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8 Attorneys for Petitioner  
9 Chevron Products Company

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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. 831-400**

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

Date: April 10, 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.  
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1           2.       Chevron will be in violation of District Rules 203(b), 2004(f)(1) and 3002(c)(1),  
2 which require compliance with permit conditions, as Chevron will be out of compliance once the  
3 cells of the No. 4 Separator are open in violation of Section E, Condition No. 2 of its permit.

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

6           2.       Chevron will be in violation of District Rules 464(b)(1)(A), (b)(2), (b)(3) and  
7 Rule 1176(e)(2), which require that the wastewater separators be equipped with solid, fully  
8 sealed covers or lids.

9           4.       Chevron will be in violation of District Rule 1176(e)(1) because, during the  
10 maintenance work, VOC emissions may exceed the 500 ppm allowable limit as state in  
11 Rule 1176(e)(1). Chevron is taking steps to minimize the emittance of VOC emissions and does  
12 not expect emissions from the No. 4 Separator in excess of 500 ppm during the variance period;  
13 however, Chevron may not be able to completely control the VOC emissions while the material  
14 is being removed from the No. 4 Separator.

15           5.       Chevron needs to open the No. 4 Separator to perform inspection, maintenance,  
16 and possible repairs. The District permit requires the No. 4 Separator cells to be closed.  
17 However, the equipment must be open for the work to be performed. Therefore, it is beyond  
18 Chevron's reasonable control to comply with District rules and permit conditions.

19           6.       Photographs of the No. 4 Separator illustrating the maintenance work are attached  
20 to the Petition as Exhibit 2.

21           7.       Denial of the variance would cause significant harm to Petitioner in that, if  
22 Petitioner cannot perform maintenance, Petitioner may be unable to operate the No. 4 Separator  
23 which could result in potential shut down of the Refinery. If the Refinery were to shut down due  
24 to its inability to maintain the No. 4 Separator, Petitioner would suffer significant financial  
25 penalty of approximately \$1,000,000 per day in lost production and sales.

26           8.       The total estimated excess VOC emissions from the subject activity during the  
27 variance period will be 2.6 pounds. Chevron will be using a HPC Vapor Control System with  
a 99% VOC control efficiency to minimize emissions. Chevron will also employ additional

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System with a 99% VOC control efficiency to minimize emissions. Chevron will also employ additional mitigation measures to reduce VOC emissions to the maximum extent feasible during the variance period.

9. Chevron's estimate of the VOC emissions during the variance period are attached as Exhibit 3 to the Petition. Furthermore, Chevron's estimate of the VOC emission reductions during the period are attached as Exhibit 4 to the Petition.

10. The need to maintain the No. 4 Separator to prevent discharge into the Santa Monica Bay and the resulting harm to Chevron from a shutdown outweighs excess emissions given those emissions will be mitigated to the maximum extent feasible.

11. Chevron considered curtailment. However, curtailment would not obviate the need for a variance because when the No. 4 Separator is cleaned out, inspected, and repaired, it must be open; whereas, to be compliant with District Rules and permit conditions the No. 4 Separator cells must be closed. Achieving compliance through curtailment is not an option in this matter due to the need to clean out and replace any damaged lids at the No. 4. Separator.


12. During the period that the variance is in effect, Chevron has agreed to reduce excess emissions to the maximum extent feasible by complying with the conditions of the Proposed Order and by using a HPC Vapor Control System with a 99% VOC control efficiency to minimize emissions.

13. Chevron will monitor emissions during the variance period. Records of these inspections shall be made available to the District upon request.

14. Operation under the Order is not expected to result in a violation of Health and Safety Code Section 41700.

**FOR CHEVRON PRODUCTS COMPANY:**

Dated: April 3, 2024

By:   
Andre West