



3485 Pacheco Boulevard
Martinez, CA 94553

July 31, 2023

TV Tracking #: 787

1. ☐ RECEIVED IN
ENFORCEMENT: 08/01/2023

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Jeffrey Gove
Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

**Subject: Semi-Annual Title V Deviation Summary Report
January 1, 2023 – June 30, 2023**

RECEIVED
2023 AUG - 1 PM 1:00
BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

Dear Mr. Gove:

Please find Martinez Refining Company's Semi-Annual Title V Deviation Summary report for the period of January 1, 2023 through June 30, 2023. This report includes a summary of the inoperable monitors for the first half of 2023.

Should you have any questions or concerns regarding this report, please contact Mr. Gregory San Martin at (925) 313-5260 /, Gregory.SanMartin@pbfenergy.com or you may contact me at the numbers below.

Sincerely,

Michael Marlowe
Manager, Environmental Affairs
Martinez Refining Company, LLC
3485 Pacheco Boulevard
Martinez, CA 94553
O 925.313.3705
C 831.332.2820
michael.marlowe@pbfenergy.com

Attachment

BAAQMD Title V Permit
6 Month Deviation Summary Report

From 1/1/2023 to 6/30/2023

A0011 Martinez Refining Company

Facility Address:

3485 Pacheco Blvd

City: Martinez

State: CA

Zip Code: 94553-0071

Mailing Address

3485 Pacheco Blvd

City: Martinez

State: CA

Zip Code: 94553-0071

Contact: Greg San Martin

Title: Sr Air Env Engr

Phone: (925) 313-3743

Title V deviations for the reporting period are summarized below:

Event Started: 6/12/2023 9:09 AM

Stopped: 6/30/2023 3:00 PM

☐ Ongoing Event

Event Description: Acoustic Sensors 13VI4004, 13VI4051, 13VI4053 and 9VI537 were inoperative for more than 15 consecutive days.

Probable Cause:

Corrective actions or
preventative steps taken:

May have resulted in a violation of :

Permit:

AQMD: Regulation 1, Rule 1, Section 5

Other:

Event Started: 11/21/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1507

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: 6-1-310

Other: _____

Event Description: BAAQMD issued NOV A52406 for "22165.6 -> 30% Opacity > 6-min./hr. Failure too comply with Reg. 6-1-310." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/24/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1507

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Reg 10, 40CFR60.11(d)

Other: 40CFR63.6(e)(1)(I), 63.1570(c)

Event Description: BAAQMD issued an NOV A52402 for "Failure to operate control equipment in a manner consistent with good air pollution control practices". Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/24/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1509

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Reg 10, 40CFR 60.6.11 (d)

Other: 40CFR 63.6(e)(1)(I), 63.1570(c)

Event Description: BAAQMD issued an NOV A52403 for "Failure to operate control equipment in a manner consistent with good air pollution and control practices." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/21/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1507

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Reg 2, Rule 1, Section 320

Other: _____

Event Description: BAAQMD issued an NOV A52404 for "Failure to operate ESPs as represented in permit applications." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/21/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1509

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Reg 2, Rule 1, Section 320

Other: _____

Event Description: BAAQMD issued NOV A52405 for "Failure to operate ESPs as represented in permit applications." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/24/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1507

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: 6-1-310

Other: _____

Event Description: BAAQMD issued NOV A52407 for "22165.6 ->30% Opacity >6-min./hr. Failure to comply with Reg. 6-1-310." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/21/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1509

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: 6-1-310

Other: _____

Event Description: BAAQMD issued NOV A52408 for "22165.6 --> 30% Opacity > 6-min./hr. Failure too comply with Reg. 6-1-310." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 11/24/2022

Stopped: _____

☐ Ongoing Event

Source Number: 1509

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: 6-1-310

Other: _____

Event Description: BAAQMD issued NOV A52409 for "22165.6 --> 30% Opacity > 6-min./hr. Failure too comply with Reg. 6-1-310." Corrective actions previously provided for this event.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 1/6/2023

Stopped: 1/6/2023

☐ Ongoing Event

Source Number: _____

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 1, Section 301

Other: H&S Code 41700

Event Description: Transfer of waste water treatment plant tanks released odors into nearby Martinez community resulting in BAAQMD issuing a public nuisance NOV.

Probable Cause: In preparation for the continued rain fall, MRC had been working to process large amounts of stormwater from the recent heavy rains.

Corrective actions or
preventative steps taken: Stopped transfer.

This citation is not a federally enforceable rule.

Event Started: 1/10/2023 10:31 AM
Stopped: 1/10/2023 10:32 AM

☐ Ongoing Event

Source Number: 1509
Abatement Device : A13
Emission Point:

May have resulted in a violation of :

Permit:
AQMD: Regulation 6, Rule 1, Section 3
Other:

Event Description: COB#2 opacity analyzer 9AI2531 showed an indicated excess of greater than 1 Ringelmann for more than 3 minutes during the 10:00 am clock hour.

Probable Cause: COB#2 was shutdown prior to COB1 turnaround to proactively address RFG valve positioning reliability concerns. During shutdown of COB#2, the main RFG valve unexpectedly closed and reopened just prior to cutting all fuel from the burners. The sudden loss and reintroduction of fuel likely created enough soot to cause an opacity, which took longer to clear with just the forced draft fans once all fuel was out.

Corrective actions or preventative steps taken: Completed shutdown of COB#2. Conducted maintenance on RFG control valves.

Event Started: 1/18/2023 5:30 PM
Stopped: 1/18/2023 5:45 PM

☐ Ongoing Event

Source Number: 1471
Abatement Device :
Emission Point:

May have resulted in a violation of :

Permit:
AQMD:
Other: 40 CFR 63.670(e)

Event Description: The LOP flare (S1471) had an indicated deviation of the net heating value of the combustion zone (NHVcz) for one 15 minute block. Given the expected composition, conducting investigation to determine if analyzer reading is correct.

Probable Cause: Potential overinjection of steam at the flare tip.

Corrective actions or preventative steps taken: Systems were stabilized and flaring stopped.

Event Started: 2/2/2023 10:54 PM
Stopped: 2/3/2023 1:23 PM

☐ Ongoing Event

Source Number:
Abatement Device :
Emission Point:

May have resulted in a violation of :

Permit: Permit Condition 12271 Part 15
AQMD:
Other:

Event Description: Refinery Fuel Gas (RFG) H2S analyzer 9AI2831 showed an indicated excess of the 50 ppm 24-hour average limit for H2S in RFG going to Clean Fuels.

Probable Cause: High levels of H2S was found in treating units.

Corrective actions or preventative steps taken: Increased treatment and replaced caustic to bring down H2S.

Event Started: 2/16/2023 12:37 AM

Stopped: 2/16/2023 12:44 AM

☐ Ongoing Event

Event Description: COB#1 opacity analyzer 9AI2529 showed an indicated excess of greater than 1 Ringelmann for more than 3 minutes during the 12:00 am clock hour.

Probable Cause: Event occurred during startup of COB#1. Cause under investigation including potential for false analyzer reading.

Corrective actions or
preventative steps taken: Began investigation of cause of event.

Source Number: 1507

Abatement Device : A12

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 6, Rule 1, Section 3

Other: _____

Event Started: 1/31/2023 11:25 AM

Stopped: 1/31/2023 5:30 PM

☐ Ongoing Event

Event Description: Smoke from fire at S1421 VFU resulted in BAAQMD issuing a public nuisance NOV A62086.

Probable Cause: While VFU Column was down for maintenance cleaning, pyrophoric material ignited.

Corrective actions or
preventative steps taken: Fire crew responded and fire was extinguished.

Source Number: 1421

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 1, Section 301

Other: H&S Code 41700

This is not a Federally Enforceable Citation

Event Started: 1/31/2023 11:25 AM

Stopped: 1/31/2023 5:30 PM

☐ Ongoing Event

Event Description: Smoke from fire at S1421 VFU resulted in BAAQMD issuing an NOV A62087 for visible emissions.

Probable Cause: While VFU Column was down for maintenance cleaning, pyrophoric material ignited.

Corrective actions or
preventative steps taken: Fire crew responded and fire was extinguished.

Source Number: 1421

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 6, Rule 1, Section 3

Other: _____

Event Started: 1/30/2023 12:00 AM

Stopped: ☐ Ongoing Event

Event Description: BAAQMD issued an NOV for "failure to accurately submit a causal report for the flaring event of 11/22/2022 as required by BAAQMD Rule 12-12-406." A62088

Probable Cause: MRC sent one report for the three flaring events but BAAQMD has indicated that 3 separate reports should have been submitted.

Corrective actions or
preventative steps taken: MRC prepared and submitted 3 separate reports.

Source Number: _____

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 12, Rule 12, Section _____

Other: _____

Event Started: 1/30/2023 12:00 AM

Stopped: ☐ Ongoing Event

Event Description: BAAQMD issued an NOV for "failure to accurately submit a causal report for the flaring event of 11/24/2022 as required by 12-12-406." A62089

Probable Cause: MRC sent on report for the three flaring events but BAAQMD has indicated that 3 separate reports should have been submitted.

Corrective actions or
preventative steps taken: MRC prepared and submitted 3 separate reports.

Source Number: _____

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 12, Rule 12, Section _____

Other: _____

Event Started: 3/2/2023 10:45 AM

Stopped: 3/2/2023 11:10 AM ☐ Ongoing Event

Event Description: COB#1 opacity analyzer 9AI2529 showed an indicated excess of greater than 1 Ringelmann for more than 3 minutes

Probable Cause: During maintenance of Carbon Monoxide Boiler 1 (COB1), a fuel gas controller was inadvertently left in automatic, which led to flooding of the firebox and the Electrostatic Precipitators (ESPs) tripping offline. This resulted in an opacity exceedance.

Corrective actions or
preventative steps taken: Placed COB 1 on stable condition and reset ESP.

Reiterated importance of revisiting mitigation plans prior to performing instrument work.

Source Number: 1507

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 6, Rule 1, Section 3 _____

Other: _____

Event Started: 1/12/2023 3:55 AM

Stopped: 1/13/2023 3:15 PM

☐ Ongoing Event

Source Number: 4180

Abatement Device :

Emission Point:

May have resulted in a violation of :

Permit:

AQMD: Regulation 1, Rule 1, Section 5

Other:

Event Description: Late reporting of inoperative monitor >24 hours for SRU4 TRS analyzer 18A234.

Probable Cause: No low alarm for SRU4 TRS analyzer 18A234.

Corrective actions or

preventative steps taken:

Setup low low alarm for SRU4 TRS analyzer 18A234.

Event Started: 3/8/2023 12:00 PM

Stopped: 4/1/2023 12:00 AM

☐ Ongoing Event

Source Number:

Abatement Device :

Emission Point:

May have resulted in a violation of :

Permit:

AQMD: Regulation 12-15-403

Other:

Event Description:

Two new H2S fenceline monitors (Path 1 and 2) will not be meeting the 90% data completeness requirement for the first quarter of 2023, in part, due to stability issues associated with the new equipment that is causing the monitors to not stay in alignment. The alignment issues was, in part, due to weather conditions immediately following the equipment installation. MRC is currently in the process of modifying the design of the equipment to improve stability and alignment and mitigate weather impacts.

Probable Cause:

The H2S fenceline monitors are new equipment and technology that have not been used in this application except for a proof of performance field study conducted at another refinery that BAAQMD evaluated. MRC has been monitoring system performance since operation began and has been making system

Corrective actions or

preventative steps taken:

improvements to meet BAAQMD requirements. However, some identified issues, such as instrument stability, has required additional construction and improved equipment support manufacturing that has taken time to properly design and implement.

MRC has been working closely with a contractor since before the monitors were required to be installed to develop both short-term and long-term solutions to improve the stability of the monitors including building shelter extensions and designing new supports.

Event Started: 3/14/2023 9:38 AM

Stopped: 3/29/2023 5:04 PM

☐ Ongoing Event

Source Number:

Abatement Device :

Emission Point:

May have resulted in a violation of :

Permit:

AQMD: Regulation 1, Rule 1, Section 5

Other:

Event Description: Late reporting of inoperative monitor >24 hours for acoustic sensor 9VI536 on PRV J287

Probable Cause: Utilities did not receive alarm due to alarm mapping issue.

Corrective actions or

preventative steps taken:

CSE remapped alert status assignment to alert Utility Board Operator.

Event Started: 3/14/2023 9:38 AM

Stopped: 3/29/2023 5:04 PM

☐ Ongoing Event

Source Number: _____

Abatement Device : _____

Emission Point: _____

May have resulted in a violation of :

Permit: _____

AQMD: Regulation 1, Rule 1, Section 5

Other: _____

Event Description: PRV J287 Acoustic Sensor 9V1536 was inoperative for more than 15 consecutive days. MRC is reporting out of an abundance of caution. MRC does not believe we violated 15 consecutive Operating Days.

Probable Cause: Regulation 1-523.2 reads Parametric monitor periods of inoperation shall not exceed 15 consecutive days per incident or 30 calendar days per consecutive 12-month period.

Corrective actions or preventative steps taken:

Regulation 1-220 defines an Operating Day: A 24 hour time period from midnight to midnight. Using this definition the acoustic sensor 9V1536 was only inoperative for 14 midnight to midnight days.

Maintenance repaired acoustic sensor within 24 hours. CSE remapped alert status assignment to alert Utility Board Operator to avoid delays in reporting and repair. All daily sock inspections were done during this event period, verifying that no release events occurred.

Event Started: 4/1/2023 12:54 PM

Stopped: 4/2/2023 5:46 AM

☐ Ongoing Event

Source Number: 4141/4031

Abatement Device : A4141

Emission Point: _____

May have resulted in a violation of :

Permit: Condition#12271, Part 35

AQMD: _____

Other: _____

Event Description: The HGHT F14011 (S#4141) and F14012 (S#4031) 46A195 NOx Analyzer showed an indicated excess of the 10 ppm NOx limit (corrected to 3% oxygen) averaged over three hours.

Probable Cause: Ammonia system control valves not operating properly

Corrective actions or

preventative steps taken: Replaced trim on small and large control valves.

Event Started: 4/4/2023 5:46 PM

Stopped: 4/4/2023 8:50 PM

☐ Ongoing Event

Source Number: 4141/4031

Abatement Device : A4141

Emission Point: _____

May have resulted in a violation of :

Permit: Condition#12271, Part 35

AQMD: _____

Other: _____

Event Description: The HGHT F14011 (S#4141) and F14012 (S#4031) 46A195 NOx Analyzer showed an indicated excess of the 10 ppm NOx limit (corrected to 3% oxygen) averaged over three hours.

Probable Cause: The HGHT charge pump tripped off line

Corrective actions or

preventative steps taken: Charge pump was restarted and feed brought back into unit.

Event Started: 4/9/2023 5:56 PM
Stopped: 4/26/2023 3:04 PM

☐ Ongoing Event

Source Number: _____
Abatement Device : _____
Emission Point: _____

May have resulted in a violation of :

Permit: _____
AQMD: Regulation 1, Rule 1, Section 5
Other: _____

Event Description: Late reporting of inoperative monitor (>24 hours) for acoustic sensor 9VI536 on PRV J287. Acoustic Sensor was repaired within 24 hours of discovery.

Probable Cause: Utilities did not receive alarm due to alarm mapping issue.

Corrective actions or preventative steps taken:

Maintenance repaired the acoustic sensor within 24 hours. CSE remapped alert status assignment to alert Utility Board Operator and prevent delays in reporting and repair. All daily sock inspections were completed during this event period, verifying that no release events occurred. When we report a deviation late, we also are reporting the late reporting of the incident as a deviation too.

Event Started: 4/9/2023 5:56 PM
Stopped: 4/26/2023 3:04 PM

☐ Ongoing Event

Source Number: _____
Abatement Device : _____
Emission Point: _____

May have resulted in a violation of :

Permit: _____
AQMD: Regulation 1, Rule 1, Section 5
Other: _____

Event Description: PRV J287 Acoustic Sensor 9VI536 was inoperative for more than 15 consecutive days. The Acoustic Sensor was repaired within 24 hours of discovery.

Probable Cause: Utilities did not receive alarm due to alarm mapping issue.

Corrective actions or preventative steps taken:

Maintenance repaired acoustic sensor within 24 hours of discovery. CSE remapped alert status assignment to alert Utility Board Operator to prevent delays in reporting and repair. All daily sock inspections were completed during this event period, verifying that no release events occurred.

Event Started: 4/9/2023 5:56 PM

Stopped: 4/26/2023 3:04 PM ☐ Ongoing Event

Source Number:

Abatement Device :

Emission Point:

May have resulted in a violation of :

Permit:

AQMD: Regulation 1, Rule 1, Section 5

Other:

Event Description:

PRV 1287 Acoustic Sensor 9VI536 has been inoperative for 30 "operating days," as defined in Regulation 1-220. Consequently, MRC does not believe it exceeded the 30 day limit specified in Regulation 1-523.2. However, out of an abundance of caution, MRC is nevertheless reporting this incident. The Acoustic Sensor was repaired within 24 hours of discovery. Regulation 1-523.2 reads Parametric monitor periods of inoperation shall not exceed 30 calendar days per consecutive 12-month period. Regulation 1-220 defines an Operating Day: A 24 hour time period from midnight to midnight. Using this definition, acoustic sensor 9VI536 was only inoperative for 30 midnight to midnight days.

Probable Cause: Utilities did not receive alarm due to alarm mapping issue.

Corrective actions or preventative steps taken:

Maintenance repaired the acoustic sensor within 24 hours. CSE remapped alert status assignment to alert Utility Board Operator and prevent delays in reporting and repair. All daily sock inspections were completed during this event period, verifying that no release events occurred.

Event Started: 5/6/2023 5:30 PM

Stopped: ☐ Ongoing Event

Source Number: 1070

Abatement Device :

Emission Point:

May have resulted in a violation of :

Permit: Permit Condition #18153

AQMD: Regulation 8, Rule 5, Section 3

Other: 40 CFR 60, Subpart Kb 60.112b

Event Description:

Approximately 10,000 bbls of hydrocarbon passed through the floating roof seals of Tk-1070 (internal floating roof tank) on to the top of the floating roof. Normally, Tk-1070 contains sour water, and a 3-foot layer of a heavy gas oil sponge. At this time, it is believed sour water coming from Delayed Coking was contaminated with full range hydrocarbon, resulting in a low flash point material. Level instrumentation on Tk-1070 was not functioning, resulting in a tank overfill as the floating roof reached its maximum working height. A smaller amount of oil (1 to 2 bbls) was released outside of Tk-1070 through tank vents and cracks in the frangible roof seal.

Probable Cause: Level instrumentation on Tk-1070 was not functioning.

Corrective actions or

preventative steps taken:

TK-1070 was bypassed after discovering oil leaking down the side of the tank.

Event Started: 4/19/2023 7:50 AM

Stopped: 4/19/2023 7:51 AM

☐ Ongoing Event

Event Description: PRV N-9 on KGP Main Fractionator Column (C-205) relieved to atmosphere for 50 seconds.

Probable Cause:
Corrective actions or
preventative steps taken:

While performing routine maintenance on the J-204 lube oil system, J-204 wet gas compressor tripped on low lube oil pressure to second stage seal oil. This trip caused a pressure build in the KGP main fractionator system. The flow to the flare did not increase quickly enough to reduce pressure buildup. The excess pressure caused the PRD release. More specifically, the vent valve (PC953) is controlling off pressure measured by PI 953, which is on the accumulator. PI 953 readings did NOT increase at the same rate as pressure at the MF. This lag in pressure readings, once addressed, may prevent future releases of a similar nature.

Several actions have been undertaken to fully understand the underlying cause of this release and to prevent reoccurrence of the event. The device was reinspected after the release and found to be in good working condition (this PRD was replaced and tested earlier this year). The MF Pressure was previously NOT displayed on the HMI, but only the Accumulator pressure, which pegged at 20 psig... ADDED PI5001 to the HMI so MF pressure is now shown on screen. Several lines and valves that may have restricted flows were steamed. Several oil and gas line valves (including 1863) were tested to verify that they were performing properly. Oil to gas seals were inspected and found to be in good working condition. Pressure transmitters were checked to confirm oil valve status. A needle valve on pressure tubing was replaced. Other measures are under consideration.

May have resulted in a violation of :

Permit:

AQMD: 8-28-214

Other: 40 CFR 63.648(j)(3)(v)(A)

Source Number: 1759

Abatement Device :

Emission Point:

Event Started: 5/25/2023 10:00 AM

Stopped: 5/25/2023 10:00 AM

☐ Ongoing Event

Event Description: MRC did not submit a 10 day Title V deviation report for NOV A62085 (issued 1/21/23).

Probable Cause:

Corrective actions or
preventative steps taken: Submittal of this form.

May have resulted in a violation of :

Permit:

AQMD: Reg. 2-6-307

Other:

Source Number:

Abatement Device :

Emission Point:

Event Started: 6/2/2023 11:00 PM
Stopped: 6/3/2023 12:00 AM ☐ Ongoing Event

Source Number: 1431
Abatement Device :
Emission Point:

May have resulted in a violation of :
Permit:
AQMD: Regulation 9-1-307
Other:

Event Description: SRU SCOT #1 & 2 (S1431/S1432) analyzer 8A849 showed an indicated excess of greater than 250ppm (clock hour limit) for the clock hour starting at 11:00 pm on 6/2/2023.

Probable Cause:

Corrective actions or
preventative steps taken:

Event Started: 6/14/2023 10:02 AM
Stopped: 6/14/2023 10:02 AM ☐ Ongoing Event

Source Number:
Abatement Device :
Emission Point:

May have resulted in a violation of :
Permit:
AQMD: Per NOV, Reg 6-1-305
Other:

Event Description: On 6/14/2023, BAAQMD requested a 10 day Title V deviation report for not treating receipt of NOV A62090 (issued 5/25/2023) as a deviation. This deviation notification does not involve any episode, incident or equipment.

Probable Cause: Not Applicable - Not an incident

Corrective actions or

preventative steps taken:

In response to the request, MRC promptly completed and submitted (under protest) this 10 day deviation report.

Certification Statement

I certify under penalty of law that based on the information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.


Signature of Responsible Official

Daniel Ingram
Print Name

Refinery Manager
Title

7/31/23
Date

BAAQMD Title V Permit
6 Month Monitoring Report

From 1/1/2023 to 6/30/2023

A0011

Martinez Refining Company

Facility Address:

3485 Pacheco Blvd

City: Martinez

State: CA

Zip Code: 94553-0071

Mailing Address

3485 Pacheco Blvd

City: Martinez

State: CA

Zip Code: 94553-0071

Contact: Greg San Martin

Title: Sr Air Env Engr

Phone: (925) 313-3743

Inoperable monitors as defined by BAAQMD Regulations 1-522 and 1-523 for the reporting period are summarized below:

Started		Stopped		Source (S#)	Abatement Device (A#)	Emission Point (P#)	CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
1/3/2023	1:00 PM	1/5/2023	11:00 AM				☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: FXG H2S / 14 A 1251 analyzer has been inoperative >24 hours.																													
1/12/2023	3:55 AM	1/13/2023	3:15 PM				☒	☐	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: SRU4 TRS 18A234 analyzer has been inoperative for >24 hours.																													
1/17/2023	2:07 PM	1/18/2023	5:20 PM				☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: RFG BTU 9A2716 analyzer has been inoperative >24 hours.																													
1/17/2023	2:07 PM	1/18/2023	5:20 PM				☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: RFG FGBD / SG /9A413 analyzer has been inoperative >24 hours.																													
1/17/2023	2:09 PM	1/18/2023	5:12 PM				☐	☐	☐	☒	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: RFG 9A1610 analyzer has been inoperative >24 hours.																													
1/19/2023	8:20 AM	1/20/2023	12:00 PM				☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: RFG FGBD/SG/9A413 analyzer has been inoperative > 24 hours.																													
1/19/2023	8:20 AM	1/20/2023	12:00 PM				☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: RFG Btu 9A2716 analyzer has been inoperative > 24 hours.																													
1/31/2023	9:06 AM	2/1/2023	10:00 AM				☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description: RFG FGBD/BTU/SG/9A2716/9A413 analyzer has been inoperative > 24 hours (monitors both BTU and Specific Gravity)																													

<u>Started</u>		<u>Stopped</u>	<u>Source (S#)</u>	<u>Abatement Device (A#)</u>	<u>Emission Point (P#)</u>	<u>CEM</u>	<u>GLM</u>	<u>Fuel Gas</u>	<u>Parametric</u>	<u>NOx</u>	<u>SO2</u>	<u>CO</u>	<u>H2S</u>	<u>TRS</u>	<u>NH3</u>	<u>O2</u>	<u>CO2</u>	<u>H2O</u>	<u>Opacity/ LTA</u>	<u>Lead</u>	<u>Steam</u>	<u>Flow</u>	<u>Wind Dir.</u>	<u>Wind Speed</u>	<u>pH</u>	<u>Temp.</u>	<u>VOC.</u>	<u>Gauge Press.</u>		
6/24/2023	5:20 PM	6/29/2023	9:00 AM		☒	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
<u>Event Description:</u>		Monitor 5VI3002 - PRV SV-15873 (M31) CCU MAIN FRAC C-119 was inoperative for 24 hours. This is not a PRV release.																												

Certification Statement

I certify under penalty of law that based on the information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

	<u>Daniel Ingram</u>	<u>Refinery Manager</u>	<u>7/31/23</u>
Signature of Responsible Official	Print Name	Title	Date

<u>Started</u>		<u>Stopped</u>			<u>Source (S#)</u>	<u>Abatement</u>	<u>Emission</u>	<u>Point (P#)</u>	<u>CEM</u>	<u>GLM</u>	<u>Fuel</u>	<u>Parametric</u>	<u>NOx</u>	<u>SO2</u>	<u>CO</u>	<u>H2S</u>	<u>TRS</u>	<u>NH3</u>	<u>O2</u>	<u>CO2</u>	<u>H2O</u>	<u>Opacity/</u>	<u>Lead</u>	<u>Steam</u>	<u>Flow</u>	<u>Wind Dir.</u>	<u>Wind</u>	<u>pH</u>	<u>Temp.</u>	<u>VOC.</u>	<u>Gauge</u>
2/1/2023	2:34 PM	2/9/2023	3:17 PM	☒					☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		DC Flare NHVcz 67A250 anlayzer has been inoperative for > 24 hours. Please note the rule allows for use of either an analyzer or sampling to monitor NHV. While the analyzer is inoperative, the required sampling will be taken to fulfill monitoring requirements.																													
2/11/2023	8:32 AM	2/15/2023	1:55 PM	☒					☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		LOP Flare NHVcz 9A100 analyzer has been inoperative for > 24 hours. Please note the rule allows for use of either an analyzer or sampling to monitor NHV. While the analyzer is inoperative, the required sampling will be taken to fulfill monitoring requirements.																													
3/13/2023	2:20 PM	3/14/2023	6:30 PM	☒					☒	☐	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		SRU4 TRS 18A234 analyzer has been inoperative for > 24 hours.																													
3/14/2023	6:28 PM	3/16/2023	8:26 AM	☒					☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		FXG H2S 14A1251 analyzer has been inoperative for >24 hours.																													
3/14/2023	9:38 AM	3/29/2023	5:04 PM	☒					☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		Acoustic Sensor on PRV J287 has been inoperative for >24 hours. Verified sock in place, so confirmed no release during this time.																													
3/16/2023	1:16 PM	3/20/2023	5:01 PM	☒					☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		FXG H2S 14A1251 analyzer has been inoperative for >24 hours.																													
3/18/2023	7:45 AM	3/19/2023	3:45 PM	☒					☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		CHIM 1 West Breach O2 2A2728 analyzer has been inoperative for >24 hours.																													
4/2/2023	7:16 PM	4/13/2023	9:00 AM	☒					☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		Acoustic Sensor 9VT537 on PRV J132-1 has been inoperative for >24 hours. Verified sock in place, so confirmed no release during this time. Operations will continue to monitor.																													
4/9/2023	5:56 PM	4/26/2023	3:04 PM	☒					☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		Acoustic Sensor 9VI536 on PRV J287 has been inoperative for >24 hours. Verified sock in place, so confirmed no release during this time.																													
5/15/2023	8:43 AM	7/13/2023	10:23 AM	☒					☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		CF RFG H2S 9A2831 analyzer has been inoperative for >24 hours.																													
5/15/2023	8:43 AM	7/13/2023	10:23 AM	☒					☒	☐	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		CF RFG TRS 9A2825 analyzer has been inoperative for >24 hours																													
5/25/2023	5:29 PM	5/30/2023	3:06 PM	☒					☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		FXG H2S Analyzer 14A1251 has been inoperative for >24 hours																													
6/12/2023	9:09 AM	6/30/2023	3:00 PM	☒					☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		Acoustic Sensors 13VI4004, 13VI4051, 13VI4053 and 9VI537 have been inoperative for >24 hours. Verified socks in place, so confirmed no release during this time. Operations will continue to monitor.																													
6/17/2023	5:41 AM	6/26/2023	3:45 PM	☒					☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Event Description:		OPCEN FXG H2S Analyzer 14A1251 has been inoperative for more than 24 hours.																													

BAAQMD Title V Permit
6 Month Monitoring Report

From 1/1/2023 to 6/30/2023

A0011

Martinez Refining Company

Facility Address:

3485 Pacheco Blvd

City: Martinez

State: CA

Zip Code: 94553-0071

Mailing Address

3485 Pacheco Blvd

City: Martinez

State: CA

Zip Code: 94553-0071

Contact: Greg San Martin

Title: Sr Air Env Engr

Phone: (925) 313-3743

Inoperable monitors as defined by BAAQMD Regulations 1-522 and 1-523 for the reporting period are summarized below:

<u>Started</u>		<u>Stopped</u>	<u>Source (S#)</u>	<u>Abatement Device (A#)</u>	<u>Emission Point (P#)</u>	<u>CEM</u>	<u>GLM</u>	<u>Fuel Gas</u>	<u>Parametric</u>	<u>NOx</u>	<u>SO2</u>	<u>CO</u>	<u>H2S</u>	<u>TRS</u>	<u>NH3</u>	<u>O2</u>	<u>CO2</u>	<u>H2O</u>	<u>Opacity/ LTA</u>	<u>Lead</u>	<u>Steam</u>	<u>Flow</u>	<u>Wind Dir.</u>	<u>Wind Speed</u>	<u>pH</u>	<u>Temp.</u>	<u>VOC.</u>	<u>Gauge Press.</u>	
1/3/2023	1:00 PM	1/5/2023	11:00 AM			☒	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		FXG H2S / 14 A 1251 analyzer has been inoperative >24 hours.																											
1/12/2023	3:55 AM	1/13/2023	3:15 PM			☒	☐	☐	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		SRU4 TRS 18A234 analyzer has been inoperative for >24 hours.																											
1/17/2023	2:07 PM	1/18/2023	5:20 PM			☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		RFG BTU 9A2716 analyzer has been inoperative >24 hours.																											
1/17/2023	2:07 PM	1/18/2023	5:20 PM			☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		RFG FGBD / SG /9A413 analyzer has been inoperative >24 hours.																											
1/17/2023	2:09 PM	1/18/2023	5:12 PM			☐	☐	☐	☒	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		RFG 9A1610 analyzer has been inoperative >24 hours.																											
1/19/2023	8:20 AM	1/20/2023	12:00 PM			☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		RFG FGBD/SG/9A413 analyzer has been inoperative > 24 hours.																											
1/19/2023	8:20 AM	1/20/2023	12:00 PM			☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		RFG Btu 9A2716 analyzer has been inoperative > 24 hours.																											
1/31/2023	9:06 AM	2/1/2023	10:00 AM			☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Event Description:		RFG FGBD/BTU/SG/9A2716/9A413 analyzer has been inoperative > 24 hours (monitors both BTU and Specific Gravity)																											