate supplies of CARB cleaner-burning gasoline.

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

No. Chevron has considered the option of curtailing or terminating its operations in lieu of obtaining a variance. However, Chevron cannot clean, inspect and repair the equipment and remain in compliance with all applicable District rules and regulations.

Achieving compliance through curtailment is not an option in this matter due to the need to periodically clean out the No. 3 Separator.

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)
VOC	20.4 lbs total	20.89 lbs total	None

* 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 should be no net excess emissions during the variance period with consideration of mitigation. District Rule 1176(e)(1) requires that wastewater systems shall not emit VOCs greater than 500 ppmv above background levels. In this matter, Chevron does not expect emissions from the No. 3 Separator in excess of 500 ppmv during the variance period. Moreover, mitigation measures will be employed to control and reduce VOC emissions.

For example, Chevron will pull the vapors from the Separator and send to the HPC Vapor Control System. In addition, Chevron will prefabricate wooden lids with plastic sheeting to act as temporary covers. The lids once removed will be replaced with plastic and wooden coverings while the vapors are being removed.

Chevron will also use vacuum trucks and portable Frac tanks for the transportation of solids and storage of solids until they can be processed. Chevron will use carbon canisters for additional vapor control for the vacuum trucks and Frac Tanks. There should be little to no VOC emissions from the equipment after the materials are removed.

In an abundance of caution and to mitigate for any incidents in which VOC emissions exceed 500 ppmv, Chevron will conduct additional inspections using Method 21 for Refinery atmospheric pressure relief devices, or PRDs, during the variance period. Chevron will also make any necessary repairs. As mitigation, Chevron will perform additional inspections of ETP drains and loop seals during the variance period and make repairs.

Chevron estimates 20.4 pounds of VOC emissions from the No. 3 Separator during the variance period. The calculation of VOC emissions assumes one foot of sludge remaining in the subject equipment after three days of cleaning. In addition, the excess emission calculations assume that all of the VOCs in the sludge evaporate.

In comparison, Chevron estimates that the VOC reductions from the additional inspections would achieve approximately 20.89 pounds during the variance period. As stated above, VOC reductions are expected from the additional inspections and repairs of the PRDs, ETP drains and loop seals during the variance period. With mitigation, Chevron estimates net zero excess emissions of VOCs in this matter.

Chevron's estimate of the VOC emissions during the variance period are attached as Exhibit 3 to the Petition.

Chevron's estimate of the VOC emission reductions during the period are attached as Exhibit 4 to the Petition.

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.

Chevron will mitigate the excess VOC emissions to the maximum extent feasible during the variance period.

For example, Chevron will pull the vapors from the Separator and send to the HPC Vapor Control System. In addition, Chevron will prefabricate wooden lids with plastic sheeting to act as temporary covers. The lids once removed will be replaced with plastic and wooden coverings while the vapors are being removed.

Chevron will also use vacuum trucks and portable Frac tanks for the transportation of solids and storage of solids until they can be processed. Chevron will use carbon canisters for additional vapor control for the vacuum trucks and Frac Tanks

Chevron will inject Potassium Permanganate (KMnO₄) into the solids to neutralize the H₂S odors in the system. In addition, Chevron will place odor neutralizing agent near the Separator to neutralize any odors. If noxious odors are detected at the work site, Chevron will stop work on the Separator and reseal the equipment.

Attached to the Petition as Exhibit 5 are Petitioner's Proposed Short Variance Conditions. These are similar to the conditions adopted by the Hearing Board for the No. 4 Separator maintenance outage. See Hearing Board Case No. 831-392.

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 will monitor VOC emissions from the subject equipment during the variance period. Emissions will be monitored. Chevron will also have people checking the perimeter of the Separator to ensure that no noxious odors are being emitted. See also Exhibit 5, Petitioner's Proposed Short Variance Conditions.

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 period for maintenance, inspection and repair. Chevron will employ personnel as necessary to help restore the equipment to compliant operation as soon as possible.

See also Exhibit 5, Petitioner's Proposed Short Variance Conditions.

24. State the date by which you expect to achieve final compliance: July 14, 2023

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

Final compliance should be achieved when the permanent concrete lids are replaced and sealed.

Chevron estimates that it will require about 45 days to complete the work. However, there may be delays in performing the maintenance work and resealing the No. 3 Separator. Delays may arise if repairs to the equipment are needed. Chevron will not know of the need for repairs until the covers are opened.

If the variance is granted, Petitioner expects to pull covers at the No. 3 Separator on Wednesday, May 31, 2023. As a condition of the variance, twenty four (24) hours prior to removal of concrete covers, Petitioner shall ensure that the vapor space of the No. 3 Separator will be under a vacuum with the vapors routed to the HPC Vapor Control System.

With a 45-day project schedule and accounting for unanticipated delays, Petitioner requests a short variance for No. 3 Separator beginning on May 31, 2023 and ending on July 14, 2023.

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 2, 2023

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 15: OIL/WATER SEPARATION					
OIL WATER SEPARATOR, HIGH FLOW BYPASS BOX, T-250, FIXED COVER, WIDTH: 6 FT ; DEPTH: 15 FT ; LENGTH: 10 FT A/N: 405760	D1231			BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	H23.4
CARBON ADSORBER, EFS-1, EACH OF TWO UNITS IN SERIES, 2000 LBS A/N: 405760	C1820	D1220 D1221			D90.28, E128.1, E153.4
CARBON ADSORBER, EFS-2, EACH OF TWO UNITS IN SERIES, 2000 LBS A/N: 405760	C1822	D1220 D4380			D90.33, E128.1, E153.4
JUNCTION BOX, 2 ENCLOSED ENTRANCE FLOW JUNCTION BOXES A/N: 405760	D4380	C1822		BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	H23.4, H23.53
JUNCTION BOX, 5 ENCLOSED ENTRANCE FLOW JUNCTION BOXES A/N: 405760	D4381			BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	H23.4
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 405760	D3660				H23.3
DRAIN SYSTEM COMPONENT A/N: 405760	D3712			HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]	H23.4
System 2: NO. 3 SEPARATOR AND APC					S13.7

- * (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 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 15: OIL/WATER SEPARATION					
OIL WATER SEPARATOR, FIXED COVER, WIDTH: 12 FT 4 IN; DEPTH: 5 FT 8 IN; LENGTH: 103 FT 2 IN A/N: 405761	D1232	C1837		BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	E71.2, H23.4, H23.53
SUMP, T-30 FIXED COVER, WIDTH: 8 FT; DEPTH: 12 FT; LENGTH: 10 FT A/N: 405761	D1233	C1837		BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	H23.4, H23.53
JUNCTION BOX, ENTRANCE FLOW A/N: 405761	D1234			BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	H23.4
CARBON ADSORBER, EFS-3, EACH OF TWO UNITS IN SERIES, 2000 LBS A/N: 405761	C1837	D1232 D1233			D90.32, E128.1, E153.4
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 405761	D3661				H23.3
DRAIN SYSTEM COMPONENT A/N: 405761	D3722			BENZENE: (10) [40CFR 61 Subpart FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #4, 6-20-2013]; VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	H23.4
System 3: NO. 4 SEPARATOR AND APC					S13.7

- * (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 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





08.17.2007



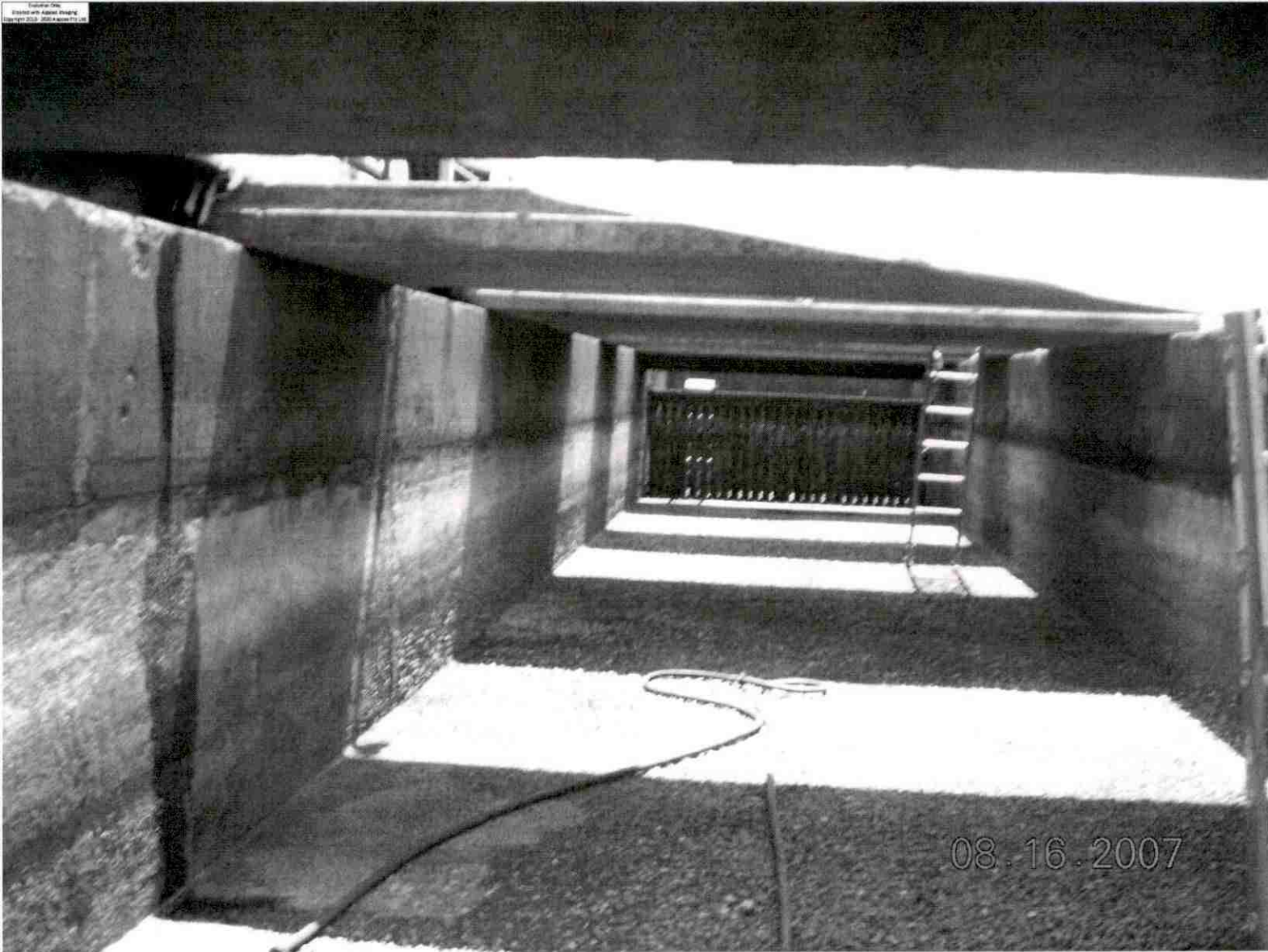


EXHIBIT 3

Exhibit No. 3

Estimate of Total Excess Emissions from the No. 3 Separator Chevron Products Company Case No. 831-397

Inputs

#3 Separator Length: 100.17 ft
#3 Separator Width: 12.33 ft
T-30 Length: 8 ft
T-30 Width: 16 ft
Sludge Density: 7.9 lbs/gal
Average VOC readings above 500 ppm after 3 days of cleaning: 1,509 ppm
Allowed VOC from Rule 1176: 500 ppm
Junction Box Vapor Space VOC Reading = 5,350 ppm
Outage Period = 45 days

Assumptions

1 ft of sludge is left in separator after 3 days of cleaning
All VOC in sludge evaporates
No credit taken for vapor control system
Correlation equation for junction box applies

#3 Separator & T-30 VOCs

VOC (lb) = %VOC x Sludge Mass (lb)
% VOC = 1,509 ppm - 500 ppm = 1,009 ppm or 0.1009%
#3 Separator Sludge Mass =
 $100.17 \times 12.33 \times 1 = 1,235.10 \text{ ft}^3 \times 7.5 \text{ gal/ft}^3 = 9,263.22 \text{ gal} \times 7.9 \text{ lb/gal} = 73,179 \text{ lb}$
T-30 Sludge Mass =
 $8 \times 16 \times 1 = 128 \text{ ft}^3 \times 7.5 \text{ gal/ft}^3 = 960 \text{ gal} \times 7.9 \text{ lb/gal} = 7,584 \text{ lb}$
Total Sludge Mass =
 $73,179 \text{ lb} + 7,584 \text{ lb} = 80,763 \text{ lb}$
VOC (lb) = $80,763 \text{ lb} \times 0.001009 = \mathbf{81.49 \text{ lb}}$

Junction Box 19 VOCs

VOC (lb) = Outage Period (hr) x VOC Leak Rate (lb/hr)
Screening Value (SV) = $5350 \text{ ppm} - 500 = 4,850 \text{ ppm}$
VOC Leak Rate (lb/hr) = $3.148\text{E-}04 \times (\text{SV})^{1.02} = 3.148\text{E-}04 \times (4850)^{1.02} = 1.81 \text{ lb/hr}$
VOC (lb) = $1.81 \text{ lb/hr} \times 45 \text{ d} \times 24 \text{ hr/d} = \mathbf{1,954.8 \text{ lb}}$

With Vapor Control with minimum 99% destruction efficiency

Total VOCs = $81.49 \text{ lb} + 1,955 \text{ lb} = 2,036.3 \text{ lb}$
 $2,036.3 \times 0.99 = 2,015.9 \text{ lb}$ destructed

Total Excess Emissions = $2,036.3 - 2,015.9 \text{ lb} = \mathbf{20.4 \text{ lb VOCs}}$

EXHIBIT 4

Exhibit No. 4

**Estimate of Total VOC Emission Reductions during Variance Period
Chevron Products Company
Case No. 831-397**

Microsoft Word - 0203 Fugitive Guidelines.doc (aqmd.gov)

				# of Days	% Inspected			
				45	0.4			
Component Type	Average Leak Level Above Lower Leak Level	Correlation Equation Emissions	Correlation Equation Emissions	Correlation Equation Emissions	# of Components that will get 2X Inspections	Total Emissions if all Leaking	Leak Rate	Total Emissions for Leaking Components
-	ppm	lbs/hr	lbs/day	lbs/total days	-	lbs/total days	%	lbs/total days
Drains*	783	0.00138	0.03321	1.49458	160	239.13	0.25%	0.60
Loop Seal*	14752	0.00911	0.21873	9.84282	50	492.14	4.07%	20.01
PRD*	242	0.00065	0.01563	0.70329	44	30.94	0.93%	0.29
Total								20.89

* Data taken from 4Q 2022 and 1Q 2023

Component Type	Total ETP components monitored in 4Q2022 & 1Q 2023	Total ETP Leaking components in 4Q2022 & 1Q 2023	%
Drains	400	1	0.25%
Loop Seal	123	5	4.07%
PRD	108	1	0.93%

Calculation Steps

Step 1 Correlation Equation [$\text{lbs/hr} = (1.92 \times 10^{-5}) \cdot (\text{SV})^{0.642}$] using average leak rate
Step 2 Convert to lbs/day
Step 3 Multiply to lbs/total days
Step 4 Multiply by the Total Number of components to get lbs/total days for all components of that type
Step 5 Multiply by the Leak Rate to get the lbs/total days period from actual components found leaking

EXHIBIT 5

Exhibit No. 5

**Proposed Short Variance Conditions
Chevron Products Company
Case No. 831-397**

1. Chevron shall remove the covers of the No. 3 Separator at the Refinery only as necessary to maintain, inspect and repair the subject equipment. No more than five (5) covers shall be removed at any one time except in case of emergency.
2. Chevron shall use temporary covers on No. 3 Separator as much as possible during work to reduce VOC emissions from the equipment.
3. Chevron shall use its best efforts to remove water, oil and solids from the No. 3 Separator prior to removing the concrete covers.
4. Twenty four (24) hours prior to removal of concrete covers, Chevron shall ensure that the vapor space of the No. 3 Separator is under vacuum and vapors will be routed to the HPC Vapor Control System with a 99% VOC control efficiency, operating under a current permit to operate by the District. The HPC Vapor Control System shall be in use until the point where oil and emulsion have been removed and personnel are entering the workspace.
5. Chevron shall employ vacuum trucks to pull the oil, water and sludge remaining in the No. 3 Separator. Vacuum trucks and portable Frac tanks shall be used for the transportation and storage of the solids. Carbon canisters shall be used for additional vapor control for the vacuum trucks and Frac tanks.
6. Chevron shall employ personnel 24 hours per day and 7 days per week at the job site to remove oil and emulsion during the maintenance phase.
7. Chevron shall inject potassium permanganate (KMnO₄) into No. 3 Separator as needed for odor control when the solids are being removed. Chevron shall use Chemco odor control in the area as needed for odor control.
8. Chevron shall provide the District with the height of sludge and oil-water layer observed at the beginning of the maintenance period and after the initial 72 hours at each of the open work locations.
9. Chevron shall monitor for VOC emissions according to method 21 at No. 3 Separator twice per shift (i.e., four times per day) during the entire variance period. Records of these inspections shall be made available to the District upon request.

10. Chevron personnel shall be present at all times and will conduct odor surveillance twice per shift at No. 3 Separator during the entire variance period.
11. Should three (3) complaints within a 4 hour period be determined to be caused by the work activities at the No. 3 Separator, Chevron shall within one hour cease work and replace the temporary covers on the No. 3 Separator until VOC emissions are stable and measured at less than 500 ppm.
12. At the beginning of the variance period, Chevron shall inspect for leaks and make repairs immediately, if leaks are found, in the Refinery atmospheric pressure relief devices, Effluent Treatment Plant (ETP) drains, and loop seals. This inspection shall be in addition to those required by District rules. Chevron shall provide copies of the inspection and repair records upon request by the District.
13. Chevron shall notify the District by calling 800-CUT-SMOG, Attn: Inspector Jentry Kear within 12 hours and at least 2 hours before the following events: (1) when the caulking of the covers of No. 3 Separator is first removed, and (2) when the covers of No. 3 Separator are first removed.
14. Chevron shall notify the District by calling 800-CUT-SMOG, Attn: Inspector Jentry Kear within 6 hours after the following events: (1) when removal of oil and emulsion is complete, and (2) when the covers on No. 3 Separator are replaced and sealed.
15. Final compliance will have been achieved when covers are replaced and sealed at No. 3 Separator. Chevron shall notify the District's Clerk of the Board in writing and the District by calling 800-CUT-SMOG (Attn: Inspector Jentry Kear) when final compliance is achieved.
16. Chevron shall notify the District by calling 1-800-CUT-SMOG regarding any odor complaint from the City of El Segundo during the variance period.
17. Chevron shall submit to the District via email (Attention: Inspector Jentry Kear) the calculations of estimated total VOC excess emissions and reductions within one week of replacing and sealing the covers of No. 3 Separator.
18. Chevron shall pay all applicable fees to the Clerk of the Hearing Board on or before fifteen days from the date the variance is granted or the variance shall be invalidated pursuant to Rule 303 – Hearing Board Fees, subsection (k).