

March 2, 2006

Ms. Deborah Jordan  
Director, Air Management Division  
**United States Environmental Protection Agency**  
75 Hawthorne Street  
San Francisco, CA 94105

Subject: Minor Revision to Major Facility Review Permit

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing minor revisions to the Major Facility Review Permit for the following facility:

Application Numbers	Facility Number	Facility Name	Address, City	Type of Operation
10115, 12217	A0016	ConocoPhillips – San Francisco Refinery	1380 San Pablo Avenue Rodeo, CA 94572	Petroleum Refinery

The District proposed a minor permit revision for this facility pursuant to Application 10115 on November 3, 2005. No comments on the proposed revisions were received.

The District proposed a minor permit revision for this facility pursuant to Application 12217 on October 19, 2005. No comments on the proposed revisions were received.

The facility has informed the District that it is out of compliance with 40 CFR 61, Subpart FF, National Emission Standard for Benzene Waste Operations. Therefore, a schedule of compliance for this requirement has been added in Section V.C.

In addition, the District is including three schedules of compliance for 40 CFR 60, Subpart J, Standards of Performance for Petroleum Refineries pursuant to the facility's letter of May 11, 2004, to EPA Region 9 requesting alternative monitoring plans for 3 sources. This letter requests periodic monitoring for sources that burn gas that is low in H<sub>2</sub>S. These schedules of compliance are similar to the one in Section V.B for the A420, Marine Loading Thermal Oxidizer.

In addition to the revisions above, the following administrative amendments are being made to the permit:

- Typographical errors in the permit issued on 4/12/05 have been corrected. The asterisk for Source S308 in Condition 20989, which denotes a

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EXECUTIVE OFFICER/APCO

"grandfathered" source has been removed. A change in the status of this source was approved in Application 10871.

- Typographical errors in the permit issued on 1/6/06 have been corrected. The NOx limit in Table VII-A.34 for S438 for BAAQMD Condition 1694, part E.4 has been corrected to 7 ppmv @ 3% O<sub>2</sub>, 1-hour average. The limit is correct in the text of the permit condition in Section VI, Permit Conditions. The name of S385 in Table IV-G has been corrected.
- Various references to Application 5814 have been updated. These references stated that when Application 5814 was issued, certain limits would change. Since these limits were already contained in the permit, this is an administrative amendment. The final permits for this application were issued on 1/25/06. Also, the asterisks for Sources S301-S303, and S1001-S1003 in condition 20989 were deleted. The asterisks denote "grandfathered" sources. Since the sources were modified pursuant to Application 5814, they are no longer grandfathered.

The District has decided to issue a permit with the above revisions.

A copy of the revised Major Facility Review Permit is enclosed for your information. If you have any questions on this action, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Sincerely,

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Jack Broadbent  
Executive Officer/Air Pollution Control Officer

JB:BFB:bfc

**Enclosure**

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