

January 22, 2008

J. Michael Kenney, Refinery Manager
ConocoPhillips – San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572

ALAMEDA COUNTY

Tom Bates
Scott Haggerty
Janet Lockhart
Nate Miley

Re: **ConocoPhillips – San Francisco Refinery - Facility #A0016**
Significant Revisions to Major Facility Review Permit pursuant to Application 10994

Dear Mr. Kenney:

CONTRA COSTA COUNTY

Mark DeSaulnier
Mark Ross
(Vice-Chair)
Michael Shimansky
Gayle B. Uilkema
(Chair)

This is to advise you that the Bay Area Air Quality Management District is proposing significant revisions to the Major Facility Review Permit for ConocoPhillips – San Francisco Refinery (Facility Number A0016).

MARIN COUNTY

Harold C. Brown, Jr.

The purpose of this action is to incorporate the refinery NESHAPS (MACT), 40 CFR 63, Subpart UUU, for the reformers and the sulfur recovery units; to add requirements in the EPA's consent decree for the sulfur recovery units and sulfur pits; and to incorporate some minor permit changes from Application 13424.

NAPA COUNTY

Brad Wagenknecht

The District is inviting public comment on the significant revisions. The notice inviting written public comment will be published in the Contra Costa Times. The final date for comments is March 15, 2008. The proposal has been submitted to EPA for concurrent review.

SAN FRANCISCO COUNTY

Chris Daly
Jake McGoldrick
Gavin Newsom

Attached is a Statement of Basis that includes the revised parts of the permit, your comments of May 15, 2006 on a draft submitted to you via email on April 17, 2006, and a response to the comments.

SAN MATEO COUNTY

Jerry Hill
(Secretary)
Carol Klatt

If you have any questions on this matter, please call **Brenda Cabral, Supervising Air Quality Engineer, at (415) 749-4686.**

Very truly yours,

SANTA CLARA COUNTY

Erin Garner
Yoriko Kishimoto
Liz Kniss
Patrick Kwok

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

SOLANO COUNTY

John F. Silva

JPB:BGY:bfc

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Cc: Valerie Uyeda, ConocoPhillips – San Francisco Refinery

Attachments

H:\Engineering\TITLE V Permit Appls\1 ALL T5 Application Files here\A0016\sig-10994\A0016sig proposal-10994.DOC

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

RESPONSE TO CONOCOPHILLIP'S COMMENTS OF MAY 15, 2006

Item 1: BAAQMD Regulation 6-311, General Operations, does not apply to S1001-S1003, Sulfur Recovery Units because they are subject to 6-330, Sulfur Recovery Units.

Response: Various sections of a rule may apply to one source. In fact, Sections 6-301, 6-305, and 6-310 of this rule also apply to this source. The only sources that are exempt from this section are fuel-fired indirect heat exchangers, as stated in the section.

Item 2: Applicability of NSPS 40 CFR 60, Subpart J, to flares is not certain.

Response: This issue was resolved in Application 12601.

Item 3 was an answer to a question, not a comment.

Item 4: A note is required in Table VII-L to indicate that the "presence of flame" requirement in 40 CFR 63, Subpart A, only applies when "emissions from S306 or S308 regeneration are vented to the flare."

Response: The note has been added.

Item 5: Delete references to 40 CFR 60, Subpart A, in Table IV-Ua because they are contained in 40 CFR 60, Subpart J by reference.

Response: The District has not taken this approach in the past and will retain the references.

Items 6-9 were answers to questions, not comments.

Item 10: Delete references to BAAQMD Condition 19278, parts 1 and 2 in Tables IV-Ua and VII-Ua for the sulfur recovery units.

Response: The permit conditions were deleted in Application 12433, so the references have been deleted.

Item 11a: Allow frequency of source testing for sulfuric acid mist required by BAAQMD Condition 19278, part 3, to be once per permit term instead of annually.

Response: The facility has just two years of source test data and this is a condition that is common to all five refineries. Relaxation of the condition should be considered for all refinery sulfur recovery units at once. The District defers consideration of this request to a future date.

Item 11b: Allow 60 days to submit source test after testing date.

Response: This change was made.

Item 12: Add "...12-hour rolling average" to the description of the SO₂ Emission Limit in 40 CFR 60.104(a)(2) and 40 CFR 63.1568(a)(1)(i) in Table VII-Ua for the sulfur recovery units.

Response: The average has been added because it is the average required by 40 CFR 60.105(e)(4)(i).

Item 13: Performance Specification 3 in Appendix B of 40 CFR 60 does not apply to the sulfur recovery units.

Response: The District concurs and has removed the citations in Table IV-Ua.

Items 14-17 were answers to questions, not comments.

Item 18: Change the facility name from "Conoco" to "ConocoPhillips" throughout the document.

Response: The change has been made.

Item 19: Delete Methods 4 and 15 from Table VII, Test Methods. These methods are not referenced in Refinery MACT II.

Response: They are mentioned in the NSPS, and so have been retained.