

PHILLIPS 66  
RODEO RENEWABLE ENERGY COMPLEX  
1380 San Pablo Avenue  
Rodeo, CA 94572



PROVIDING ENERGY. IMPROVING LIVES.

TV Tracking #1284 (Semi-Annual)

January 26, 2026

1.  RECEIVED IN  
ENFORCEMENT: 01/26/2026

021-ESDR-26  
05-B-01-C

**Via E-Mail – Compliance@BAAQMD.gov**

Director of Compliance and Enforcement  
Bay Area Air District (BAAD)  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Attn: Title V Reports

**Subject: Six-month Monitoring Report for July 1, 2025 through December 31, 2025  
Phillips 66 Rodeo Renewable Energy Complex #16 (21359)**

Director:

Phillips 66 Company is submitting its Monitoring Report covering the period of July 1, 2025, through December 31, 2025, as required by Section I.F in its Title V permit.

If you have any questions or require additional information, please contact me at (510) 245-4672.

Sincerely,

A handwritten signature in blue ink, appearing to read "B Eastep", with a large, stylized flourish at the end.

Brent Eastep  
Senior Manager, Environmental

Attachments

cc: Ms. Erin Kelly, BAAD Inspector, via e-mail (Ekelly@BAAQMD.gov)  
Ms. Roshni Brahmbhatt, Manager, Air Enforcement Section (ENF 2-1)  
Enforcement and Compliance Assurance Division,  
U.S. Environmental Protection Agency, Region 9  
Air Enforcement Section, via e-mail (AEO\_R9@epa.gov)

**BAAD Title V Permit  
6 Month Deviation Summary Report  
From 7/1/2025 to 12/31/2025  
Rodeo Renewable Energy Complex, A0016**

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***Certification Statement***

I certify under penalty of law that based on the information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

x   
Signature of Responsible Official

Bobby Thomas  
Print Name

Vice President, RREC  
Title

1/26/2026  
Date

**BAAQMD Title V Permit  
6 Month Deviation Summary Report**

*From 7/1/2025 to 12/31/2025*

**A0016 Phillips 66 Rodeo Renewable Energy Complex**

Facility Address:

1380 San Pablo Ave

City: Rodeo

State: CA \_\_\_\_\_

Zip Code: 94572-1354 \_\_\_\_\_

Mailing Address:

1380 San Pablo Ave

City: Rodeo

State: CA \_\_\_\_\_

Zip Code: 94572-1354 \_\_\_\_\_

Contact: John Carroll Title: Sr Specialist, Env Phone: (510) 245-4677

*Title V deviations for the reporting period are summarized below:*

May have resulted in a deviation from:

Deviation No: <u>008-25</u>	Source Number(s): <u>97</u>	Permit: <u>27819-11(c) ; 27819-5</u>
Event Started: <u>2/1/2025</u>	Abatement Device(s) : <u>626</u>	AQMD: _____
Stopped: _____	Emission Point(s): _____	Other: _____

**Event Description:** Sampling indicated that the TOC concentration exceeded the 10 ppm limit at S97 (Tank 100) beginning 02/01/2025. In addition, the Permit Condition 277819 (c) emission limit was exceeded. On 6/24/2025 TOC concentration was less than 10 ppm and in compliance. Samples indicated that the TOC concentration exceeded 10 ppm beginning 6/25/2025.

**Probable Cause:** Phillips 66 has been sampling using an on-site GC since December 9, 2024, for analysis to aid in identifying potential causes of the TOC concentrations.

**Corrective actions or preventative steps taken:** Phillips 66 will continue to evaluate TOC characteristics to aid in mitigating TOC exceedances at Tank 100 (S-97) and identifying the source of the TOC.

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Deviation No: 028-25	Source Number(s): 600	Permit: 27649-8
Event Started: 7/7/2025 9:00 AM	Abatement Device(s) : 623; 625	AQMD: _____
Stopped: 7/7/2025 5:00 PM	Emission Point(s): _____	Other: _____

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**Event Description:** On July 7th, 2025, the thermal oxidizer (TO) at the Pretreatment Unit (S-600) was taken offline for maintenance. S-600 emissions were routed back through the abatement devices (Bio-treating filters A-622/624, Vapor Point System A-1011, and PTU carbon bed A-623/625) during the TO downtime. In an abundance of caution this deviation is being submitted for potentially exceeding the 10 ppm TOC limit.

**Probable Cause:** The TO abating S600 was taken offline for system maintenance.

**Corrective actions or preventative steps taken:** During maintenance on the thermal oxidizer at S-600, vapors were controlled by the A-622/624, A-1011 and A-623/625. Vapors from S-600 were routed back to the temporary Thermal Oxidizer promptly after maintenance was completed.

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Deviation No: 045-25	Source Number(s): 600	Permit: 27649-8; 27649-9
Event Started: 8/10/2025 3:00 AM	Abatement Device(s) : 623; 625	AQMD: _____
Stopped: 8/10/2025 7:00 AM	Emission Point(s): _____	Other: _____

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**Event Description:** On August 10th 2025, around 2:30 AM, the rental thermal oxidizer (TO) being used to abate emissions at S-600, shutdown due to an electrical malfunction at the Pretreatment Unit (S-600). As a result of the shutdown, the TO interlock system activated thereby blocking the S-600 emissions in the unit. Around 3 AM on August 10th 2025 the S-600 vapors were routed through the (PTU carbon bed A-623/625) until TO operations were restored around 7 AM on August 10th 2025. After the TO was restarted on August 10th, the on-line FID at the carbon bed outlet A-623/625 has indicated values above 10 ppm. In an abundance of caution this deviation is being submitted for potentially exceeding the 10 ppm TOC limit.

**Probable Cause:** The TO abating S-600 shutdown due to an electrical malfunction at the pretreatment unit (S-600).

**Corrective actions or preventative steps taken:** During downtime on the thermal oxidizer at S-600, vapors were controlled by the A-622/624, A-1011 and A-623/625. TO operation was restored as soon as possible. The TO has been operating normally since the re-start. There should be no active vapor or air flow in the carbon bed system. Phillips 66 is working to determine the cause of the FID readings at the carbon bed outlet.

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Deviation No: <u>046-25</u>	Source Number(s): <u>426; 437</u>	Permit: _____
Event Started: <u>8/4/2025</u>	Abatement Device(s) : _____	AQMD: <u>8-18-309, 401.2</u>
Stopped: <u>8/6/2025</u>	Emission Point(s): _____	Other: <u>40 CFR 60.482-6a(a)1</u>

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Event Description: During an assessment of the leak detection and repair (LDAR) program, the following items were identified.  
1.S437 (Unit 110) A potential Open-Ended Line was identified on ¾" bleed valve. The open line was inspected with an FID (the reading was 0 ppm,) and the cap was put back on the open line.  
2.S426 (MTC) Two needle valves on a pressure transmitter were not identified in the LDAR database. These components are only in service several days a year because they are located on a line that is only in use when the thermal oxidizer is used. The valves were inspected with an FID and the reading was zero.

Probable Cause: 1.The cap was not put back on the bleed valve after usage.  
2.The valves were not included due to an administrative oversight.

Corrective actions or preventative steps taken: The potential Open-Ended line was plugged and the needle valves on the pressure transmitter valves were tagged and added to the LDAR database.

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Deviation No: <u>047-25</u>	Source Number(s): <u>600</u>	Permit: <u>27649 Part 8; 27649 Part 9</u>
Event Started: <u>8/25/2025 8:39 AM</u>	Abatement Device(s) : <u>623; 625</u>	AQMD: _____
Stopped: <u>8/28/2025 3:15 PM</u>	Emission Point(s): _____	Other: _____

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Event Description: The thermal oxidizer (TO) at the Pretreatment Unit (S-600) was offline for maintenance on 08/25/2025 from approximately 08:39 AM to 21:25 PM and 08/28/2025 from approximately 12:15 PM to 15:15 PM.  
Vapors from S-600 were routed back through the abatement devices (Bio-treating filters A-622/624 and PTU carbon bed A-623/625) during the TO downtime.  
In an abundance of caution this deviation is being submitted for potentially exceeding the 10 ppmv (measured as methane, C1) and 2.6 pounds TOC per calendar day limits.

Probable Cause: The TO abating S-600 was taken offline for system maintenance.

Corrective actions or preventative steps taken: During maintenance on the TO at S-600, vapors were controlled by the A-622/624, A-1011 and A-623/625. Vapors from S-600 were routed back to the temporary TO promptly after maintenance was completed each day.

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Deviation No: 048-25	Source Number(s): 600	May have resulted in a deviation from:
Event Started: 9/13/2025 12:00 AM	Abatement Device(s) : 623; 625	Permit: 27649 Part 8; 27649 Part 9
Stopped: 9/13/2025 12:05 AM	Emission Point(s):	AQMD:
		Other:

**Event Description:** The rental/temporary/ Envent thermal oxidizer (TO) at the Pretreatment Unit (S-600) shutdown on 9/13/2025 from approximately 12:00 AM to 12:05 AM. The TO was taken down for maintenance on 09/16/2025 from 9:40 AM to 1:55 PM and on 09/18/2025 09:00 AM to 1:20 PM. During the periods where the TO was shutdown, vapors from S-600 were routed back through the Bio-treating filters A-622/624 and PTU carbon bed A-623/625. Out of an abundance of caution, this deviation is being submitted for potentially exceeding the 10 ppmv TOC (measured as methane, C1) and 2.6 pounds TOC per calendar day limits on 09/13/2025, 9/16/2025, and 9/18/2025.

**Probable Cause:** On 09/13/2025 the TO abating S-600 shutdown unexpectedly requiring vapor flow to be diverted through the Bio-treating filters A-622/624 and PTU carbon bed A-623/625. On 09/16/2025 and 9/18/2025 the TO abating S-600 was taken down for preventative maintenance.

**Corrective actions or preventative steps taken:** For the duration of the TO trip and maintenance at S-600, vapors were controlled by the A-622/624 and A-623/625. The TO was returned to service as expeditiously as possible.

Deviation No: 049-25	Source Number(s): 600	May have resulted in a deviation from:
Event Started: 9/28/2025 1:45 PM	Abatement Device(s) : 623; 625	Permit: 27649 Part 8; 27649 Part 9
Stopped: 10/1/2025 1:30 PM	Emission Point(s):	AQMD:
		Other:

**Event Description:** The rental/temporary/ Envent thermal oxidizer (TO) at the Pretreatment Unit (S-600) shutdown on 09/28/2025 at approximately 01:45 PM and was restarted after performing maintenance on 09/29/2025 at approximately 11:30 AM. The TO was taken down for further maintenance again on 09/30/2025 at approximately 7:00 PM and was returned to service on 10/1/2025 at approximately 1:30 PM. During the period when the TO was shutdown, vapors from S-600 were routed back through the Bio-treating filters A-622/624 and PTU carbon bed A-623/625. Out of an abundance of caution, this deviation is being submitted for potentially exceeding the 10 ppmv TOC (measured as methane, C1) and 2.6 pounds TOC per calendar day limits between 09/28/2025 and 10/1/2025.

**Probable Cause:** On 09/28/2025 the TO abating S-600 shutdown unexpectedly requiring vapor flow to be diverted through the Bio-treating filters A-622/624 and PTU carbon bed A-623/625. After the TO was re-started, it was taken out of service for maintenance again on 9/30/2025.

**Corrective actions or preventative steps taken:** For the duration of the TO shutdown at S-600, vapors were controlled by the A-622/624 and A-623/625. The TO was returned to service as expeditiously as possible.

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Deviation No: 050-25	Source Number(s): 600	Permit: 27649 Part 8; 27649 Part 9; 27649-17c
Event Started: 10/14/2025 7:30 AM	Abatement Device(s) : 622; 623; 624; 625	AQMD: _____
Stopped: 10/14/2025 4:30 PM	Emission Point(s): _____	Other: _____

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**Event Description:** The rental thermal oxidizer (TO) at the Pretreatment Unit (S-600) was shutdown on 10/14/2025 at approximately 7:30 AM and was restarted after performing maintenance on 10/14/2025 at approximately 4:30 PM. The TO was shut down again on 10/23/2025 at 10:30 AM for further work and restarted on 10/23/2025 at 4:00 PM. During the periods when the TO was shutdown, vapors from S-600 were routed back through the Bio-treating filters A-622/624 and carbon bed A-623/625. On 10/14/2025 during the period when the TO was shutdown, the water spray rate at the Bio-treating filters A-622/624 was below the minimum water spray rate of 400 gallons per day. During review it was determined that the minimum water spray rate at the Bio-treating filters A-622/624 was below the minimum rate from 10/10/2025 until 10/20/2025. However, the bio-treating filters were not in use during that period except on 10/14/2025 during the TO shutdown. Out of an abundance of caution, this deviation is being submitted for potentially exceeding the 10 ppmv TOC (measured as methane, C1), 2.6 pounds TOC per calendar day limits and 400 gallons per day minimum water spray rate on 10/14/2025.

**Probable Cause:** The TO abating S-600 was shutdown for maintenance on 10/14/2025 and again on 10/23/2025 requiring vapor flow to be diverted through the Biotreating filters A-622/624 and PTU carbon bed A-623/625. The water spray rate at the bio-treating filters was below the minimum flow rate due to process control automation issues with the spray control valves on 10/14/2025.

**Corrective actions or preventative steps taken:** For the duration of the TO shutdown at S-600, vapors were controlled by the Bio-treating filters A-622/624 and carbon bed A-623/625. The TO was returned to service as expeditiously as possible. The water spray control valves will be operated manually until a long-term solution is found.

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Deviation No: 051-25	Source Number(s): 1010	Permit: 23125-14
Event Started: 10/17/2024 6:10 PM	Abatement Device(s) : 424	AQMD: _____
Stopped: 10/19/2024 1:15 AM	Emission Point(s): _____	Other: _____

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**Event Description:** This deviation is submitted out of abundance of caution. During Unit 235 startup, abatement device A424 operated at a temperature of 1240°F from 10/17/2024 at 6:10 PM to 10/19/2024 at 1:15 AM. The temperature was raised to 1450°F on 10/19/2024 at 1:15 AM and acid gas was later introduced on 10/23/2024 at 3:00 PM. Permit condition 23125-13 requires that the minimum temperature be determined as the temperature that ensures compliance with the H<sub>2</sub>S, reduced sulfur compounds and total reduced sulfur limits. Because these sulfur compound emission limits are only relevant while acid gas is being abated at Unit 235, the RREC understands that the A-424 temperature limit applies when acid gas is being processed at the Unit. This period of sub-1409°F temperature was limited and occurred only during the time that acid gas was not being processed at the unit.

**Probable Cause:** The temperature setpoint was below the minimum permitted temperature before acid gas was introduced to the unit on 10/23/2024.

**Corrective actions or preventative steps taken:** A424 Incinerator temperature was raised to, and maintained at, 1450°F before any acid gas was introduced to the unit.



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Deviation No: 057-24	Source Number(s): 151	Permit: 27464-1b
Event Started: 9/27/2024 10:00 AM	Abatement Device(s) :	AQMD:
Stopped:	Emission Point(s):	Other:

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**Event Description:** Permit Condition 27646-1b of Authority to Construct for application 31157 requires that S-151 (Tank 242) submit an application and receive approval from BAAQMD prior to operating it in the renewable fuels process. Phillips 66 submitted permit application number 32147 in June 2023 to allow Tank 242 to store renewable naphtha (RN). However, the tank was put into RN service prior to BAAQMD issuing the permit for Application number 32147.

**Probable Cause:** Initially, Tank 241 (S150) was premised to store RN and Tank 242 was going to store gasoline. Due to an internal miscommunication, the RN has been stored in Tank 242 prior to receiving the permit change. However, there is no change in emissions at the facility as a whole because the RN that is currently being stored in Tank 242 was already permitted to be stored in Tank 241, and the gasoline currently in Tank 241 was permitted to be stored in Tank 242. The throughput of RN is the same regardless of whether it is stored in Tank 241 or Tank 242.

**Corrective actions or preventative steps taken:** Phillips 66 will work with BAAQMD to finish processing application 32147.

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Deviation No: 057-25	Source Number(s): 600	Permit: 27649-8; 27649-9
Event Started: 12/11/2025 10:20 AM	Abatement Device(s) : 622; 623; 624; 625	AQMD:
Stopped: 12/11/2025 1:05 PM	Emission Point(s):	Other:

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**Event Description:** The thermal oxidizer (TO) at the Pretreatment Unit (S-600) was offline for maintenance on 12/11/2025 from approximately 10:20 AM to 1:05 PM. Vapors from S-600 were routed back through the abatement devices (Bio-treating filters A-622/624 and PTU carbon bed A-623/625) during the TO downtime. In an abundance of caution, this deviation is being submitted for potentially exceeding the 10 ppmv (measured as methane, C1) and 2.6 pounds TOC per calendar day limits.

**Probable Cause:** The thermal oxidizer (TO) at the Pretreatment Unit (S-600) was offline for maintenance on 12/11/2025 from approximately 10:20 AM to 1:05 PM. Vapors from S-600 were routed back through the abatement devices (Bio-treating filters A-622/624 and PTU carbon bed A-623/625) during the TO downtime. In an abundance of caution, this deviation is being submitted for potentially exceeding the 10 ppmv (measured as methane, C1) and 2.6 pounds TOC per calendar day limits.

**Corrective actions or preventative steps taken:** During maintenance on the TO at S-600, vapors were controlled by the A-622/624, and A-623/625. Vapors from S-600 were routed back to the temporary TO promptly after maintenance was completed.

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		<u>May have resulted in a deviation from:</u>	
Deviation No: 059-24	Source Number(s): 600	Permit: 27649-17b	
Event Started: 9/3/2024 8:00 AM	Abatement Device(s) : 622; 624	AQMD: _____	
Stopped: _____	Emission Point(s): _____	Other: _____	

**Event Description:** On September 25, 2024, the differential pressure on the biofilters (A622 and A624) was determined to be below the minimum pressure drop of 0.25 inches of water (in of H2O).

**Probable Cause:** During the review of the differential pressure data and instrumentation, it was originally thought the pressure was being reported in psi, however it was determined that the pressure was being reported in inches of H2O. Upon discovery it was noted that the pressure was actually between 0.01- 0.05 in. of water and not psi. According to the vendor, the minimum pressure differential across the biofilters is neither a meaningful operational parameter nor a performance indicator. A high pressure across the biofilter could indicate performance issues, but low pressure does not cause any performance concerns. There is no emission impact related to the low differential pressure and it is unclear why this permit condition is necessary.

**Corrective actions or preventative steps taken:** Because low differential pressure is not indicative of biofilter performance and has no effect on emissions, Phillips 66 will work with BAAQMD to remove the minimum differential pressure permit limit.

		<u>May have resulted in a deviation from:</u>	
Deviation No: 079-24	Source Number(s): 1007	Permit: 27646FW-7	
Event Started: 12/15/2024 8:00 AM	Abatement Device(s) : 49; 53	AQMD: _____	
Stopped: _____	Emission Point(s): _____	Other: _____	

**Event Description:** Application 31157 Permit Condition 27646FW Part 7 requires one-time source testing at the DAF (A-49) and API (A-53) Thermal Oxidizers (TOs) no later than 180 days after the Rodeo Renewed startup. Both devices were tested upon start up in 2009 and 2018, respectively. Phillips 66 planned on source testing the TOs using the same methods used in 2009 and 2018. The 2009 and 2018 tests were submitted to BAAQMD, and no issues were reported by BAAQMD to Phillips 66 regarding the tests or methods used in the tests. Based on this tacit approval by BAAQMD, Phillips 66 planned to use the same methodology. In an abundance of caution, however, Phillips 66 reached out to BAAQMD Source Testing Division on 11/18/2024 regarding the previously used methodology. On 12/2/2024 Phillips 66 was informed via email that BAAQMD would not grant approval to test the TOs using the previously used methodology. Due to the late notice by BAAQMD of the change in source testing requirements, Phillips 66 did not have enough time to design and manufacture the changes that would be required by BAAQMD to source test the TOs before the deadline of 12/15/2024. Phillips 66 is in the process of a project to meet the BAAQMD testing requirements. It is unclear why issues related to the original test methods used in 2009 and 2018 were not communicated by BAAQMD to Phillips 66 in a timelier manner. Phillips 66 believes that had BAAQMD not changed their testing requirements for these sources without informing Phillips 66, testing as conducted in 2009 and 2018 would have been completed on time

**Probable Cause:** Phillips 66 planned to source test both TOs using the methods previously accepted by BAAQMD. Due to the change in testing requirements communicated by BAAQMD, the TOs must be modified, or a temporary stack must be built. Due to this unexpected project Phillips 66 is unable to test the TOs by the deadline of 12/15/2024.

**Corrective actions or preventative steps taken:** Phillips 66 is in the process of a project to make the necessary changes to the TOs so they can meet the new BAAQMD requirements. Following the completion of the project, Phillips 66 will source test the TOs with a third-party contractor in a timely manner.

## BAAQMD Title V Permit 6 Month Monitoring Report

### A0016 Phillips 66 Rodeo Renewable Energy Complex

Facility Address:

1380 San Pablo Ave

City: Rodeo

State: CA

Zip Code: 94572-1354

Mailing Address:

1380 San Pablo Ave

City: Rodeo

State: CA

Zip Code: 94572-1354

Contact: John Carroll

Title: Sr Specialist, Env

Phone: (510) 245-4677

*Inoperable monitors as defined by BAAQMD Regulations 1-522 and 1-523 for the reporting period are summarized below:*

Started	Stopped	Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)																																														
7/24/2025	8:15 AM	7/24/2025 1:55 PM	<input checked="" type="checkbox"/> 043-25	1010																																															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th>Fuel Gas</th> <th>Parametric</th> <th>NOx</th> <th>SO2</th> <th>CO</th> <th>H2S</th> <th>TRS</th> <th>NH3</th> <th>O2</th> <th>CO2</th> <th>H2O</th> <th>Opacity/LTA</th> <th>Lead</th> <th>Steam</th> <th>Flow</th> <th>Wind Dir.</th> <th>Wind Speed</th> <th>pH</th> <th>Temp.</th> <th>VOC</th> <th>Gauge Press.</th> </tr> </thead> <tbody> <tr> <td>CEM</td> <td>GLM</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>								Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC	Gauge Press.	CEM	GLM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<p>Event Description: The SO2 analyzer at U235 was placed into maintenance mode beginning on 7/24/2025 at 8:15 AM. Work finished on the analyzer on 7/24/2025 at 1:55 PM. While in maintenance mode, the actual reading was not 'held' and a false excess occurred due to Phillips 66 technician running various calibration tests. After completing these tests, the analyzer was placed back in service and returned to normal operation.</p>																																																			
8/16/2025	7:20 AM	8/17/2025 7:20 AM	<input checked="" type="checkbox"/> 058-25	599																																															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th>Fuel Gas</th> <th>Parametric</th> <th>NOx</th> <th>SO2</th> <th>CO</th> <th>H2S</th> <th>TRS</th> <th>NH3</th> <th>O2</th> <th>CO2</th> <th>H2O</th> <th>Opacity/LTA</th> <th>Lead</th> <th>Steam</th> <th>Flow</th> <th>Wind Dir.</th> <th>Wind Speed</th> <th>pH</th> <th>Temp.</th> <th>VOC</th> <th>Gauge Press.</th> </tr> </thead> <tbody> <tr> <td>CEM</td> <td>GLM</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>								Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC	Gauge Press.	CEM	GLM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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CEM	GLM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																													
<p>Event Description: The O2 analyzer at U237 failed daily validation on 08/16/2025 at 7:20 AM. The analyzer passed daily validation and returned to service on 08/17/2025 7:20 AM. (BAAD ID#201853)</p>																																																			

Started	Stopped		Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
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8/18/2025 8:00 AM 8/18/2025 10:45 AM  059-25 599

CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/ LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Event Description: The SO2 analyzer at U237 was placed into maintenance mode beginning on 8/18/2025 at 8:00 AM. Work finished on the analyzer on 8/18/2025 at 10:45 AM. While in maintenance mode, the actual reading was not 'held' and a false excess occurred due to Phillips 66 technician running various calibration tests. After completing these tests, the analyzer was placed back in service and returned to normal operation. (BAAD ID#201858)

8/20/2025 7:05 AM 8/20/2025 12:50 PM  060-25 599

CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/ LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Event Description: The SO2 analyzer at U237 was placed into maintenance mode beginning on 8/20/2025 at 7:05 AM. Work finished on the analyzer on 8/20/2025 at 12:50 PM. While in maintenance mode, the actual reading was not 'held' and a false excess occurred due to Phillips 66 technician running various calibration tests. After completing these tests, the analyzer was placed back in service and returned to normal operation. (BAAD ID# 201861)

9/21/2025 7:25 AM 9/22/2025 10:10 AM  061-25 599

CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/ LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Event Description: The NOx analyzer at U237 failed daily validation on 09/21/2025 at 7:25 AM. The analyzer passed daily validation and returned to service on 09/22/2025 10:10 AM. (BAAD ID#201949)

9/26/2025 7:18 AM 9/29/2025 10:30 AM  062-25 599

CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/ LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Event Description: The O2 analyzer at U237 failed daily validation on 09/26/2025 at 7:18 AM. The analyzer passed daily validation and returned to service on 09/29/2025 10:30 AM. (BAAD ID#201971)

Started	Stopped	Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
11/15/2025	7:17 AM	11/17/2025 7:29 AM	<input checked="" type="checkbox"/> 063-25	438	

CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Event Description: The NOx analyzer at U110 failed daily validation on 11/15/2025 at 7:17 AM. The analyzer passed daily validation and returned to service on 11/17/2025 7:29 AM. (BAAD ID#202601)

11/27/2025	8:20 AM	12/1/2025 7:23 AM	<input checked="" type="checkbox"/> 064-25	438	
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CEM	GLM	Fuel Gas	Parametric	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	Opacity/LTA	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	VOC.	Gauge Press.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Event Description: The NOx analyzer at U110 failed daily validation on 11/27/2025 at 8:20 AM. The analyzer passed daily validation and returned to service on 12/1/2025 7:23 AM. (BAAD ID#202631)