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March 25, 2020

Dr. Philip Fine
Deputy Executive Officer, Planning and Rules
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

sent via email: pfine@aqmd.gov

Re: South Coast AQMD Proposed Rule 1109.1 Refinery Equipment Sulfur in Refinery Fuel Gas Survey

Dear Dr. Fine:

Recently, South Coast AQMD Proposed Rule 1109.1 (PR1109.1) staff requested that stakeholders complete a survey to assist the District in the assessment of sulfur in refinery fuel gas systems. Chevron does not believe that such a survey is currently warranted by the PR1109.1 rulemaking, since District staff has not provided the technical basis supporting a conclusion that refinery fuel gas treatment will be required to achieve NO_x BARCT compliance. Furthermore, the current extended deadline of March 31, 2020 for completion of the survey is impractical under normal circumstances given the depth and scope of the information requested; given the extraordinary circumstances facilities are currently dealing with related to COVID-19, the survey should be further postponed or delayed indefinitely.

In response to COVID-19, Chevron El Segundo Refinery is focused on the health of its employees and contractors, operating safely and effectively while meeting its environmental compliance obligations, and continuing to deliver product to its customers that provide essential infrastructure and transportation during this challenging time. Our efforts need to remain focused on these critical tasks while COVID-19 remains a threat to our workforce, community, and business. Any non-essential District requests should be reconsidered or postponed by South Coast AQMD so that it does not take away manpower and resources that is currently needed by our operations in dealing with this public health crisis.

Chevron very much wants to be a collaborative partner in the PR1109.1 rulemaking and overall NO_x RECLAIM Transition process. We understand these are unprecedented times and appreciate the efforts of the District to adapt in a situation that is fluid and changing. We would

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be happy to discuss this matter with you further by phone or video conference. Please feel free to reach out to me, or to Bridget McCann, directly if you have any questions.

Sincerely,

Robert G. Orinion

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cc: Ms. Susan Nakamura, South Coast Air Quality Management District
Mr. Michael Krause, South Coast Air Quality Management District
Ms. Heather Farr, South Coast Air Quality Management District
Mr. Sarady Ka, South Coast Air Quality Management District

Mr. Rod Spackman – Corporate Affairs Manager, Chevron
Ms. Susan Worley – HES Manager, Chevron
Mr. Jeff Wilson – Corporate Affairs, Chevron
Ms. Bridget McCann – HES Specialist, Chevron
Mr. Vaughn Delphin – Air Regulatory Lead, Chevron