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Attorneys for Petitioner
Chevron Products Company

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

In the Matter of

CHEVRON PRODUCTS COMPANY,

[Facility I.D. No. 800030]

Petitioner,

vs.

SOUTH COAST AIR QUALITY MANAGEMENT
DISTRICT,

Respondent.

Case No. 831-408

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

Date: December 2, 2025
Time: Consent Calendar

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

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

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

1 Chevron requires a variance because although Isomax CEMS 13 is operational, Chevron will be
2 unable to perform the relative accuracy test audit (“RATA”) for CEMS 13 that is required before
3 December 3, 2025, until the Isomax can be restarted after the completion of repairs. Chevron
4 will also be unable to timely conduct ammonia source testing as required before December 31,
5 2025, by Permit conditions. Accordingly, Chevron will not be able to maintain compliance with
6 all Facility Permit conditions in accordance with District Rules 203(b), 2004(f)(1) and
7 3002(c)(1), because it will be unable to perform the RATA for CEMS 13 or ammonia source
8 testing at F-720 and F-731. In addition, Chevron will be in violation of District Rule 2011(f)(6)
9 and District Rule 2012(h)(6), which require that Chevron install, operate, and maintain Isomax
10 CEMS 13 no later than 12-months after the initial startup of the major SOx or NOx source,
11 respectively. The District recently informed Chevron that the Refinery has a SOx RATA
12 requirement for the subject equipment based on the accuracy of the SOx orifice plate and fuel
13 flow. Isomax CEMS 13 is working, calibrating, and passing validation, but the RATA testing
14 cannot be performed within the 12-month timeframe required by Rules 2011(f)(6) and
15 2012(h)(6).

16 3. A copy of the relevant sections of the facility RECLAIM Permit No. 800030,
17 dated October 9, 2025, are attached to the Petition as Exhibit 1.

18 4. In 2024, work at the Isomax, including F-720 and F-731, was performed to install
19 a SCR as part of upgrades. These modifications were required under Rule 1109.1 to reduce
20 NOx. Currently, Isomax CEMS 13 is working, calibrating, and passing validation to ensure
21 compliance with District emissions monitoring requirements. Certification testing on Isomax
22 CEMS 13 was scheduled to be performed in October of 2025 in advance of the deadline of
23 December 3, 2025.

24 5. On Thursday, October 2, 2025, there was a fire at the Isomax, which caused an
25 unforeseen emergency shutdown of the unit. The incident was unexpected and unforeseeable.
26 Chevron launched an investigation to determine the root cause of the incident. The investigation
27 remains ongoing.

1 6. Chevron was able to inspect the Isomax unit area after the incident. At that time,
2 Chevron discovered that both Isomax F-720 and F-731 were damaged and required repairs. The
3 Isomax has remained shutdown since the fire event. The furnaces will not be brought online
4 until repairs are completed.

5 7. Chevron will be unable to perform certification testing on CEMS 13 or the
6 quarterly source testing for ammonia at the furnaces due to the incident and non-operation of
7 F-720 and F-731. Chevron is working diligently on the repair of the subject equipment so that
8 the RATA and ammonia source testing can be performed on CEMS 13 as soon as practicable.
9 Chevron anticipates that the equipment will be brought back online and the RATA performed
10 on CEMS 13 and ammonia source testing conducted no later than September 30, 2026.

11 8. Chevron has launched an internal investigation to determine the root cause of
12 the incident which remains ongoing. The incident was unexpected and unforeseeable. The
13 subject equipment is inspected and maintained in accordance with industry practices. Chevron
14 conducts daily validation of Isomax CEMS 13. In particular, CEMS 13 undergoes daily and
15 monthly preventative maintenance for the CEMS system in addition to NOx efficiency testing
16 and ammonia testing. While maintenance was performed, the incident was unforeseen. Due to
17 the incident, compliance with all applicable District rules and Facility Permit conditions is
18 beyond Chevron's reasonable control because although CEMS 13 remains operational, the
19 Isomax will be down and cannot be operated such that Chevron cannot perform the RATA for
20 CEMS 13 as required by Permit Condition D82.18 and District Rule and 2012(h)(6) until the
21 furnaces are repaired and brought back online. For the same reasons, Chevron cannot perform
22 the quarterly ammonia source testing within the timeframe required under Permit Condition
23 D29.29. Petitioner will also be in violation of District Rule 2011(f)(6), which requires that
24 Petitioner install, operate, and maintain all required monitoring, reporting, and recordkeeping
25 systems no later than 12 months after the initial startup of new major SOx sources. Chevron
26 will also be in violation of Administrative Condition No. 2, requiring that Chevron maintain all
27 equipment and ensure proper operation of the equipment. As such, Chevron will therefore be

1 in violation of District Rules 203(b), 2004(f)(1) and 3002(c)(1), which require compliance with
2 permit conditions.

3 9. Because of the incident, Chevron cannot remain in compliance with all District
4 rules and permit conditions during the variance period. Although CEMS 13 remains operational
5 and is calibrating, the Isomax will be down and cannot be operated. Chevron will be unable to
6 perform the RATA for CEMS 13 until the Isomax and related furnaces (F-720 and F-731) can be
7 restarted. As such, Chevron will be unable to comply with all applicable District rules and
8 permit conditions during that time. Without a variance, Chevron may be subject to fines and
9 penalties due to noncompliance with District rules and permit conditions. Chevron is working
10 diligently to stabilize and startup units due to the Isomax incident.

11 10. The closing or taking would be without a corresponding benefit in reducing air
12 contaminants because there will be no excess emissions if the variance is granted. While CEMS
13 13 is operational, the furnaces are not. Chevron is working diligently to repair damage at Isomax
14 furnaces F-720 and F-731. The furnaces will not be brought back online until the repairs are
15 complete. In addition, Chevron is agreeing to continue to operate and calibrate CEMS 13 for the
16 duration of the variance period, and report NOx and SOx emissions for Isomax furnaces F-720
17 and F-731 on a monthly basis pursuant to the requirements of District Rule 2011(f)(2) and (f)(3)
18 and District Rule 2012(h)(2) and (h)(3) until Provisional Approval is issued pursuant to Rule
19 2011, Appendix A, Chapter 2, paragraph B. 14 and Rule 2012, Appendix A, Chapter 2,
20 paragraph B.13.

21 11. Chevron has considered the option of curtailing or terminating Furnace operations
22 in lieu of obtaining a variance, but achieving compliance through curtailment is not an option
23 here. To comply with applicable District rules and permit conditions, the RATA on CEMS 13
24 and quarterly source testing for ammonia needs to be performed to achieve compliance in this
25 matter. The furnaces will not be brought back online until repairs are complete, and Chevron
26 cannot perform the RATA or ammonia source testing until the furnaces are back online.
27 Curtailment or termination of operations will not achieve final compliance in this matter. The
subject furnaces require repairs and will remain non-operational for nearly all the duration of this

1 variance. Chevron anticipates that the equipment will be brought back online and the RATA on
2 CEMS 13 and source testing performed no later than September 30, 2026. There are no excess
3 emissions if the variance were granted.

4 12. As mentioned above, during the period that the variance is in effect, there will be
5 no excess emissions because the subject equipment is non-operational. Nonetheless, Chevron
6 agrees to reduce excess emissions to the maximum extent feasible by complying with the
7 conditions of the Order. Specifically, to mitigate excess emissions, Chevron will continue to
8 operate and calibrate CEMS 13 for the duration of the variance period, and report NOx and SOx
9 emissions for Isomax furnaces F-720 and F-731 on a monthly basis pursuant to the requirements
10 of District Rule 2011(f)(2) and (f)(3) and District Rule 2012(h)(2) and (h)(3) until Provisional
11 Approval is issued pursuant to Rule 2011, Appendix A, Chapter 2, paragraph B.14 and Rule
12 2012, Appendix A, Chapter 2, paragraph B.13.

13 13. Chevron will monitor emissions during the variance period. The equipment in
14 this matter will be monitored by CEMS 13. While under provisional certification, CEMS 13 is
15 operational while Chevron continues to investigate the incident. The Isomax furnaces F-720 and
16 F-731 will not be operational. As such, Chevron expects the CEMS to record zero emissions
17 from the equipment during the variance period. Chevron will monitor, record and report to the
18 District air emissions from the Refinery in accordance with the conditions of the Order.

19 **FOR CHEVRON PRODUCTS COMPANY:**

20 Dated: November 21, 2025

21 By: Andre West
22 Andre West
23 HSE Environmental Compliance Specialist
24 Chevron Products Company
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