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8 Attorneys for Petitioner
9 Chevron Products Company

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11 **BEFORE THE HEARING BOARD OF THE**
12 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

13 In the Matter of

14 CHEVRON PRODUCTS COMPANY,

15 [Facility I.D. No. 800030]

16 Petitioner,

17 vs.

18 SOUTH COAST AIR QUALITY MANAGEMENT
19 DISTRICT,

20 Respondent.

Case No. 831-407

DECLARATION OF ANDRE WEST
FOR CHEVRON PRODUCTS
COMPANY TO THE HEARING BOARD

Date: August 20, 2025
Time: Consent Calendar

21 Petitioner Chevron Products Company (“Chevron”) hereby submits this Declaration of
22 Andre West, HSE Environmental Compliance Specialist, to the Hearing Board:

23 1. Chevron owns and operates a refinery located at 324 W. El Segundo Boulevard,
24 El Segundo, California (“Refinery”). The Refinery is a major producer of fuel, refining crude oil
25 and intermediates for gasoline, diesel and jet fuel.

26 2. Chevron will be in violation of District Rules 203(b), 2004(f)(1) and 3002(c)(1)
27 because such District Rules require Chevron to comply with all Facility Permit conditions, and

1 Chevron will not be able to do so when the subject equipment is taken out of service for
2 maintenance and repairs.

3 3. A copy of the relevant sections of the facility RECLAIM Permit No. 800030,
4 dated March 20, 2025, are attached to the Petition as Exhibit 1.

5 2. Chevron requires a short variance to clean fouling from the surfaces of the
6 furnace tubes in the F-201A Furnace (Furnace) at the Refinery while in operation. Fouling is a
7 byproduct of the combustion process and periodically requires removal to prevent overheating
8 and potential failure.

9 3. While the fouling is removed, the SCR must be bypassed to prevent damage.
10 Accordingly, Chevron will not be able to maintain compliance with all Facility Permit
11 conditions in accordance with District Rules 203(b), 2004(f)(1) and 3002(c)(1), while it
12 removes fouling from the surface of the Furnace tubes at the Refinery while in operation.

13 4. Compliance is beyond Chevron's reasonable control. Chevron is currently in
14 compliance with applicable District Rules and permit conditions. However, unless Chevron
15 removes the fouling from the surfaces of the Furnace tubes, the Furnace tubes may be damaged
16 and the SCR system that controls NOx from the Furnace may overheat. Currently, the SCR
17 has experienced higher temperature readings at the inlet. The SCR receives flue gas from the
18 Furnace. Higher SCR inlet temperatures are the result of fouling on the exterior of the Furnace
19 tubes. Fouling of the Furnace tubes prevents sufficient heat transfer on the tubes resulting in
20 higher flue gas temperatures being routed from the Furnace to the SCR. Continued operation of
21 the Furnace and the SCR at current higher temperatures may exceed the SCR design limits
22 with damage to the SCR catalyst. Damage to the SCR would eventually result in an
23 exceedance of the permitted NOx limit of 5 ppm in the Facility Permit. Compliance is beyond
24 Chevron's reasonable control because exterior cleaning of the Furnace tubes must be
25 performed and the SCR must be bypassed to prevent removed foulant from traveling
26 downstream impacting SCR catalyst. Chevron has maintained the subject equipment in
27 compliance with industry standards.

1 5. Chevron expects that the cleaning of the Furnace tubes can be completed in
2 approximately 3 weeks. Chevron is working diligently to plan and execute cleaning operations
3 to reduce SCR temperature back to normal operating conditions. However, during this
4 maintenance work, the SCR must be bypassed to prevent damage and there is no way to isolate
5 the Furnace to complete the cleaning. Administrative Condition No. 2 requires the operator to
6 maintain all equipment and ensure the proper operation of the equipment, Administrative
7 Conditions Nos. 4 and 5, require SCR operation, and in turn, District Rules 203(b), 2004(f)(1)
8 and 3002(c)(1), require compliance with permit conditions. Because the SCR must be
9 bypassed while the Furnace is at minimum rates, Chevron cannot operate the Furnace in
10 compliance with all applicable rules and permit conditions while the maintenance is being
11 performed and a variance is required.

12 6. Denial of the variance would cause significant harm to Chevron in that Chevron
13 may be forced to shut down and then restart certain Refinery process units while the repairs are
14 performed. The shutdown of the Refinery would result in a financial penalty to Chevron of
15 approximately \$1,00,000 per day in lost production and sales. Further, a permanent shutdown
16 would result in the loss of large numbers of permanent jobs and would greatly depreciate the
17 capital invested in the Refinery. A permanent shutdown of the Refinery may also have a
18 significant impact on regional petroleum markets.

19 7. The closing or taking would be without a corresponding benefit in reducing air
20 contaminants because without the variance, Chevron would be required to shut down and restart
21 the Refinery units, resulting in flaring and air emissions. There will be no excess emissions in
22 this matter.

23 8. Chevron will maintain the NOx emissions in compliance with the 5 ppm limit.
24 The granting of the variance request would benefit the environment by eliminating the risk of
25 excess emissions from if Chevron were forced to shut down the Furnace for cleaning. And,
26 without the subject equipment in service, the Refinery cannot meet demand for high quality,
27 CARB 3 compliant gasoline. Chevron also anticipates that completion of Furnace tube cleaning
will improve Furnace efficiency resulting in the firing down of the furnace and subsequently

1 produce less emissions. As such, the granting of the short variance should lead to long-term
2 gains in efficiency and reductions in overall Refinery emissions.

3 9. Chevron has considered the option of curtailing or terminating operations in lieu
4 of obtaining a variance. However, Chevron cannot immediately curtail or terminate operations
5 because doing so would be expected to lead to excess emissions and potentially the need for
6 flaring due to the shutdown and startup of Refinery units. In comparison, Chevron does not
7 anticipate excess emissions if the variance were granted, as rates will be minimized to maintain
8 compliance with the 5 ppm NOx limit at the Furnace.

9 10. Chevron has also examined the option of shutting down the Furnace to remove
10 the fouling. However, the Furnace cannot be isolated. Other Refinery units may also need to be
11 shut down and restarted with the Furnace. Chevron has determined that shutting down the
12 Furnace would result in higher economic losses and would also have a higher impact to the
13 environment in terms of NOx. If the Furnace is shutdown, cleaned, and started back up, the NOx
14 emissions from the Furnace would be much greater. There are no excess emissions in this
15 matter.

16 11. As mentioned above, during the period that the variance is in effect, there will be
17 no excess emissions and the NOx levels will be controlled to comply with the 5 ppm limit.
18 Nonetheless, Chevron agrees to reduce excess emissions to the maximum extent feasible by
19 complying with the conditions of the Order. Specifically, to mitigate excess emissions, Chevron
20 will use natural gas in the Furnace and fire duty will be reduced to minimum rates. In addition,
21 the 2 Crude Unit will be limited to minimum feed rates and held steady to control and reduce
22 NOx emissions from the Furnace.

23 12. Chevron will monitor emissions during the variance period. The Refinery is
24 equipped with Continuous Emissions Monitoring Systems (CEMS) to continuously monitor,
25 record and report to the District air emissions from the Refinery. The emissions monitoring data
26 will be provided to the District upon request.

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FOR CHEVRON PRODUCTS COMPANY:

Dated: August 15, 2025

By: 
Andre West
HSE Environmental Compliance Specialist
Chevron Products Company