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SOUTH COAST AIR QUALITY
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BEFORE THE HEARING BOARD
OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

CHEVRON PRODUCTS COMPANY
(Facility ID No. 800030)

Petitioner,

Case No. 831-405

**DECLARATION OF ANDRE WEST IN
SUPPORT OF CHEVRON PRODUCTS
COMPANY'S PETITION FOR SHORT
VARIANCE AND ALTERNATIVE
OPERATING CONDITIONS**

Hearing Date: April 1, 2025
Time: Consent Calendar

I, Andre West, hereby declare:

1. I am the Environmental Compliance Specialist for Chevron Products Company ("Chevron") El Segundo, California petroleum refinery, located at 324 West El Segundo Boulevard, El Segundo, California 90245 (the "Refinery"). I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto under oath.

2. I am familiar with the contents of the Petitions for Short Variance ("Variance") and Alternative Operating Condition ("AOC") ("collectively, "Petitions") filed by Chevron in Case No. 831-405 on March 12, 2025.

3. This Declaration is submitted pursuant to District Hearing Board ("Board") Rule 4 in support of Chevron's Petitions, and for its consideration on the Board's Consent Calendar. The Petitions and supporting Exhibits 1 through 7 are incorporated herein by reference.

4. Chevron owns and operates the Refinery, which is in the business of petroleum refining. Key processes at the Refinery include cracking of heavy petroleum hydrocarbons in the Refinery's FCCU, processing and treatment of crude oil feed in the Crude Unit, on-site production of hydrogen utilized in refining, storage and loading of gasoline and other finished petroleum products, and operation of numerous air pollution control systems.

5. Chevron has filed the Petitions to seek relief to allow the required periodic maintenance of the V-3 and V-4 Caustic Scrubbers (Device ID Nos. C1738 and C1739), as the Caustic Scrubbers cannot be taken out of service for maintenance without violating certain provisions of District Rules and Conditions of the Facility Permit.

6. The Caustic Scrubbers are American Petroleum Institute (API) scrubbers designed to strip vent gases of H₂S prior to release to the atmosphere. The Caustic Scrubbers are listed in the Facility Permit as connected to, and controlling the emissions from, Resid Tank T425 (Device ID No. D1313), Tank T426 (Device ID No. D1282) and Tank T430 (Device ID No. D1283) ("Hot Tanks").

7. The Hot Tanks and Caustic Scrubbers are essential to Refinery operations. The Hot Tanks are used as surge storage vessels between the Refinery's Crude Units and 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.

8. Pursuant to applicable federal and state regulations as well as industry standards, the Caustic Scrubbers and Hot Tanks generally are regularly maintained using a combination of frequent external inspections and scheduled periodic outages for major maintenance. Consistent with this, Chevron routinely conducts planned and unplanned preventative maintenance on the

subject equipment, which is well maintained according to industry standards and District requirements.

9. Chevron has determined that it is time to perform such periodic maintenance activities to ensure the reliable operation of the Caustic Scrubbers. Specifically, equipment upstream of the Caustic Scrubbers will be cleaned and internals inspected and replaced as needed to ensure the equipment is functioning properly. Valves that have been found to be obsolete will be replaced, and valves that have been deemed to be vital to unit operation will be serviced. These maintenance activities also will prevent sludge material from flowing from the upstream equipment to the Caustic Scrubbers. The Scrubbers will also be taken out of service to be cleaned and to replace their internals as needed.

10. To ensure safe access for facility personnel, maintenance on the Caustic Scrubbers cannot be completed while the Scrubbers remain operational and connected to the listed equipment. The maintenance work is necessary and required to continue the safe and reliable operation of the Caustic Scrubbers while the Hot Tanks are allowed to continue in operation.

11. Disconnection of the Caustic Scrubbers from the Hot Tanks will mean that Chevron cannot reasonably avoid noncompliance with certain District Rules and Permit Conditions. Specifically:

- a. Permit Condition C8.8 requires in relevant part that the Refinery "shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 10 gpm." Because the Caustic Scrubbers will be temporarily taken out of service for maintenance, Chevron cannot comply with the minimum flow rate limit in this condition during the maintenance period, and a variance is needed to complete the proposed maintenance work.
- b. Section E of Chevron's Permit, Administrative Condition E.4 provides that "[t]he 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.” The Caustic Scrubbers are identified in the Permit as being emissions control devices for the Hot Tanks. When the Caustic Scrubbers are offline for repairs, and until they are returned to compliant steady-state operation, they will not be in “full use” or fully controlling emissions from the Hot Tanks.

- c. Under District Rule 203(b), equipment that is required to have a permit shall not be operated contrary to the Conditions specified in the permit to operate. District Rule 2004(f)(1) and Rule 3002(c)(1) reiterate the requirement to comply with all Permit Conditions. Because Chevron will be unable to comply with the various District Rules and Regulations and its Title V Permit Conditions listed in the Petitions until maintenance on the Scrubbers is completed and all subject equipment is returned to compliant steady-state operation, Chevron will need a Variance and AOC relief from these Rules to allow the Refinery to continue operating the units normally controlled by the Scrubbers until this maintenance work is completed.

12. During the maintenance on the Caustic Scrubbers, Chevron plans to operate a fully permitted, portable scrubber rented from Envent Corporation (Envent Scrubber) to control emissions from the Hot Tanks. The Envent Scrubber will be connected to the Hot Tanks vent line at all times that the Caustic Scrubbers are out of service to ensure emissions are controlled. Accordingly, there will be no net increase in emissions and no excess emissions associated with the outage of the Caustic Scrubbers.

13. The maintenance period is expected to take no more than nine weeks starting April 7, 2025, and ending June 9, 2025, well within the 90-day relief period allowable for a short variance. 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.

14. During the maintenance work, Chevron will also continue its usual monitoring of emissions using its permitted CEMS and other monitoring devices. All monitoring and reporting conditions required under permits for the Envent Scrubber will be followed.

15. If this variance is denied and Chevron is forced to shut down the Hot Tanks to conduct the required maintenance, it may result in the shutdown of other key Refinery process units, flaring, and/or other excess emissions, and may potentially result in the shutdown of the Refinery. If Chevron were forced to shut down units, it may result in a corresponding reduction in supply of gasoline, diesel, jet fuel and other petroleum products to the market, and downstream adverse impacts to California citizens who rely on those transportation fuels. A shutdown of the Hot Tanks also may result in potential environmental impacts associated with increased flaring and wastewater discharges due to the shutdown and subsequent startup of the Refinery. In contrast, operation under the requested Variance and AOC is not expected to result in any excess emissions and will have a net benefit for the environment.

16. The need for the variance does not stem from operator error or neglect. The Caustic Scrubbers have been properly inspected and maintained. The maintenance work will allow for routine inspection and replacement of equipment internals upstream of the Caustic Scrubbers, which will better remove sludge that can negatively impact the Scrubber pumps' function. This, in turn, will help ensure the continued reliable and effective operation of the Caustic Scrubbers, which is critical to minimizing excess emissions.

17. Chevron 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 while it conducts maintenance to the Caustic Scrubbers. Completing this maintenance safely requires temporary shutdown of the Scrubbers, which will necessarily cause the rule and condition violations discussed above. Thus, achieving compliance through curtailment is not an option in this matter.

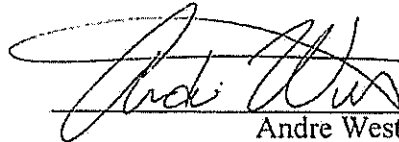
18. Finally, Chevron intends to achieve compliance with the applicable provisions of District Rules and Regulations by working to minimize the maintenance period and returning the

subject equipment back into service. Final compliance will be achieved when the Scrubbers are reconnected to the Caustic Tank equipment and restarted.

19. Chevron and the District have agreed to proposed Variance Conditions as provided in the Proposed Findings and Decision (Exhibit 7) filed concurrently herewith.

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

Executed this 27 day of March 2025, in the County of Los Angeles, State of California.


Andre West