
**Tesoro Refining &
Marketing Company LLC**

150 Solano Way
Martinez, CA 94553
Tel: 925.228.1220

July 25, 2025

VIA EMAIL TO COMPLIANCE@BAAQMD.GOV

Mr. Jeffrey Gove, Director
Compliance and Enforcement Division
Bay Area Air District
375 Beale Street, Suite 600
San Francisco, CA 94105

TV Tracking #1301 - B2758 (Semi-Annual)
TV Tracking #1302 - B2759 (Semi-Annual)
TV Tracking #1303 - E1200 (Semi-Annual)

1. RECEIVED IN
ENFORCEMENT: 07/25/2025

**SUBJECT: Title V Semi-Annual Monitoring Report
Marathon's Martinez Renewable Fuels Facility (Plant ID B2758) and Amorc Terminal
(Plant IDs B2759 and E1200)
Reporting Period: January 1 to June 30, 2025**

Dear Mr. Gove:

Pursuant to the requirements outlined in Section I, Standard Conditions, Part F of the Tesoro Refining & Marketing Company LLC Title V Permit (issued January 11, 2016), and the Tesoro Logistics Operations LLC Title V Permit (issued August 5, 2013), the attached document includes information for deviations reported to have occurred during the reporting period. The Semi-Annual Monitoring Report consists of four parts: 1) All Inoperative Monitors and emissions exceedances reported for the reporting period; 2) A summary of the sources where source testing and cylinder gas audits were scheduled; 3) The Title V deviations reported for the reporting period; and 4) A summary of all RMP deficiencies during the reporting period. This Title V Semi-Annual Monitoring Report contains the signature of the Refinery's responsible official as required by Regulation 2-6-502, and by 40 CFR Part 70.6.

If you have any questions, please contact me at (925) 323-9207 or CVLyon@marathonpetroleum.com.

Sincerely,



Connor Lyon
Environmental Engineer

Attachment

ecc: Andrew Kobayashi, BAAD
Anais Tournier, BAAD

Read File No. 8598

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**Marathon's Tesoro Martinez Renewable Fuels Facility and Amorco Terminal
Reportable Compliance Activity (RCA): Inoperative Monitors
Reporting Period: 01/01/2025 to 06/30/2025**

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

| Date | IMF ID# | Unit | Pollutant / Parameter |
|-----------|---------|-------------------------------------|--------------------------|
| 1/9/2025 | | Pacheco Slough GLM (ID 2356) | H2S |
| 5/21/2025 | | East Air Flare (S-854) H2S Analyzer | H2S |

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

7-22-2025

Date

Donald C Staats Vice President Refining

Name and Title

Marathon's Tesoro Martinez Renewable Fuels Facility and Amorc Terminal
Source Tests and Audits
Reporting Period: 01/01/2025 to 06/30/2025

The following is a list of the sources that were operated during the reporting period in which source tests and cylinder gas audits were scheduled as required. Sources not listed were not included during the reporting period.

| Source ID | Source Description |
|-----------|--|
| A39 | API/DNF Thermal Oxidizer |
| A2000 | Sout Water Stripper Thermal Oxidizer |
| S952 | No. 1 Gas Plant Engine, M1 |
| S953 | No. 1 Gas Plant Engine, M2 |
| S2014 | Sodium Sulfide Tank No. 1 |
| S1525 | Non Retail Service Station |
| S1517 | Coker Flare |
| S854 | East Air Flare |
| S1012 | West Air Flare |
| S992 | Emergency Flare |
| S919 | F19 No. 2 HDS Depentanizer Reboiler |
| S920 | F20 No. 2 HDS Charge Heater |
| S933 | F33 Hydrocracker Reactor Heater (CEMS also used for F28 through F32) |
| S934 | F34 Hydrocracker Stabilizer Reboiler |
| S937 | F37 Hydrogen Plant Heater |
| S973 | F55 No. 3 HDS Recycle Gas Heater |
| S1511 | F78 Hot Oil Heater |
| S1526 | No. 5 Gas Plant 100-lb Fuel Gas Mix Pot |

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

7-22-2025

 Date

Donald C. Staats Vice President Refining

 Name and Title

BAAQMD Title V Permit
Semi-Annual Deviation Summary

JANUARY - JUNE 2025

B2758 / B2759 / E1200 - Martinez Refinery and Amcorco Terminal

Facility Address:

150 Solano Way

City: Martinez State: CA Zip: 94553

Mailing Address:

150 Solano Way

City: Martinez State: CA Zip: 94553

Contact:

Anne Partmann

Title:

Environmental Supervisor

Phone:

925-372-3006

Application Regulation / Permit Condition / Other:

Condition 27591.4

Date Event Date Event

Started: Stopped:

1/4/2025

1/4/2025

Source (S#): N/A

Abatement Device (A#): A-2000

Emission Point (E#): N/A

Event Description:

The Foul Water Stripper Thermal Oxidizer (A-2000) (TO) reduction zone temperature dropped below its limit of 2,100 degrees F for more than 15 minutes on 1/4/2025 between 00:43 and 1:17 due to cold waste gas going to the TO and dropping the temperature. As a response, the FWS was put in hot standby by 1:17 AM. The temperature excursion exceeded 50 degrees F within that time.

Probable Cause:

In the proces of bringing one of the Foul Water Stripper (FWS) adsorbers (A-2002) back into service from an adsorber changeout, an operator accidentally left a valve open resulting in an accumulation of water at the bottom of the adsorber vessels which blocked the vapor path to the TO. As a result, there was a sudden drop in fuel at the TO and the temperature in the reducing zone dropped.

Corrective Action or Preventative Steps Taken:

Feed was removed from the unit and the Foul Water Stripper was placed in hot standby. The TO was reset and began heating up to its setpoint temperature. The operator procedure was reviewed with the operator.

Application Regulation / Permit Condition / Other:

BAAQMD 6-1-301

Date Event Date Event

Started: Stopped:

1/8/2025

1/8/2025

Source (S#): S-1600

Abatement Device (A#): A-2000

Emission Point (E#): N/A

Event Description:

The Foul Water Stripper (FWS) Thermal Oxidizer (A-2000) (TO) was observed to be smoking intermittently on 1/8/25 from around 2:50 PM to 3:20 PM. As a response, operational adjustments were made to stabilize the TO. No qualified person was onsite to conduct a Ringlemann test and no other opacity measures or quantitative visible emissions observations are available. The visible emissions may have exceeded No.1 on the Ringlemann chart for more than 3 minutes in an hour.

Probable Cause:

The FWS feed contained hydrocarbons which increased fuel at the TO burner. To compensate with the fuel excess, the natural gas valve position was automatically decreased. At the same time, combustion air decreased correspondingly to maintain an air/ natural gas ratio. After the natural gas valve hit its minimum position at 50%, the fuel could not be reduced any lower resulting in fuel excess with insufficient oxygen for complete combustion which likely caused the visible emissions.

Corrective Action or Preventative Steps Taken:

Operators manually increased secondary air flow to the burner. This brought in more oxygen to the burner to allow for more complete combustion of the incoming hydrocarbons in the foul water feed thus reducing the visible emissions. To reduce the likelihood of reoccurrence, the natural gas minimum valve position was lowered to provide a wider range of automatic air/ natural gas control, and improved operator guidance on what moves to perform to better manage hydrocarbon in the waste gas while minimizing visible emissions was written and distributed.

Application Regulation / Permit Condition / Other:

Condition 27591.4

Date Event Date Event

Started: Stopped:

1/9/2025

1/9/2025

Source (S#): N/A

Abatement Device (A#): A-2000

Emission Point (E#): N/A

Event Description:

The Foul Water Stripper Thermal Oxidizer (A-2000) (TO) reduction zone temperature dropped below its limit of 2,100 degrees F for more than 15 minutes on 1/9/2025 between 10:11 AM and 10:29 AM. The temperature excursion exceeded 50 degrees F within that time.

Probable Cause:

To manage visible emissions resulting from hydrocarbons in the Foul Water Stripper (FWS) feed, operators manually increased nitrogen to the TO. The intent of this move was to decrease temperature along the stack which would automatically increase the combustion air and natural gas valve positions off their minimum position allowing for more automatic control and for complete combustion of the hydrocarbons. However, too much nitrogen was introduced at once dropping the temperature lower than intended.

Corrective Action or Preventative Steps Taken:

The temperature excursion directly resulted from a corrective action to address the visible emissions at the TO. After the nitrogen increase and subsequent temperature drop, the TO natural gas and combustion air were able to stabilize automatically. After this, the reducing zone temperature was automatically brought back up to the desired setpoint. To reduce the likelihood of reoccurrence, improved operator guidance on what moves to perform to better manage hydrocarbon in the waste gas while minimizing visible emissionn was written and distributed.

Application Regulation / Permit Condition / Other:

BAAQMD 6-1-301

Date Event Date Event

Started: Stopped:

1/9/2025

1/9/2025

Source (S#): S-1600

Abatement Device (A#): A-2000

Emission Point (E#): N/A

Event Description:

The Foul Water Stripper (FWS) Thermal Oxidizer (A-2000) (TO) was observed to be smoking intermittently on 1/9/25 from around 10:07 AM to 12:03 PM. As a response, operational adjustments were made to stabilize the TO. No qualified person was onsite to conduct a Ringlemann test and no other opacity measures or quantitative visible emissions observations are available. The visible emissions may have exceeded No.1 on the Ringlemann chart for more than 3 minutes in an hour.

Probable Cause:

The FWS feed contained hydrocarbons which increased fuel at the TO burner. To compensate with the fuel excess, the natural gas valve position was automatically decreased. At the same time, combustion air decreased correspondingly to maintain an air/ natural gas ratio. After the natural gas valve hit its minimum position at 50%, the fuel could not be reduced any lower resulting in fuel excess with insufficient oxygen for complete combustion which likely caused the visible emissions.

Corrective Action or Preventative Steps Taken:

Operators manually increased nitrogen flow to the TO. This decreased stack temperature allowed for the combustion air and natural gas valve positions to automatically open more off their minimum valve position. As a result, more air was introduced to the TO burner allowing for the complete combustion of the hydrocarbons. To reduce the likelihood of reoccurrence, improved operator guidance on what moves to perform to better manage hydrocarbon in the waste gas while minimizing visible emissions was written and distributed.

Application Regulation / Permit Condition / Other:

BAAD 2-1-301, 2-1-302

Date Event Date Event

Started: Stopped:

1/30/2013 Ongoing Source (S#): 1584 Abatement Device (A#): N/A Emission Point (E#): N/A

Event Description:

NOV A63828 was issued by the BAAD on 3/6/2025 that alleges failure to obtain a valid Authority to Construct (ATC) and Permit to Operate (PTO) prior to constructing and operating the Tract 4 Unloading Spot.

Probable Cause:

Tesoro disputes the District's allegations.

Corrective Action or Preventative Steps Taken:

Tesoro received an ATC for Tract 4 Unloading Spot on November 13, 2019 and submitted a startup notification to the District on November 19, 2020. Without conceding to and despite its disagreement with the District's allegations, Tesoro is working with the District on permitting Tract 4 Unloading Spot. Additionally, Tesoro ceased vacuum truck slops offloading at the Tract 4 Unloading Spot on January 16, 2025. No offloading activities have occurred since then.

Application Regulation / Permit Condition / Other:

Title V Condition 26791.2

Date Event Date Event
Started: Stopped:

3/13/2025 3/13/2025 Source (S#): S-1012 Abatement Device (A#): N/A Emission Point (E#): N/A

Event Description: Vtip exceeded Vmax at the West Air Flare (S-1012) for 1x 15-min block from 20:45 to 21:00 on 3/13/2025.

Probable Cause: The Vtip exceeded the Vmax during the second 3HDO nitrogen purge associated with its most recent catalyst changeout. The excess nitrogen decreased the BTU content of the vent gas lowering the Vmax value. Additionally, the excess nitrogen kept the air blower rate elevated thus keeping Vtip high during this period of flaring. The air blower rate controller does not discern between hydrocarbon and nitrogen flow so excess nitrogen keeps the air blower rate, and thus Vtip, high.

Corrective Action or Preventative Steps Taken: An air flow reduction factor of 95% was implemented for periods of nitrogen purging to prevent the Vtip from incorrectly remaining high during periods of purging to thus prevent it from exceeding the lowered Vmax. Additionally, improvements on internal visibility of Vtip vs Vmax was implemented.

Application Regulation / Permit Condition / Other:

Condition 27604.2

Date Event Date Event
Started: Stopped:

3/22/2025 3/27/2025 Source (S#): N/A Abatement Device (A#): N/A Emission Point (E#): N/A

Event Description: Tesoro failed to test for Total Sulfur (TS) concentration of fuel gas for the week of 3/16/2025.

Probable Cause: Tesoro's onsite sulfur gas chromatogram (GC) was inoperable and fuel gas samples were not sent to a third party lab for total sulfur analysis.

Corrective Action or Preventative Steps Taken: The GC has been repaired, and onsite TS analysis has resumed. Documentation on the urgency of missed environmental samples and protocols for third party analysis when onsite lab instruments are inoperable was drafted and is being implemented at the lab.

Application Regulation / Permit Condition / Other:

Condition 27604.2

Date Event Date Event

Started: Stopped:
3/29/2025 4/1/2025 Source (S#): N/A Abatement Device (A#): N/A Emission Point (E#): N/A

Event Description: Tesoro failed to test for Total Sulfur (TS) concentration of fuel gas for the week of 3/16/2025.

Probable Cause: Tesoro's onsite sulfur gas chromatogram (GC) was inoperable and fuel gas samples were not sent to a third party lab for total sulfur analysis.

Corrective Action or Preventative Steps Taken: The GC has been repaired, and onsite TS analysis has resumed. Documentation on the urgency of missed environmental samples and protocols for third party analysis when onsite lab instruments are inoperable was drafted and is being implemented at the lab.

Application Regulation / Permit Condition / Other:
BAAD 8-5-320.3

Date Event Date Event
Started: Stopped:
4/12/2025 4/12/2025 Source (S#): S-612 Abatement Device (A#): N/A Emission Point (E#): N/A

Event Description:
During the TK-612 10-year primary and secondary seal inspection, TK-612 was found to have center pole gasket seal gaps exceeding 1/8".

Probable Cause:
During regular use of the tank the internal floating roof moves up and down which introduces wear on the center pole gasket. There was no evidence of center pole misalignment or mechanical defects. The ethanol service of TK-612 may have also contributed to accelerated wear on the gasket material.

Corrective Action or Preventative Steps Taken:
The gasket was replaced on 4/12/2025.

Application Regulation / Permit Condition / Other:
BAAD 8-5-320.3

Date Event Date Event
Started: Stopped:
4/12/2025 4/12/2025 Source (S#): S-696 Abatement Device (A#): N/A Emission Point (E#): N/A

Event Description:

During the TK-696 10-year primary and secondary seal inspection, TK-696 was found to have center pole and guide pole gasket seal gaps exceeding 1/8"

Probable Cause:

During regular use of the tank the internal floating roof moves up and down which introduces wear on the center pole and guide pole gaskets. There was no evidence of center pole or guide pole misalignment or mechanical defects. The brief ethanol service of TK-696 in 2014 may have also contributed to accelerated wear on the gasket material.

Corrective Action or Preventative Steps Taken:

The gaskets were replaced on 4/12/2025.

Application Regulation / Permit Condition / Other:

BAAQMD 6-1-301

Date Event Date Event

Started: Stopped:

4/29/2025 4/29/2025 Source (S#): N/A Abatement Device (A#): A-2000 Emission Point (E#): N/A

Event Description:

The Foul Water Stripper Thermal Oxidizer (A-2000) was observed to be smoking on 4/29/25. The smoking was intermittent from around 5:41 PM to 5:43 PM, and consistent from 5:43 PM to 5:47 PM. No qualified person was onsite at the time to conduct a Ringelmann test and no other opacity measures or quantitative visible emissions observations are available. The visible emissions may have exceeded No.1 on the Ringelmann chart for more than 3 minutes in an hour.

Probable Cause:

The Foul Water Stripper Thermal Oxidizer (A-2000) oxygen analyzer readings unexpectedly dropped at 5:40 PM on 4/29/2024 indicating the need for maintenance. In response, the oxygen controller was put in manual mode to avoid controlling on suspect data. At the same time, the thermal oxidizer coincidentally became air limited likely due to incoming hydrocarbon carryover. Due to the O2 controller being in manual mode, additional air was not automatically introduced to the stack resulting in incomplete combustion of the incoming hydrocarbon and therefore smoking.

Corrective Action or Preventative Steps Taken:

The Foul Water Stripper (S-1600) was placed in hot standby and feed was reintroduced on 4/30/2025 at around 10:00 PM after the oxygen analyzer was maintained and recalibrated and once the Foul Water Stripper and thermal oxidizer (A-2000) were determined to be stable.

Application Regulation / Permit Condition / Other:

BAAQMD 6-1-301

Date Event Date Event

Started: Stopped:

6/12/2025 6/12/2025 Source (S#): S-1600 Abatement Device (A#): A-2000 Emission Point: N/A

Event Description:

The Foul Water Stripper Thermal Oxidizer (A-2000) was observed to be smoking on 6/12 from around 1:10 PM to 2:37 PM. In response, the unit was placed in hot standby. No qualified person was onsite to conduct a Ringelmann test and no other opacity measures or quantitative visible emissions observations are available. The visible emissions may have exceeded No.1 on the Ringelmann chart for more than 3 minutes in an hour.

Probable Cause:

Hydrocarbon in the foul water feed resulted in a fuel rich environment within the thermal oxidizer (TO) burner. Additionally, the TO oxygen analyzer experienced two periods of diverging from the redundant third party O2 CEMS leading up to the smoking incident. These two conditions resulted in unstable operation of the thermal oxidizer and ultimately led to insufficient reducing zone air for complete combustion of the incoming hydrocarbon at the thermal oxidizer.

Corrective Action or Preventative Steps Taken:

Immediately following the event, feed was removed from the unit, the foul water feed tanks were flushed to remove any entrained hydrocarbons, and the Foul Water Stripper was placed in hot standby. Additional troubleshooting efforts include increasing foul water residence time to allow for more theoretical separation between the foul water and hydrocarbon, conducting additional upstream sampling to identify the sources of hydrocarbon, injecting demulsifier upstream of the foul water charge tanks to prevent emulsified hydrocarbon from going to the foul water strippers, conducting more thorough investigations of potential sources of hydrocarbon, and adjusting TO operation control logic to allow board operators to manually increase or decrease the amount of combustion air added to the burner.

Application Regulation / Permit Condition / Other:
BAAQMD 2-1-307 (Title V Condition 27586.2)

Date Event Date Event

Started: Stopped:

6/20/2025

6/20/2025

Source (S#): S-1600

Abatement Device (A#): N/A

Emission Point: N/A

Event Description:

Emissions from the Foul Water Stripper (S-1600) were temporarily routed to the flare header and recovered by the flare gas recovery system while the Foul Water Stripper was starting up from hot standby.

Probable Cause:

The operator accidentally reintroduced feed to S-1600 prior to ensuring the valve between the foul water stripper and flare gas recovery was completely closed.

Corrective Action or Preventative Steps Taken:

The operator was reminded of the requirement to reintroduce feed only after the valve to the flare gas recovery is completely closed. The operator guidance and work instruction was reviewed and revised accordingly to ensure this is requirement is explicitly clear.

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

Donald C Steads

Print Name

Vice President Refining

Title

1-22-2025

Date

**Marathon's Tesoro Martinez Renewable Fuels Facility and Amorco Terminal
RMP Deficiencies**

Reporting Period: 01/01/2025 to 06/30/2025

RMP Deficiencies are defined by Marathon Petroleum Corporation Corporate HES&S Standards (PSM5008) and are summarized below:

Audit Findings from RMP or PSM Compliance Audits

There were no applicable audit findings that occurred during the reporting period.

PSM or RMP Agency Inspection Findings and/or Citations Related to an RMP Covered Process

There were no applicable findings and/or citations that occurred during the reporting period.

Incident Root Causes

There were no applicable incidents that occurred during the reporting period.

RMP Deficiencies Corrected During the Reporting Period

There were no RMP deficiencies corrected during the reporting period.

Open PSM Audit Corrective Recommendations

| Recommendation No. | Recommendation Title | Responsible Person |
|------------------------|--|---------------------------|
| 332338 | 2024 PSM - Update MOC Site Plan RSI 14-02 | Kenneth Bloch (882492) |
| 332700 | 2024 PSM - Update Emergency Procedure Deficiencies | James Hutchinson (107130) |
| 332760 | 2024 PSM - Develop PSM Maximum Intended Inventory Calculations | Andrew Williams (8035984) |
| 332763 | 2024 PSM - Update PSM Covered Process table in RSI 20-5 | Kenneth Bloch (882492) |
| 332775 | 2024 PSM - Completed Procedure Auditing & Upskilling | James Hutchinson (107130) |
| 332777 | 2024 PSM - Restart the PSM-101 Training Program | Kenneth Bloch (882492) |
| 332783 | 2024 PSM - Correct P&ID and Locked Valve List errors | Marcio Bonfa (1727224) |
| 332786 | 2024 PSM - Enter Causal Factor and Root Causes into intelx | Kenneth Bloch (882492) |
| 332811 | 2024 PSM - Improve Building Management | Kenneth Bloch (882492) |
| 332860 | 2024 PSM - Correct R&SI 04-01 Roles and Responsibilities | James Hutchinson (107130) |
| 332867 | 2024 PSM - Review Gauging Procedures | James Hutchinson (107130) |
| 332870 | 2024 PSM - Remove Duplicated R&SI | Kenneth Bloch (882492) |
| 332885 | 2024 PSM - Implement Ops Limits Dashboard | Andrew Williams (8035984) |
| 332891 | 2024 PSM - Update R&SI 10-1 | James Hutchinson (107130) |

| | | |
|------------------------|--|----------------------------|
| 332895 | 2024 PSM - Unit Qualification Tracking Updates | James Hutchinson (107130) |
| 332899 | 2024 PSM - Upgrade DCS Console | Andrew Williams (8035984) |
| 332902 | 2024 PSM - Remedy Alarm/Instrument ID Conflicts | Philip Pulas (8019342) |
| 333597 | 2024 PSM - Completion of all required reviews during a PHA | Kenneth Bloch (882492) |
| 333675 | 2024 PSM - Management Review of PHA Recommendations | Kenneth Bloch (882492) |
| 342630 | 2024 PSM - PHA-A-S: Methodology for PHA communications | Andrew Williams (8035984) |
| 342631 | 2024 PSM - CON-A-S: Reinstall process hazard overview boards | Kenneth Bloch (882492) |
| 342632 | 2024 PSM - MI-A-S-1: Raw Feed Tank, 95A-895, CUI inspection | Scott Chestnut (8024426) |
| 342633 | 2024 PSM - MI-A-S-2: CUI inspection schedule for insulated tanks | Scott Chestnut (8024426) |
| 342636 | 2024 PSM - MI-D-S: Evaluate inspection schedule discrepancy | Scott Chestnut (8024426) |
| 342637 | 2024 PSM - MI-E-S: List of I&E technician equipment for calibration and certification | Demetrios Pettas (8025894) |
| 342640 | 2024 PSM - MI-H-S: Update all inspection piping isometric drawings | Scott Chestnut (8024426) |
| 342644 | 2024 PSM - II-B-S: Update Incident Investigation Program RSI 05-01 for USW participation | Kenneth Bloch (882492) |
| 342645 | 2024 PSM - II-C-S: Close or extend overdue investigation recs and regular communication/review | Kenneth Bloch (882492) |
| 342646 | 2024 PSM - SCA-A-S: Update next SCA date | Kenneth Bloch (882492) |

| | | |
|------------------------|--|------------------------|
| 342647 | 2024 PSM - SPM-A-S: Revise process safety management documents | Kenneth Bloch (882492) |
| 342648 | 2024 PSM - SPM-B-S: Update Safety Plan for current ITPM activities | Kenneth Bloch (882492) |

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



Date

Donald C. Spartz Vice President Refining

Name and Title