

June 18, 2009

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

Re: **ConocoPhillips – San Francisco Refinery - Facility #A0016**  
Significant and Minor Revisions to Major Facility Review Permit pursuant to  
Applications 13427, 16941, 18744, and 18747  
**ConocoPhillips Carbon Plant - Facility #A0022**  
Significant Revisions to Major Facility Review Permit pursuant to Application 17331

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

Dear Ms. Jordan:

**CONTRA COSTA COUNTY**  
John Gioia  
Mark Ross  
Michael Shimansky  
Gayle B. Uilkema

The District is issuing revisions to the Major Facility Review permits for the following facilities: ConocoPhillips – San Francisco Refinery (Facility #A0016) and ConocoPhillips Carbon Plant (Facility #A0022). The initial permit for Facility #B7419, Air Liquide, had been included in the public notice for this project, but will not be issued until some discussions about non-federally enforceable conditions are finalized.

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

The purpose of this action is to add the Clean Fuels Expansion Project to the Title V permits and to make some additional changes. The pre-construction review applications were 13424 and 15328. The minor tank changes made in Applications 16941, 18744, and 18747 were also being proposed in this action. In addition, this action resolves the remaining items on the appeal that was submitted to the District pursuant to the initial Title V permit in 2003.

**NAPA COUNTY**  
Brad Wagenknecht  
(Vice-Chairperson)

**SAN FRANCISCO COUNTY**  
Chris Daly  
Eric Mar  
Gavin Newsom

This permit was originally proposed for public comment on April 15, 2009. The public comment period ended on May 25, 2009.

**SAN MATEO COUNTY**  
Carol Klatt  
Carol Groom

The District received no comments from EPA, ARB, the applicant, or the public. The final permit for Facility A0016 includes correction of various typographical errors, which are considered to be administrative amendments. The detail is in Attachment 1.

**SANTA CLARA COUNTY**  
Susan Garner  
Yoriko Kishimoto  
Liz Kniss  
Ken Yeager

We will send the final revised permits to you via the Electronic Permit Submittal System. If you have any questions regarding this project, please call Barry Young, Air Quality Engineering Manager, at (415) 749-4721, fax (415) 749-5030.

Very truly yours,

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

**SOLANO COUNTY**  
James Spering

**SONOMA COUNTY**  
Shirlee Zane  
Pamela Torliatt  
(Chairperson)

JPB:BGY:bfc

Attachment

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

## Attachment 1

### Administrative Amendments to Major Facility Review Permit for Facility A0016, ConocoPhillips Refinery

The citations for Condition 22970 were corrected. In some tables in Sections IV and VII, the condition sections were not designated as federally-enforceable or non-federally-enforceable. The designations were added.

The limits and monitoring for ammonia are not federally-enforceable. This is clear in Conditions 22962 and 23125. In Condition 22970, the limits and monitoring for ammonia were in the same part as federally-enforceable conditions. The non-federally enforceable parts have been separated from the federally-enforceable parts and given separate part numbers.

Following is the detail of the corrections for Condition 22970. These are considered to be typographical errors and are therefore administrative amendments.

Added an asterisk to Condition 22970, part A.2g, to show that ammonia limit is not FE.

Deleted ammonia calculations from Condition 22970, part A.4.a.iii and inserted them in part A.4.iv because the ammonia calculations are not FE, but the POC, PM10, and sulfuric acid mist calculations are FE.

Added an asterisk to Condition 22970, part A.4.a.iv, to show that ammonia calculations are not FE.

Re-numbered the original Condition 22970, part A.4.a.iv regarding the sulfur analysis of fuel to part A.4.a.v.

Deleted ammonia calculation instructions from Condition 22970, part A.4.b.ii and inserted them in part A.4.b.iii because the ammonia calculations are not FE, but the NOx and sulfuric acid mist calculations are FE.

Added an asterisk to Condition 22970, part A.4.b.iii, to show that ammonia calculations are not FE.

Re-numbered the original Condition 22970, part A.4.b.iii regarding the POC and PM10 calculations to part A.4.b.iv.

Added "Y" to FE column for Condition 22970 in Tables IV-A.36, IV-Na and VII-Ub except for part A.2g.

Added "N" to FE column for Condition 22970 in Tables IV-A.36, IV-Na and IV-Ub for part A.2g.

Added "Y" to FE column for Condition 22970, part B in Tables IV-D and Da.

Added "Y" to FE column for Condition 22970 in Tables IV-Q.1 and Q.2.

Changed "Y" to "N" in FE column for Condition 22970, part A.2.g in Table VII-A.36, VII-Na, VII-Ub.

Added more detail to part numbers in Tables VII-A.36, VII-Ub and VII-Na for Condition 22970.

In addition, the following corrections were made:

Added "Y" to FE column for Condition 23125, parts 1, 3, 4, 5, and 6 in Table IV-Ub.

Added "Y" to FE column for Condition 22963 in Table IV-BB.2.

Corrected citation of Condition 12122, part 16, in Table IV-Q.1. Condition refers to sweet uncracker gas, not natural gas.

The citation of 40 CFR 60.13(i) in Table IV-Q.1 was corrected to reflect that the alternative monitoring plant is for sweet uncracker gas, not natural gas.

Added "Y" to FE column for 40 CFR 60.46b(b) and 40.48b in Table IV-Q.

Added "Y" to FE column for 40 CFR 60.106a(b) in Table IV-Ub.

Changed the number of the source controlled by A50 from S307 to S464 in Table II-B. The vent scrubber controls the hydrogen plant (S464) at the cracking unit (S307), not the cracking unit itself.