



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 19, 2023

Jennifer Ahlskog
Environmental Team Leader
Phillips 66
San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572

RE: Final Notification of Deficiency Regarding Regulation 12, Rule 15 Fenceline Air Monitoring Plan and Quality Assurance Project Plan

Dear Ms. Ahlskog:

On February 10, 2023, Phillips 66 submitted a proposed fenceline air monitoring plan (AMP) and quality assurance project plan (QAPP) to the Bay Area Air Quality Management District (Air District). Phillips 66 submitted the AMP and QAPP to comply with District Regulation 12-15, the Air District's Air Monitoring Guidelines for Petroleum Refineries (Guidelines), and the Air District's December 22, 2022 letter interpreting Regulation 12-15 and the Guidelines.

Following receipt of Phillips 66's February 10, 2023 revised AMP and QAPP, the Air District made the revised AMP and QAPP available for public comment from March 20, 2023 through April 20, 2023. The comments we received and our responses to them are available at <https://www.baaqmd.gov/plans-and-climate/emission-tracking-and-monitoring/fenceline-monitoring-plans>.

Having reviewed and considered Phillips 66's February 10, 2023 revised AMP and QAPP, and the public comments received, the Air District has determined that the revised AMP and QAPP do not meet the requirements of District Regulation 12-15-403 because they contain numerous deficiencies. Details regarding the deficiencies are included in Attachment 1 to this letter.

Pursuant to Rule 12-15-404.4, Phillips 66 must correct all of the deficiencies in the AMP and QAPP, and resubmit them within 45 days from the date on which you receive this letter. Please note that all questions and issues must be raised before you submit your plan in response to this notice of deficiency or they are waived.

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The Air District looks forward to working with you to resolve the outstanding issues with the AMP and QAPP. If you have any questions regarding this notification, please contact Chris Crowley at 415-749-5118 for compliance issues, or me at 415-749-4601 for technical issues.

Sincerely,

Jerry Bovee, P.E., QSTI
Air Quality Engineering Manager

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Bay Area Air Quality Management District
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