

**DOCKETED**

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<b>Project Title:</b>	Compliance - Watson Cogeneration Company AFC
<b>TN #:</b>	235342
<b>Document Title:</b>	CEC 3rd Quarter '20 Emissions Report WCC
<b>Description:</b>	N/A
<b>Filer:</b>	Craig Chi
<b>Organization:</b>	Watson Cogeneration Company
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	10/20/2020 12:09:54 PM
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**Watson Cogeneration Company**

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**VIA EMAIL**

October 21, 2020

Mr. Anwar Ali  
Compliance Project Manager  
California Energy Commission  
1516 9<sup>th</sup> Street, MS-2000  
Sacramento, California 95814-5512

**Subject: Watson Cogeneration Company (Facility #06755)  
Quarterly Emissions Report – AQ 28 – 3<sup>rd</sup> Quarter 2020  
Submittal # 394**

Dear Mr. Ali:

Attached is Watson Cogeneration Company's (Facility #06755) Quarterly Emissions Report for the third quarter of 2020. The report contains a table of emission limits (Table 1), a table of daily fuel and ammonia usage (Table 2A), a table of daily emissions (Table 2B), and a table of emissions during start up mode (Table 2C) for each of the site's four gas turbines. A CEC permit has been issued for a fifth train, but it has been removed from Table 1 since the unit has not been built. Along with the quarterly emissions report, please find copies of the last sulfur content analysis in the quarter for our refinery fuel gas and butane.

During the third quarter of 2020, Watson Cogeneration Company (WCC) experienced one breakdown / excess emissions incident as currently required by the SCAQMD.

- 9/25/2020 – WCC experienced a Deviation with Excess Emissions at 8:43 AM, resulting in an exceedance of CEC Permit Conditions AQ-17 and AQ-13. The issue was resolved at 9:00 AM, and notification was made to AQMD at 8:56 AM. Subsequent report was issued on 10/08/2020 and is attached.

If you have any questions concerning this report, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig Chi', written over a horizontal line.

Craig Chi  
Watson Cogeneration Operations Engineer

bcc: Tracy Hoang, Marathon Los Angeles Refinery  
Jimmie Espie, WCC  
David Booth, WCC

**Table 1**

**Emission Limits as required by the California Energy Commission Conditions of Certification**

Turbine Number	Concentration Limits (ppmv @ 15% O <sub>2</sub> )				Maximum Daily Emission Limits <sup>4</sup> (lbs/day)					Start-Up/Shutdown Emission Limits <sup>5</sup> (lbs/day)				
	NO <sub>x</sub>	SO <sub>2</sub>	CO	NH <sub>3</sub>	NO <sub>x</sub>	SO <sub>2</sub>	CO	PM	ROG	NO <sub>x</sub>	SO <sub>2</sub>	CO	PM	ROG
1 - 4	8	2	2.5 <sup>1</sup> 4.5 <sup>2</sup>	20	2600	246	568	1244	531	2156	59	82	186	108
5	5	---	2.5 <sup>3</sup>	20	209	10	64	95	18	449	8	296	92	32

Notes:

1. Limit applies when turbine is operated at or above 85% capacity, except during startup and shutdown.
2. Limit applies when turbine is operated below 85% capacity, except during startup and shutdown.
3. Limit applies when turbine is operated at or above 50% capacity.
4. Limits do not apply on days when a start-up or shutdown has occurred. Limits pertain to combined emissions from Units 1-4.
5. Limits apply only on days when a start-up or shutdown has occurred. Limits pertain to stack emissions from individual Units.

**Table 2A**  
**Daily Fuel & Ammonia Usage**

Date	Unit Start-Up or Shutdown	Fuel Usage - By Unit (mmbtu/hr)					Fuel Usage - By Fuel Type (mmbtu/hr)			Ammonia Usage - By Unit (lbs/day)			
		GTG #1	GTG #2	GTG #3	GTG #4	Boiler #42	Natural Gas	Refinery Gas	Butane	GTG #1	GTG #2	GTG #3	GTG #4
7/1/20		1051	1081	1048	1026	0	3345	722	140	2094	1933	2094	2040
7/2/20		1054	1099	1066	1045	0	3482	648	134	2094	1933	2094	2040
7/3/20		1018	1068	1046	1009	0	3636	399	106	2094	1933	2094	2040
7/4/20		1017	1058	1044	995	0	3461	537	116	2094	1933	2094	2040
7/5/20		999	1041	1024	971	0	3224	696	114	2094	1933	2094	2040
7/6/20		1037	1083	1037	1012	0	2875	1165	129	2094	1933	2094	2040
7/7/20		1014	1053	1015	985	0	2651	1278	137	2094	1933	2094	2040
7/8/20		1064	1105	1068	1038	0	2996	1141	138	2094	1933	2094	2040
7/9/20		1074	1118	1082	1050	0	3184	1018	122	2094	1933	2094	2040
7/10/20		1055	1110	1065	1037	0	3033	1124	109	2094	1933	2094	2040
7/11/20		993	1046	1031	973	0	2792	1148	102	2094	1933	2094	2040
7/12/20		992	1039	1026	967	0	2849	1068	107	2094	1933	2094	2040
7/13/20		1053	1086	1059	1018	0	2955	1125	135	2094	1933	2094	2040
7/14/20		1058	1096	1070	1030	0	3009	1115	130	2094	1933	2094	2040
7/15/20		1069	1114	1081	1048	0	3400	789	123	2094	1933	2094	2040
7/16/20		1063	1118	1083	1052	0	3401	801	114	2094	1933	2094	2040
7/17/20		1055	1117	1072	1048	0	3370	817	105	2094	1933	2094	2040
7/18/20		1028	1075	1061	1012	0	3251	813	111	2094	1933	2094	2040
7/19/20		1027	1079	1063	1014	0	3326	748	109	2094	1933	2094	2040
7/20/20		1050	1094	1066	1034	0	3068	1054	122	2094	1933	2094	2039
7/21/20		1065	1110	1077	1048	0	3257	919	124	2094	1933	2094	2040
7/22/20		1051	1086	1062	1027	0	3164	940	122	2094	1933	2094	2040
7/23/20		1072	1103	1082	1044	0	3215	951	136	2094	1933	2094	2040
7/24/20	Y	1023	1093	1066	1031	0	3181	904	127	2040	1933	2094	2040
7/25/20		0	1190	1169	1148	0	2610	778	129	0	1933	2094	2040
7/26/20		0	1208	1184	1152	0	2597	825	132	0	1933	2094	2041
7/27/20		0	1189	1171	1141	0	2504	879	128	0	1933	2094	2040
7/28/20		0	1223	1191	1169	0	2519	943	131	0	1933	2094	2040
7/29/20		0	1236	1193	1170	0	2481	998	131	0	1933	2094	2039
7/30/20		0	1252	1194	1180	0	2618	888	130	0	1933	2094	2039
7/31/20	Y	541	1169	1117	1112	0	2790	1026	123	980	1933	2094	2039
8/1/20		1030	1054	1039	987	0	3019	938	153	2094	1933	2094	2040
8/2/20		1036	1055	1051	1003	0	3034	942	168	2094	1933	2094	2040
8/3/20		1062	1087	1061	1032	0	3276	808	158	2094	1933	2094	2040
8/4/20		1049	1076	1046	1021	0	3240	802	150	2094	1767	2094	2040
8/5/20		1045	1076	1054	1019	0	3213	839	142	2094	1387	2094	2040
8/6/20		1046	1079	1059	1027	0	3302	768	141	2094	1470	2094	2040
8/7/20		1044	1077	1045	1027	0	3226	837	130	2094	1933	2094	2040
8/8/20		1016	1064	1047	1006	0	3261	754	119	2094	1933	2094	2040
8/9/20		1013	1062	1045	1007	0	3103	905	120	2094	1933	2094	2040
8/10/20		1026	1072	1031	1017	0	3091	942	113	2094	1933	2094	2040
8/11/20		1008	1059	1040	1018	0	3150	858	116	2094	1933	2094	2040
8/12/20		1048	1090	1049	1043	0	3237	872	121	2094	1933	2094	2040
8/13/20		1035	1072	1029	1008	0	3077	955	112	1637	1933	2094	2040
8/14/20		1048	1080	1041	1023	0	3100	965	126	1905	1933	2094	2040
8/15/20		999	1026	1026	1001	0	2867	1041	144	2094	1933	2094	2040
8/16/20		1027	1040	1046	990	0	2951	977	175	2094	1933	2094	2040
8/17/20		1135	1157	1115	1099	0	3474	889	144	2094	1933	2094	2040
8/18/20		1125	1154	1105	1089	0	3195	1139	138	2094	1764	2094	2040
8/19/20		1098	1130	1080	1066	0	3113	1117	143	2094	1481	1822	2041
8/20/20		1110	1135	1089	1085	0	3116	1146	158	2094	1499	2086	2040
8/21/20		1103	1129	1087	1070	0	3125	1111	152	2094	1426	1869	2039
8/22/20		1038	1052	1040	997	0	2963	1013	150	2094	1439	1557	2039
8/23/20		1068	1094	1048	1041	0	3116	992	143	2094	1272	1557	2039
8/24/20		1068	1108	1056	1046	0	3211	940	128	2094	1337	1557	2004
8/25/20		1061	1098	1049	1038	0	3275	836	135	2094	1462	1557	1784
8/26/20		1047	1093	1038	1031	0	3261	828	120	2094	1468	1557	1664
8/27/20		1064	1107	1053	1054	0	3452	701	126	2094	1575	1557	1664
8/28/20		1052	1100	1047	1035	0	3502	603	128	2094	1443	1557	1664

**Table 2A**  
**Daily Fuel & Ammonia Usage**

Date	Unit Start-Up or Shutdown	Fuel Usage - By Unit (mmbtu/hr)					Fuel Usage - By Fuel Type (mmbtu/hr)			Ammonia Usage - By Unit (lbs/day)			
		GTG #1	GTG #2	GTG #3	GTG #4	Boiler #42	Natural Gas	Refinery Gas	Butane	GTG #1	GTG #2	GTG #3	GTG #4
8/29/20		1029	1070	1049	1015	0	3499	545	120	2094	1497	1557	1664
8/30/20		1036	1070	1053	1016	0	3585	469	122	2094	1503	1557	1664
8/31/20		1017	1053	1011	1000	0	3446	514	119	2094	1358	1557	1664
9/1/20		1061	1094	1051	1040	0	3403	709	134	2094	1354	1557	1664
9/2/20		1062	1101	1053	1042	0	3670	462	125	2094	1360	1594	1702
9/3/20		1053	1085	1039	1022	0	3550	515	135	1996	1465	1806	1848
9/4/20		1066	1096	1042	1034	0	3727	379	132	1933	1357	1933	1933
9/5/20		1073	1112	1039	1038	0	3576	571	114	1933	1208	1933	1933
9/6/20		1132	1168	1094	1096	0	3661	716	113	1933	1241	1933	1933
9/7/20		1114	1166	1107	1101	0	3748	614	125	1933	1190	1933	1933
9/8/20		1086	1133	1076	1068	0	3861	379	124	1933	1170	1933	1933
9/9/20		1045	1086	1031	1021	0	3812	270	101	1933	1274	1933	1933
9/10/20		1033	1089	1039	1026	0	3741	344	102	1933	1320	1933	1933
9/11/20		1032	1093	1037	1025	0	3537	547	103	1933	1394	1933	1933
9/12/20		1005	1048	1026	984	0	3461	483	118	1933	1565	1933	1933
9/13/20		1008	1049	1023	988	0	3416	535	118	1933	1563	1933	1933
9/14/20		1051	1088	1029	1022	0	3543	525	123	1933	1444	1933	1933
9/15/20		1045	1092	1034	1026	0	3576	500	121	1933	1451	1933	1933
9/16/20		1056	1096	1038	1028	0	3672	426	120	1933	1562	1933	1933
9/17/20		1045	1084	1024	1017	0	3401	645	124	1933	1426	1933	1933
9/18/20		1044	1076	1022	1012	0	3507	512	134	1933	1400	1933	1933
9/19/20		1003	1044	1017	982	0	3459	468	119	1933	1369	1933	1933
9/20/20		1021	1050	1027	993	0	3411	537	141	1933	1471	1933	1933
9/21/20		1045	1086	1030	1023	0	3676	376	132	1933	1357	1933	1933
9/22/20		1044	1092	1032	1028	0	3629	443	123	1933	1374	1933	1933
9/23/20		1059	1102	1034	1037	0	3617	490	126	1933	1336	1933	1933
9/24/20		1069	1100	1035	1035	0	3665	436	140	1933	1425	1933	1933
9/25/20		1093	1114	1061	1055	0	3809	363	152	1916	1340	1933	2331
9/26/20		1068	1096	1073	1038	0	3727	401	146	1933	1502	1933	2577
9/27/20		1067	1083	1067	1028	0	3754	329	163	1933	1532	1933	2116
9/28/20		1072	1098	1058	1049	0	3792	363	122	1933	1444	1933	1933
9/29/20		1057	1107	1043	1043	0	3734	402	114	1933	1299	1933	1933
9/30/20		1069	1108	1042	1036	0	3813	321	120	1933	1284	1933	1933

**Table 2B**  
**Daily Emissions**

Date	Unit Start-Up or Shutdown	Total Mass Emissions - GTG's #1 - 4				
		Midnight - Midnight				
		(lbs/day)				
		NOX	SO2	CO	PM <sup>1</sup>	ROG <sup>1</sup>
7/1/20		589.0	3.5	130.6	398.7	267.4
7/2/20		607.0	2.9	106.0	403.9	270.8
7/3/20		608.6	2.7	108.0	391.7	262.5
7/4/20		595.5	3.3	111.4	389.4	261.1
7/5/20		569.8	3.4	105.8	382.2	256.3
7/6/20		575.0	7.8	117.9	396.0	265.9
7/7/20		575.1	6.9	131.8	386.6	259.8
7/8/20		624.6	6.8	145.1	405.9	272.6
7/9/20		652.5	7.9	152.9	410.3	275.4
7/10/20		674.1	9.6	149.9	405.0	271.9
7/11/20		734.3	10.8	81.5	384.0	257.9
7/12/20		658.5	9.2	77.2	382.1	256.5
7/13/20		684.2	11.1	96.0	400.3	268.8
7/14/20		711.2	10.7	86.4	403.9	271.2
7/15/20		694.1	9.3	86.7	408.7	274.1
7/16/20		725.0	7.0	83.4	409.0	274.4
7/17/20		706.9	9.5	72.8	406.9	272.9
7/18/20		713.2	7.8	70.4	395.8	265.5
7/19/20		727.8	7.6	74.0	396.4	265.9
7/20/20		764.4	6.7	79.1	403.0	270.5
7/21/20		717.5	7.4	76.2	407.8	273.7
7/22/20		766.0	8.0	80.6	400.9	269.1
7/23/20		802.1	7.1	89.3	408.1	273.9
7/24/20	Y	779.7	7.4	72.4	399.5	268.1
7/25/20		773.5	10.1	70.0	333.6	223.9
7/26/20		871.8	10.4	73.3	337.3	226.4
7/27/20		832.4	7.5	71.8	333.3	223.8
7/28/20		849.3	7.2	72.0	341.3	229.2
7/29/20		872.8	6.4	85.7	342.9	230.3
7/30/20		848.6	8.2	76.3	345.1	231.7
7/31/20	Y	742.3	7.3	73.1	374.0	251.1
8/1/20		644.3	5.4	61.7	390.0	261.8
8/2/20		626.6	6.4	64.5	393.3	264.0
8/3/20		598.0	4.6	13.8	402.2	269.8
8/4/20		640.0	5.2	12.6	397.4	266.6
8/5/20		799.7	6.4	30.8	397.7	266.9

**Table 2B**  
**Daily Emissions**

Date	Unit Start-Up or Shutdown	Total Mass Emissions - GTG's #1 - 4				
		Midnight - Midnight				
		(lbs/day)				
		NOX	SO2	CO	PM <sup>1</sup>	ROG <sup>1</sup>
8/6/20		821.2	6.1	34.9	399.1	267.7
8/7/20		631.4	3.9	48.0	397.6	266.8
8/8/20		655.4	11.1	65.7	391.8	262.8
8/9/20		675.6	4.4	93.2	391.6	262.8
8/10/20		631.7	6.5	78.9	393.3	263.9
8/11/20		694.8	5.7	42.6	391.1	262.5
8/12/20		612.1	4.2	28.5	401.1	269.1
8/13/20		693.1	4.3	48.3	393.2	263.9
8/14/20		662.8	4.7	48.3	397.8	267.0
8/15/20		593.7	8.7	45.9	384.7	258.3
8/16/20		581.1	7.0	50.4	389.5	261.5
8/17/20		651.6	8.1	71.0	427.2	286.7
8/18/20		683.2	6.1	61.3	424.6	285.0
8/19/20		744.4	14.3	77.4	415.2	278.7
8/20/20		684.4	9.1	79.2	419.7	281.8
8/21/20		730.9	13.5	160.3	416.6	279.7
8/22/20		686.9	6.0	150.6	391.7	263.0
8/23/20		654.7	5.4	120.0	403.4	270.8
8/24/20		715.2	5.6	120.1	405.8	272.3
8/25/20		718.2	3.8	110.0	402.6	270.1
8/26/20		738.4	2.6	81.9	399.1	267.7
8/27/20		733.1	2.9	87.4	405.4	271.9
8/28/20		807.7	7.2	94.0	400.9	268.8
8/29/20		843.8	1.6	122.9	394.1	264.2
8/30/20		829.2	2.6	167.1	395.2	264.9
8/31/20		811.7	2.1	147.6	386.2	258.9
9/1/20		850.0	2.7	87.1	402.3	269.8
9/2/20		777.0	3.3	104.6	402.8	270.0
9/3/20		717.9	3.1	131.7	397.6	266.5
9/4/20		654.4	2.0	76.2	400.8	268.6
9/5/20		721.3	2.5	68.1	403.3	270.4
9/6/20		784.6	3.6	86.5	425.2	285.2
9/7/20		702.1	1.9	82.7	424.8	284.8
9/8/20		703.8	2.2	107.0	412.7	276.5
9/9/20		711.7	3.3	123.0	395.3	264.8
9/10/20		716.4	2.9	117.2	395.9	265.2

**Table 2B  
Daily Emissions**

Date	Unit Start-Up or Shutdown	Total Mass Emissions - GTG's #1 - 4 Midnight - Midnight (lbs/day)				
		NOX	SO2	CO	PM <sup>1</sup>	ROG <sup>1</sup>
9/11/20		749.2	3.0	125.2	396.3	265.7
9/12/20		799.9	1.4	99.0	384.5	257.8
9/13/20		767.9	1.5	81.5	385.1	258.2
9/14/20		730.9	2.0	109.1	396.6	265.9
9/15/20		728.9	1.9	103.1	397.2	266.2
9/16/20		753.9	3.1	62.8	399.1	267.4
9/17/20		789.1	4.1	56.2	394.9	264.8
9/18/20		752.5	2.3	68.0	393.2	263.6
9/19/20		803.7	2.3	74.9	382.9	256.7
9/20/20		770.8	2.9	66.3	387.2	259.6
9/21/20		703.3	3.6	69.2	395.7	265.2
9/22/20		731.5	2.8	83.7	396.9	266.0
9/23/20		723.3	3.7	89.6	400.6	268.5
9/24/20		706.5	2.0	78.1	401.2	268.9
9/25/20		965.5	2.8	82.3	409.0	274.1
9/26/20		748.8	2.5	71.5	404.4	271.0
9/27/20		767.8	2.8	70.1	401.5	269.0
9/28/20		743.9	2.2	76.6	404.5	271.0
9/29/20		738.0	2.8	78.0	402.0	269.4
9/30/20		805.3	3.9	#REF!	402.2	269.5

1. PM & ROG emission estimates were calculated using fuel based emission factors and fuel usage data.

Fuel	PM	ROG
Natural Gas:	0.00393	0.00263
Refinery Gas:	0.00402	0.00272
Butane:	0.00402	0.00272

The foregoing fuel based emission factors have been updated based on 1997 & 1998 stack testing.



**Table 2C  
Daily Emissions for Individual Units during Startup**

Date	Unit	Total Mass Emissions - GTG's #1				
		Midnight - Midnight				
or Shutdown		(lbs/day)				
		NOX	SO2	CO	PM 1	ROG 1
7/24/2020	Y	165.7	0.2	12.9	97.0	65.1
7/31/2020	Y	103.0	0.3	6.3	51.4	34.5

Date	Unit	Total Mass Emissions - GTG's #2				
		Midnight - Midnight				
or Shutdown		(lbs/day)				
		NOX	SO2	CO	PM 1	ROG 1
	NONE					

Date	Unit	Total Mass Emissions - GTG's #3				
		Midnight - Midnight				
or Shutdown		(lbs/day)				
		NOX	SO2	CO	PM 1	ROG 1
	NONE					

Date	Unit	Total Mass Emissions - GTG's #4				
		Midnight - Midnight				
or Shutdown		(lbs/day)				
		NOX	SO2	CO	PM 1	ROG 1
	NONE					

Unit	Cogeneration Unit
Sample Point	Eff.Before Compress

Profile #	9007
Date	9/28/2020
Time	06:00
Sample No.	1790980
Status	Complete

H2S - SCD-HiLvl	<1.0	ppm
COS - SCD-HiLvl	3	ppm
MeSH - SCD-HiLvl	<1.0	ppm
EtSH - SCD-HiLvl	<1.0	ppm
DMS - SCD-HiLvl	<1.0	ppm
Other S Compds-SCD-HiLvl	1	ppm
Sulfur (sum)-SCD-Calc	4	ppm

Unit	Cogeneration Unit
Sample Point	Butane - TK 79

Profile #	9010
Date	9/28/2020
Time	06:00
Sample No.	1790981
Status	Complete

H2S - SCD-LoLvl	<0.1	ppm
COS - SCD-LoLvl	<0.1	ppm
MeSH - SCD-LoLvl	<0.1	ppm
EtSH - SCD-LoLvl	0.3	ppm
DMS - SCD-LoLvl	0.1	ppm
Other S Compds-SCD-LoLvl	6.1	ppm
Sulfur (sum)-SCD-Calc	6.5	ppm



Environmental Department

**Tesoro Refining & Marketing Company LLC**  
A subsidiary of Marathon Petroleum Corporation

Los Angeles Refinery – Carson Operations  
2350 E. 223<sup>rd</sup> Street  
Carson, California 90810  
310-816-8100

October 8, 2020

**7018 0360 0001 1198 6153**  
**VIA Certified Mail**  
**Return Receipt Requested**

Title V Administrator  
South Coast Air Quality Management District  
PO Box #4944  
Diamond Bar, CA 91765

**Re: Title V Excess Emissions Deviation Report Notification #626800**  
**Facility ID No. 174655**

Dear Title V Administrator:

Tesoro Los Angeles Refinery – Carson Operations is providing the enclosed Form 500-N for the Title V Excess Emissions Deviation Notification made on September 25, 2020, at approximately 8:56 AM. If there are any questions, please contact me at (310) 847-3949.

Sincerely,

Tracy Hoang  
HES Professional

Enclosure: A – SCAQMD Form 500N

cc: Env File 3E05-0046708

ecc: George Lamont, SCAQMD  
Robert Nguyen – Marathon  
Adrian Rosu – Marathon  
Connie Chow – Marathon



South Coast Air Quality Management District

**Form 500-N  
Deviations, Emergencies, & Breakdowns**

Mail Application To:  
PO Box 4944  
Diamond Bar, CA 91765

Tel: (909) 396-3385

[www.aqmd.gov](http://www.aqmd.gov)

\*This written report is in addition to requirements to verbally report certain types of incidents. Verbal reports may be made by calling AQMD at 1-800-288-7664 (1-800-CUT-SMOG) or AQMD enforcement personnel.

Section I - Facility Information			
1. Permit to be issued to (Business name of operator to appear on permit):  Tesoro Refining & Marketing Company LLC	2. Valid AQMD Facility ID (Available on Permit or Invoice Issued by AQMD):  174655		
3. Address (where incident occurred): 2350 E. 223rd St			
City: Carson	State: CA	Zip Code: 90810	
4. Mailing Address (if different from Item 2): 2350 E. 223rd St			
City: Carson	State: CA	Zip Code: 90810	
5. Provide the name, title, and phone number of the person to contact for further information			
Tracy Hoang	HES Professional	310-847-3949	
Name	Title	Phone	
Section II - Reporting of Breakdowns, Deviations, and Emergencies			
1. This written notification is to report a(n):			
Type of Incident	Verbal Report Due*	Written Report Due	
a. <input type="checkbox"/> Emergency under Rule 3002 (g)	Within 1 hour of discovery.	Within 2 working days from when the emission limit was exceeded	
b. <input type="checkbox"/> Breakdown under:	For Rules 430 2004 - Within 1 hour of discovery	For Rules 430 2004 - Within 7 calendar days after breakdown is corrected, but no later than 30 days from the start of the breakdown, unless a written extension is granted	
<input type="checkbox"/> Rule 430 (Non-RECLAIM)	For Rule 218 - Within 24 hours or next business day for failure/shutdown exceeding 24 hours.	For Rule 218 - With required semi-annual reports	
<input type="checkbox"/> Rule 2004 (RECLAIM)			
<input type="checkbox"/> Rule 218 (Non-RECLAIM) [See Rule 218 (f)(3)]			
c. <input checked="" type="checkbox"/> Deviation with excess emissions [See Title V Permit, Section K, Condition No. 22B]	Within 72 hours of discovery of the deviation or shorter reporting period if required by an applicable State or Federal Regulation	Within 14 days of discovery of the deviation	
d. <input type="checkbox"/> Other Deviation [See Title V Permit, Section K, Condition Nos. 22D & 23]	None	With required semi-annual reports	
2. The incident was first discovered by: Environmental on? 9/25/2020 8:46:00 AM			
		Date	Time
3. The incident was first reported to: Operator 6 on? 9/25/2020 8:56:00 AM			
a. <input checked="" type="radio"/> Via Phone		Date	Time
b. <input type="radio"/> In Person	Notification Number (Required):	626800	
4. When did the incident actually occur? 9/25/2020 8:43:00 AM			
	Date	Time	

	Received By:	Assigned By:	Inspector:
	Date/Time Received:	Date/Time Assigned:	Date/Time Received Assignment:
<b>AQMD</b>	Date Delivered to Team:	Date Reviewed Inspector Repo	Date Facility Inspected:
<b>USE</b>	Team:	Sector:	Breakdown/Deviation Notification
<b>ONLY</b>	Recommended Action: Cancel Notification	Grant Relief	Issue NOV No. _____ Other: _____
	Final Action: Cancel Notification	Grant Relief	Issue NOV No. _____ Other: _____

5. Has the incident stopped? a.  Yes, on: 9/25/2020 9:00:00 AM b.  No  
 Date Time

6. What was the total duration of the incident? 1 (see attachment)  
 Days Hours

7. For equipment with an operating cycle, as defined in Rule 430 (b)(3)(A), when was the end of the operating cycle during which the incident occurred? N/A  
 Date Time

8. Describe the incident and identify each piece of equipment (by permit, application, or device number) affected. Attach photos (when available) of the affected equipment and attach additional pages as necessary. Devices Affected: 1226, 1233, 1236, 1239, 1227, 1234, 1237, 1240, 1228, 1229  
At approximately 8:43 AM on September 25, 2020, all four Cogeneration Gas Turbine Generators (GTGs) experienced an unexpected loss in DeNOx steam flow. The average NOx concentrations on all four GTGs exceeded the 8 ppm limit for a 1-hour period between 8 and 9 AM.

9. This incident may have resulted in a:  
 a.  Violation of Permit Condition(s): Administrative Condition E4, A248.1, E73.1  
 b.  Violation of AQMD Rule(s): R203(b), R2004(f)(1), R3002(c)(1), R2005, NOX: 8 PPMV (4) [RULE 2005, 6-3-2011]

10. What was the probable cause of the incident? Attach additional pages as necessary.  
A Trip & Throttle (T&T) valve on Steam Turbine Generator (STG) #1 (D1228) was inadvertently closed while attempting to increase speed on STG #2 (D1229). This caused a steam relief valve to lift on STG #1, which resulted in a significant reduction in DeNOx steam to all four GTGs.

11. Did the incident result in excess emissions?  No  Yes (Complete the following and attach calculations.)  
 VOC lbs  NOx see attachment lbs  SOx lbs  H2S lbs  
 CO lbs  PM lbs  Other lbs pollutant

12. For RECLAIM facilities Subject to Rule 2004 (i)(3) ONLY: If excess emissions of NOx and/or SOx were reported in Item 11, do you want these emissions to be counted when determining compliance with your annual allocations?  
 a.  Yes, for:  NOx  SOx b.  No, for:  NOx  SOx  
 If box 12(b) above is checked, include all information specified in Rule 2004(i)(3)(B) and (C), as applicable.

13. Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventative measures employed to avoid future incidents. Include photos of the failed equipment if available and attach additional pages as necessary.  
See Attachment

14. Was the facility operating properly prior to the incident?  
 a.  Yes b.  No, because:

15. Did the incident result from operator error, neglect or improper operation or maintenance procedures?  
 a.  Yes b.  No, because:

16. Has the facility returned to compliance?  
 a.  No, because:  
 b.  Yes (Attach evidence such as emissions calculations, contemporaneous operating logs or other credible evidence.)

**Section III - Certification Statement**

I certify under penalty of law that based on 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.

For Title V Facilities ONLY:  I also certify under penalty of law that that I am the responsible official for this facility as defined in AQMD Regulation XXX.

*DEIA*  
Bradley Eden Vice President, Tesoro Los Angeles Refinery 10-8-2020  
 Signature of Responsible Official Title Date  
 Brad Levi 310-816-8100 310-847-5475  
 Type or Print Name of Responsible Official Phone Fax  
 2350 E. 223rd St Carson CA 90810  
 Address City: State Zip Code

13. Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventative measures employed to avoid future incidents. Include photos of the failed equipment if available and attach additional pages as necessary.

Operations immediately opened the T&T valve on STG #1, increased ammonia injection to all four GTGs, verified DeNOx steam valve functionality, and re-established normal DeNOx steam rates. The NOx concentration fell below the 8 ppm limit at 9 AM. Operations will label the T&T valves on both STGs, improve communication between console and field operators, and update the procedure document to verify proper T&T valve closure.

## Attachment

### 6. Duration of DeNOx Steam Loss

U91	<u>1</u>	minute
U92	<u>2</u>	minute
U93	<u>0</u>	minute
U94	<u>2</u>	minute

### 11. NOx Excess Emissions

U91	<u>3.56</u>	ppm
U92	<u>4.49</u>	ppm
U93	<u>6.63</u>	ppm
U94	<u>NA*</u>	ppm

\* U94's NOx analyzer was in calibration during this event.