Tesoro Refining & Marketing Company LLC

150 Solano Way
Martinez, CA 94553
Tel: 925.228.1220

July 30, 2026

TV Tracking #1412 - B2758 (Semi-Annual)
TV Tracking #1413 - B2759 (Semi-Annual)
TV Tracking #1414 - E1200 (Semi-Annual)

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

1. ☐ RECEIVED IN ENFORCEMENT: 07/30/2026

SUBJECT: **Title V Semi-Annual Monitoring Report**
Marathon's Martinez Renewable Fuels Facility (Plant ID B2758) and Amorco Terminal (Plant IDs B2759 and E1200)
Reporting Period: January 1 to June 30, 2026

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 or comments, please contact Paula Bremer at 925-228-2340 or PBremer@marathonpetroleum.com.

Sincerely,

Anne Partmann
Environmental Manager

Attachment

ecc: Andrew Kobayashi, BAAD
Anais Tournier, BAAD
Leo Castellblanch, BAAD

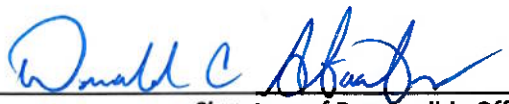
Marathon's Tesoro Martinez Renewable Fuels Facility and Amorco Terminal
Reportable Compliance Activity (RCA): Inoperative Monitors
Reporting Period: 01/01/2026 to 06/30/2026

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
1/13/2026	202735	S-854	Gas Chromatograph Analyzer
2/4/2026	202796	S-1600	Vapor Flow Meter
2/17/2026	202845	OPT4 FTIR, TDL, UV-DOAS Analyzer (West)	SO2, 1,2-Butadiene, Hexane, BTEX, NH3, and H2S
2/17/2026	202841	S-1012	Gas Chromatograph Analyzer
2/20/2026	202859	S-1600	Vapor Flow Meter
2/23/2026	202868	S-1600	Vapor Flow Meter
4/17/2026	203042	S-937	NOx

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

7/30/2026
Date

Donald C. Staats, VP Refining
Name and Title

Marathon's Tesoro Martinez Renewable Fuels Facility and Amorco Terminal
Reportable Compliance Activity (RCA): Excess Emissions or Excursions
Reporting Period: 01/01/2026 to 06/30/2026

Inoperative Monitors as defined by BAAQMD Regulations 1-522.7 and 1-523.3
for the reporting period are summarized below:

Date	IMF ID#	Unit	Pollutant / Parameter
4/14/2026	203021	S-1511	NOx
4/17/2026	203042	S919, S920, S928, S929, S930, S931, S932, S933, S934, S937, and S973	NOx

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.

Donald C Staats

Signature of Responsible Official

7/30/2026
Date

Donald C. Staats, VP Refining
Name and Title

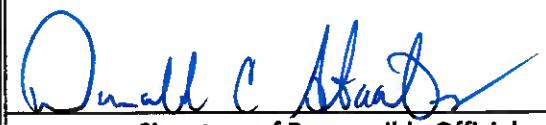
Marathon's Tesoro Martinez Renewable Fuels Facility and Amorco Terminal
Source Tests and Audits
Reporting Period: 01/01/2026 to 06/30/2026

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
S952	No. 1 Gas Plant Engine, M1
S953	No. 1 Gas Plant Engine, M2
S954	No. 1 Gas Plant Engine, M3
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

7/30/2026
Date

Donald C. Staats, VP Refining
Name and Title

BAAQMD Title V Permit
Semi-Annual Deviation Summary

JANUARY-JUNE 2026

B2758 / B2759 / E1200 - Martinez Renewable Fuels Facility and Amorco Terminal

Facility Address:	Mailing Address:
150 Solano Way	150 Solano Way
City: Martinez State: CA Zip: 94553	City: Martinez State: CA Zip: 94553

Contact:	Title:	Phone:
Anne Partmann	Environmental Supervisor	925-372-3006

Application Regulation / Permit Condition / Other:
BAAQMD 6-1-301

Date Event Started:	Date Event Stopped:			
1/27/2026	1/27/2026	Source (S#): S-1025	Abatement Device (A#): A-14	Emission Point: N/A

Event Description:
A thermal oxidizer (TO) owned by Envent Plant 16338 was brought onsite to abate emissions out of No. 1 Gas Plant (A-14) while the normal fuel gas recovery system was down for a site wide turnaround. On 1/27/2026 at around 19:37, the Envent TO tripped and was brought back online at around 20:15. During this period, the loading rack (S-1025) completed two truck loading events from 19:37 - 19:47 and 19:58 - 20:06, whose resulting vapors were abated by A-14 in a mode that has not been certified by CARB.

Probable Cause:
Under normal operations (non-turnaround related), the operational response to an A-14 trip includes ceasing all activities that are abated by A-14, including S-1025 operation. In this case, the temporary Envent TO tripped while A-14 remained fully functional, and did not trigger the standard operational response.

Corrective Action or Preventative Steps Taken:
Operations personnel were educated on the need to shut down S-1025 operation if the Envent TO trips. The Envent TO has since been removed from the site after the fuel gas recovery system was returned to service after turnaround.

Application Regulation / Permit Condition / Other:
BAAQMD 6-1-301

Date Event Started:	Date Event Stopped:			
1/29/2026	2/1/2026	Source (S#): S-1003	Abatement Device (A#): N/A	Emission Point: N/A

Event Description:
During catalyst loading of a reactor in 2HDO (S 1003), intermittent visible emissions were observed on 1/29/26 and 2/1/26 at approximately 9:45 AM. In response, a funnel and sock were added to the bins. No qualified person was onsite to conduct a Ringlemann test and no other opacity measurement 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. The catalyst loading activities started on 1/26/26 but no other reports of visible emissions were reported.

Probable Cause:
Improper operational and contractor awareness of the requirements to reduce visible emissions from catalyst loading activities.

Corrective Action or Preventative Steps Taken:
The visible emissions issue was communicated to the contractor performing the loading and adjustments were made to the catalyst loading process to reduce dust generation, including the use of a funnel and sock at the transfer point.

Application Regulation / Permit Condition / Other:
BAAQMD 6-1-301

Date Event Started:	Date Event Stopped:			
1/31/2026	1/31/2026	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 1/31/26 from around 10:19 AM to 10:25 AM. 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 likely contained emulsified hydrocarbons resulting in incomplete combustion at A-2000 resulting in visible emissions.

Corrective Action or Preventative Steps Taken:
Operators reduced flow to the TO to reduce visible emissions.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:			
2/9/2026	2/9/2026	Source (S#): S-1600	Abatement Device (A#): N/A	Emission Point: N/A

Event Description:

Tesoro failed to report an inoperative parametric monitor (RCA 202796) for an S-1600 overhead vapor flow meter (018FI0468) by the next working day after the meter exceeded 24 hours of being inoperative. The monitor became inoperative on 2/4/2026 at around 1:20 PM, exceeded 24 hours of being inoperative on 2/5/2026 at 1:20 PM, and was reported via an RCA on 2/9/2026 at 3:40 PM.

Probable Cause:

The Foul Water Stripper was removed from service for scheduled maintenance during the first quarter 2026 turnaround. During the shutdown and subsequent startup, salt formation within the system led to obstruction of the overhead vapor flow meter. Upon returning the system to service, the flow meter initially appeared to function properly; however, it was later recognized that the data was not representative of process conditions and the flow meter was inoperative.

Corrective Action or Preventative Steps Taken:

The plugging at the flow meter was resolved by applying steam and adjusting the steam tracing. Automatic data alerts were implemented to flag when the flow meter generates potentially inaccurate information, allowing prompt identification if the meter becomes inoperative.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:			
3/29/2026	3/29/2026	Source (S#): S-985	Abatement Device (A#):	Emission Point:

Event Description:
S-985 (No. 1 Gas Plant Cooling Tower) total cooling tower water recirculation rate exceeded the limit of 5,500 gpm on 3/29/2026 from 2:18 PM to 2:19 PM. The maximum rate reached 5,530 gpm.

Probable Cause:
There was increased cooling water demand at S-2010 and S-2013 due to operating conditions that day.

Corrective Action or Preventative Steps Taken:
Operations personnel decreased cooling demand from this cooling tower to immediately decrease the recirculation rate.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:			
4/9/2026	4/9/2026	Source (S#): S-819	Abatement Device (A#): N/A	Emission Point: N/A

Event Description:
The Air District discovered three leaks at the API (S-819) exceeding the 500 ppm leak threshold during a site visit on 4/9/2026.

Probable Cause: Small gaps in the seams and/or missing bolts on the API covers.

Corrective Action or Preventative Steps Taken: Sealant was applied to the three areas found to be leaking. When re-monitored there were no leaks detected.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:			
4/14/2026	4/14/2026	Source (S#): S-1511	Abatement Device (A#):	Emission Point:

Event Description:
F-78 (S-1511) experienced an indicated excess of the 3-hour averaged NOx concentration corrected to 3% O2 exceeding its 7 ppm limit. The excess lasted from 4/14/2026 at 12:00 to 4/14/2026 at 17:00.

- -

Probable Cause:
During maintenance on F 78 (S 1511), powering down equipment interrupted the NOx analyzer signal, causing the system to interpret a false low reading and reduce ammonia injection, which led to a temporary rise in NOx levels. The issue wasn't identified until the analyzer signal returned after maintenance was completed, at which point operations restored ammonia flow and brought NOx levels back into normal range.

Corrective Action or Preventative Steps Taken:
Operations immediately noticed the ammonia was pulled out once the signal returned and worked to reestablish flow.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:				
4/17/2026	4/20/2026	Source (S#):	S-919, S-920, S-928, S-929, S-930, S-931, S-932, S-933, S-934, S-937, and S-973	Abatement Device (A#):	Emission Point:

Event Description:
The facility NOx bubble limit of 834.4 lb/day was exceeded for three consecutive days from 4/17/2026 to 4/19/2026.

Probable Cause:
Maintenance replaced the motherboard on F 37 (S 937), and when the analyzer came back online the NOx reading was approximately 35% higher than normal, which resulted in the site NOx bubble limit being exceeded.

Corrective Action or Preventative Steps Taken:
Analyzer technicians identified an incorrect heating element configuration and corrected the improper settings that led to the artificially elevated NOx readings observed after the motherboard replacement. After the adjustment, the NOx readings returned to the normal range.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:						
4/14/2026	On-going	Source (S#):	S-1600	Abatement Device (A#):	A-2000	Emission Point:	N/A

Event Description:

Between April 14 and 17, 2026, Tesoro's third-party contractor installed a temporary Fourier Transform Infrared (FTIR) analyzer at A-2000, the Foul Water Stripper Thermal Oxidizer (FWS TO), to support the configuration of new Tunable Diode Laser (TDL) and Differential Optical Absorption Spectroscopy (DOAS) analyzers. The intent of the FTIR analyzer was to provide real time, accurate sulfur dioxide (SO2), nitrogen oxides (NOx), ammonia (NH3), and carbon monoxide (CO) data for the TDL and DOAS to be configured against. The FTIR's real-time data indicated that emissions of NH3 and CO from A-2000 exceeded the applicable limits of 0.11 lbs/hr and 10 ppmv corrected to 15% O2 averaged for 1-hour, respectively.

Probable Cause:

To address recurring hydrocarbons in the FWS TO feed that were causing visible emissions, Tesoro, with the assistance of Zeeco, the original equipment manufacturer of the three-stage thermal oxidizer, adjusted the TO optimize the oxidizing stage over the reducing stage. However, because CO and NH3 were not directly measured, it was not discovered that this reduced the ammonia destruction efficiency and increased CO emissions until the temporary FTIR was installed and indicated emissions exceeding the respective emissions limits. The ammonia limit of 0.11 lbs/hr was established in the Authority to Construct (ATC) based on Zeeco's stated 99.9% destruction efficiency. The CO permit limit was set in the ATC based on the manufacturers design rather than actual performance data. Marathon submitted a permit application (720986) on December 13, 2024 to increase the CO permit limit to what can be reasonably achieved and maintained based on post start up emission data rather than Zeeco's design specifications.

Corrective Action or Preventative Steps Taken:

Immediate tuning and troubleshooting were performed to reduce the CO and NH3 emissions. Evaluation of the impact of process variables and different operating scenarios on NH3 and CO are underway with the newly installed continuous analyzers. For ammonia, both the estimated maximum and average emissions remain well below the acute and chronic hazard indices and ammonia has not been detected at parts per billion concentrations at the fenceline by the FTIR analyzer. CO is a criteria pollutant and does not contribute to nonattainment with respect to the ozone or PM standards. Marathon's application requests that the CO limit be increased from 10 ppmv @ 15% O2 (1-hr) as stated by Zeeco's design specifications to 107 ppmv @ 15% O2, which reflects RACT.

Application Regulation / Permit Condition / Other:

Date Event Started:	Date Event Stopped:			
5/8/2026	5/8/2026	Source (S#): S1025	Abatement Device (A#): N/A	Emission Point: N/A

Event Description: During an inspection of S1025 truck rack APCO inspectors measured emissions from an oily water sewer drain in excess of the vapor-tight leak threshold of 500 ppm.

Probable Cause: Previous maintenance activities at the loading rack resulted in excess hydrocarbons in the local drains.

Corrective Action or Preventative Steps Taken: The drain was cleared of material using a vacuum truck and flushed until a reading at the drain below the vapor-tight leak threshold of 500 ppm was obtained. Future maintenance activities will include flushing and monitoring the drains after the completion of the work.

Marathon's Tesoro Martinez Renewable Fuels Facility and Amorco Terminal

RMP Deficiencies

Reporting Period: 01/01/2026 to 06/30/2026

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

RMP Deficiencies Corrected During the Reporting Period

Recommendation No.	Recommendation Title	Date Completed
332760	2024 PSM - Develop PSM Maximum Intended Inventory Calculations	4/9/2026
332763	2024 PSM - Update PSM Covered Process table in RSI 20-5	3/9/2026
332811	2024 PSM - Improve Building Management	5/15/2026
332867	2024 PSM - Review Gauging Procedures	5/11/2026
332870	2024 PSM - Remove Duplicated R&SI	2/23/2026
332885	2024 PSM - Implement Ops Limits Dashboard	4/14/2026
333597	2024 PSM - Completion of all required reviews during a PHA	2/20/2026

342630	2024 PSM - PHA-A-S: Methodology for PHA communications	2/16/2026
342632	2024 PSM - MI-A-S-1: Raw Feed Tank, 95A-895, CUI inspection	5/22/2026
342633	2024 PSM - MI-A-S-2: CUI inspection schedule for insulated tanks	2/21/2026
342645	2024 PSM - II-C-S: Close or extend overdue investigation recs and regular communication/review	1/21/2026
342646	2024 PSM - SCA-A-S: Update next SCA date	2/20/2026
342647	2024 PSM - SPM-A-S: Revise process safety management documents	2/20/2026

Open PSM Audit Corrective Recommendations

Recommendation No.	Recommendation Title	Responsible Person
332700	2024 PSM - Update Emergency Procedure Deficiencies	James Hutchinson
332775	2024 PSM - Completed Procedure Auditing & Upskilling	James Hutchinson
332783	2024 PSM - Correct P&ID and Locked Valve List errors	James Hutchinson
332860	2024 PSM - Correct R&SI 04-01 Roles and Responsibilities	James Hutchinson
332891	2024 PSM - Update R&SI 10-1	James Hutchinson
332895	2024 PSM - Unit Qualification Tracking Updates	James Hutchinson
332899	2024 PSM - Upgrade DCS Console	Grisel Ortiz Morales
332902	2024 PSM - Remedy Alarm/Instrument ID Conflicts	Philip Pulas
342631	2024 PSM - CON-A-S: Reinstall process hazard overview boards	Alek Hamparian
342636	2024 PSM - MI-D-S: Evaluate inspection schedule discrepancy	Scott Chestnut
342637	2024 PSM - MI-E-S: List of I&E technician equipment	Demetrios Pettas

	for calibration and certification	
342640	2024 PSM - MI-H-S: Update all inspection piping isometric drawings	Scott Chestnut

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.

Donald C Staats

Signature of Responsible Official

7/30/2026

Date

Donald C. Staats, VP Refining