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8 Attorneys for Petitioner
9 Chevron Products Company

10
11 **BEFORE THE HEARING BOARD OF THE**
12 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

13 In the Matter of

14 CHEVRON PRODUCTS COMPANY,

15 [Facility I.D. No. 800030]

16 Petitioner,

17 vs.

18 SOUTH COAST AIR QUALITY MANAGEMENT
19 DISTRICT,

20 Respondent.

Case No. 831-402

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

Date: June 6, 2024
Time: Consent Calendar

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

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

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

1 Chevron will not be able to do so when the subject equipment is taken out of service for
2 maintenance and repairs.

3 3. A copy of the relevant sections of the facility RECLAIM Permit No. 800030,
4 dated January 16, 2024, are attached to the Petition as Exhibit 1.

5 2. The V-3 and V-4 Caustic Scrubbers (“Caustic Scrubbers”) have experienced
6 degradation and require repair. The repairs cannot be performed while the Caustic Scrubbers
7 are in service. Chevron cannot complete the necessary repairs and remain in compliance with
8 the Facility Permit because permit conditions require the operation of the Caustic Scrubbers.

9 3. As Chevron needs to temporarily pause operation of the Caustic Scrubbers to
10 perform the repairs, and as Facility Permit Condition No. C8.8 and Administrative Condition
11 No. 2 require Caustic Scrubber operation, Chevron will be in violation of District Rules 203(b),
12 2004(f)(1) and 3002(c)(1), which require compliance with permit conditions.

13 4. Compliance is beyond Chevron’s reasonable control. The Caustic Scrubbers
14 have experienced degradation and need to be repaired. The subject equipment is at risk of
15 failure at this time based on recent, routine inspections. If the work is not performed, then a
16 sudden and unforeseen shutdown may occur due to corrosion and operational use, which would
17 result in the subsequent curtailment or shutdown of other Refinery units. Chevron has
18 performed prior periodic repairs to the Caustic Scrubbers based on their condition—inspecting,
19 maintaining, and repairing the Caustic Scrubbers in November 2014 pursuant to a Short
20 Variance from the District (Case No. 831-373). Accordingly, the need for the variance is not
21 the product of operator error or neglect as the subject equipment has been properly inspected
22 and maintained.

23 5. Permit Condition C8.8 states, in part, that the operator shall use this equipment
24 in such a manner that the flow rate being monitored, as indicated below, is not less than 10
25 gpm. Administrative Condition No. 2 requires the operator to ensure all proper operation of
26 equipment. District Rules 203(b), 2004(f)(1) and 3002(c)(1) require compliance with all
27 permit conditions. Chevron will not be able to operate the Caustic Scrubbers in compliance
with all applicable rules and permit conditions while the repair is being performed, as there is

1 no way to complete the Caustic Scrubber repairs without the units being offline. A variance is
2 therefore needed to perform the necessary repairs at the Caustic Scrubbers.

3 6. Denial of the variance would cause significant harm to Chevron in that denial
4 could force Petitioner to shut down and then restart certain Refinery process units while the
5 repairs are performed. The shutdown of the Refinery would result in a financial penalty to
6 Chevron of approximately \$1,00,000 per day in lost production and sales. In addition, the shut
7 down and restart of the Refinery units would result in flaring and air emissions that would
8 otherwise not occur if the variance is granted. As such, denial of the variance would result in
9 an increase in air emissions and financial impacts to Chevron that would be unreasonable and
10 unavoidable.

11 7. The closing or taking would be without a corresponding benefit in reducing air
12 contaminants. There will be no excess emissions in this matter. A District-permitted Envent
13 Scrubber will be connected at all times during the outage to control emissions while the work is
14 being performed. The Envent Scrubber is guaranteed to be at least as effective at controlling
15 emissions as the Caustic Scrubbers.

16 8. If the work is not performed, and the subject equipment were to suddenly fail,
17 then Petitioner may be required to shut down and restart the Refinery units, resulting in flaring
18 and air emissions. An upset condition could result in safety risks and potential environmental
19 impacts. The shutdown of the Refinery if the variance were not granted could also result in
20 increased flaring and air emissions due to shut down and subsequent startup of the Refinery.
21 Alternatively, if the variance is granted, Chevron does not anticipate any excess emissions.
22 Moreover, Chevron expects that the reliability and flexibility of Caustic Scrubber operations will
23 be improved with the project. As part of the maintenance and repairs, Chevron plans to add level
24 transmitters to the Caustic Scrubbers. Accordingly, the maintenance work will give operations a
25 better indication of the caustic level in the scrubbers and will allow for more reliable operation of
26 the pumps.

27 9. Chevron has considered the option of curtailing or terminating operations in lieu
of obtaining a variance. Chevron cannot operate the subject equipment and remain in

1 compliance with permit conditions while the Caustic Scrubbers are being repaired. Achieving
2 compliance through curtailment is not an option in this matter.

3 10. As mentioned above, during the period that the variance is in effect, there will be
4 no excess emissions. Nonetheless, Chevron agrees to reduce excess emissions to the maximum
5 extent feasible by complying with the conditions of the Order. In contrast, if the variance is not
6 granted, the shut down and restart of the Refinery units due to an upset condition would result in
7 flaring and air emissions that would otherwise not occur if the variance is granted.

8 11. Chevron will monitor emissions during the variance period. The Refinery is
9 equipped with Continuous Emissions Monitoring Systems (CEMS) to continuously monitor,
10 record and report to the District air emissions from the Refinery. The emissions monitoring data
11 will be provided to the District upon request.

12 12. During the duration of the repair, Chevron shall have the emissions of hydrogen
13 sulfide (H2S) from the permitted portable scrubber monitored once per day by the vendor using
14 Colorimetric Detector Tubes.

15 13. In addition, Chevron shall have the emissions of volatile organic compounds
16 (VOCs) from the permitted portable scrubber monitored once per shift by the vendor during
17 the variance period.

18 14. Chevron shall make its monitoring records available to the District for
19 inspection upon request.

20 **FOR CHEVRON PRODUCTS COMPANY:**

21 Dated: May 31, 2024

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