

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

SOUTH COAST AQMD
CLERK OF THE BOARDS

SEP 29 PM 4:23

EV
11/13/25

PETITIONER: CHEVRON PRODUCTS COMPANY CASE NO: 831-409
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 Zip 90245	Costa Mesa, CA Zip 90245
☎ (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 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 for the region. There is good cause for the Hearing Board to review the emergency variance petition (Petition) in this matter. Petitioner is filing this Petition in response to an incident at the Refinery which was both unexpected and unforeseen.

On Monday, October 27, 2025, Petitioner identified a leak on a spent catalyst line between the regenerator and reactor at the Fluidized Catalytic Cracking Unit (FCCU). The leak was found during routine Operator rounds and is located in an elevated part of the reactor structure. The leak on the spent catalyst line resulted in Operations stopping the feed at the FCCU. This caused the Electrostatic Precipitator (ESP) to trip offline at 12:30 AM on October 28, 2025. The loss of the ESP led to an FCCU opacity exceedance of greater than 20%.

At 12:45 AM on October 28, 2025, a Breakdown condition was called into the District (Notification #862289) due to an opacity exceedance of 20% at the FCCU. The District responded to the incident. Significant efforts are being made to complete the repairs and return the FCCU to full service.

Petitioner plans to shut down the K-10 Main Air Blower on the FCCU to make the repairs to the spent catalyst line. This will allow for inspection of the line and should significantly reduce the risk of an opacity exceedance going forward. Petitioner anticipates elevated opacity when the FCCU is brought back into full service.

Petitioner requests an emergency variance, beginning today and ending on Friday, November 14, 2025, to allow Petitioner to make the repairs and return the FCCU at the Refinery to full service.

Petitioner has filed a petition for regular variance for additional time to perform CEMS certification and ammonia source testing at two furnaces at Isomax. These two furnaces were damaged in the Isomax fire and require repair before the testing can be completed. The regular variance and incident at Isomax are not related to the request for emergency variance in this matter. The leak in the catalyst line at the FCCU is a separate issue.

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

The subject equipment is located at the Chevron Refinery in El Segundo, California. The Refinery, owned and operated by Chevron Products Company, is a major producer of fuel. Processes include refining of crude oil and intermediates for gasoline, diesel, and jet fuel.

The facility RECLAIM permit No. 800030, dated October 9, 2025 (Facility Permit), further identifies and describes this equipment, copies of which are attached to this Petition as Exhibit 1.

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.

Equipment/Activity	Application Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Fluid Catalytic Cracking Unit (FCCU)	N/A	Section D Process 3: System 1	N/A
REGENERATOR, V-10, WITH 14 PAIRS OF 1 ST AND 2 ND STAGE INTERNAL CYCLONES, DIAMETER: 45 FT; HEIGHT: 62 FT 9 IN T-T WITH	AN 637508	D203	N/A
ELECTROSTATIC PRECIPITATOR, K-50, RESEARCH-COTTRELL, 58 FTL. X 30 FT W. X 36 FT H	AN 479168	C1909	N/A
ELECTROSTATIC PRECIPITATOR, K-60, RESEARCH-COTTRELL, 58 FT L. X 30 FT W. X 36 FT H.	AN 479168	C1908	N/A
SELECTIVE CATALYTIC REDUCTION, REACTOR #1, R-50, AQUEOUS NH3, BASF HONEYCOMB DENOX CATALYST TYPE 04-85, OR APPROVED EQUIVALENT CATALYST, 2973.5 CU.FT	AN 502414	C4200	N/A
SELECTIVE CATALYTIC REDUCTION, REACTOR #2, R-60, AQUEOUS NH3, BASF HONEYCOMB DENOX CATALYST TYPE 04-85, OR APPROVED EQUIVALENT CATALYST, 2973.5 CU.FT	AN 502414	C4201	N/A

*Attach copy of denial letter

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.

The FCCU represents the central operating unit or "heart" of the Chevron refinery. The FCCU takes heavy gas oils of marginal value and converts them to lighter hydrocarbons suitable for finished petroleum products. The gas oils are catalytically cracked in the FCCU to lighter fractions by contacting the gas oils with a fine particulate catalyst at over 900 degrees Fahrenheit. The FCCU is essential to Refinery operations.

At the FCCU, reaction products are separated by the Main Fractionator Column into individual petroleum products and blending stocks according to their relative molecular weight. Lighter reaction products are collected near the top of the column while heavier products gravitate to the bottom. The lightest reaction products consist of overhead gases and are collected from the top of the Main Fractionator Column.

These overhead gases are compressed into a liquid state by the K-140 Compressor. The compressed petroleum liquid is then further distilled and separated into petroleum products and blending stocks.

The catalytic reactions which produce petroleum products leave carbon deposits – commonly referred to as either petroleum coke or coke – on the catalyst particles. These carbon deposits must be removed in order to reuse the catalyst. The coked catalyst is transferred to the FCCU Regenerator where coke is removed from the catalyst.

Chevron injects air into the Regenerator to supply oxygen for burning the coke at temperatures over 1200 degree Fahrenheit. The heat generated by burning the coke in the Regenerator supplies the heat necessary to promote the cracking reactions in the Reactor.

Petitioner is responding to an emergency condition caused by a leak on a spent catalyst line located between the regenerator and reactor at the FCCU. The leak on the line resulted in Operations stopping feed into the FCCU. This caused the ESP to trip offline. The loss of the ESP led to an FCCU opacity exceedance of greater than 20%.

Petitioner plans to shut down the K-10 Main Air Blower on the FCCU to make the repairs to the spent catalyst line. This will allow for inspection of the line and should significantly reduce the risk of an opacity exceedance going forward. However, Petitioner anticipates elevated opacity when the FCCU is brought back into full service.

Petitioner requests an emergency variance in this matter, beginning today and ending on Friday, November 14, 2025, to allow Petitioner to make the repairs and return the FCCU at the Refinery to full service.

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

If yes, how often: Daily monitoring is being performed. Date of last maintenance and/or inspection: 10/2/2025
Describe the maintenance and/or inspection that was performed.

The subject equipment is inspected and maintained in accordance with industry practices. For example, the operators routinely and frequently check and monitor pressures, temperatures and flow rates on the Refinery units. Daily inspections are made of the equipment operating at the Refinery.

The leak was found during routine Operator rounds and is located in an elevated part of the reactor structure. The incident in this matter was not caused by operator error or neglect. While maintenance was performed, the incident was unforeseen. In this matter, the leak was discovered during routine maintenance.

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).

Rule	Explanation
District Rule 401(b)	District Rule 401(b)(1) provides that "[a] person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour" when those emissions are darker or more opaque than the standard. Petitioner cannot complete the shutdown and startup procedures for the FCCU without periodically exceeding opacity limits.
California Health & Safety Code Section 41701	California Health & Safety Code Section 41701 states that "no person shall discharge into the atmosphere from any source whatsoever any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any hour" when those emissions are darker or more opaque than the standard. Petitioner cannot complete the shutdown and startup procedure for the FCCU without periodically exceeding opacity limits.
District Rules 203(b), 2004(f)(1) and 3002(c)(1)	District Rule 203(b) states that permitted equipment shall not be operated contrary to the conditions specified in the permit to operate. Similarly, RECLAIM Rule 2004(f)(1) requires compliance with all facility permit conditions. In addition, Rule 3002(c)(1) requires compliance with all Title V permit conditions; the Refinery is now a Title V facility. The Facility Permit includes administrative conditions concerning the operation of the subject equipment. Petitioner cannot complete the shutdown and startup procedure for the FCCU without impacting certain permit conditions.
Permit Condition C12.1	As required by the condition, the operator shall use this equipment in such a manner that the ESP daily average voltage and secondary current (or total power input) being monitored as indicated below are greater than or equal to the average value in the most recent source test at the outlet of the FCCU Regenerator exhaust stack that demonstrated compliance with the emission limits. Petitioner cannot comply with this condition during the variance period.
Permit Condition E71.7	As required by the condition, the operator shall only operate this equipment using a minimum of ten (10) (out of 16 total) electrostatic precipitator (ESP) electrical grids energized in one (1) ESP and make the necessary operating adjustments to ensure compliance with the applicable emission limits of District Rules 404 and 405. Operating adjustments shall include changes to the voltage and/or amperage at the operational grids to maintain sufficient particulate capture efficiency. Petitioner cannot comply with this condition during the variance period.
Administrative Condition 2 (Section E)	Administrative Condition No. 2 states that the operator shall maintain all equipment and ensure proper operation of all equipment. Petitioner cannot comply with this condition during the variance period.

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

Case No.	Date of Action	Final Compliance Date	Explanation

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

Case No.	Date of Action	Final Compliance Date	Explanation
831-407	August 25, 2025	August 31, 2025	A variance was required to clean fouling from the surfaces of the furnace tubes in the F-201A. Furnace (Furnace) at the Refinery while in operation. While the fouling was removed, the SCR must be bypassed to prevent damage. The Hearing Board granted the petition. The work was completed without incident.
831-405	April 7, 2025	May 22, 2025	Scrubbers V-3 and V-4 were taken offline for maintenance activities, which were not allowed per the Title V permit. The Hearing Board granted the petition. The scrubbers were cleaned and internals inspected and replaced. The scrubbers were returned to service without incident.

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.
14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s):

Compliance in this matter is beyond Petitioner's reasonable control.

On Monday, October 27, 2025, Petitioner identified a leak on a spent catalyst line between the regenerator and reactor at the FCCU. The leak was found during routine Operator rounds and is located in an elevated part of the reactor structure. The leak on the spent catalyst line resulted in Operations stopping the feed at the FCCU. This caused the ESP to trip offline at 12:30 AM. The loss of the ESP led to an FCCU opacity exceedance of greater than 20%. Petitioner is working to address the incident.

At 12:45 AM on October 28, 2025, a Breakdown condition was called into the District (Notification #862289) due to an opacity exceedance of 20% at the FCCU. The District responded to the incident. Significant efforts are being made to complete the repairs and return the FCCU to full service.

Petitioner plans to shut down the K-10 Main Air Blower on the FCCU to make the repairs to the spent catalyst line. This will allow for inspection of the line and should significantly reduce the risk of an opacity exceedance going forward. However, Petitioner anticipates elevated opacity when the FCCU is brought back into full service. Petitioner requests an emergency variance, beginning today and ending on Friday, November 14, 2025, to allow Petitioner to make the repairs and return the FCCU at the Refinery to full service.

Petitioner maintains the equipment at the Refinery is good operating condition. The leak on the spent catalyst line was unforeseen and unexpected. Petitioner is working diligently to make the repairs and restart the FCCU.

See also Paragraph 4 above.

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)?

The leak on the spent catalyst line was discovered at the FCCU on Monday, October 27, 2025. Here, the leak was found during routine Operator rounds. The leak resulted in Operations stopping the feed at the FCCU which caused the ESP to trip offline. The loss of the ESP led to an FCCU opacity exceedance of greater than 20%. Prior to the incident, the FCCU was running well and as expected.

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

Petitioner is working diligently to address the issue. Petitioner plans to shut down the K-10 Main Air Blower on the FCCU to make the repairs to the spent catalyst line. This will allow for inspection of the line and should significantly reduce the risk of an opacity exceedance going forward. However, Petitioner anticipates elevated opacity when the FCCU is brought back into full service.

See also Paragraphs 4 and 14 above.

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 are estimated as 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 emergency variance was not granted in this matter, Petitioner may not be allowed to bring the FCCU back online in compliance with all applicable District rules and permit conditions. If the FCCU was unable to operate, then Petitioner estimates in excess of \$1,000,000 per day in lost revenues due to the incident. Petitioner is working diligently to make the repairs and return the FCCU to full service.

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

No. Petitioner has considered the option of curtailing or terminating Refinery operations in lieu of obtaining a variance. Petitioner cannot complete repairs, restart the FCCU and remain in compliance with all applicable District rules and regulations. Achieving compliance through curtailment is 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.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
Opacity	N/A	N/A	N/A

* Column A minus Column B = Column C

Excess Opacity: up to 80% opacity expected during startup.

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

Petitioner estimates that there may be opacity exceedances during the variance period. Based on experience, Petitioner expects excess opacity may reach 80% for short periods when the FCCU is restarted.

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

To minimize opacity emissions, Petitioner intends to work safely and expeditiously to minimize the period for maintenance, inspection, and repair of the FCCU so the FCCU can be promptly restarted. A copy of Petitioner's Proposed Emergency Variance Conditions is attached to the Petition as Exhibit 2.

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.**

Petitioner will monitor emission levels from the equipment during the variance period. During the startup period, opacity can be measured with an opacity meter. Petitioner has an opacity meter to continuously quantify opacity at the Refinery. The opacity measurements will be made available to the District on request.

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.

Petitioner intends to achieve compliance with the applicable provisions of District Rules and Regulations by working safely and expeditiously to minimize the period for maintenance, inspection and repair. Petitioner will employ personnel as necessary to help restore the equipment to compliant operation as soon as possible.

See also Exhibit 2, Petitioner's Proposed Emergency Variance Conditions.

24. State the date by which you expect to achieve final compliance: November 14, 2025.

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

Final compliance should be achieved when the FCCU is online and stable with the ESP in operation and opacity under the limit. Petitioner requests an emergency variance in this matter, beginning today and ending on Friday, November 14, 2025, to allow Petitioner to return the FCCU at the Refinery to full service.

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.

District Inspector: Huy Dang (310) 233-7016

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 October 29, 2025

at El Segundo, California

Andre West

Signature

Andre West

Print Name

Environmental Execution Specialist

Title

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:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: FLUID CATALYTIC CRACKING					P13.1
✓ REGENERATOR, V-10, WITH 14 PAIRS OF 1ST AND 2ND STAGE INTERNAL CYCLONES, DIAMETER: 45 FT; HEIGHT: 62 FT 9 IN T-T WITH A/N:	D203	C326 C327	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 500 PPMV (5A) [CONSENT DECREE CIVIL NO. C 03-04650 CRB, 6-27-2005]; CO: 500 PPMV (8A) [40CFR 60 Subpart J, 12-1-2015; 40CFR 63 Subpart UUU, #2, 11-19-2020]; CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; HAP: (10) [40CFR 63 Subpart UUU, #2, 11-19-2020]; NH3: 10 PPMV (5) [RULE 1105.1, 11-7-2003]; NOX: 8 PPMV (5B) [RULE 1109.1, 11-5-2021]; NOX: 16 PPMV (5C) [RULE 1109.1, 11-5-2021]; NOX: 20 PPMV (5) [CONSENT DECREE CIVIL NO. C 03-04650 CRB, 6-27-2005]; NOX: 40 PPMV (5A) [CONSENT DECREE CIVIL NO. C 03-04650 CRB, 6-27-2005]; NOX: 231.8 LBS/HR (7) [RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]; PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; PM: 0.5 LB(S)/1000 LBS COKE BURNOFF (5A) [CONSENT DECREE CIVIL NO. C 03-04650 CRB, 6-27-2005]; PM: 2 LBS/TON COKE BURNOFF (8) [40CFR 60 Subpart J, 12-1-2015; 40CFR 63 Subpart UUU, #2, 11-19-2020]; PM: 2.8 LBS/1000 BBL(S) (5B) [RULE 1105.1, 11-7-2003]; SO2: 25 PPMV (5) [A63.18, A63.22, A99.26, A99.27, A195.8, A195.9, A195.10, A195.11, A195.12, A195.13, A195.14, A195.51, A195.52, A229.4, A229.5, A229.6, A229.7, D29.1, D29.25, D82.4, D82.10, D90.25, D323.2, E54.13, E57.6, H23.40, H23.42, H23.52, K40.4, K67.88

* (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:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: FLUID CATALYTIC CRACKING					P13.1
CYCLONE, K-14, (V-12) FIRST STAGE, HEIGHT: 8 FT ; DIAMETER: 4 FT A/N: 273922	C3171				D323.1
VESSEL, V-318, CATALYST FINES COLLECTOR, WITH WATER BATH, LENGTH: 16 FT ; DIAMETER: 5 FT 6 IN A/N: 273922	D323				D323.1
CYCLONE, K-15, (V-11) SECOND STAGE, HEIGHT: 8 FT ; DIAMETER: 4 FT A/N: 273922	C1904				D323.1
EJECTOR, K-55, JET EDUCTOR SERVING V-55 & V-56 A/N: 273922	D1905			PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]	D323.4
TANK, SURGE, V-55, CATALYST FINES, HEIGHT: 58 FT 6 IN; DIAMETER: 12 FT A/N: 273922	D1906				D323.1
VESSEL, V-56, CATALYST FINES COLLECTOR, WITH WATER BATH, LENGTH: 21 FT 2 IN; DIAMETER: 6 FT 7 IN A/N: 273922	D1907				D323.1
System 4: FCC AIR POLLUTION CONTROL SYSTEM					
✓ ELECTROSTATIC PRECIPITATOR, K-60, RESEARCH-COTTRELL, 58 FT L. X 30 FT W. X 36 FT H. A/N: 479168	C1908	S329 C4200 C4201			C12.1, E71.7, E102.1
✓ ELECTROSTATIC PRECIPITATOR, K-50, RESEARCH-COTTRELL, 58 FT- L. X 30 FT W. X 36 FT H. A/N: 479168	C1909	S329 C4200 C4201			C12.1, E71.7, E102.1

* (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.

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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: FLUID CATALYTIC CRACKING					P13.1
SELECTIVE CATALYTIC REDUCTION, REACTOR #1, R-50, AQUEOUS NH3, BASF HONEYCOMB DENOX CATALYST TYPE 04-85, OR APPROVED EQUIVALENT CATALYST, 2973.5 CU.FT. A/N: 502414	C4200	C326 C327 C1908 C1909			D12.36, D12.37, E73.6, E193.5
SELECTIVE CATALYTIC REDUCTION, REACTOR #2, R-60, AQUEOUS NH3, BASF HONEYCOMB DENOX CATALYST TYPE 04-85, OR APPROVED EQUIVALENT CATALYST, 2973.5 CU.FT. A/N: 502414	C4201	C326 C327 C1908 C1909			D12.36, D12.37, E73.6
DRUM, WATER SEAL, V-30, SCR SAFETY BYPASS, HEIGHT: 30 FT T/T, DIAMETER: 12 FT A/N: 502414	D4202	C326 C327 S329			D12.38, K67.65
BLOWER, K-66A, SCR PURGE AIR, 200 HP A/N: 502414	D4203				
BLOWER, K-66B, SCR PURGE AIR, SPARE, 200 HP A/N: 502414	D4204				
Process 4: HYDROTREATING					P13.1
System 1: LSFO NAPHTHA HYDROTREATER (NHT)					S13.2, S15.10, S15.28, S56.1
REACTOR, R-1210, HEIGHT: 20 FT ; DIAMETER: 7 FT 6 IN A/N:	D333				
COLUMN, DEBUTANIZER, C-1230, HEIGHT: 76 FT 7 IN; DIAMETER: 9 FT A/N:	D334				

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (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:

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate being supplied to the absorber.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The continuous monitoring system shall include visual and audio alarms.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1401, 6-15-2001]

[Devices subject to this condition : C3825]

- C12.1 The operator shall use this equipment in such a manner that the ESP daily average voltage and secondary current (or total power input) being monitored as indicated below are greater than or equal to the average value in the most recent source test at the outlet of the FCCU Regenerator exhaust stack that demonstrated compliance with the emission limits.

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:

The operator shall install and maintain a continuous monitoring and recording system to accurately measure and record the:

1. voltage
2. current

at each ESP field. In addition, the operator shall keep records, in a manner approved by the District, for each of these parameters.

If the daily average ESP total power input falls below the level measured in the most recent source test at the outlet of the FCCU Regenerator exhaust stack that demonstrated compliance with the emission limit, a source test at the FCCU Regenerator stack shall be performed within 90 days at the new minimum daily average ESP total power level. The source test shall be performed according to the requirements specified in Permit Condition D29.1

**[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 401, 3-2-1984;
 RULE 404, 2-7-1986; RULE 405, 2-7-1986; 40CFR 60 Subpart J, 12-1-2015]**

[Devices subject to this condition : C1908, C1909]

C19.1 The operator shall maintain solution circulation rate and ammonia concentration in accordance with the following relationship:

solution circulation rate	gallons per minute	ammonia concentration	percent by weight
Greater than or equal to	250	Greater than or equal to	15

[RULE 1303(a)(1)-BACT, 5-10-1996]

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 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C1967]

- E71.4 The operator shall not operate this equipment if more than two tank trucks are loaded at any one time.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D3109]

- E71.5 The operator shall only inject ammonia into this equipment if the flue gas inlet temperature is at least 510 degrees F.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C3533, C3696]

- ✓ E71.7 The operator shall only operate this equipment using a minimum of ten (10) (out of 16 total) electrostatic precipitator (ESP) electrical grids energized in one (1) ESP and make the necessary operating adjustments to ensure compliance with the applicable emission limits of District Rules 404 and 405. Operating adjustments shall include changes to the voltage and/or amperage at the operational grids to maintain sufficient particulate capture efficiency.

[RULE 404, 2-7-1986; RULE 405, 2-7-1986]

[Devices subject to this condition : C1908, C1909]

- E71.9 The operator shall only use this equipment for the storage of any of the following commodities: Alkylate, FCC Light Gasoline, Hydrobate, Isomax Light Gasoline, Isomerate, Reformate and Motor Gasoline.

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 supercede 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

**EMERGENCY VARIANCE
CHEVRON PRODUCTS COMPANY (FID 800030)
CASE NO. 831-409
PROPOSED EMERGENCY VARIANCE CONDITIONS**

1. Petitioner shall complete the startup process for the FCCU at the Refinery as soon as it is safe to do so and by no later than Friday, November 14, 2025.
2. Petitioner shall mitigate opacity through use of the FCCU Electrostatic Precipitators (ESP) K-50 and K60 (C1908 and C1909), as safe to do so, during the variance period.
3. Petitioner shall inform the SCAQMD Inspector, via email (attention AQ Inspector Huy Dang at hdang@aqmd.gov) when the ESPs are energized upon final startup of the FCCU.
4. Petitioner shall inform the SCAQMD Inspector, via email (attention AQ Inspector Huy Dang hdang@aqmd.gov) when opacity returns to below the limit set forth in by Rule 401 and California HSC 41701.
5. Petitioner shall notify the Clerk of the Hearing Board and the District by email (hdang@aqmd.gov) within 24 hours of achieving final compliance in this matter.
6. Petitioner shall pay all applicable fees to the Clerk of the Hearing Board by [insert date], or the variance shall be invalidated pursuant to District Rule 303(k).

