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

22 JUN 16 PT2:18
PETITIONER: CHEVRON PRODUCTS COMPANY
CASE NO: 831-394

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 90245                            Costa Mesa, CA 92626
   ☑ (310) 615-5508 Ext.                         ☑ (714) 755-8084 Ext.
   Fax (310) 615-5153                             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 is not required in this matter. This Petition has been filed with time for public notice.

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

   The subject equipment is located at the Chevron Products Company (Chevron or Petitioner) Refinery in El Segundo, California (Refinery). The Refinery is a major producer of fuel. Processes include refining of crude oil and intermediates for gasoline, jet and diesel fuel. The Refinery also produces petroleum coke (Coke). Coke is produced at the Coker Unit and is a necessary co-product of Refinery operations.

   The subject equipment consists of the Coke storage at the Refinery. Petition may need a variance for the temporary storage of Coke in a reservoir containment area below grade level external to the existing Coke storage capacity open piles at the Refinery. The incident impacting Coke storage may come to pass due to a potential contract expiration at the Port of Long Beach (Port).

   The contract expiration between the International Longshore and Warehouse Union (ILWU) and the Pacific Maritime Assoc. (PMA) may temporarily interrupt the movement of materials out of the Port. The issue has the potential to restrict Petitioner’s ability to ship Coke. The petition is being filed in case a variance is needed.
Petitioner can store approximately two days of Coke in enclosures at the Refinery. Petitioner can also store a limited volume of Coke in railcars. The Port facility at KCBX can also store some Coke at their Pier F facility on Chevron’s behalf. In the unlikely event there were no loading of ships, Chevron’s storage capacity at the Refinery and Port will be reached.

If the contract expiration results in situation where the Coke storage capacity at the Refinery is reached, Petitioner may need to temporarily store excess Coke outside of an enclosed structure. Such storage would take place within a reservoir containment basin below grade inside the Refinery. Emissions associated with storage the Coke outside of enclosed structure are estimated at 23.1 lbs./day of PM.

If an impasse on the contract is reached and a variance is not granted, Coke cannot be generated. As such, Petitioner would need to shut down the Coker and certain process units that either feed or receive feed from the Coker Unit. This would significantly impact production at the Refinery and result in more significant emissions to the environment than the small amount of excess PM emissions related to the variance. Transportation fuels product supplies into the market may also be impacted if the Coker unit were shut down for an extended period.

The facility RECLAIM Permit No. 800030, dated January 5, 2022 (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.

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.

<table>
<thead>
<tr>
<th>Equipment/Activity</th>
<th>Application/ Permit No.</th>
<th>RECLAIM Device No.</th>
<th>Date Application/Plan Denied (if relevant)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>STORAGE BUILDING, R-5010, COKE WITH WATER SPRAY AT TRANSFER POINT AND DOORS, NET CAPACITY 330,000 CU FT, (COMMON TO RAW &amp; RECLAIM COKE HANDLING), WIDTH: 130 FT; HEIGHT: 65 FT;</td>
<td>453091</td>
<td>D176</td>
<td>N/A</td>
</tr>
</tbody>
</table>

*Attach copy of denial letter

A copy of the relevant sections for the Facility Permit is attached as Exhibit 1.

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.

Coke is a necessary co-product of Refinery operations. The Refinery cannot operate and convert crude oil into transportation fuel products without the ability to handle and ship Coke. Shipment of Coke is necessary to the operation of the Refinery.

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

If yes, how often: Daily Visual & Quarterly for Coke Building  Date of last maintenance and/or inspection Daily. Describe the maintenance and/or inspection that was performed.

Operators perform daily inspections of the A-Frame and Coke handling equipment in the Coke building. In addition, operators inspect the water spray systems for the Coke building at least four times per year.
However, the root cause of the need for this petition is the contract expiration and potential work stoppage at the ports. The incident is outside of Petitioner's reasonable control. The Coke building is in good condition.

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).

<table>
<thead>
<tr>
<th>Rule</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>District Rules 203(b), 2004(f)(1) and 3002(C)(1) [for Administrative Condition No. 2]</td>
<td>District Rule 203(b) states that permitted equipment shall not be operated contrary to the conditions specified in the permit to operate. In addition, 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. For example, Administrative Condition No. 2 states that the operator shall maintain all equipment that ensures proper operation of the equipment. Because of the contract expiration, Petitioner will need to store Coke in open piles at the Refinery in violation of District rules and permit conditions.</td>
</tr>
<tr>
<td>District Rule 1158(d)</td>
<td>District Rule 1158(d)(2) provides that &quot;[t]he operator shall maintain all piles in enclosed storage.&quot; Because the contract expiration, Petitioner will need to store Coke in open piles at the Refinery in violation of District rules and permit conditions.</td>
</tr>
</tbody>
</table>

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☑

<table>
<thead>
<tr>
<th>Case No.</th>
<th>Date of Action</th>
<th>Final Compliance Date</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☑ No ☐

<table>
<thead>
<tr>
<th>Case No.</th>
<th>Date of Action</th>
<th>Final Compliance Date</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>831-393</td>
<td>May 19, 2022</td>
<td>May 25, 2022</td>
<td>District Permit Conditions requiring Cogen C Train not to exceed 9 ppmv NOx and CO concentrations of 10 ppmv. The tuning work for Cogen C Train has been completed.</td>
</tr>
</tbody>
</table>

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.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]
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 the District Rules and permit conditions listed above.

Coke produced at the Refinery is normally trucked to KCBX at the Port of Long Beach. Coke is loaded on ships by ILWU members for transport. The KCBX facility may be impacted by the ILWU contract expiration. However, Petitioner has contracts to ship Coke to overseas customers through the Port. This is handled by shipping Coke via truck from the Refinery to the Port. The contract expiration is between the ILWU and the Port shipping companies and does not involve Petitioner. Yet, this issue is impacting Refinery operations.

Petitioner has the ability to store Coke in an enclosure at the Refinery. However, the storage capacity for Coke is limited. Petitioner estimates that it would fill the enclosure at the Refinery with Coke in about two days. Storage of Coke in an enclosure is not an option if the contract expiration continues to impact Coke shipments.

Petitioner has investigated the ability to ship Coke from the Refinery by rail car. However, this is not a viable option for the Refinery. The rails have not been used for many years and may need to be repaired before heavy use. In addition, District Rule 1158(d)(12) requires that railcars used to ship Coke from the Refinery be covered with either a slot-type cover or a continuous tarp that covers the top of the railcar. Even if the rails were in good service, Petitioner has been unable to locate Coke railcars that can be covered as required by the District.

If an agreement is not reached, Petitioner may be left with no option but to store Coke in open piles or shut down process units that feed the Coker and related process units. The emissions related to shut down and restart of the Coker and related process units would be significant.

Petitioner can also store a limited volume of Coke in railcars. The Port facility at KCBX can also store some Coke at their Pier F facility on Chevron’s behalf. In the unlikely event there were no loading of ships, Chevron’s storage capacity at the Refinery and Port will be reached. Additional details on the status of Coke storage at the Refinery and the contract expiration can be provided at the hearing for Short Variance, if needed.

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)?

Petitioner is currently in compliance with applicable rules and regulations concerning the storage and shipment of Coke. Chevron will only store Coke in open piles as a last resort. Once Port operations have been restored, Petitioner will remove any open piles as expeditiously as possible.

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

Since learning of the contract expiration, Petitioner has evaluated its options of how to address the build-up of Coker inventory. However, none comply with District rules regulations. Petitioner has limited Coke storage capacity. Petitioner can also store a limited volume of Coke in railcars. The Port facility at KCBX can also store some Coke at their Pier F facility on Chevron’s behalf. In the unlikely event there were no loading of ships, Chevron’s storage capacity at the Refinery and Port will be reached. Additional details on the status of Coke storage, and the temporary below ground level containment reservoir identified for temporary storage at the Refinery and the contract expiration, can be provided at the hearing for Short Variance, if needed.

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 loss to the Refinery is estimated 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).

If the variance were denied, Petitioner will need to store Coke in open piles or be forced to shut down the Coker and related process units. This would result in significant fuel reductions from the Refinery and major economic
loss by Petitioner, estimated to be in excess of $1,000,000 per day. The loss would result in the practical closing of a lawful business without a corresponding benefit in reducing air contaminants.

In addition, there would be complications if upstream oil and gas production were impacted due to the inability to store or ship Coke. Certain upstream wells are closely tied to Refinery operations, such as certain wells located in San Joaquin Valley. If upstream wells needed to be shut in, some wells may never come back.

Petitioner estimates emissions of approximately 23.1 lbs./day of PM from the Coke storage pile. If a variance is not granted, however, Petitioner would have to shut down the Coker and certain process units that either feed or receive feed from the Coker Unit. This would significantly impact production and result in more significant emissions to the environment.

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

Petitioner has considered either curtailing or terminating its Refinery operations in lieu of obtaining a variance. However, Chevron cannot operate the subject equipment and remain in compliance with all applicable District rules and permit conditions. Achieving compliance through curtailment in 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.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>(A) Total Estimated Excess Emissions (lbs/day)</th>
<th>(B) Reduction Due to Mitigation (lbs/day)</th>
<th>(C)* Net Emissions After Mitigation (lbs/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM-10</td>
<td>23.1 lbs/day</td>
<td>N/A</td>
<td>23.1 lbs/day</td>
</tr>
</tbody>
</table>

* 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.

Emissions associated with storage the Coke outside of enclosed structure are estimated at 23.1 lbs./day of PM. A copy of the estimate of excess emissions is attached to the Petition as Exhibit 2.

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.

Petitioner will take reasonable steps to minimize possible excess emissions to the maximum extent feasible.

A copy of Petitioner's Proposed Short Variance Conditions is attached to the Petition as Exhibit 3.

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.
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.

Once normal operations have been restored and Chevron is able to resume shipment of Coke, the Refinery will remove any open piles as expeditiously as possible.

24. State the date you are requesting the variance to begin: ____________________________
and the date by which you expect to achieve final compliance: ____________________________

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.

Jentry Kear, Air Quality Inspector

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 June 14, 2022

[Signature]

Environmental Compliance Specialist

[Print Name]

26. SMALL BUSINESS: To be eligible for reduced fees (see District Rule 303) you must complete the following:

Declaration Re Small Business

1. I am an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

2. The petitioner is a business that meets the following definition of Small Business as set forth in District Rule 102:

SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

Youn May Attach Additional Pages If Necessary]
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:

<table>
<thead>
<tr>
<th>Equipment</th>
<th>ID No.</th>
<th>Connected To</th>
<th>RECLAIM Source Type/ Monitoring Unit</th>
<th>Emissions* And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Process 2: COKING AND RESID CONDITIONING</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>P13.1</td>
</tr>
<tr>
<td>CONVEYOR, BELT, K-5015, PIT SIDE, 445 FT. L., WITH A DRIVE MOTOR, K-5015 TO K-5017 TRANSFER POINT ENCLOSED AND VENTED TO A VENTURI SCRUBBER, A/N: 453091</td>
<td>D168</td>
<td>C4102</td>
<td>PM: (9) [RULE 405, 2-7-1986]</td>
<td>A63.13, D323.1</td>
<td></td>
</tr>
<tr>
<td>CONVEYOR, BELT, K-5017, TRANSFERRING RAW COKE FROM CONVEYOR K-5015 TO TRUCK LOAD STATION D-5040A, TRANSFER POINTS AT BOTH ENDS ALSO ENCLOSED, ENCLOSURE VENTILATED TO A BAGHOUSE, A/N: 453091</td>
<td>D4096</td>
<td>C4101</td>
<td>PM: (9) [RULE 405, 2-7-1986]</td>
<td>A63.13, D323.1, E57.5</td>
<td></td>
</tr>
<tr>
<td>BULK MATERIAL LOAD/UNLOAD STATION, D-5040A, 500 TON CAPACITY, CONSISTING OF A HOPPER AND TWO LOADING STATIONS, EQUIPPED WITH TELESCOPING CHUTES, CONVEYOR TRANSFER POINT ENCLOSED &amp; VENTILATED</td>
<td>D4097</td>
<td>C4101</td>
<td>PM: (9) [RULE 405, 2-7-1986]</td>
<td>A63.13, D323.1</td>
<td></td>
</tr>
<tr>
<td>STORAGE BUILDING, R-5010, COKE, WITH WATER SPRAY AT TRANSFER POINT AND DOORS, NET CAPACITY 330,000 CU FT, (COMMON TO RAW &amp; RECLAIM COKE HANDLING), WIDTH: 130 FT; HEIGHT: 65 FT; LENGTH: 175 FT, A/N: 453091</td>
<td>D176</td>
<td></td>
<td>PM: (9) [RULE 405, 2-7-1986]</td>
<td>A63.13, D323.1</td>
<td></td>
</tr>
<tr>
<td>CONVEYOR, BELT, K-5050, RAIL CAR LOADING, LENGTH: 120 FT, WITH A DRIVE MOTOR (COMMON TO RAW &amp; RECLAIM COKE HANDLING)</td>
<td>D180</td>
<td></td>
<td>PM: (9) [RULE 405, 2-7-1986]</td>
<td>A63.13, D323.1</td>
<td></td>
</tr>
</tbody>
</table>

* (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:

For the purpose of demonstrating the exemption from PSD requirements, the operator shall calculate the annual NOx and SOx emissions by using daily emission data reported to the AQMD pursuant to Reg. XX.

[RULE 1703 - PSD Analysis, 10-7-1988; 40CFR 52.21 - PSD, 6-19-1978]

[Devices subject to this condition : D2207]

A63.13 The operator shall limit emissions from this equipment as follows:

<table>
<thead>
<tr>
<th>CONTAMINANT</th>
<th>EMISSIONS LIMIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visible emissions</td>
<td>Less than or equal to 10 Percent opacity</td>
</tr>
</tbody>
</table>

[RULE 1158, 7-11-2008]

[Devices subject to this condition : D166, D167, D168, D170, D171, D172, D173, D174, D175, D176, D177, D178, D179, D180, D182, D183, D3549, D3550, D3554, D3559, D4094, D4095, D4096, D4097]

A63.17 The operator shall limit emissions from this equipment as follows:

<table>
<thead>
<tr>
<th>CONTAMINANT</th>
<th>EMISSIONS LIMIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Less than or equal to 3550 LBS IN ANY CALENDAR MONTH</td>
</tr>
<tr>
<td>VOC</td>
<td>Less than or equal to 2590 LBS IN ANY CALENDAR MONTH</td>
</tr>
<tr>
<td>PM10</td>
<td>Less than or equal to 5436 LBS IN ANY CALENDAR MONTH</td>
</tr>
</tbody>
</table>
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:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

1). Stack or emission point identification;

2). Description of any corrective actions taken to abate visible emissions;

3). Date and time visible emission was abated; and

4). All visible emission observation records by operator or a certified smoke reader.
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 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 401, 3-2-1984]

[Devices subject to this condition: D166, D167, D168, D170, D171, D172, D173, D174, D175, D176, D177, D178, D179, D180, D182, D183, D317, D318, D319, D320, D323, C326, C327, C1904, D1906, D1907, C3171, D3549, D3550, D3554, D3559, D3571, D4094, D4095, D4096, D4097, D4384, D4485]
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 supersede 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
Exhibit 2

EXCESS EMISSIONS CALCULATIONS
CHEVRON PRODUCTS COMPANY
CASE NO. 831-394

Excess emissions associated with storing coke in a structure that is not enclosed come from three stages:

1. Dropping the coke into the pile, 0.235 lb PM/day,
2. Wind erosion on the pile surface, 23.1 lb PM/day, and
3. Removing coke from the pile, 0.235 lb PM/day.

The calculations of emissions include the following assumptions:

1. Coke will be wetted
2. Average wind speed is 8 miles/hr
3. Material moisture content is 10%
4. Acreage of the pile is 3.5

Emissions from placing the coke into the pile and removing the coke were calculated using the following formula:

\[
E = \frac{13.2}{2000} \left( \text{Number of Active Days} \right) \left( \text{Acreage of the Pile} \right) \left( \text{Control Factor} \right)
\]

Where:

\[
\begin{align*}
E & = \text{emissions factor (lb/ton)} \\
k & = \text{particle size multiplier (dimensionless)} \\
U & = \text{mean wind speed (miles/hr)} \\
N & = \text{Emissions from wind erosion were}
\end{align*}
\]

\[
E = \frac{13.2}{2000} \left( \text{Number of Active Days} \right) \left( \text{Acreage of the Pile} \right) \left( \text{Control Factor} \right)
\]

Where:

\[
\begin{align*}
E & = \text{Emissions from the pile (tons/yr)} \\
\text{Number of Active Days} & = \text{Days per year where there is at least 8 hours of activity occurring at the piles} \\
\text{Control Factor} & = \text{For wet material, the control factor is 0.5} \\
& \quad \text{For sprayed material, the control factor is 0.3} \\
& \quad \text{For dry material, the control factor is 1}
\end{align*}
\]
Exhibit 3

CHEVRON PRODUCTS COMPANY
CASE NO. 831-394
PROPOSED SHORT VARIANCE CONDITIONS

1. Chevron Products Company (Chevron) shall inform South Coast Air Quality Management District (District) Compliance personnel and the Clerk of the Hearing Board in writing at least twenty-four (24) hours prior to the initiation of an open storage pile.

2. Chevron shall provide a water spray to control fugitive dust emissions from any open storage pile.

3. Chevron shall conduct a test to determine percent moisture content of any open storage pile in accordance with Rule 1158(h)(1). Chevron shall provide copies of its monitoring records to the District upon request.

4. Chevron shall notify the Clerk of the Hearing Board in writing by facsimile transmission at (909) 396-3317 upon achieving final compliance in this matter.

5. Chevron shall pay all applicable fees, if any, by __________, 2022 or this variance shall be invalidated pursuant to Rule 303(m)(2).