



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

May 23, 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

**ALAMEDA COUNTY**

Tom Bates  
(Chairperson)  
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Liz Kniss  
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James Sperring

**SONOMA COUNTY**

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Shirlee Zane

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing a minor revision to the Major Facility Review Permit for ConocoPhillips – San Francisco Refinery.

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.

The alternative operating scenario for S448 allows 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.

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 was deleted to allow the owner/operator to store liquids with higher vapor pressures in the tank.

The 45-day EPA review period ran from March 8, 2011, to April 21, 2011, and no comments were received from EPA.

This revision is minor pursuant to BAAQMD Regulation 2-6-215, is not subject to public comment, and therefore, requires no public notice.

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

The final revised Major Facility Review Permit 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 permit 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,

Signed

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

JPB:BFB:kht

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