

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

PETITIONER: Ultramar Inc., d/b/a/ Valero Wilmington Refinery

CASE NO: 3845-112

FACILITY ID: 800026

FACILITY ADDRESS: 2402 East Anaheim Street

[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Wilmington, CA 90744

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, 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).

Sharon Shearer

Frances Keeler & David Tong

Ultramar Inc., d/b/a Valero Wilmington Refinery

Peacock Piper Tong + Voss LLP

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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, Item 4)

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

N/A

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

Ultramar Inc.'s d/b/a/ Valero Wilmington Refinery ("Ultramar" or "Petitioner") business is petroleum refining. Key processes at Petitioner's Wilmington, California refinery (the "Refinery") include cracking of heavy petroleum hydrocarbons in the refinery's FCCU, processing and treatment of crude oil feed, storage and shipping of gasoline and other finished petroleum products, and operation of numerous air pollution control systems.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, 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)*
FCCU Regenerator, FCCU Heater, and Electrostatic Precipitators subject to Condition F9.1	800026	Process 3, Systems 1 – 2; D36, D38, C39, C1615	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 is a necessary part of Ultramar's business because it cracks heavy gas oil into smaller hydrocarbon chains, which is fundamental to the production of gasoline and other fuels. Without the safe and reliable operation of the FCCU, Ultramar would be unable to produce a majority of its refined petroleum products.

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

If yes, how often: See Below Date of last maintenance and/or inspection See Below

Describe the maintenance and/or inspection that was performed.

The purpose of this Variance and AOC is to allow Ultramar to conduct necessary maintenance on the Refinery's Alkylation Unit (Process 7, System 1, Unit 68). The shutdown of the Alkylation Unit requires the Refinery to also shut down and restart the FCCU. During the shutdown period no violations will occur. It is the restart of the FCCU that will result in violations.

Ultramar maintains an inspection and maintenance program for this equipment in compliance with federal, state, and local regulatory requirements and industry codes (including API 510 – Pressure Vessel Inspection Code, and API 570 – Piping Inspection Code). The program is designed to ensure safe and reliable operation of fixed equipment and piping within the Refinery.

The FCCU and Alkylation units undergo regular maintenance typically every six years; the last turnaround which included the FCCU was conducted in 2022.

In addition to this comprehensive maintenance schedule, Ultramar conducts regularly scheduled planned and unplanned preventative maintenance on all units at issue in this petition. Refinery personnel also conduct audio-visual inspections of these units daily and perform routine maintenance on an as needed basis.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] 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, Item 9, Example #2).

Rule	Explanation
203(b), 2004(f)(1) & 3002(c) (for all equipment)	Under Rule 203(b), equipment that is required to have a permit "shall not be operated contrary to the conditions specified in the permit to operate." Likewise, RECLAIM (Regulation XX), Rule 2004(f)(1) and Title V (Regulation XXX), Rule 3002(c) reiterates the requirement to comply with all Facility Permit Conditions. Because Ultramar will be unable to comply with the various District Rules and Permit conditions listed below, Ultramar will need a variance and AOC from these rules.
407(a) (for Process 3, Systems 1, 2 and 3); Equipment Specific CO limitation of 2,000 ppmv,	District Rule 407(a) provides that "[a] person shall not discharge into the atmosphere from any equipment: 1) Carbon monoxide (CO) exceeding 2,000 ppm by volume measured on a dry basis, averaged over 15 consecutive minutes." Additionally, the Title V Permit contains an Equipment Specific CO limitation of 2,000 ppmv. During the FCCU restart, there may be times when Ultramar could observe brief periods of CO emissions above the 2,000 ppm limit, due to incomplete combustion of flue gas in the FCCU as temperatures in the FCCU lower below and rise to their normal operating levels at restart. Incomplete combustion in the FCCU tends to generate less CO ₂ but more CO than is generated in the FCCU during normal operations. Thus, there is a possibility that brief periods of CO emissions could occur at concentrations higher than the 2,000 ppm limit in District Rule 407(a) and the Equipment specific Permit Condition. Thus, Ultramar requests a variance and AOC from District Rule 407(a) during the FCCU restart.
203(b) & 2004(f)(1) [Condition No. A63.4 of Facility P/O No. 800026] (for Process 3, Systems 1, 2 and 3)	Condition A63.4 limits CO emissions from the FCCU Regenerator (D36) to 955 lbs/day. During the FCCU restart, there may be times when Ultramar could observe brief periods of daily CO emissions above the 955 lb limit, due to incomplete combustion of flue gas in the FCCU until temperatures in the FCCU reach normal operating levels. Incomplete combustion in the FCCU tends to generate less CO ₂ but more CO than is generated in the FCCU during normal operations. Thus, there is a possibility that brief periods of CO emissions could occur in amounts greater than the 955 lb/day limit in Condition A63.4. To provide for this possibility, Ultramar requests a variance and AOC from Condition A63.4 during the FCCU restart periods.

401(b)(1) & California Health & Safety Code Section 41701 (for FCCU regenerator (D36))	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 which is ... [a]s dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the United States Bureau of Mines." In addition, California Health & Safety Code Section 41701 provides 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 one hour which is . . . [a]s dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines." During startup of the FCCU Regenerator (D36), the Electrostatic Precipitators (ESPs) (C39 and C1615), which control opacity, will not be operating at design efficiency and flow rate. During this period, the ESP may not have the physical capacity to control opacity sufficiently to stay within the limits in Rule 401(b)(1) and Health and Safety Code Section 41701. Thus, during the FCCU Regenerator startup, there is a possibility that visible air contaminants could occur for longer than three minutes in any one hour with opacity greater than those shades designated No. 2 and No. 1 on the Ringelmann Chart.
203(b) & 2004(f)(1) & 3002(c) [Condition Nos. F9.1 of Facility P/O No. 800026] (for D36)	Condition F9.1 provides that "the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is ... [a]s dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the United States Bureau of Mines" or equivalent opacity from the FCCU Regenerator (D36). During startup of the FCCU, the Electrostatic Precipitators (ESPs) (C39 and C1615), which control opacity, will not be operating at designed efficiency and flow rate and the ESPs may not have the physical capacity to control opacity sufficiently to stay within the opacity limit in Conditions F9.1. Thus, there is a possibility that the emission of visible air contaminants may occur for periods longer than three minutes in any one hour with opacity darker than Ringelmann No. 1.
203(b) & 2004(f)(1) & 3002(c) [Administrative Condition Nos. E.3 and E.7 of Facility P/O No. 800026] (first sentence only) (for FCCU regenerator (D36))	Section E of Ultramar's Permit, Administrative Condition E.3 (first sentence), provides that Ultramar's permit "does not authorize the emissions of contaminants in excess of those allowed by Division 26 of the Health and Safety Code of California or the Rules and Regulations of the AQMD." Similarly, the first sentence of Administrative Condition E.7 provides that the Refinery "shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit." As discussed above, there is a possibility that during the variance and AOC period, the Refinery will not be able to avoid emitting air contaminants in excess of the requirements of the Health and Safety Code, District Rules and/or the Permit.
203(b), 2004(f)(1) 3002 (c) [Administrative Condition E.8 of Facility P/O No. 800026] (for all equipment)	In Section E of Ultramar's Permit, the first sentence of 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, except those listed in Table 1 of Rule 2001 for NO_x RECLAIM sources and Table 2 of Rule 2001 for SO_x RECLAIM sources." Because Ultramar will be unable to comply with District Rules 203, 202, 2004, 3002 and 407 during the variance and AOC period, it also will be unable to comply with Administrative Condition E.8, which generally requires RECLAIM equipment to comply with District Rules not otherwise listed in District Rule 2001 as being inapplicable for NO_x and SO_x emissions.

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
3845-111	11-27-2024	3-9-2025	The FCCU was under variance coverage in connection with a planned turnaround conducted by the Refinery between January and March 2025.

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.

See NOVs attached hereto as Exhibit 2

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). Provide specific event(s) and date(s) of occurrence(s), if applicable.

It is beyond the reasonable control of the Refinery to comply with the permit conditions, rules and laws listed below.

On March 9, The Refinery recently completed a turnaround on various processes throughout the Refinery. (See Case No. 3845-111). While the FCCU and the Alkylation Unit did not require any regular maintenance at the time of the turnaround, they were shut down because other units undergoing major maintenance connected to the units had to be shutdown. Once all the maintenance was completed and all the equipment was brought back online, the Refinery observed that the Alkylation Unit (Process 7, System 1, Unit 68) was not performing as expected as the unit was not ramping up to full rates in the typical manner. The Refinery investigated the issue in the Alkylation Unit and determined the issue is likely iron fluoride scale deposited in the trays of the ISO Stripper Column (Device ID No. D79). The scale formation has not occurred in the ISO Stripper Column in the past and could not have been anticipated. The Alkylation Unit undergoes regular maintenance, typically every six years. The last turnaround which included the Alkylation Unit was in 2022. Thus, the iron fluoride scale formation was beyond the Refinery's reasonable control.

Since the formation of the iron fluoride scale was discovered, the Refinery has been running the unit on reduced rates. The Refinery has consulted with experts and taken various actions to remove the scale while the Alkylation Unit remained online. First, the Refinery reduced heat in the ISO Stripper Column to increase flow at the bottom in an attempt to flush the scale through. The Refinery also attempted to flush the scale through by changing the velocity of flows going into the ISO Stripper Column. Neither online measure worked. Therefore, to return the Alkylation Unit to its full function, the unit must be taken offline so that the ISO Stripper Column can be cleaned.

The ISO Stripper Column will be chemically cleaned to help dissolve the iron fluoride scale. The ISO Stripper Column will be opened to clean out the remaining scale, and then it will be inspected to ensure there is no damage before the Refinery conducts restart operations. The Refinery has hired contractors with the proper expertise to conduct the cleaning operations. The contractors will be available beginning April 24 to conduct the cleaning operation.

The Alkylation Unit receives light olefins (butylene and isobutylene) from the FCCU and produces alkylate, a component in high octane gasolines, by combining the olefins with isobutane and catalyst. With the Alkylation Unit offline, the Refinery has nowhere to send the olefins produced by the FCCU, so the Refinery will also have to shut down the FCCU until the chemical cleaning of the ISO Stripper Column is complete. At that time, the Refinery will restart the FCCU. The Refinery is only requesting coverage for the FCCU start-up, which will occur during the month of May, and will be completed by June 1, 2025.

The Refinery is not currently in violation of any permit conditions or district rules and regulations. No violations will occur during the shutdown period. It is the startup of the FCCU that will result in violations of certain permit conditions and district rules and regulations, including the District's opacity rules and permit conditions, and exceedances of the District's CO rule and permit limitations on the FCCU. While the Alkylation Unit does not require variance coverage, it is integral in the refining of petroleum products and critical to the Refinery's refining business. Without safe and reliable operation of this equipment, the Refinery would be unable to comply with the good operating conditions of its Permit and produce a majority of its refined petroleum products.

If the Refinery is not allowed to restart the FCCU, the Refinery would eventually have to begin the shutdown of other units, which would result in excess emissions and violations of additional permit conditions. Ultramar also would be unable to continue to refine fuels and meet its contractual obligations to do so, thus amounting to a taking of Ultramar's business.

The Refinery FCCU Regenerator (D36) has an equipment specific permit limitation limiting CO emissions to 2000 ppmv. Rule 407 also limits the CO emissions to 2000 ppmv. During the restart of the FCCU Regenerator, there may be brief periods of time where CO emissions may exceed the 2000 ppmv permit and Rule limitations due to incomplete combustion of the fuel gas as temperatures in the FCCU Regenerator are below their normal operating levels. Incomplete combustion tends to produce less CO₂ but more CO than is generated during normal operations. Therefore, the Refinery seeks a variance and AOC relief from the equipment specific permit limitations of 2000 ppmv and Rule 407 for the period the FCCU Regenerator is restarted, until such time as the device reaches optimal operating temperatures (steady state).

Additionally, Permit Condition A63.4 limits CO emissions from the FCCU Regenerator (D36) to 955 lbs./day. During the FCCU restart, there may be times when Ultramar could observe brief periods of daily CO emissions above the 955 lb. limit due to incomplete combustion of flue gas in the FCCU as temperatures in the FCCU drop below their normal operating levels at shutdown and restart. Incomplete combustion in the FCCU tends to generate less CO₂ but more CO than is generated in the FCCU during normal operations. Thus, there is a possibility that brief periods of CO emissions could occur in amounts greater than the 955 lbs./day limit in Condition A63.4. To provide for this possibility, Ultramar requests a variance and AOC from Condition A63.4 during the FCCU restart period.

During the FCCU Regenerator startup, the Electrostatic Precipitators (ESPs), C39 and C1615, which serve to control opacity, will not be operating at optimal temperature and flow rate and may not have the physical capacity to control opacity sufficiently to stay within the opacity limits in Rule 401(b)(1), Permit Condition F9.1, and Health and Safety Code Section 41701. It is beyond Ultramar's reasonable control to comply with Permit Condition F9.1, District Rules 401(b)(1) and Health & Safety Code Section 41701 during the FCCU start-up period until such time as optimal temperature and flow rate have been reached. Therefore, Ultramar requests a variance and AOC from these requirements for no more than 65% for five (5) minutes during the start-up period, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU start-up.

Finally, Ultramar's Permit also contains Administrative Conditions E.3, E.7 and E.8 which require Ultramar to maintain compliance with emissions limits in District Rules and the Health and Safety Code to ensure RECLAIM equipment complies with District Rules. Similarly, District Rules 203(b), 2004(f)(1) and 3002(c) require Ultramar to comply with all permit conditions. As explained above, Ultramar will be unable to comply with the various District Rules and Permit conditions listed above until the equipment at issue in this petition is fully restarted and returns to normal operation. Therefore, the Refinery also will be unable to comply with

these conditions and rules until the equipment at issue in this petition is fully restarted and returns to normal operation.

Ultramar will comply with the variance conditions and AOC attached hereto as **Exhibit 3**.

The Refinery expects the repair work on the Alkylation Unit to begin on April 24, 2025 and that the repair work will be complete by mid-May, with startup beginning immediately following this work. The equipment is expected to reach steady state by June 1, 2025. Therefore, Ultramar is requesting that a Short Variance and AOC commencing on May 1, 2025 continuing through June 1, 2025, be granted.

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)? Provide specific event(s) and date(s) of occurrence(s).

Petitioner currently is in compliance. Noncompliance will occur with the start-up of the FCCU.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

As discussed above, Petitioner is currently operating the Refinery in compliance with all applicable District Rules and its Title V Permit Conditions. Variance and AOC relief is being sought for the currently planned Alkylation repair activities described above, which will cause the Refinery to be temporarily out of compliance with District Rules and the Facility Permit. Petitioner will work to complete the repair activities as expeditiously and as safely as possible to minimize the period of non-compliance.

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: \$ _____ Approximately 1.6 to 2.4 million per day _____

Number of employees laid off (if any): _____

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

The denial of this variance would result in significant harm to Ultramar. Ultramar supplies petroleum products to customers throughout the western United States. The FCCU and Alkylation Unit are critical to Refinery operations and must be in full operation for Ultramar to supply its customers and to meet its contractual commitments for gasoline and other types of fuels throughout the western United States. If the Hearing Board denies this petition, Ultramar would not be allowed to restart the FCCU and the Alkylation Unit.

If the Refinery is not allowed to restart the FCCU, it will experience short term economic losses of approximately \$ 1.6 million/day. If other systems must be shut down it would result in significant financial penalties to Ultramar in terms of lost production and lost sales, adverse impacts on Ultramar's ability to produce multiple refined petroleum products, and forcing Ultramar to violate contractual arrangements with customers, resulting in financial losses of approximately \$2.4 million per day to Ultramar. The inability to restart the Refinery's FCCU could also have disruptive effects on the regional petroleum markets.

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

Curtailment or shutdown of additional units would not remedy these compliance issues. As stated above, the Refinery has attempted various methods to resolve the issue with the iron fluoride scaling in the ISO Stripper Column with the Alkylation Unit online, however those measures have been unsuccessful. Therefore, the Refinery must shutdown and repair the equipment to return to full normal operations. The violations are a result of the need to restart the FCCU after conducting the repairs to the Alkylation Unit.

Ultramar has included, as **Exhibit 3** variance conditions and AOC that it proposes to comply with during the variance and AOC period.

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, insert "N/A" here and 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)
See attached Exhibit 4.			

* Column A minus Column B = Column C

Excess Opacity: 65 %

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

See emissions spreadsheet attached as Exhibit 4.

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.

Ultramar will make every effort to expedite equipment startup, and to minimize emissions during the variance period and AOC. The Refinery will temporarily surrender the ability to use a number of CO ERCs for the variance period to offset emissions.

For excess opacity, Ultramar intends to introduce feed to the FCCU gradually, to further minimize the potential for excess opacity. Also, Ultramar is willing to limit opacity when restarting the FCCU to no more than 65% for five (5) minutes in any one-hour period and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU start-up.

Ultramar also has considered whether other possible measures may be reasonably available to reduce emissions. However, given the nature and extent of the emissions involved and the technical demands of the start-up process, there are no other feasible mitigation measures available that would have a further impact in reducing start-up related emissions.

- Emissions of CO can be measured and quantified using the CEMS.

- Ultramar intends to achieve compliance as soon as possible by expediting equipment startup, and achieve stable operations as quickly as possible. Ultramar is providing all needed on-site personnel and resources necessary to assist in this effort.

- Not Applicable

- _____ Mohammed Eltaramsi _____ Ext. 2681
_____ Irene Kim _____ Ext 2385

PAGE 9 OF 14

**SUPPLEMENT TO PETITION FOR VARIANCE
ALTERNATIVE OPERATING CONDITION (AOC)**

PETITIONER: Ultramar Inc., d/b/a/ Valero Wilmington Refinery

CASE NO: 3845-112

FACILITY ID: 800026

FACILITY ADDRESS: 2402 East Anaheim Street

CITY, STATE, ZIP: Wilmington, CA 90744

Petitioner is requesting an Alternative Operating Condition (AOC) which will act as a permit revision to the Title V facility permit. Last Revision No. 149, issued on May 28, 2024

2025 APR -9 PM 3:21
CLERK OF THE BOARD
909-396-2500
www.aqmd.gov

1. Are you located within 50 miles of an affected state or Indian reservation? No ☒ Yes ☐

State	Indian Reservation/Location

2. List below the SIP-approved or federally enforceable requirements from which you are seeking relief in the form of an AOC.

Device/Application No.	Explanation of Non-compliance	Applicable Rule	Date of Rule
Fluid Catalytic Cracking Unit (FCCU) Regenerator (D36), FCCU Heater (D38) and Electrostatic Precipitators (ESPs) (C39, C1615)	Device will not be able to meet opacity limitations.	Health & Safety Code Section 41701, Rule 203(b), Rule 2004(f)(1), Rule 3002(c)(1), Rule 401(b)(1), Condition No. F9.1, Administrative Conditions Nos. E.3 and E.7 (first sentence only) and E.8	12-3-04 11-09-01 4-6-07 11-5-10 Stats. 1977, c. 644 § 1
FCCU Regenerator (D36), FCCU Heater (D38) and ESPs (C39,	Devices will not be able to meet CO limitations.	Rule 203(b), Rule 2004(f)(1), Rule 3002(c)(1),	12-3-04

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If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

3717800

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

C1615)		Rule 407(a), Equipment Specific CO limitation of 2,000 ppmv, Condition A63.4, Administrative Conditions Nos. E.3 and E.7 (first sentence only) and E.8	4-2-82 4-6-07 11-5-10
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EXAMPLE:

Device/Application No.	Explanation of Non-compliance	Applicable Rule	Date of Rule
D1	cannot use compliant printing ink	1130(c)	9-8-95
D17	cannot use compliant coating	1128(c)(5)(A)	2-7-92
D18	cannot test boiler for Rule 1146 CO compliance	1146 3004(a)(4)	5-12-94 8-11-95

3. List proposed AOC(s). Each AOC must contain the elements specified in Rule 518.2(g).

(Opacity Limits) AOC for Health & Safety Code Section 41701 (limiting visible emissions to No.2 Ringelmann), Rule 203(b), Rule 2004(f)(1), Rule 3002(c)(1), Rule 401(b)(1)(limiting visible emissions to 20% opacity), Condition No. F9.1, Administrative Conditions Nos. E.3 and E.7 (first sentence only) and E.8.

- 1) Petitioner shall limit total opacity when restarting Refinery Unit 61, the Fluid Catalytic Cracking Unit (FCCU)(FCCU Regenerator (Device 36) and FCCU Heater (Device 38); Process 3, System 1-2) to one instance of no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup. At all other times, the facility shall comply with District and Health and Safety Code requirements for opacity.
 - a) Determination of compliance shall be based upon continuous monitoring and recording of opacity using a certified opacity meter that meets Performance Specification I in 40 C.F.R. App. B. to Part 60 for the period of the variance. Petitioner shall maintain opacity records as required and shall promptly provide copies to the District upon request. In the event the Certified Opacity Meter fails, Petitioner shall maintain a certified Visible Emissions Evaluator (VEE) on site. The VEE shall take opacity readings in accordance with US EPA Method 9 for one fifteen-minute continuous period every hour when the Main Air Blower is on until the Certified Opacity Monitor is back in service.
 - b) Petitioner shall notify the District (using 1-800-CUT-SMOG and referring to this variance number) within one (1) hour if the Refinery exceeds any of the time or opacity limits in this Condition.
 - c) Petitioner shall notify the District (by email to Air Quality Inspector II Mohammed Eltamamsi (meltamamsi@aqmd.gov) within one (1) hour if the Refinery exceeds 30% opacity for six (6) minutes aggregate in any one-hour period during the variance and AOC period.

- d) Petitioner shall notify the District (using 1-800-CUT-SMOG and referring to this variance number) within one (1) hour if the Certified Opacity Monitor fails.
 - e) Petitioner shall submit all opacity data collected during the start-up period to South Coast AQMD by email to Air Quality Inspector (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.
- 2) Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) at least one (1) hour but no more than two (2) hours prior to conducting each of the following Unit 61 (FCCU) events related to the restart of the unit:
- a) Introduction of Catalyst
 - b) Circulating Catalyst
 - c) Adding Hydrotreated Torch Fuel
 - d) Introducing Feed

Petitioner shall notify the District within two (2) hours of discovery of any significant change in conducting any of the operational parameters listed in this Condition.

- 3) During events related to restarting the FCCU, Petitioner shall:
- a) Empty ESP catalyst hoppers prior to start-up.
 - b) Not recycle any catalyst fines into the system, and shall only use equilibrium catalyst to the maximum extent feasible.
 - c) Not add any additives or constituents to the catalyst that would increase the possibility of particulate emissions.
 - d) Load catalyst as quickly as possible (to seal dip legs).
 - e) The FCCU main blower and the ESP shall be in full operation prior to the startup of the FCCU.
- 4) Petitioner shall not conduct walnut shell injections in the FCCU expander (Device No. D 1249) during the FCCU start-up period.
- 5) Petitioner shall vent the FCCU to the air pollution control system, which shall be in operation at all times during the start-up operations.
- 6) Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) within four (4) hours after it achieves steady state operations of Unit 61 (FCCU) after startup.

(CO Limits) AOC for Rule 203(b), Rule 2004(f)(1), Rule 3002(c)(1), Rule 407(a), Equipment Specific CO limitation of 2,000 ppmv, Condition A63.4, Administrative Conditions Nos. E.3 and E.7 (first sentence only) and E.8

- 7) Petitioner shall temporarily suspend the use of sufficient Emission Reduction Credits (ERCs) to offset excess emissions increases of CO during the variance and AOC period, as noted in the **Exhibit 4**.
- 8) During start-up of the FCCU Regenerator (D36), the Petitioner may allow CO emissions to reach a maximum of 2,375 ppmv of uncorrected concentration based on an uncorrected 15-minute averaged concentration for no more than six (6) hours. At all other times, Petitioner shall comply

with Rule 407(a) and the equipment specific condition of 2,000 ppmv.

- 9) Petitioner shall monitor, record, and maintain records of CO emissions from the FCCU Regenerator (D36) during start-up using Certified CO Continuous Emissions Monitoring System (CEMS).
 - a) Petitioner shall submit all CO data collected during the start-up period to South Coast AQMD by email to Air Quality Inspector II Mohammed Eltamamsi (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.
 - b) CO data shall include the uncorrected 15-minute averaged concentrations (dry basis) [Rule 407], the corrected hourly averaged concentrations (dry basis) [40 CFR 60.103], and the daily CO emissions [P/O Condition A63.4]
- 10) Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) within four (4) hours after it achieves steady state operations of Unit 61 (FCCU) after startup.

4. Explain how operation under the AOC will not result in the source discharging such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property

The purpose of this petition is to allow Ultramar to restart the FCCU. Petitioner does not anticipate that the start-up will cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or could endanger the comfort, repose, health, or safety of any such persons or the public, or cause, or have a natural tendency to cause, injury, or damage to business or property. Odorous substances are not anticipated to be released during the variance and AOC period. Additionally, as explained below in item #6, air dispersion modeling indicates that hourly emissions from turnaround or FCCU restart activities will not by themselves, cause an exceedance of any National Ambient Air Quality Standard. Finally, during past variances and AOCs of the same nature, the Refinery has not caused any public nuisances.

5. Explain how the AOC will not violate any NSPS, NESHAP or other standard promulgated by the U.S. EPA under Sections 111 or 112 of the Clean Air Act, or any District rule that substitutes for such requirements, any standard or requirement under Titles IV or VI of the CAA or any requirements where an AOC cannot be granted.

40 CFR 60 Subpart J, 12-1-2015

Ultramar is subject to 40 CFR 60 Subpart J (12-1-2015) for the units and devices for which this AOC is sought, however Subpart J does not apply during start up and shut down periods or period of malfunction. Since all the emissions which may have exceeded subpart J will occur only during startup, no violations will occur.

Start up and shutdown emissions are exempted from complying with NSPS requirements pursuant to 40 CFR 60 Subpart A. 60.8(c) states, in pertinent part, "...nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard." Thus, during the FCCU startup, the Petitioner will not violate this applicable NSPS.

40 CFR 63 Subpart UUU, 11-19-2020

Additionally, the FCCU is subject to the requirements of 40 CFR 63 Subpart UUU for PM and CO pollutants. 40 CFR 63.1570 (which contains the applicability requirements of 40 CFR 63 Subpart UUU states that "Consistent with Sec. Sec. 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with Sec. 63.6(e)(1)." Section 63.6(e)(1) requires the operator of

a source to operate the source and any air pollution control equipment in accordance with safety and "good air pollution control practices." "During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices." Section 63.6(e)(3) requires a startup, shutdown, and malfunction plan. Petitioner has such a plan and will operate in accordance to the plan during the AOC period. Thus, Petitioner will not violate the NESHAP standard of Subpart UUU.

6. Explain how the excess emissions resulting from operation pursuant to the AOC would not, by themselves, cause an exceedance of a National Ambient Air Quality Standard

Ultramar has conducted air dispersion modeling in the past for a planned turnaround and demonstrated that those emissions, by themselves would not exceed any National Ambient Air Quality Standards. The peak hourly emissions from the repair activities will be less than or the same as those for the planned turnaround (Variance 3845-80). Therefore, the emissions from this AOC are also not expected to cause an exceedance of any National Ambient Air Quality Standard.

7. Did the violation(s) result from a breakdown of technology? If Yes, explain below. If No, skip to No. 8.

- (A). Explain how the breakdown could not have been prevented through careful planning or design.

N/A

- (B). Explain how the breakdown could not reasonably have been foreseen and avoided.

N/A

- (C). Explain how at all times the equipment, including air pollution control equipment, or processes were maintained and operated in a manner consistent with good practice for minimizing emissions

N/A

- (D). Explain how repairs were or will be made in an expeditious fashion using off-shift labor and overtime, to the extent practicable, to ensure that such repairs are made as expeditiously as practicable

N/A

- (E). Explain how the breakdown is not part of a recurring pattern indicative of inadequate design, operation, or maintenance.

N/A

8. If the violation(s) will occur during startup or shutdown, explain how the frequency and duration of operation in startup or shutdown mode will be minimized to the maximum extent feasible.

Ultramar will make every effort to expedite startup, and to minimize emissions during the AOC period. For excess opacity, Ultramar intends to introduce feed to the FCCU gradually, so as to further minimize the potential for excess opacity. Also, Ultramar is willing to limit opacity when restarting the FCCU to no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup.

During start-up of the FCCU Regenerator (D36), the Petitioner may allow CO emissions to reach a maximum of 2,375 ppmv of uncorrected concentration for no more than six (6) hours. At all other times,

Petitioner shall comply with Rule 407(a) and the equipment specific condition of 2,000 ppmv.

Ultramar also has considered whether other possible measures may be reasonably available to reduce emissions. However, given the nature and extent of the emissions involved and the technical demands of the restart process, there are no other feasible mitigation measures reduce the duration of the startup.

9. Prepare an Excess Emission Calculation Attachment (Attachment I) for each device, or group of similar devices, that is or will be operating in non-compliance. **You should check with the Clerk of the Board prior to filing this petition to determine if there are any credits available in the AOC SIP allowance bank for the relevant pollutants. If no credits are available, you must demonstrate mitigation to zero excess emissions.**

See attached Exhibit 4.

10. Identify below any Emission Reduction Credit (ERC) certificates that you will voluntarily relinquish during the term of the AOC in the event that the SIP allowance bank is depleted and is unavailable for use.

ERC Certificate Information

ERC No.	Pollutant	Pounds/Day	Pounds/Month (30 x lbs/day)
AQ001325	CO	151	4530

***If there are no AOC credits for the relevant pollutant(s) available in the SIP allowance bank, skip to No. 13.**

11. Explain how any emissions resulting from AOC and all other AOCs in effect will not exceed AOC credits held in the AOC Credit Bank.

Not Applicable.

12. Based on the required attachments and calculations, summarize (in pounds) [1] the combined, monthly excess emissions, [2] mitigating emission reductions, and [3], ERC and/or emissions you are requesting to be withdrawn from the AOC SIP allowance bank, Charts 12(A) and 12 (B).

See attached Exhibit 4

(A)

Pollutant	Month/Year (Example: 6/98)	[1] Excess Emissions From Attachments	[2] Mitigating Emission Reductions from Attachments	[3] ERC Emissions Relinquished
CO	5/2025	928	N/A	4530

- (B) Using previous Chart, calculate total emissions required from bank, if available.

Pollutant	Emissions (pounds) Required from Bank (+1-2-3)
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None	

13. Prepare a Mitigation Measure Emission Calculation Attachment (Attachment II) for emission reductions that are feasible, to the maximum extent possible, during the period of the AOC; or explain why mitigation measures are not feasible.

Ultramar will make every effort to expedite equipment startup and to minimize emissions during the AOC period. The Refinery will temporarily surrender the ability to use a number of CO ERCs for the AOC period to offset emissions.

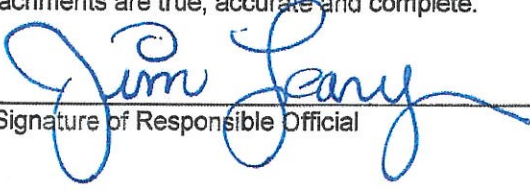
For excess opacity, Ultramar intends to introduce feed to the FCCU gradually, so as to further minimize the potential for excess opacity. Also, Ultramar is willing to limit opacity when restarting the FCCU to no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup.

During start-up of the FCCU Regenerator (D36), the Petitioner may allow CO emissions to reach a maximum of 2,375 ppmv of uncorrected concentration for no more than six (6) hours. At all other times, Petitioner shall comply with Rule 407(a) and the equipment specific condition of 2,000 ppmv.

Ultramar also has considered whether other possible measures may be reasonably available to reduce emissions. However, given the nature and extent of the emissions involved and the technical demands of the start-up process, there are no other feasible mitigation measures available that would have a further impact in reducing start-up related emissions.

I certify under penalty of law that I am the responsible official, or that official's designee, for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments are true, accurate and complete.

Dated: April 9, 2025


Signature of Responsible Official

Jim Leary
Print Name of Responsible Official

Operation Manager
Title of Responsible Official

Telephone: (562) 436-5979

ATTACHMENT I A
EXCESS EMISSION CALCULATION

PETITIONER: Ultramar Inc., d/b/a/ Valero Wilmington Refinery

CASE NO: 3845-112

FACILITY ID: 800026

Device/Application No. (s): FCCU Regenerator (D36), FCCU Heater (D38), ESPs (C39, C1615)

- A. List all SIP-approved, federally-enforceable, emission limits, permit conditions, and other requirements for which an AOC is sought:

Requirement Violated	Rule Violated	Rule Date
Condition Nos. F9.1	Health & Safety Code Section 41700, Rule 401(b)	1977, 3-2-1984
Administrative Condition Nos. E.3 (first sentence), E7 (first sentence) and E.8	Rule 203(b), Rule 2004 (f)(1), Rule 3002(c)	1-5-1990, 5-11-2001

- B. Explain below how you can reduce emissions in excess of the federally enforceable emission limits from the affected devices to the maximum extent feasible during the period of the AOC.

Ultramar will make every effort to expedite equipment startup and minimize emissions during the AOC period.

For excess opacity, Ultramar intends to introduce feed to the FCCU gradually, so as to further minimize the potential for excess opacity. Also, Ultramar is willing to limit opacity when restarting the FCCU to no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup.

Ultramar also has considered whether other possible measures may be reasonably available to reduce emissions. However, given the nature and extent of the emissions involved and the technical demands of the shutdown and restart process, there are no other feasible mitigation measures available that would have a further impact in reducing start-up related emissions.

- C. List the emission limits, activity levels and/or operating conditions that you propose to comply with in lieu of the AQMD requirement(s).

Petitioner shall limit total opacity when restarting Unit 61 (FCCU) to one instance of no more 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup.

- D. Attach calculations of monthly excess emissions, done in accordance with Rule 518.2 (h)(1), from equipment subject to the AOC and summarize results here: **See emissions calculations attached as Exhibit 4.**

Monthly Emissions (Pound)				
Pollutant	Month/Yr	[1] Based on Compliance with Rules, Existing Permit Conditions and Projected Activity Levels [518.2(h)(1)(A)]	[2] Based on Proposed Operating Conditions and Activity Levels [518.2(h)(1)(B)]	[3]* Excess Emissions (Difference)
Opacity		See Exhibit 4, Attached		

*Column 1 minus Column 2 = Column 3

If your proposed emission limits, operating conditions or activity levels will vary by calendar month, provide numbers for each month from the first day of non-compliance, or the day the AOC petition is submitted, whichever is later, until the last day of non-compliance.

- E. Propose below the procedures you will use to monitor, record and report excess emissions.

- 1) Petitioner shall limit total opacity when restarting Refinery Unit 61, the Fluid Catalytic Cracking Unit (FCCU)(FCCU Regenerator (Device 36) and FCCU Heater (Device 38); Process 3, System 1-2) to one instance of no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup. At all other times, the facility shall comply with District and Health and Safety Code requirements for opacity.
 - a) Determination of compliance shall be based upon continuous monitoring and recording of opacity using a certified opacity meter that meets Performance Specification I in 40 C.F.R. App. B. to Part 60 for the period of the variance. Petitioner shall maintain opacity records as required and shall promptly provide copies to the District upon request. In the event the Certified Opacity Meter fails, Petitioner shall maintain a certified Visible Emissions Evaluator (VEE) on site. The VEE shall take opacity readings in accordance with US EPA Method 9 for one fifteen-minute continuous period every hour when the Main Air Blower is on until the Certified Opacity Monitor is back in service.
 - b) Petitioner shall notify the District (using 1-800-CUT-SMOG and referring to this variance number) within one (1) hour if the Refinery exceeds any of the time or opacity limits in this Condition.
 - c) Petitioner shall notify the District (by email to Air Quality Inspector II Mohammed Eltamamsi (meltaramsi@aqmd.gov) within one (1) hour if the Refinery exceeds 30% opacity for six (6) minutes aggregate in any one-hour period during the variance and AOC period.
 - d) Petitioner shall notify the District (using 1-800-CUT-SMOG and referring to this variance number) within one (1) hour if the Certified Opacity Monitor fails.
 - e) Petitioner shall submit all opacity data collected during the start-up period to South Coast AQMD by email to Air Quality Inspector (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.

- 2) Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) at least one (1) hour but no more than two (2) hours prior to conducting each of the following Unit 61 (FCCU) events related to the restart of the unit:

- a) Introduction of Catalyst
- b) Circulating Catalyst
- c) Adding Hydrotreated Torch Fuel
- d) Introducing Feed

Petitioner shall notify the District within two (2) hours of discovery of any significant change in conducting any of the operational parameters listed in this Condition.

- 3) During events related to restarting the FCCU, Petitioner shall:

- a) Empty ESP catalyst hoppers prior to start-up.
- b) Not recycle any catalyst fines into the system, and shall only use equilibrium catalyst to the maximum extent feasible.
- c) Not add any additives or constituents to the catalyst that would increase the possibility of particulate emissions.
- d) Load catalyst as quickly as possible (to seal dip legs).
- e) The FCCU main blower and the ESP shall be in full operation prior to the startup of the FCCU.

- 4) Petitioner shall not conduct walnut shell injections in the FCCU expander (Device No. D 1249) during the FCCU start-up period.
- 5) Petitioner shall vent the FCCU to the air pollution control system, which shall be in operation at all times during the start-up operations.
- 6) Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) within four (4) hours after it achieves steady state operations of Unit 61 (FCCU) after startup.

ATTACHMENT II A
MITIGATION MEASURE EMISSION CALCULATION

PETITIONER: Ultramar Inc., d/b/a/ Valero Wilmington Refinery

CASE NO: 3845-112

FACILITY ID: 800026

- A. Describe proposed mitigation measures that reduce emission to maximum extent possible from equipment not in violation of an applicable requirement and the affected device/application no.(s):

Ultramar will make every effort to expedite equipment startup and minimize emissions during the AOC period.

For excess opacity, Ultramar intends to introduce feed to the FCCU gradually, so as to further minimize the potential for excess opacity. Also, Ultramar is willing to limit opacity when restarting the FCCU to no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup.

Ultramar also has considered whether other possible measures may be reasonably available to reduce emissions. However, given the nature and extent of the emissions involved and the technical demands of the restart process, there are no other feasible mitigation measures available that would have a further impact in reducing start-up related emissions.

- B. List proposed operating conditions and activity levels for each of the above affected activities or device/application no(s).

Not Applicable

- C. Attach calculations of monthly emission mitigations, done in accordance with Rule 518.2 (h)(2)(D), from equipment not in violation of an applicable requirement and summarize results here: **See attached Exhibit 4**

		Monthly Emissions (Pound)		
Pollutant	Month/Yr	[1] Baseline Emission Rate	[2] Post Reduction Emission Rate X Activity Level	[3]* Intra-Facility Emission Reduction (Difference)
Opacity		See Exhibit 4, Attached		

*Column 1 minus Column 2 = Column 3

If emissions reductions you are committing to will vary by calendar month, provide numbers for each month from the first day of non-compliance, or the day the AOC petition is submitted, whichever is later, until the last day of non-compliance.

- D. Propose below the procedures you will use to monitor, record and report mitigating emission reductions.

Emissions of opacity can be measured and quantified using the CEMS devices.

ATTACHMENT I B
EXCESS EMISSION CALCULATION

PETITIONER: Ultramar Inc., d/b/a/ Valero Wilmington Refinery

CASE NO: 3845-112

FACILITY ID: 800026

Device/Application No. (s): FCCU Regenerator (D36), FCCU Heater (D38), ESPs (C39, C1615)

- A. List all SIP-approved, federally-enforceable, emission limits, permit conditions, and other requirements for which an AOC is sought:

Requirement Violated	Rule Violated	Rule Date
CO limitation	Rule 407(a)	4-2-1982
Condition A63.4	Rule 203(b), Rule 2004 (f)(1)	1-5-1990, 5-11-2001
Equipment Specific CO limitation of 2000 ppmv,	Rule 203(b), Rule 2004 (f)(1)	1-5-1990, 5-11-2001
Administrative Condition Nos. E.3 (first sentence), E.7 (first sentence) and E.8	Rule 203(b), Rule 2004 (f)(1)	1-5-1990, 5-11-2001

- B. Explain below how you can reduce emissions in excess of the federally enforceable emission limits from the affected devices to the maximum extent feasible during the period of the AOC.

Ultramar will make every effort to expedite equipment startup and minimize emissions during the Variance and AOC period. The Refinery will temporarily surrender the ability to use a number of CO ERCs for the Variance and AOC period to offset emissions.

Ultramar also has considered whether other possible measures may be reasonably available to reduce emissions. However, given the nature and extent of the emissions involved and the technical demands of the restart process, there are no other feasible mitigation measures available that would have a further impact in reducing start-up related emissions.

- C. List the emission limits, activity levels and/or operating conditions that you propose to comply with in lieu of the AQMD requirement(s).

The Refinery will temporarily surrender the ability to use a number of CO ERCs for the Variance and AOC period to offset emissions.

- D. Attach calculations of monthly excess emissions, done in accordance with Rule 518.2 (h)(1), from equipment subject to the AOC and summarize results here: **See emissions calculations attached as Exhibit 4**

Pollutant	Month/Yr	Monthly Emissions (Pound)		
		[1] Based on Compliance with Rules, Existing Permit Conditions and Projected Activity Levels [518.2(h)(1)(A)]	[2] Based on Proposed Operating Conditions and Activity Levels [518.2(h)(1)(B)]	[3]* Excess Emissions (Difference)
CO		See Exhibit 4, Attached		

*Column 1 minus Column 2 = Column 3

If your proposed emission limits, operating conditions or activity levels will vary by calendar month, provide numbers for each month from the first day of non-compliance, or the day the AOC petition is submitted, whichever is later, until the last day of non-compliance.

E. Propose below the procedures you will use to monitor, record and report excess emissions.

- 1) Petitioner shall temporarily suspend the use of sufficient Emission Reduction Credits (ERCs) to offset excess emissions increases of CO during the variance and AOC period, as noted in the **Exhibit 4**.
- 2) During start-up of the FCCU Regenerator (D36), the Petitioner may allow CO emissions to reach a maximum of 2,375 ppmv of uncorrected concentration based on an uncorrected 15-minute averaged concentration for no more than six (6) hours. At all other times, Petitioner shall comply with Rule 407(a) and the equipment specific condition of 2,000 ppmv.
- 3) Petitioner shall monitor, record, and maintain records of CO emissions from the FCCU Regenerator (D36) during shutdown and start-up using Certified CO Continuous Emissions Monitoring System (CEMS).
 - a) Petitioner shall submit all CO data collected during the start-up period to South Coast AQMD by email to Air Quality Inspector II Mohammed Eltamamsi (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.
 - b) CO data shall include the uncorrected 15-minute averaged concentrations (dry basis) [Rule 407], the corrected hourly averaged concentrations (dry basis) [40 CFR 60.103], and the daily CO emissions [P/O Condition A63.4]
- 4) Petitioner shall notify the District within four (4) hours after it achieves steady state operations of Unit 61 (FCCU) after start up.

ATTACHMENT II B
MITIGATION MEASURE EMISSION CALCULATION

PETITIONER: Ultramar Inc., d/b/a/ Valero Wilmington Refinery

CASE NO: 3845-111

FACILITY ID: 800026

- A. Describe proposed mitigation measures that reduce emission to maximum extent possible from equipment not in violation of an applicable requirement and the affected device/application no.(s):

N/A

- B. List proposed operating conditions and activity levels for each of the above affected activities or device/application no(s).

Not Applicable

- C. Attach calculations of monthly emission mitigations, done in accordance with Rule 518.2 (h)(2)(D), from equipment not in violation of an applicable requirement and summarize results here: **See attached Exhibit 4**

Monthly Emissions (Pound)				
Pollutant	Month/Yr	[1] Baseline Emission Rate	[2] Post Reduction Emission Rate X Activity Level	[3]* Intra-Facility Emission Reduction (Difference)
CO		See Exhibit 4, Attached		

*Column 1 minus Column 2 = Column 3

If emissions reductions you are committing to will vary by calendar month, provide numbers for each month from the first day of non-compliance, or the day the AOC petition is submitted, whichever is later, until the last day of non-compliance.

- D. Propose below the procedures you will use to monitor, record and report mitigating emission reductions.

Emissions of CO can be measured and quantified using the CEMS devices.

E: HB:Petitions:AOC Supplement: Revised October 5, 2007

EXHIBIT “1”

FACILITY PERMIT TO OPERATE ULTRAMAR INC

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: CATALYTIC CRACKING					P13.1
REGENERATOR, FCC, 61-IN-1, WITH CYCLONE, HEIGHT: 100 FT 6 IN; DIAMETER: 26 FT 6 IN A/N: 598866	D36	C39 D157 D166 D168 D973	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 500 PPMV (8) [40CFR 60 Subpart J, 12-1-2015; RULE EMISSION LIMIT/REQUIREMENT SURVIVING TERMINATION OF VALERO CONSENT DECREE, 6-16-2005]; 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: 41 PPMV (8) [RULE EMISSION LIMIT/REQUIREMENT SURVIVING TERMINATION OF VALERO CONSENT DECREE, 6-16-2005]; NOX: 82 PPMV (8A) [RULE EMISSION LIMIT/REQUIREMENT SURVIVING TERMINATION OF VALERO CONSENT DECREE, 6-16-2005]; PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]; PM: 1 LB(S)/1000 LBS COKE BURNOFF (8) [RULE EMISSION LIMIT/REQUIREMENT SURVIVING TERMINATION OF VALERO CONSENT DECREE, 6-16-2005]; PM: 2 LBS/TON COKE BURNOFF (8A) [40CFR 60 Subpart J, 12-1-2015]; PM10: 2.8 LBS/1000 BBLs FRESH FEED (5) [RULE 1105.1, 11-7-2003]; SO2: 25 PPMV (8A) [RULE EMISSION	A63.4, A63.8, A195.2, A195.3, A195.4, A195.17, A195.18, A195.19, A195.21, A195.22, D29.12, D29.13, D82.3, D90.4, D323.1, E73.5, E193.4, H23.27, H23.36, K40.3

- * (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 ULTRAMAR INC

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: CATALYTIC CRACKING					P13.1
HEATER, 61-H-1, REFINERY GAS, 100 MMBTU/HR WITH A/N: 178009 BURNER, REFINERY GAS, JOHN ZINK, MODEL YE, 1 BURNER	D38		NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; HAP: (10) [40CFR 63 Subpart DDDDD, 10-6-2022]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.2, D90.3, E71.1, H23.5
System 3: FCCU CONTROL					
ELECTROSTATIC PRECIPITATOR, 61-PR-1A/B, FCCU, MODEL 24/25/2X9/10 IN, TWO PARALLEL SINGLE CHAMBER UNITS, 24 GAS PASSAGES PER PRECIPITATOR A/N: 178024	C39	D36 C1615		NH3: 10 PPMV (5) [RULE 1105.1, 11-7-2003]	A195.3, C12.1, E102.1
ELECTROSTATIC PRECIPITATOR, 61-PR-2, FCCU, HAMON RESEARCH-COTTRELL, SINGLE CHAMBER, 27 GAS PASSAGES WITH A/N: 458075 HOPPER, 8 TOTAL AMMONIA INJECTION, AQUEOUS AMMONIA	C1615	C39		NH3: 10 PPMV (5) [RULE 1105.1, 11-7-2003]	A195.3, C12.1, D90.6, D90.7, D90.8, D90.9, E193.5, E193.6
System 4: CATALYST HANDLING UNIT					
HOPPER, DUMP, FRESH CATALYST STORAGE, 61-V-1 A/N: 178025	D40			PM: (9) [RULE 405, 2-7-1986]	D323.1
HOPPER, DUMP, EQUILIBRIUM CATALYST STORAGE, 61-V-2 A/N: 178025	D41			PM: (9) [RULE 405, 2-7-1986]	D323.1

- * (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 ULTRAMAR INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D768]

A63.3 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
PM	Less than or equal to 2 LBS PER DAY
CO	Less than or equal to 1 LBS PER DAY

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D932]

A63.4 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
CO	Less than or equal to 955 LBS PER DAY
PM	Less than or equal to 562 LBS PER DAY

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D36]

A63.5 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
-------------	-----------------

FACILITY PERMIT TO OPERATE ULTRAMAR INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

FACILITY CONDITIONS

- F8.1 The operator shall comply with all applicable mitigation measures and/or project conditions stipulated in the "Statement of Findings, Statement of Overriding Considerations, and Mitigation Monitoring Plan" document which is part of the AQMD Certified Subsequent Environmental Impact Report dated 08/30/2002 for this facility.

[CA PRC CEQA, 5-12-2017]

- F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
- (a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
 - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[**RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

- F10.1 Material(s) that contain the following compound(s) shall not be used in this facility;

FACILITY PERMIT TO OPERATE ULTRAMAR INC

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]

FACILITY PERMIT TO OPERATE ULTRAMAR INC

SECTION E: ADMINISTRATIVE CONDITIONS

5. The operator shall not use any equipment having air pollution control device(s) incorporated within the equipment unless the air pollution control device is in full operation. [204]
6. The operator shall maintain records to demonstrate compliance with rules or permit conditions that limit equipment operating parameters, or the type or quantity of material processed. These records shall be made available to SCAQMD personnel upon request and be maintained for at least: [204]
 - a. Three years for a facility not subject to Title V; or
 - b. Five years for a facility subject to Title V.
7. The operator shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit. Compliance with emission limits shall be determined according to the following specifications, unless otherwise specified by SCAQMD rules or permit conditions: [204]
 - a. For internal combustion engines and gas turbines, measured concentrations shall be corrected to 15 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1110.2, 1134, 204]
 - b. For other combustion devices, measured concentrations shall be corrected to 3 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1146, 1146.1, 204]
 - c. For a large NO_x source, compliance with a RECLAIM concentration limit shall be measured over a continuous 60 minutes for that source; [2012]
 - d. For non-combustion sources, compliance with emission limits shall be determined and averaged over a period of 60 minutes; [204]

FACILITY PERMIT TO OPERATE ULTRAMAR INC

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 compounds 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 of 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 Regulations, except those listed in Table 1 of Rule 2001 for NO_x RECLAIM sources and Table 2 of Rule 2001 for SO_x RECLAIM sources. Those provisions listed in Tables 1 or 2 shall not apply to NO_x or SO_x 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 NO_x or SO_x 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.

FACILITY PERMIT TO OPERATE ULTRAMAR INC

SECTION E: ADMINISTRATIVE CONDITIONS

- b. Brief process description, including maximum and normal operating temperatures, pressures, through-put, etc.
 - c. Operating conditions under which the test will be performed.
 - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts/stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
 - e. Brief description of sampling and analytical methods used to measure each pollutant, temperature, flow rates, and moisture.
 - f. Description of calibration and quality assurance procedures.
 - g. Determination that the testing laboratory qualifies as an "independent testing laboratory" under Rule 304 (no conflict of interest).
10. The operator shall submit a report no later than 60 days after conducting a source test, unless otherwise required by SCAQMD Rules or equipment-specific conditions. The report shall contain the following information: [204]
- a. The results of the source test.
 - b. Brief description of the equipment tested.
 - c. Operating conditions under which test will be performed.
 - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts/stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
 - e. Field and laboratory data forms, strip charts and analyses.

FACILITY PERMIT TO OPERATE ULTRAMAR INC

SECTION E: ADMINISTRATIVE CONDITIONS

- f. Calculations for volumetric flow rates, emission rates, control efficiency, and overall control efficiency.
- 11. The operator shall, when a source test is required, provide and maintain facilities for sampling and testing. These facilities shall comply with the requirements of SCAQMD Source Test Method 1.1 and 1.2. [217]
- 12. Whenever required to submit a written report, notification or other submittal to the Executive Officer, SCAQMD, or the District, the operator shall mail or deliver the material to: Deputy Executive Officer, Engineering and Compliance, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765-4178. [204]

**Exhibit 2 –
NOVs**



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
6	30	24

From:
To:

Facility Name: Ultramar Inc.		Facility ID#: 800026	Sector: LB
Location Address: 2402 E. Anaheim St.		City: Wilmington	Zip: 90744
Mailing Address: 2402 E Anaheim St.		City: Wilmington	Zip: 90744

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1) Title V 1118(d)(1)(D) 40CFR 63		Section J	Failure to maintain NHVcz at or above 270 Btu/scf
2	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	218.1 40CFR 60	Title V		Failure to conduct CEMS audit in the 2nd quarter of 2024 for D1550 CO analyzer and D36 NOx and SO2 analyzer
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: Sharon Shearer	Phone: 510.295.7655	Served By: Mohammed Elharamsi	Date Notice Served: 9/17/24
Title: Env. Manager	Email: Sharon.shearer@valent.com	Phone No: ☐ 909-396- ☒ 310-233-7009	Email: meltaramsi@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail



NOTICE OF VIOLATION

DATE OF VIOLATION

Month:	Day:	Year:
02	13	23

Facility Name: ULTRAMAR INC		Facility ID#: 800026	Sector: LB
Location Address: 2402 E. ANAHEIM ST.		City: WILMINGTON	Zip: 90744
Mailing Address: 2402 E. ANAHEIM ST.		City: WILMINGTON	Zip: 90744

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2004 (e)			INACCURATE QUARTER 1 & 2 QCERS
2	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2004 (b)(4)			INACCURATE APEP
3	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2004 (c)(1)			SUBMITTED QCER/APEP CORRECTIONS AFTER THE END OF THE RECONCILIATION PERIOD FOR THE LAST QUARTER OF THE 2023 COMPLIANCE YEAR
4	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2012 APPX. A CH 3I LARGE, 2			FAILURE TO USE CORRECT MISSING DATA PROCEDURE
5	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2012 (c)(3)(A)			FAILURE TO SUBMIT DAILY NOx EMISSIONS WITHIN THE 96-HOUR EXTENSION

Served To: JON ELLIOT	Phone: 562-491-6797	Served By: LUCAS ANOTADO	Date Notice Served: 10/18/2024
Title: ENVIRONMENTAL ENGINEER	Email: JON.ELLIOT@VALERO.COM	Phone No: ☒ 909-396-2169 ☐ 310-233-	Email: LANOTADO @ aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL

EXHIBIT “3”

EXHIBIT 3
[PROPOSED] VARIANCE AND AOC CONDITIONS
April 8, 2024

Ultramar, Inc., DBA Valero Wilmington Refinery

Short Variance Petition 3845-112

Unless U.S. EPA objects to the Alternative Operating Conditions ("AOCs") below within the 45-day review period or in response to a timely citizen petition, the following Conditions Number 1 - 16 shall apply to the equipment referenced for the duration of both the Variance and AOC.

Condition 16 is only applicable to the AOC:

1. The Variance and AOC period shall commence on May 1, 2025. The Variance and AOC period shall end when all start-ups are completed, and normal refinery operations are reached.
2. Petitioner shall limit total opacity when restarting Refinery Unit 61, the Fluid Catalytic Cracking Unit (FCCU)(FCCU Regenerator (Device 36) and FCCU Heater (Device 38); Process 3, System 1-2) to one instance of no more than 65% for five (5) minutes aggregate in any one-hour period during the variance and AOC, and 30% on an hourly average for no more than twelve (12) hours during the duration of the FCCU startup. At all other times, the facility shall comply with District and Health and Safety Code requirements for opacity.
 - a. Determination of compliance shall be based upon continuous monitoring and recording of opacity using a certified opacity meter that meets Performance Specification I in 40 C.F.R. App. B. to Part 60 for the period of the variance. Petitioner shall maintain opacity records as required and shall promptly provide copies to the District upon request. In the event the Certified Opacity Meter fails, Petitioner shall maintain a certified Visible Emissions Evaluator (VEE) on site. The VEE shall take opacity readings in accordance with US EPA Method 9 for one fifteen-minute continuous period every hour when the Main Air Blower is on until the Certified Opacity Monitor is back in service.
 - b. Petitioner shall notify the District (using 1-800-CUT-SMOG and referring to this variance number) within one (1) hour if the Refinery exceeds any of the time or opacity limits in this Condition.
 - c. Petitioner shall notify the District (by email to Air Quality Inspector II Mohammed Eltaramsi (meltaramsi@aqmd.gov) within one (1) hour if the Refinery exceeds 30% opacity for six (6) minutes aggregate in any one-hour period during the variance and AOC period.

- d. Petitioner shall notify the District (using 1-800-CUT-SMOG and referring to this variance number) within one (1) hour if the Certified Opacity Monitor fails.
 - e. Petitioner shall submit all opacity data collected during the start-up period to South Coast AQMD by email to Air Quality Inspector (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.
- 3. Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) at least one (1) hour but no more than two (2) hours prior to conducting each of the following Unit 61 (FCCU) events related to the restart of the unit:
 - a. Introduction of Catalyst
 - b. Circulating Catalyst
 - c. Adding Hydrotreated Torch Fuel
 - d. Introducing Feed

Petitioner shall notify the District within two (2) hours of discovery of any significant change in conducting any of the operational parameters listed in this Condition.

- 4. During events related to restarting the FCCU, Petitioner shall:
 - a. Empty ESP catalyst hoppers prior to start-up.
 - b. Not recycle any catalyst fines into the system, and shall only use equilibrium catalyst to the maximum extent feasible.
 - c. Not add any additives or constituents to the catalyst that would increase the possibility of particulate emissions.
 - d. Load catalyst as quickly as possible (to seal dip legs).
 - e. The FCCU main blower and the ESP shall be in full operation prior to the startup of the FCCU.
- 5. Petitioner shall not conduct walnut shell injections in the FCCU expander (Device No. D 1249) during the FCCU start-up period.
- 6. Petitioner shall vent the FCCU to the air pollution control system, which shall be in operation at all times during the start-up operations.

7. Petitioner shall notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) within four (4) hours after it achieves steady state operations of Unit 61 (FCCU) after startup.
8. Petitioner shall temporarily suspend the use of sufficient Emission Reduction Credits (ERCs) to offset excess emissions increases of CO during the Variance and AOC period, as noted in **Exhibit 4** to Petitioner's Petition for a Variance and AOC.
9. During start-up of the FCCU Regenerator (D36), the Petitioner may allow CO emissions to reach a maximum of 2,375 ppmv of uncorrected concentration based on an uncorrected 15-minute averaged concentration for no more than six (6) hours. At all other times, Petitioner shall comply with Rule 407(a) and the equipment specific condition of 2,000 ppmv.
10. Petitioner shall monitor, record, and maintain records of CO emissions from the FCCU Regenerator (D36) during start-up using Certified CO Continuous Emissions Monitoring System (CEMS).
 - a. Petitioner shall submit all CO data collected during the start-up period to South Coast AQMD by email to Air Quality Inspector II Mohammed Eltaramsi (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.
 - b. CO data shall include the uncorrected 15-minute averaged concentrations (dry basis) [Rule 407], the corrected hourly averaged concentrations (dry basis) [40 CFR 60.103], and the daily CO emissions [P/O Condition A63.4]
11. Petitioner shall submit an electronic copy of the FCCU startup, shutdown, and malfunction plan, as required by 40 CFR Section 63.6(e)(3), along with a letter certifying that the facility has performed the shutdown and the start-up of the unit in accordance with such plan, to South Coast AQMD by email to Air Quality Inspector II Mohammed Eltaramsi (meltaramsi@aqmd.gov) no later than five (5) days after normal refinery operations are reached.
12. Petitioner shall immediately notify the District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) if Petitioner receives any complaints regarding visible emissions or odors during the Variance and AOC period including the name address and phone number of any complainant.
13. For the variance, Petitioner shall calculate, record, and report all excess emissions during the Variance and AOC period, and pay all applicable fees to the Clerk of the Board on or before thirty (30) days from the receipt of invoice or this variance shall be invalid pursuant to Rule 303(k).

14. Within 30 days after achieving normal operations, Petitioner shall calculate the actual excess emissions for all pollutants from each equipment during the Variance and AOC period and report the final emissions data to District Inspector Mohammed Eltaramsi.
15. Petitioner shall notify the Clerk of the Board and District compliance staff by telephone (using 1-800-CUT-SMOG and referring to this variance number) within 5 days once final compliance with District rules is achieved.
16. In the event U.S. EPA objects to the AOCs within the 45-day review period or in response to a timely citizen petition, the AOCs shall be ineffective to protect the Petitioner from U.S. EPA or citizen enforcement under the federal Clean Air Act for any federally enforceable requirement, and the words, "and AOC" shall be stricken from Conditions 1- 15, as applicable.

EXHIBIT “4”

Facility Name: Ultramar Inc., a Valero Company
Facility Address: 2402 E. Anaheim Street
Wilmington, CA 90744

Variance Petition: 3845-112
Facility ID: 800026

Summary - Monthly Mass Emissions of CO (pursuant to Rule 518.2(h)(1))

Month	Proposed AOC (lbs)	Allowable Operating Condition (lbs)	Net Excess Emissions (lbs)
CO - May	158,122	157,194	928

Summary - Monthly Excess Mass Emissions During AOC Period (pursuant to Rule 518.2(h)(1))

Event	Estimated Excess Emissions (Lbs)				
	PM	NOx	ROG	CO	SOx as SO2
Emissions from FCCU - May	-	-	-	928	-
Total, lbs	-	-	-	928	-

ERCs and RTCs Offsets Needed (pursuant to Rule 518.2(i))

Month	Emissions (Lbs)				
	PM (ERCs)	NOx (RTCs)	ROG (ERCs)	CO (ERCs)	SOx (RTCs)
April - May				928	
Daily Average				31	
Offset Totals	-	-	-	151	-

Potential Certificates	-	-	-	AQ001325 151 lbs	-
Potential Certificates				AQ012004 24 lbs	
Potential Certificates				AQ012003 41 lbs	
Potential Certificates				AQ012270 34 lbs	
Total Certificate Value				250 lbs	

Summary - Excess Opacity Emissions (pursuant to Table II of Rule 303)

Proposed Variance Opacity, %	65
Allowance, %	20
Opacity Excess, %	45
Estimated # of Days	8
Excess Opacity Fee, \$	\$ 12.65
Total Fee, \$/opacity	\$ 4,554

Based on actual number of days of exceedance during 2015 Shutdown