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

PETITIONER: Tesoro Refining & Marketing Company LLC - Los Angeles Refinery-Carson Operations ("LARC")

CASE NO: 4982-138

FACILITY IDs: 174655

FACILITY ADDRESSES: 2350 East 223rd Street

City, State, Zip: Carson, CA 90810

1. TYPE OF VARIANCE REQUESTED

☒ INTERIM ☐ SHORT ☒ REGULAR ☐ EMERGENCY ☐ *EX PARTE* EMERGENCY

Tesoro Refining & Marketing Company LLC ("Petitioner" or "Tesoro") respectfully submits to the District Hearing Board this Petition for an interim and regular variance from District Rules 203(b),1189, 2004(f)(1), and 3002(c)(1) to allow Petitioner more time to conduct an annual source test on the No. 2 Hydrogen Plant. The source test is due by May 30, 2025, but the refinery is not able to complete a test acceptable to the District by this date because the plant is operating at reduced production rates. Petitioner is diligently taking steps to increase production rates in order to conduct the source test by the end of May, but reduced rates are in place to protect certain reforming heater tubes, which are experiencing elevated temperatures. If Petitioner is not able to increase rates to conduct the test, this variance will be required to allow Petitioner through approximately December 15, 2025 to conduct the test.

No excess emissions arise as a result of Petitioner's variance request because the plant will continue to operate at reduced rates if the elevated tube temperatures persist. The reduced rates are generating less emissions of volatile organic compounds ("VOCs") per day than normal operations.

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).

Viviana L. Heger, Esq.
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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)

Petitioner has been working to try to conduct the annual VOC source test for the No. 2 Hydrogen Plant by May 30, 2025 despite the recent issues with elevated temperatures on certain reforming heater tubes. Within the last two weeks, Petitioner has learned that the hot reforming heater tubes will likely continue to interfere with timely completion of the source test in May and that the District is unable to accept a May 2025 source test while the hot reforming tubes prevent the plant from increasing its hydrogen production rates, above the prior year's annual average production rate. Petitioner learned on May 15, 2025, that the plant's production rates will not be high enough until late November 2025, more than 90 days from now. In response, Petitioner immediately took steps to file this petition for interim and regular variance to extend the May 30, 2025 source test deadline. There has not been sufficient time to schedule a hearing on 30 days' notice for a regular variance because 30 days ago, Petitioner did not know that the hot reforming tubes would interfere in this way with Petitioner's May 2025 source test schedule. While public notice cannot be provided in conjunction with Petitioner's interim variance request, it will be provided in conjunction with Petitioner's regular variance request.

Good cause exists to grant Petitioner's interim variance request for the No. 2 Hydrogen Plant. The plant is an essential refinery unit because it not only provides hydrogen for refinery units, but it also provides steam used at the refinery. Currently, the tubes associated with the No. 2 Hydrogen Plant reforming heater are experiencing elevated temperatures that require the plant to slow down and reduce production rates. In early April, Petitioner suspected that the hot reforming tubes had additional coke build up, but de-coking maintenance activities in early April 2025 failed to resolve the elevated tube temperatures. It is suspected that absorbent material from the upstream chloride guard bed has migrated downstream onto the reforming heater tubes. In mid-April, Petitioner finalized its source test schedule for the No. 2 Hydrogen Plant but learned from plant operators in late April 2025 that it was unsafe to increase production rates for a source test. Currently, the No. 2 Hydrogen Plant is maintained at a safe and compliant operating condition within the acceptable tube temperature range.

In response to the reduced rates, Petitioner sought input from the District to determine if a source test of the plant based on its current level of operation would be acceptable followed by another source test later in 2025. Rule 1189(e)(2) requires Petitioner to certify that the source test is "accurate and represents the actual operating conditions of the plant at the time of testing." A source test before May 30, 2025 would be accurate and representative of "conditions at the time of testing," but it would not meet the requirement that the plant must be operated above the prior year's annual average hydrogen production rate during testing, as set forth in the guidelines in Attachment A of Rule 1189. A source test later in 2025 would provide representative results but not within the time frame specified in Rule 1189(e)(1).

On May 6, 2025, Petitioner learned from South Coast AQMD Senior Enforcement Manager Kevin Orellana that the District would not be able to accept an annual source test in May 2025 when the plant is operating at reduced rates followed by a second source test later in 2025.

The plant will undergo scheduled turnaround maintenance in September 2025 ("September 2025 Turnaround"). In the meantime, however, Petitioner is left with very few options:

(a) Petitioner can try to increase rates of the plant to run the source test by May 30, 2025, which does not appear possible at this time due to the elevated temperatures on the reforming heater tubes.

(b) Before the September 2025 Turnaround, Petitioner can conduct an unplanned shut down the No. 2 Hydrogen Plant and try to identify and resolve the cause of the elevated tube temperatures; however, shutting the plant down now and again in September will result in excess emissions from flaring (for two rather than one maintenance event). This option also severely and adversely curtails steam production, which will impact production of gasoline, diesel and jet for the market.

(c) Petitioner can identify and resolve the cause of the elevated tube temperatures during the September 2025 Turnaround when the overall plant and associated equipment undergoes comprehensive inspection and maintenance that is scheduled to begin on or about September 30, 2025 and conclude on or about November 10, 2025. Petitioner believes that the No. 2 Hydrogen Plant may need to be shutdown to physically inspect the reforming heater tubes to understand the cause and resolution of the elevated tube temperatures.

It is operationally prudent to shut down the plant once and handle all comprehensive inspection and maintenance at one time under option (c), above. This variance is needed to implement option (c), above. The District is not opposed to extending to due date for the required source test.

Other options are not feasible. Petitioner has been, and continues to be, diligent to try to implement option (a), above, but the option does not appear feasible at this time. Option (b), above, is disadvantageous because it increases emissions and is not operationally feasible. At this time, another large steam producer – Unit 91 of the Cogeneration plant – is shutdown to perform a planned major turnaround. As a result, steam production from the No. 2 Hydrogen Plant is needed to maintain stable refinery operations.

Good cause exists to grant Petitioner's interim variance request because Petitioner only recently discovered that the hot reforming heater tube issues would prevent a source test in May 2025. Petitioner learned less than 30 days ago on May 6, 2025 that source testing at the current operating levels would not be acceptable to the District. Petitioner learned last Thursday, May 15, that regular hydrogen production rates may not resume until late 2025 after the September 2025 Turnaround. Given that these developments occurred within the last two weeks, there has not been adequate time for a public hearing on 30 days' advance notice. Good cause exists to grant the interim variance while notice is provided for the regular variance requested herein.

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

Tesoro Los Angeles Refinery - Carson engages in petroleum refining and production of fuels and other products.

6. List the equipment and/or activity(s) that are the subject of this petition.

Relevant Excerpts from the Facility Permit are attached hereto as **Attachment 1.**

PPC Equipment/Activity	Application/	RECLAIM	Date

	Permit No.	Device No.	Application/Plan Denied (if relevant)
Reforming Heater	N/A	D1465	N/A
No. 2 Hydrogen Plant Atmospheric Vents	N/A	D2892 D2893	N/A
No. 2 Hydrogen Plant, Process 7, System 2	N/A	See **Attachment 2**	N/A

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 reforming heater (Device No. D1465) and its associated tubes are part of the No. 2 Hydrogen Plant (Process 7, System 2), which serves the refinery to produce hydrogen useable in pure form. The atmospheric vents (Device Nos. D2892 and D2893) specified above are subject to the VOC limits in Rule 1189.

The No. 2 Hydrogen Plant generates necessary hydrogen for hydrotreating units and for the hydrocracking unit operation. The unit also produces steam for various other process units as part the refinery steam system. Both hydrogen and steam at the refinery are important for producing and meeting stringent California Air Resources Board fuel specifications. Hydrogen is used to remove sulfur compounds. Steam is used for many essential refinery operations, including for critical steam-driven turbines and equipment and to prevent opacity at refinery flares, devices that are used during emergency and other times to reduce emissions of uncombusted petroleum hydrocarbons. Steam is also a vital source for numerous heat exchanger operations and used for numerous steam turbines to run essential refinery compressors.

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

If yes, how often: Daily

Date of last maintenance and/or inspection: May 20, 2025

Describe the maintenance and/or inspection that was performed.

The No. 2 Hydrogen Plant undergoes regular inspection and maintenance including daily inspections and a maintenance turnaround every five years. Tube temperatures are taken each shift (twice a day), and the maximum temperature value is logged as part of the monitoring records.

In addition, Petitioner also conducts maintenance activities to resolve issues detected during shift inspections. In November 2024, Petitioner's inspections detected and resolved elevated temperatures in the reforming heater tubes. High tube temperatures, if not mitigated, compromise the metallurgy of the tubes and could lead to a tube failure. In response to the elevated reforming tube temperature in November 2024, operators successfully performed a steam de-coke procedure to remove carbon build-up on the reforming catalyst. By removing the carbon build-up, the tubes were able to dissipate heat more efficiently during the reforming process. The plant's reforming heater tubes operated well throughout 2024 and the first quarter of 2025 until March 31, 2025 when Petitioner detected elevated tube temperatures again. A second steam de-coke operation was performed in early April 2025. Thus far, the most recent steam de-coke has not been successful in alleviating the high tube temperature; therefore, the No. 2 Hydrogen Plant rate has been reduced to keep tube temperature in a safe

operating range.

9. List all District rules, and/or permit conditions from which you are seeking variance relief. Briefly explain how you are or will be in violation of each rule or condition.

Rule	Explanation
Rule 1189 (e)(1)	Subdivision (e)(1) of Rule 1189 requires annual source testing at the plant's process vents (Device Nos. 2892 and 2893) to demonstrate compliance with the emission limits in Rule 1189(c)(3). Subdivision (c)(3) of the rule requires that process vents of hydrogen plants combined emit less than 2.5 pounds of VOCs per million standard cubic feet of hydrogen produced. Source testing must be conducted and test reports submitted within 12 calendar months from the previous testing and reporting. May 30, 2025 is the due date for the 2025 annual source, but Petitioner does not believe it will be able to source test by this date and requires until approximately mid-December 2025 to conduct the test for the reasons discussed in paragraph 14. (Applicable to Device Nos. D2892 and D2893)
Rule 1189, Attachment A	Attachment A provides guidance for Rule 1189 source testing. General Requirement No. 3 states that source testing at the process vents (Device Nos. D2892 and D2893) must be during normal operation conditions, specifying that hydrogen production "must not be less than the annual operating hourly average." Petitioner does not believe it will be able to safely increase rates to greater than the annual operating average; therefore, this variance is required until such time that rates can be increased by approximately mid-December 2025 following the September 2025 Turnaround. (Applicable to Device Nos. D2892 and D2893)
Rules 203(b), 2004(f)(1) and 3002(c)(1)	These rules require that a facility permit holder comply at all times with all permit conditions applicable to its facility. Petitioner will be unable to comply with the conditions specified below. (Applicable to Device Nos. noted below.)
S13.4	This condition provides that the entire No. 2 Hydrogen Plant (Process 7, System 2) is subject to Rule 1189, although Rule 1189 only applies to the process vents (Device Nos. D2892 and D2893). Because Petitioner is not able to comply with Rule 1189 source testing requirements for the reasons described above, it will also be unable to comply with this condition until completion of source testing during normal operations. (Applicable to Device Nos. D2892, D2893, and all devices for Process 7, System 2 listed in Attachment 2)
Administrative Condition No. E.8	Administrative Condition E.8 provides that "[a]ll equipment operating

	under the RECLAIM program shall comply concurrently with all provisions of AQMD Rules and Regulations[.]" As discussed above, because Petitioner will be unable to comply with the Rule 1189 source testing requirements, it also will be unable to comply with this administrative condition. (Applicable to Device Nos. D2892, D2893)

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
			Not applicable.

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
			Not applicable.

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

Not applicable.

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

It is beyond Petitioner's reasonable control to comply with the rules and permit conditions specified in paragraph 9, above, until the No. 2 Hydrogen Plant is able to be source tested at increased production rates. Currently, Petitioner believes it may not be able to comply with source testing requirements until late 2025 when normal plant production rates are anticipated. Until then, Petitioner estimates that its current operations at reduced rates will have the advantage of reducing VOC emissions by approximately 9.21 pounds per day as compared to normal operations.

Due to the reduced rates, the plant is not able to meet the minimum process rate requirement to perform the Rule 1189 source testing on the process vents (Device Nos. D2892, D2893). The test is due by May 30, 2025, and the facility is not able to meet that date due to the following factors:

a. The hydrogen plant may have to be shut down to physically inspect the reforming heater tubes to understand why the April 2025 steam de-coking has not been successful thus far.

b. After the physical inspection, a repair plan will need to be developed and executed.

c. The hydrogen plant cannot be shut down before the Rule 1189 source test due date of May 30 because another large steam producer Cogen Unit 91 was shut down on April 5, 2025 to perform a planned major turnaround. The planned maintenance on Cogen Unit 91 is not due to be completed until after the May 30, 2025 source test due date.

d. With Cogen Unit 91 currently down, the steam production from the No. 2 Hydrogen Plant is needed to maintain stable refinery operations.

Petitioner could not have anticipated the issues it is currently experiencing at the hydrogen plant. Petitioner reasonably expected in April 2025 that the de-coking maintenance activities would succeed to drive down the temperature of the hot reforming tubes as was the case in November 2024 when similar issues were detected and resolved. On or about April 14, 2025, Petitioner finalized its plans for the annual VOC source test, but, after meeting with operators on April 21, 2025, it was determined that it was not safe to attempt to increase production rates because, despite diligent efforts, the reforming heater tubes were not operating reliably within acceptable temperature ranges. Thus, the April 2025 de-coke was not successful, and now it is suspected that the fouling mechanism is from the chloride guard bed migration, as explained in paragraph 4.

As explained in paragraph 4, Petitioner developed and proposed an alternative source testing plan to the District that would allow Petitioner to conduct the source test in May 2025 and follow up with an additional source test later in 2025. Rule 1189(e)(2) specifies that the source test must be accurate and represent "the actual operating conditions of the plant at the time of testing," which a May 2025 source test would do; however, guidance in Attachment A of the rule states that the production rates "must not be less than the annual operating hourly average." The District was not able to accept Petitioner's plans to source test in both May and late 2025 but is not opposed to Petitioner conducting the source test at a later date, which would be after the September 2025 Turnaround.

The September 2025 Turnaround will require two months' time. It will involve comprehensive inspection and maintenance activities, including changing the reforming catalyst. The catalyst change out is necessary to resolve the hot reforming tube issues, and the September 2025 Turnaround provides Petitioner the opportunity to change the catalyst. The catalyst change-out process requires time.

Petitioner plans to conduct the source test for VOCs from the hydrogen plant's vents (Device Nos. D2892 and D2893) after the turnaround activities for the plant reforming heater are complete and the plant returns to normal production ranges. The September 2025 Turnaround is scheduled to conclude on or about November 10, 2025. Petitioner believes it will be possible to resume normal production rates at or above the annual operating hourly average by November 30, 2025. To be cautious, Petitioner seeks regular variance coverage through December 15, 2025 to provide adequate time for trouble-shooting.

Petitioner will continue to curtail operations of the No. 2 Hydrogen Plant at reduced rates as needed to maintain the reforming heater tubes within the acceptable temperature ranges. The reduced rates have the advantage of reducing VOC emissions. Petitioner does not believe it will be able to safely increase rates to the annual operating average until approximately late November; therefore, compliance with the source testing standards is currently beyond Petitioner's reasonable control.

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)?

See paragraphs 4 and 14.

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

See paragraphs 4 and 14.

17. What would be the harm to your business during and/or after the period of the variance if the variance were not granted?

Denial of the variance would result in harm to Petitioner. Petitioner could not have anticipated the issues it is currently experiencing at the reforming heater for the No. 2 Hydrogen Plant, and denial of this variance would subject the Petitioner to fines or penalties while it is diligently working to achieve compliance in a safe manner.

Denial of this variance would result in increasing emissions because it would force Petitioner to forego its current plans to conduct repairs during the September 2025 Turnaround and instead would require Petitioner to attempt an unplanned shut down of the No. 2 Hydrogen Plant. Such an unplanned shutdown could result in upsets or similar incidents that would result in substantially greater excess emissions than would be created if Petitioner undertakes and completes repairs during the September 2025 Turnaround. The process of starting up the No. 2 Hydrogen Plant twice during an unplanned shut down and again during the September 2025 Turnaround would needlessly increase emissions. Starting up the hydrogen plant following a shutdown would cause emissions greater than those associated with this variance request because NOx is elevated during start-up and flaring emissions are higher on start-up.

Petitioner supplies petroleum products to customers throughout the western United States. If Petitioner were denied a variance, the refinery would likely need to attempt an unplanned shutdown of the plant and will experience significant short-term economic losses.

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

Petitioner curtailed operations of the reforming heater for the No. 2 Hydrogen Plant in April 2025 by reducing production rates for the plant. Curtailing operations, however, does not allow Petitioner to achieve compliance and, in fact, is the reason Petitioner is not able to achieve compliance. Petitioner's curtailment of operations prevent Petitioner from meeting the minimum hydrogen production rate required by the source test guidance in Attachment A of Rule 1189. A complete shutdown of the plant to attempt necessary repairs to the hot reforming tubes is also not possible because steam from the hydrogen plant is necessary to maintain stable refinery operations, particularly because Cogen Unit 91 is currently shut down for scheduled inspection and maintenance.

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) Total Estimated Excess Emissions (lbs/day)	(B) Reduction Due to Mitigation (lbs/day)	(C) Net Emissions After Mitigation (lbs/day)

There are no excess emissions associated with this variance request.

*Column A minus Column B = Column C

Excess Opacity: N/A %

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

There are no excess emissions associated with this variance request. The No. 2 Hydrogen Plant is currently operating at a reduced rate, which is estimated to reduce VOC emissions by approximately 9.21 pounds per day.

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.

Not applicable, This variance request will not result in excess emissions.

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.

Not applicable. This variance request will not result in excess emissions.

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 processes changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

See paragraphs 4 and 14.

Based on this plan, Petitioner proposes the following variance conditions:

1. During the variance period, Petitioner shall, on a daily basis, monitor the tubes on the Reforming Heater (Device No. D1465) and record its observations with regard to temperature.
2. Petitioner shall make the monitoring records set forth above available to its inspector Mario Escobedo upon request.
3. Before the September 10, 2025 Turnaround, Petitioner shall finalize a repair strategy to include a potential catalyst replacement or other measures Petitioner's inspection finds are necessary.
4. Petitioner shall notify the District at 1-800-CUT-SMOG and by telephone and e-mail to Mario Escobedo at (310) 233-7008 and mescobedo@aqmd.gov at least 24 hours prior to shutting down the Reforming Heater (Device No. D1465).
5. Petitioner shall notify the District at 1-800-CUT-SMOG and by telephone and e-mail to Mario Escobedo at (310) 233-7008 and mescobedo@aqmd.gov at least 24 hours prior to source testing the Atmospheric Vents (Device Nos. 2892, 2893).
6. Petitioner shall notify the Clerk of the Board and its inspector Mario Escobedo in writing when compliance is achieved

24. State the date by which you expect to achieve final compliance: On or about December 15, 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.

Not applicable

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or related Notice of Violation or Notice to Comply.

Mario Escobedo (310) 233-7008,
mescobedo@aqmd.gov

FOR THE FOREGOING REASONS, Petitioner requests that it be granted the relief requested.

Dated: May 20, 2025

Respectfully Submitted,

Viviana L. Heger
DUANE MORRIS

Viviana L Heger

Attorneys for Petitioner
TESORO REFINING & MARKETING COMPANY LLC

Attachment 1 – Permit Excerpts

FACILITY PERMIT TO OPERATE
TESORO REFINING & MARKETING CO, LLC

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 7: HYDROGEN PRODUCTION					
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 552809	D2492				H23.3
System 2: HYDROGEN PRODUCTION NO.2 PLANT(KTI SYSTEM)					S2.1, S13.2, S13.4, S46.4, S56.1
COMPRESSOR, RW 0052, FEED GAS, MECHANICAL SEAL, OIL FILLED,W/BUFFER GAS A/N: 552812	D1443				
TANK, SURGE, RW 6123, PENTANE, LENGTH: 14 FT ; DIAMETER: 4 FT A/N: 552812	D1444				
REACTOR, COMO, RW 6158, LENGTH: 14 FT ; DIAMETER: 5 FT A/N: 552812	D1446				
REACTOR, CHLORIDE/SULFUR GUARD, RW 6159, LENGTH: 28 FT ; DIAMETER: 8 FT A/N: 552812	D1447				
REACTOR, CHLORIDE/SULFUR GUARD, RW 6160, LENGTH: 28 FT ; DIAMETER: 8 FT A/N: 552812	D1448				
REACTOR, HIGH TEMPERATURE SHIFT, RW 6161, LENGTH: 14 FT ; DIAMETER: 9 FT A/N: 552812	D1449				
KNOCK OUT POT, RW 6114, HOT CONDENSATE, LENGTH: 9 FT 6 IN; DIAMETER: 5 FT A/N: 552812	D1450				

* (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
TESORO REFINING & MARKETING CO, LLC

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 7: HYDROGEN PRODUCTION					
KNOCK OUT POT, RW 6115, COLD CONDENSATE, LENGTH: 12 FT ; DIAMETER: 4 FT A/N: 552812	D1451				
VESSEL, DEAERATOR, RW 7109 289.02, VERTICAL SECTION, HEIGHT: 14 FT ; DIAMETER: 7 FT A/N: 552812	D2892				
VESSEL, DEAERATOR, RW 6227, HORIZONTAL SECTION, LENGTH: 22 FT ; DIAMETER: 9 FT A/N: 552812	D2893				
DRUM, RW 6119, FLARE CONDENSATE, LENGTH: 9 FT ; DIAMETER: 3 FT 6 IN A/N: 552812	D1453				
ADSORBER, PRESSURE SWING, RW 6145, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1455				
ADSORBER, PRESSURE SWING, RW 6146, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1456				
ADSORBER, PRESSURE SWING, RW 6147, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1457				
ADSORBER, PRESSURE SWING, RW 6148, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1458				

* (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
TESORO REFINING & MARKETING CO, LLC

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 7: HYDROGEN PRODUCTION					
ADSORBER, PRESSURE SWING, RW 6149, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1459				
ADSORBER, PRESSURE SWING, RW 6150, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1460				
ADSORBER, PRESSURE SWING, RW 6151, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1461				
ADSORBER, PRESSURE SWING, RW 6152, HEIGHT: 21 FT ; DIAMETER: 8 FT 6 IN A/N: 552812	D1462				
DRUM, RW 6118, PSA TAIL GAS, LENGTH: 80 FT ; DIAMETER: 12 FT A/N: 552812	D1463				
FILTER, RW 6153, FUEL GAS, BASKET TYPE A/N: 552812	D1464				
FILTER, RW 6245, PRODUCT HYDROGEN, BASKET TYPE A/N: 552812	D2049				
DRUM, SILENCER, RW 0006, PSA PURGE GAS, LENGTH: 5 FT ; DIAMETER: 5 FT 6 IN A/N: 552812	D2055				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 552812	D2493			**HAP**: (10) **[40CFR 63 Subpart CC, #5A, 6-20-2013]**	H23.3
System 3: HYDROGEN PRODUCTION UNIT HEATERS					

* (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
TESORO REFINING & MARKETING CO, LLC

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 7: HYDROGEN PRODUCTION					
HEATER, HYDROGEN PLANT, PRIMARY REFORMER, NATURAL GAS, REFINERY GAS, STOCKER AND SO. CAL NATURAL GAS, UP-FIRED NATURAL DRAFT BOX TYPE, WITH LOW NOX BURNER, 650 MMBTU/HR WITH A/N: 552815 BURNER, 144 BURNERS, REFINERY GAS, JOHN ZINK, MODEL GO-33-40, WITH LOW NOX BURNER, 650 MMBTU/HR	D570	C571	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	**CO**: 2000 PPMV (5) [**RULE 407, 4-2-1982**]; **PM**: (9) [**RULE 404, 2-7-1986**]; **PM**: 0.1 GRAINS/SCF (5) [**RULE 409, 8-7-1981**]	B61.4, D90.4, D328.1, H23.1
HEATER, RW 0054, HYDROGEN REFORMING, NATURAL GAS, PSA GAS, WITH LOW NOX BURNER, 427 MMBTU/HR WITH A/N: 552818 BURNER, WITH 55 BURNERS, NATURAL GAS, PSA GAS, JOHN ZINK, MODEL PSFG-30 & PSFFG-60, WITH LOW NOX BURNER, 427 MMBTU/HR	D1465	C1466	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	**CO**: 8.56 LBS/HR NATURAL GAS (4) ; **CO**: 25 PPMV NATURAL GAS (4) ; **CO**: 2000 PPMV (5) [**RULE 407, 4-2-1982**]; **NOX**: 6.75 LBS/HR NATURAL GAS (4) [**RULE 2005, 6-3-2011**]; **NOX**: 12 PPMV NATURAL GAS (4) [**RULE 2005, 6-3-2011**]; **PM**: (9) [**RULE 404, 2-7-1986**]; **PM**: 0. GRAINS/SCF (5) [**RULE 409, 8-7-1981**]; **PM10**: 8.54 LBS/HR NATURAL GAS (4) [**RULE 1303(b)(2)-Offset, 5-10-1996**]; **ROG**: 2.85 LBS/HR NATURAL GAS (4) [**RULE 1303(b)(2) -Offset, 5-10-1996**]	A63.33, B61.4, C1.24, C8.1, D12.12, D12.13, D29.3, D328.1, E71.7, E74.1, E175.1, H23.1
System 4: SELECTIVE CATALYTIC CONTROL SYSTEM					

* (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
TESORO REFINING & MARKETING CO, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

[RULE 1123, 12-7-1990]

[Systems subject to this condition : Process 1, System 1 , 2 , 3 , 5 , 6; Process 2, System 1 , 2 , 3 , 5 , 6 , 11; Process 3, System 1 , 2 , 3; Process 4, System 1 , 2 , 3 , 4 , 5 , 7 , 8 , 9; Process 5, System 1 , 2 , 3 , 4 , 5; Process 6, System 1 , 2 , 3; Process 7, System 1 , 2; Process 8, System 1 , 2; Process 9, System 1 , 2 , 6 , 7 , 8 , 9 , 10; Process 10, System 1 , 2 , 3; Process 11, System 1; Process 12, System 4 , 5 , 7 , 8 , 9 , 10 , 11 , 12 , 13 , 14 , 15]

S13.3 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463
VOC	District Rule	1149
VOC	District Rule	1178

[RULE 1149, 5-2-2008; RULE 1178, 4-7-2006; RULE 463, 11-4-2011]

[Systems subject to this condition : Process 16, System 2 , 3]

S13.4 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1189

[RULE 1189, 1-21-2000]

[Systems subject to this condition : Process 7, System 1 , 2]

FACILITY PERMIT TO OPERATE
TESORO REFINING & MARKETING CO, LLC

SECTION E: ADMINISTRATIVE CONDITIONS

e. For the purpose of determining compliance with Rule 407, carbon monoxide (CO) shall be measured on a dry basis and be averaged over 15 consecutive minutes, and sulfur compound which would exist as liquid or gas at standard conditions shall be calculated as sulfur dioxide (SO2) and be averaged over 15 consecutive minutes; [407]

f. For the purpose of determining compliance with Rule 409, combustion contaminant emission measurements shall be corrected to 12 percent carbon dioxide (CO2) at standard conditions and averaged over 15 consecutive minutes. [409]

g. For the purpose of determining compliance with Rule 475, combustion contaminant emission measurements shall be corrected to 3 percent of oxygen (O2) at standard conditions and averaged over 15 consecutive minutes or any other averaging time specified by the Executive Officer. [475]

8. All equipment operating under the RECLAIM program shall comply concurrently with all SCAQMD Rules and Regulation, except those listed in Table 1 of Rule 2001 for NOx RECLAIM sources and Table 2 of Rule 2001 for SOx RECLAIM sources. Those provisions listed in Tables 1 or 2 shall not apply to NOx or SOx emissions after the date the facility has demonstrated compliance with all monitoring and reporting requirements of Rules 2011 or 2012, as applicable. Provisions of the listed SCAQMD rules in Tables 1 or 2 which have initial implementation dates in 1994 shall not apply to a RECLAIM NOx or SOx source, respectively. [2001]

9. The operator shall, when a source test is required by SCAQMD, provide a source test protocol to SCAQMD no later than 60 days before the proposed test date. The test shall not commence until the protocol is approved by SCAQMD. The test protocol shall contain the following information: [204, 304]

a. Brief description of the equipment tested.

Attachment 2 – Process 7, System 2 Device Nos.

Compressor	D1443
Tank, Surge	D1444
Reactors	D1446-D1449
Knock Out Pots	D1450-D1451
Drum	D1453
Adsorbers	D1455-D1462
Drum	D1463
Filter	D1464
Filter	D2049
Drum	D2055
Fugitive Emissions	D2493

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ALLIANCES IN MEXICO

May 20, 2025

Via E-Mail and Hand Delivery

Clerk of the Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
clerkofboard@aqmd.gov

Re: Tesoro Refining & Marketing Co., LLC - Los Angeles Refinery - Carson Operations
Petition for Interim and Regular Variance
Facility ID: 174655
Case No: 4982-138

Dear Clerk of the Board:

In accordance with Hearing Board Rule 2, we hereby submit for filing an original and eight counterpart copies of a Petition for Interim and Regular Variance in connection with the above-named facility. An additional ninth counterpart of the enclosed is provided, which we ask that you conform for our files and return to our messenger. In accordance with Table III of District Rule 303, we enclose payment in the amount of $ 1,982.89. We have also filed the enclosed via e-mail transmission to clerkofboard@aqmd.gov.

Thank you for your assistance.

Very truly yours,

DUANE MORRIS LLP

Viviana L. Heger

Viviana L. Heger

VLH\pad
Enclosure: Petition for Interim and Regular Variance (original and eight copies); Check No. 3325