

March 8, 2011

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

Subject: Minor Revision to Major Facility Review Permit for Facility # A0016 pursuant to Applications 22024 and 22568

Dear Ms. Jordan:

**ALAMEDA COUNTY**  
Tom Bates  
(Chairperson)  
Scott Haggerty  
Jennifer Hosterman  
Nate Miley

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for ConocoPhillips – San Francisco Refinery and is submitting the permit to EPA for review.

**CONTRA COSTA COUNTY**  
John Gioia  
(Vice-Chair)  
David Hudson  
Mark Ross  
Gayle B. Uilkema

The purpose of this minor revision is to include an Alternate Operating Scenario for S448 Internal Floating Roof Tank (Tank 1007) and to remove BAAQMD Condition 23843 for S506.

**MARIN COUNTY**  
Harold C. Brown, Jr.

**NAPA COUNTY**  
Brad Wagenknecht

The alternative operating scenario for S448 will allow the tank to be exempt from BAAQMD Regulation 8, Rule 5, Storage of Organic Liquids, and NSPS 40 CFR 60, Subpart Kb, Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, when the tank stores liquids with a vapor pressure less than 0.5 psia. Each time that the tank resumes operation as a tank that is subject to the standards, the owner/operator will perform all required inspections. Also, the owner/operator must record the status of the tank in a contemporaneous log when switching service.

**SAN FRANCISCO COUNTY**  
Eric Mar  
Edwin M. Lee

**SAN MATEO COUNTY**  
Carol Klatt  
Carole Groom

BAAQMD Condition 23843 limits the vapor pressure of the liquid in S506. Since the tank has a natural gas blanket, pressure monitoring system, and is abated by A7, Vapor Recovery System, the limit is not necessary. The condition will be deleted to allow the owner/operator to store liquids with higher vapor pressures in the tank.

**SANTA CLARA COUNTY**  
Susan Garner  
Ash Kalra  
(Secretary)  
Liz Kniss  
Ken Yeager

This revision is minor pursuant to BAAQMD Regulation 2-6-215 and will be effective immediately. The permit will be formally issued after EPA review. This revision is not subject to public comment and therefore, requires no public notice.

**SOLANO COUNTY**  
James Spering

**SONOMA COUNTY**  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

The proposed Major Facility Review Permit and the statement of basis report can be viewed on the BAAQMD website at: <http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx>. We will also send the documents to you via the Electronic Permit Submittal System. If you have any questions on this matter, please call Dennis Jang, Senior Air Quality Engineer, at (415) 749-4707.

Sincerely,

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

JPB:BFB:kht

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