

**COMPLIANCE AND ENFORCEMENT DIVISION**

**OFFICE MEMORANDUM**

**March 11, 2002**

**TO:** WILLIAM DEBOISBLANC, DIRECTOR, PERMIT SERVICES  
**FROM:** DIRECTOR OF ENFORCEMENT *[Signature]*  
**SUBJECT:** **REVIEW OF COMPLIANCE RECORD OF:**  
**TOSCO REFINING COMPANY, CONTRA COSTA**  
**CARBON PLANT DBA:**  
**PHILLIPS 66 CARBON PLANT (SITE #A0022)**

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In keeping with standard practice, the Compliance and Enforcement Division has conducted a review of the compliance record of:

**Phillips 66 Carbon Plant**

This memorandum is intended to provide you with the results of the review, and to advise of further action, if any, that will be initiated by the Director of Enforcement.

**Background**

It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of the initial renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

**Finding**

The Enforcement Division staff has commenced a review of the records for the Phillips 66 Carbon Plant for March 1, 2001 to March 8, 2002. This review was initiated as part of the District evaluation of an application by Phillips 66 Carbon Plant for a Title V Permit. During the period subject to review, Phillips 66 Carbon Plant activities known to the District include:

No Notices of Violations were issued.

The District did not receive any complaints.

Phillips 66 Carbo plant is not under a Variance or an Order of Abatement by the District.

No Monitor excesses or equipment breakdowns were reported or documented by District staff.

### **Conclusions**

The Director of Enforcement finds that on-going compliance can be reasonably assured for this facility, due to the above record.

### **Recommendations**

The Director of Enforcement believes that the proposed application for a Title V Permit is adequate and recommends that the Director of the Permit Services Division approve this application.

(SMR TG:JB:JRG)

cc: Brenda Cabral

TVTOSC  
VGC