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HEARING BOARD
BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

**Clerk of the Boards
Bay Area Air Quality
Management District**

BEFORE THE HEARING BOARD
OF THE
BAY AREA AIR QUALITY MANAGEMENT DISTRICT
STATE OF CALIFORNIA

In the Matter of the Application of:)
)
CHEVRON PRODUCTS COMPANY, 841)
Chevron Way, Richmond, California (Plant)
No. A0010))
For An Emergency Variance from)
Regulation 8, Rule 2, Section 301)
_____)

DOCKET NO. 3629

ORDER APPROVING
EMERGENCY VARIANCE

The above-entitled matter, being an Application for an Emergency Variance from the provisions of Regulations 8-2301, having been filed on November 3, 2011 at 9:00 a.m., and having been considered by the Hearing Board:

THE HEARING BOARD STATES as the reasons for its decision and FINDS as to those matters in which findings are required:

1. Applicant filed this Application for Variance under the Emergency Variance procedures, Hearing Board Rules, Section 2.5. Pursuant to Health and Safety Code Sections 42359 and 42359.5, the Hearing Board determined that this Application properly could be ruled upon without notice and hearing. Prior to making this determination, and in accordance with Hearing Board Rules Section 2.5.d.2, the Hearing Board requested and received a response to this Application from the Air Pollution Control Officer. That response recommended the Emergency

1 Variance be approved after concluding that the hydrocarbon leak from the reboiler condensate
2 drum vent discovered on November 3, 2011 is an unforeseen emergency, and good cause has been
3 shown to support and grant the requested Emergency Variance.

4 2. Applicant operates the Richmond Refinery which is a Title V permitted facility
5 which processes crude oil into various petroleum products, located at 841 Chevron Way,
6 Richmond, CA 94802.

7 3. On November 2, 2011, at approximately 2:00 AM, a localized hydrocarbon odor
8 was detected by a Plant Operator in the FCC Unit. The odor was traced to the reboiler condensate
9 drum vent. It was determined that an upstream heat exchanger had a tube leak into the steam
10 condensate. When the heat exchanger was last inspected in October 2010, 18 tubes with signs of
11 external corrosion were plugged out-of-service of the 598 total tubes in the heat exchanger. The
12 heat exchanger was then expected to continue to run reliably for a minimum of 5 years. Chevron
13 indicated that it felt there was no reason to anticipate premature failure of the heat exchanger.

14 4. Chevron cannot repair the heat exchanger without shutting down the FCC Unit
15 and several other process plants. A shutdown now would result in potential flare activity and
16 overall greater emissions according to Chevron. A new heat exchanger will be manufactured and
17 installed in January 2012, which coordinates with other planned shutdown activities. However, in
18 order to return to compliance now, Chevron will plumb the emissions from the reboiler condensate
19 drum vent to the flare gas recovery system.

20 5. BAAQMD Regulation 8, Rule 2, Organic Compounds Miscellaneous
21 Operations, Section 301, requires that any miscellaneous operation shall not discharge into the
22 atmosphere more than 15 lbs. of organic compound emissions per day. The Petitioner estimates
23 172.8 lbs. of excess hydrocarbon emissions will be emitted per day until the reboiler condensate
24 drum vent is estimated to be plumbed to the flare gas recovery system on November 10, 2011.

25 6. Chevron Products Company has requested Emergency Variance relief from
26 November 3, 2011 at 2:00 AM through November 10, 2011 at 5:00 PM (8 days).

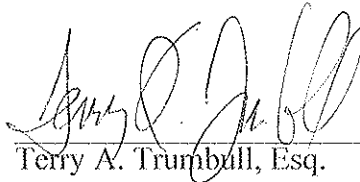
1 7. This Variance will not cause injury, detriment, nuisance, or annoyance to any
2 considerable number of persons or to the public, or endanger the comfort, repose, health or safety
3 of any such persons or the public, or cause or have a natural tendency to cause injury or damage to
4 business or property.

5 THEREFORE, THE HEARING BOARD ORDERS:

6 A Variance from Regulation 8, Rule 2, Section 301 be and is hereby granted from
7 November 3, 2011 at 2:00 a.m. through November 10, 2011 at 5:00 PM subject to the following
8 conditions:

9 1. Petitioner shall quantify and report total excess hydrocarbon emissions (in lbs.)
10 for the entire variance period to their District Inspector within one week of the end of the variance.

11
12 DATED: November 15, 2011

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17 _____
18 Terry A. Trumbull, Esq.