

April 13, 2004

ESDR-146-04
05-A-01-C

VIA CERTIFIED MAIL – 7003 2260 0002 7101 0272

Mr. Steve Hill
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: Title V Permit Corrections for Permit Reopening

Dear Mr. Hill:

ConocoPhillips Company (“ConocoPhillips”) is writing in response to the District’s letter from Mr. Jack Broadbent to Mr. Gary Frieburger dated February 24, 2004, inviting comments on reopening of the Major Facility Review (“Title V”) permit. ConocoPhillips is requesting that corrections be incorporated into Revision 1 of Title V permit for its San Francisco Refinery (Plant #A0016). Attachment 1 contains a detailed list of corrections being requested.

In 1987, Unocal (prior owner) submitted a letter to EPA requesting an alternative standard for 40 CFR 60 Subpart QQQ (“QQQ”). However, ConocoPhillips has been unable to locate a response back from EPA on Unocal’s original request. Upon further review and discussion with EPA Region 9, ConocoPhillips believes that its API Oil/Wastewater Separator (S-324) is designed to meet the standards for oil-water separators found at 40 CFR 60.692-3. The background documents for the QQQ rulemaking indicate that EPA assumed all fixed roof separators would have vents in order to prevent explosive hazards and assumed that vapor recovery was necessary to prevent separators from leaking vapors to the atmosphere through the vents. ConocoPhillips’ API system is designed with a solid, vapor-tight, fixed cover that is in full contact with liquid and does not have any vents. In response to previous correspondence (e-mail dated 12/24/03) with Mr. Julian Elliot, permit engineer, ConocoPhillips’ requested revisions were made to Tables IV-C and VII-C in Draft Revision 1 for QQQ. However, changes were not made to the permit shield. Attachments 2 and 3 contain a revision to the permit shield for QQQ.

The thermal oxidizer (Source A-420) that is the abatement device for Marine Loading Berths M1 (S-425) and M2 (S-426) is subject to 40 CFR 60 Subpart J. We have included a compliance schedule for this source in Attachments 4 & 5.

ConocoPhillips requests that the name of the Site Manager be changed to J. Michael Kenney, Refinery Manager on all correspondence. This permit change was requested in a letter to you dated November 7, 2003 (ESDR 309-03).

Due to the complex nature and sheer volume of requirements under the Title V permit, we reserve the right to request further corrections.

If you have any questions or need further clarifications, please contact Ms. Valerie Uyeda at (510) 245-5249.

Sincerely,

Philip C. Stern
Environmental Superintendent

PCS/vju
Attachment

cc: Julian Elliot, BAAQMD Permit Engineer

bcc (w/ attachments):

05-A-01-C: Title V Permit Corrections – Revision 1 (NEW)
V. Uyeda, Environmental

PDF (w/ attachments)

D. Erfert, Technical Services
J. Greene, Legal
J. Ahlskog, Environmental