

**From:** [Mohan Balagopalan](#)  
**To:** [Clerk of Board](#)  
**Subject:** Re: Case No. 831-408 - proposed consent calendar documents  
**Date:** Tuesday, November 25, 2025 12:27:35 PM  
**Attachments:** [image001.png](#)

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Hi,

Thanks for the response. With the change to include the permit conditions, I have no issue with this case to be heard on Consent Calendar.

Mohan Balagopalan

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**From:** Clerk of Board <Front\_PC@aqmd.gov>  
**Sent:** Tuesday, November 25, 2025 12:22:54 PM  
**To:** Mohan Balagopalan [REDACTED]  
**Subject:** FW: Case No. 831-408 - proposed consent calendar documents

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**From:** Chris.Norton@LW.com <Chris.Norton@LW.com>  
**Sent:** Tuesday, November 25, 2025 12:14 PM  
**To:** Clerk of Board <Front\_PC@aqmd.gov>; Samantha.Seikkula@lw.com  
**Cc:** Ryan Mansell <rmansell@aqmd.gov>; Aron.Potash@lw.com  
**Subject:** [EXTERNAL] RE: Case No. 831-408 - proposed consent calendar documents

Good afternoon, Clerk of the Boards. Please see our responses to questions on the consent calendar for Chevron's regular variance for Isomax (Case No. 831-408). In addition, enclosed is a revised version of the Proposed Findings and Order in this matter.

Did the fires at the Isomax heaters on October 2, 2025, also affect the SCR system and the ammonia injection system that vents these heaters?

- Yes. The Isomax fire affected the SCR and the ammonia injection systems that vents these heaters. Because of the fire, the SCR and ammonia injection systems are not currently operational and cannot be used at this time. Please note that the Isomax is currently down for repairs. With the equipment out of service, the Isomax is not generating emissions.

Shouldn't the order state that variance relief from Conditions D82.18 and D 29.29 is

needed instead of Rule 2011(f)(6) and 2012(h)(6), as these conditions are more specific to the situation? Aren't these heaters already major sources of NOx and SOx, and due to the requirements of Rule 1109-1, SCR was added to control these emissions and the CEMS has to be installed and operated no later than 12 months after the startup of the SCR and comply with the requirements of Rule 2011 and Rule 2012.

- We agree. As shown in the Proposed Findings, the Order should state that variance relief from Conditions D82.18 and D 29.29 is also required. We proposed to revise the Proposed Order and refile with this change. See attached. Furthermore, the commentor is correct in that the subject furnaces are major sources of NOx and SOx. Due to the requirements of Rule 1109.1, SCR was added to control Isomax emissions. The CEMS was installed and operated no later than 12 months after the startup of the SCR to comply with the requirements of Rule 2011 and Rule 2012. The regular variance in this matter should allow Petitioner to complete the work following the Isomax repairs.

Please note that the parties have conferred on this matter and the District concurs with the responses.

We are available to address these questions in more detail if required. Thank you.

**Christopher H. Norton**

**LATHAM & WATKINS LLP**  
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20th Floor  
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Direct Dial: +1.714.755.8084  
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**From:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>

**Sent:** Tuesday, November 25, 2025 8:03 AM

**To:** Seikkula, Samantha (SD) <[Samantha.Seikkula@lw.com](mailto:Samantha.Seikkula@lw.com)>

**Cc:** Ryan Mansell <[rmansell@aqmd.gov](mailto:rmansell@aqmd.gov)>; Norton, Chris (OC) <[Chris.Norton@LW.com](mailto:Chris.Norton@LW.com)>; Potash, Aron (LA) <[Aron.Potash@lw.com](mailto:Aron.Potash@lw.com)>

**Subject:** FW: Case No. 831-408 - proposed consent calendar documents

Good morning,

Please provide a response to the below questions.

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**From:** Mohan Balagopalan  
**Sent:** Tuesday, November 25, 2025 8:00 AM  
**To:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Subject:** Re: Case No. 831-408 - proposed consent calendar documents

Hi,

I have some questions.

1. Did the fires at the Isomax heaters on October 2, 2025, also affect the SCR system and the ammonia injection system that vents these heaters?
2. Shouldn't the order state that variance relief from Conditions D82.18 and D 29.29 is needed instead of Rule 2011(f)(6) and 2012(h)(6), as these conditions are more specific to the situation? Aren't these heaters already major sources of NOx and SOx, and due to the requirements of Rule 1109-1, SCR was added to control these emissions and the CEMS has to be installed and operated no later than 12 months after the startup of the SCR and comply with the requirements of Rule 2011 and Rule 2012.

Please advise. Thanks.

Mohan Balagopalan

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**From:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Sent:** Friday, November 21, 2025 4:17 PM  
**Subject:** FW: Case No. 831-408 - proposed consent calendar documents

Good afternoon,

The parties are requesting to place Chevron on Consent Calendar. Please be advised with the holiday next week, we will need a response **by Tuesday the 25<sup>th</sup> by 4pm** to ensure there is time to address any questions or concerns you may have.

Thank you,

**Clerk of the Boards**  
**South Coast AQMD**



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**From:** [Samantha.Seikkula@lw.com](mailto:Samantha.Seikkula@lw.com) <[Samantha.Seikkula@lw.com](mailto:Samantha.Seikkula@lw.com)>

**Sent:** Friday, November 21, 2025 3:40 PM

**To:** Clerk of Board <[clerkofboard@aqmd.gov](mailto:clerkofboard@aqmd.gov)>

**Cc:** Ryan Mansell <[rmansell@aqmd.gov](mailto:rmansell@aqmd.gov)>; [Chris.Norton@LW.com](mailto:Chris.Norton@LW.com); [Aron.Potash@lw.com](mailto:Aron.Potash@lw.com)

**Subject:** [EXTERNAL] Case No. 831-408 - proposed consent calendar documents

Good afternoon,

Please find attached proposed consent calendar documents in connection with Hearing Board Case No. 831-408, agreed to with District counsel (copied). These documents include: (1) the parties' Stipulation to place the matter on the consent calendar; (2) Proposed Findings and Order; and (3) a signed Declaration from Andre West, HSE Environmental Compliance Specialist. The matter is scheduled for Tuesday, December 2.

Thank you so much for your assistance, and please let us know of any questions.

Best,

**Samantha K. Seikkula**

*she/her/hers*

**LATHAM & WATKINS LLP**

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