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

PROVIDING ENERGY. IMPROVING LIVES.

TV Tracking #1159 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 07/24/2025

July 24, 2025

ESDR-224-25
05-B-01-C

Via E-Mail – Compliance@BAAQMD.gov

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Attn: Title V Reports

Subject: Six-Month Monitoring Report for January 1, 2025 through June 30, 2025
Phillips 66 Rodeo Renewable Energy Complex #A0016 (21359)

Director:

Phillips 66 Company is submitting this Monitoring Report covering the period of January 1, 2025, through June 30, 2025, as required by Section I.F. in the Rodeo Renewable Energy Complex (Facility #A0016) Title V permit.

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

Sincerely,

Brent Eastep
Environmental Director

Attachments

cc: Ms. Erin Kelly, BAAQMD 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)

BAAQMD Title V Permit
6 Month Deviation Summary Report
From 1/1/2025 to 6/30/2025
Rodeo Renewable Energy Complex, A0016

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 _____	Bobby Thomas	General Manager	7/22/2025
Signature of Responsible Official	Print Name	Title	Date

BAAQMD Title V Permit
6 Month Deviation Summary Report

From 1/1/2025 *to* 6/30/2025

A0016 Phillips 66 Rodeo Renewable Energy Complex

Facility Address:	Mailing Address:
1380 San Pablo Ave	1380 San Pablo Ave
City: Rodeo	City: Rodeo
State: CA	State: CA
Zip Code: 94572-1354	Zip Code: 94572-1354

Contact: John Carroll Title: Environmental Specialist Phone: (510) 245-4677

Title V deviations for the reporting period are summarized below:

May have resulted in a deviation from:

Deviation No:	001-25	Source Number(s):	97	Permit:	27819-11(c); 27819-5
Event Started:	1/2/2025	Abatement Device(s) :	626	AQMD:	
Stopped:	1/4/2025	Emission Point(s):		Other:	

Event Description: Sampling indicated that the TOC concentration exceeded the 10 ppm TOC limit at S97 (Tank 100) from 01/02/2025 to 01/03/2025. In addition, the Permit Condition 277819 (c) emission limit was exceeded.

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.

May have resulted in a deviation from:

Deviation No:	002-25	Source Number(s):	97	Permit:	27819-11(c); 27819-5
Event Started:	1/5/2025	Abatement Device(s) :	626	AQMD:	
Stopped:	1/31/2025	Emission Point(s):		Other:	

Event Description: Sampling indicated that the TOC concentration exceeded the 10 ppm TOC limit at S97 (Tank 100), beginning on 01/05/2025 and ended on 01/31/2025. In addition, the Permit Condition 277819 (c) emission limit was exceeded at times during this period.

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.

May have resulted in a deviation from:

Deviation No:	005-25	Source Number(s):	438	Permit:	
Event Started:	6/1/2024 9:15 AM	Abatement Device(s) :		AQMD:	1-522.4
Stopped:	6/3/2024 4:55 PM	Emission Point(s):		Other:	

Event Description: The NOx CEMS analyzer at U110 became inoperative on 6/1/2024 at 9:15 a.m.. An inoperative monitor notification should have been submitted by the next business day, 6/3/2024, but was not submitted until 6/4/2024.

Probable Cause: An inadvertent internal communication error occurred which resulted in the inoperative monitor notification not being submitted to BAAQMD by the next business day. Upon discovering that the CEMS was inoperative, the Inoperative Monitor report was submitted on 6/11/2024.

Corrective actions or preventative steps taken: Upon discovery of this issue, the inoperative monitor notification was submitted on 6/4/2024 (BAAQMD ID# 200394). The internal communication process will be more closely monitored to ensure all inoperative notifications are submitted as required.

May have resulted in a deviation from:

Deviation No:	006-25	Source Number(s):	600	Permit:	100412 Part 9; 712566
Event Started:	1/29/2025	Abatement Device(s) :	625	AQMD:	
Stopped:	2/3/2025	Emission Point(s):		Other:	

Event Description: On February 3rd, 2025 it was identified that the remedial measure notification was not submitted to BAAQMD within 96-hours of switching abatement for S600 to Activated Carbon Bed F-332B (A-625) as required by TPO (712566) condition 100412-09. The Activated Carbon Bed was put in service on January 24th, 2025. Upon discovery, a remedial measure notification was submitted to BAAQMD on 02/03/2025.

Probable Cause: An internal miscommunication resulted in the remedial measure notification not being submitted to BAAQMD within 96-hours.

Corrective actions or preventative steps taken: Upon discovery that the notification had not been submitted, a remedial measure notification was submitted to BAAQMD on 02/03/2025. An automated internal notification process is being reviewed at Phillips 66 to improve timely communication of future remedial measures at the Pretreatment Unit (S-600).

May have resulted in a deviation from:

Deviation No:	008-25	Source Number(s):	97	Permit:	27819-11(c); 27819-5
Event Started:	2/1/2025	Abatement Device(s) :	626	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.

May have resulted in a deviation from:

Deviation No:	009-25	Source Number(s):	461	Permit:	21096.3c
Event Started:	12/12/2024	Abatement Device(s) :		AQMD:	
Stopped:	12/12/2024	Emission Point(s):		Other:	

Event Description: Permit Condition 21096 requires a source test at Unit 250 B701 (S461) to be conducted annually for NOx, SO2, CO, POC, NH3, PM10, and PM2. 5. The source test was scheduled and conducted on December 12, 2024. The source test results indicate compliance with all pollutant emissions limits except that the ammonia limit was exceeded. The results of the source test were submitted to BAAQMD source testing personnel February 10, 2025. Phillips 66 is in the process of scheduling a re-test for ammonia.

Probable Cause: U250 B701 heater was experiencing high ammonia slip during the December 12, 2024, source test potentially due to plugging and uneven ammonia distribution through the heater.

Corrective actions or preventative steps taken: Phillips 66 has initiated efforts to mitigate potential elevated ammonia and added scope to the upcoming turnaround to investigate the cause of the elevated ammonia. Unit 250 came down for turnaround February 4, 2025, and during the turnaround work has been completed to clean the ammonia spargers and replace the SCR catalyst. Phillips 66 is in the process of scheduling a re-test for ammonia in March 2025 if the turnaround is completed and the unit is back online in time.

May have resulted in a deviation from:

Deviation No:	011-25	Source Number(s):	97	Permit:	27819-6
Event Started:	2/21/2025	Abatement Device(s) :	626	AQMD:	
Stopped:	2/23/2025	Emission Point(s):		Other:	

Event Description: On February 20, 2025, Phillips 66 was issued two Notices of Violation (A63921, A63922) where the Bay Area Air District (BAAD) alleged failure to monitor S97 (Tank 100) per permit condition 27819-6. In an abundance of caution, Phillips 66 is submitting this deviation report because two of the four samples from February 21, 2025, and samples from February 22, 2025 were not analyzed by GC. Handheld FID readings were taken on both days.

Probable Cause: BAAD issued Notice of Violation A63922 which alleged that missing a GC sample constituted a "failure to monitor".

Corrective actions or preventative steps taken: Phillips 66 will continue to monitor for TOC at S97 (Tank 100) in accordance with the permit requirements.

May have resulted in a deviation from:

Deviation No:	012-25	Source Number(s):	599	Permit:	27648-19f
Event Started:	12/29/2024	Abatement Device(s) :	599	AQMD:	
Stopped:	1/11/2025	Emission Point(s):		Other:	

Event Description: While Unit 237 was beginning the startup process after turnaround, the pH probe at the Unit 237 Scrubber (A-599) malfunctioned. The internal procedure to take two manual pH readings a shift, for a minimum of four pH readings a day, was followed. Each pH reading was within permitted limits (above six). Additionally, the SO2 scrubbers' liquid circulation and stack SO2 emission limits were also within permitted limits. However, the results of the pH readings were not consistently documented. Therefore 11 days do not have records of at least three pH readings throughout the day are as follows: 12/29/24, 12/30/24, 12/31/24, 1/1/25, 1/2/25, 1/3/25, 1/4/25, 1/5/25, 1/8/25, 1/9/25, and 1/11/25. All missing readings took place before any feed gas was introduced in the unit. There were no emission impacts during this period because the SO2 is directly monitored by a CEMs.

Probable Cause: After a turnaround and while the unit was beginning to start up, the pH probe malfunctioned. Handheld pH samples were taken twice a shift, but due to internal miscommunication the readings were not officially documented.

Corrective actions or preventative steps taken: The internal procedure for when the pH probe is malfunctioning will be edited to include better record keeping practices to ensure documentation of at least three pH measurements per day as required. No immediate corrective actions were taken as there were no stack SO2 emission limits or SO2 scrubber circulation exceedances.

May have resulted in a deviation from:

Deviation No:	014-25	Source Number(s):	259	Permit:	
Event Started:	2/25/2025 11:00 AM	Abatement Device(s) :		AQMD:	8-5-322.5
Stopped:	2/26/2025 11:00 AM	Emission Point(s):		Other:	

Event Description: The Bay Area Air District (BAAD) issued NOV A63805 on March 11, 2025, for a violation of the secondary seal gap standard at Tank 1006 (S259). During a BAAD initiated seal inspection at Tank 1006 on 2/25/2025, seal gaps in excess of the standards in Regulation 8 Rule 5 were measured along various parts of the secondary seal.

Probable Cause: BAAD measured seal gaps at Tank 1006 in excess of the Reg 8-5-322.5 standards and issued NOV A63805. In the Enhanced Monitoring Program, a 48-hour exemption period is allotted when Phillips 66 conducts their own inspections. Because BAAD initiated the seal inspection at Tank 1006 on 2/25/25, the limited exemption in Reg 8-5-119 does not apply. Phillips 66 fixed the tank's gaps within 48 hours in compliance with the Reg 8-5-119 enhanced monitoring repair period limited exemption. Had this been a seal inspection conducted by Phillips 66, the limited exemption criteria in Reg 8-5-119 would have been met.

Corrective actions or preventative steps taken: Upon finding the seal gaps, stiffeners were added along the entirety of the secondary seal. The tank was reinspected on 2/26/2025, and no gaps were found.

May have resulted in a deviation from:

Deviation No:	016-25	Source Number(s):		Permit:	
Event Started:	10/3/2024	Abatement Device(s) :		AQMD:	2-1-301; 2-1-302
Stopped:	4/11/2025	Emission Point(s):		Other:	

Event Description: During an internal review, a rental diesel engine that is registered under the Statewide Portable Equipment Registration Program (PERP) was determined to not meet all the PERP applicable requirements. Therefore, the engine no longer qualifies for the Regulation 2-1-105 exemption from the Regulation 2-1-301 and 2-1-302 requirements.

Probable Cause: Diesel engine was on site for emergency backup loss of utility air longer than one year as a result of administrative oversight.

Corrective actions or preventative steps taken: Electric-driven replacement engines were secured and installed in place of the diesel engines. Additional training will take place regarding requirements for PERP engines.

May have resulted in a deviation from:

Deviation No:	018-25	Source Number(s):	600	Permit:	
Event Started:	4/17/2025 10:00 AM	Abatement Device(s) :		AQMD:	8-8-315.1
Stopped:	4/17/2025 10:53 AM	Emission Point(s):		Other:	

Event Description: During a BAAD field inspection , sewer sump #1038 was found by BAAD to not be vapor-tight as defined in Regulation 8-8. At the same time as the inspection, the Pre-Treatment Unit (PTU, S-600) experienced an unscheduled shutdown which caused the sewer sump #1038 to lose vacuum and not operate in a typical manner.

Probable Cause: Unit shutdown resulted in a loss of vacuum of the sump.

Corrective actions or preventative steps taken: After re-start of the PTU, the sewer sump operation returned to typical operating conditions. Sewer Sump #1038 was monitored on 04/17/24, with a leak detected of 2 ppm, which is vapor-tight. Additionally, sealant was added to the sump access cover to prevent inadvertent opening.

May have resulted in a deviation from:

Deviation No:	019-25	Source Number(s):	599	Permit:	27648-4c; 27658-5g
Event Started:	4/24/2025 12:20 PM	Abatement Device(s) :	598; 599; 600; 601	AQMD:	
Stopped:	4/24/2025 12:25 PM	Emission Point(s):		Other:	

Event Description: During the startup of Unit 237 Sulfur Treatment Unit (A-598, A-599), the SO2 concentration reached top of range on the SO2 CEMs for approximately 2 minutes. There are no exceedances during this period indicated by the SO2 CEMS analyzer. In an abundance of caution, this deviation report is being submitted based on engineering calculations which indicate that the SO2 lb/hr, and lb/MMbtu limits may have been exceeded.

Probable Cause: During the startup of Unit 237 there was a brief, two-minute increase in SO2 concentration.

Corrective actions or preventative steps taken: As startup progressed, SO2 concentrations dropped to typical, lower levels in compliance with applicable limits.

May have resulted in a deviation from:

Deviation No:	020-25	Source Number(s):		Permit:	27646-17
Event Started:	4/29/2025 11:30 AM	Abatement Device(s) :		AQMD:	
Stopped:	4/30/2025	Emission Point(s):		Other:	

Event Description: BAAD PC 27646-17 requires silt loading factor testing and considers any exceedance of the 0.32 g/m2 silt loading factor used for paved roads ax violation of the condition. The testing indicated that the silt loading factor 0.68 g/m2.

Probable Cause: Source test result indicated a silt loading factor greater than 0.32 g/m2.

Corrective actions or preventative steps taken: As required by the permit condition, Phillips 66 has submitted a permit application for Air District review. As indicated in the permit application, the increased silt loading factor does not result in a cumulative emission increase from Application No. 31157

May have resulted in a deviation from:

Deviation No:	021-25	Source Number(s):	599	Permit:	27648-14
Event Started:	4/23/2025 12:00 AM	Abatement Device(s) :	598; 599	AQMD:	
Stopped:	4/30/2025 3:50 PM	Emission Point(s):		Other:	

Event Description: BAAD permit condition 27648-14 requires that source test results be submitted within 60 days of the source test. In this case, testing was completed on 2/21/25, however, the source test results were not reported within 60 days.

Probable Cause: Due to an administrative oversight, the source test results were not submitted within 60 days.

Corrective actions or preventative steps taken: Upon discovery, Phillips 66 submitted the source test results to BAAD.

May have resulted in a deviation from:

Deviation No:	022-25	Source Number(s):	438	Permit:	27654 Part e.4
Event Started:	5/15/2025 11:59 PM	Abatement Device(s) :		AQMD:	
Stopped:	5/16/2025 5:59 AM	Emission Point(s):		Other:	

Event Description: The Unit 110 H-1 NOx CEMs indicated an excess of the 1-hour average concentration limit of 7 ppm NOx @ 3% O2. The indicated excess began on 05/15/2025 at 11:59 PM and cleared on 05/16/2025 at 5:59 AM for a total period of 6 hours. The maximum concentration during the period of excess was 28.2 ppm NOx @ 3% O2 (+21.2 ppm NOx @ 3% O2). An excess and breakdown were reported to BAAD. (BAAD excess ID#201713 and breakdown ID#201712).

Probable Cause: At 11:59 p.m. on May 15, 2025, a NOx excess occurred at U110 H-1. After investigation, it was determined that the ammonia injection heater for the SCR stopped operating causing the ammonia flow to the SCR to stop. No cause for the ammonia injection stopping can be identified.

Corrective actions or preventative steps taken: Upon determining that the ammonia flow to the SCR had stopped, the ammonia injection heater was disassembled and reassembled. After reassembly, the heater began operating properly and ammonia flow was re-established.
An ammonia injection heater low temperature alarm will be added to provide notification that the heater has stopped operating.

May have resulted in a deviation from:

Deviation No:	023-25	Source Number(s):	437	Permit:	
Event Started:	5/12/2025	Abatement Device(s) :		AQMD:	8-10-503
Stopped:	5/13/2025	Emission Point(s):		Other:	

Event Description: During in an internal review, it was identified that the Vessel Depressurization record for vessel V-2 at Source-437 was not retained per 8-10-503 requirements. The vessel was opened for maintenance in May 2024.
Phillips 66 Confined Space records show that vessel V-2 was opened on May 20th, 2024. Initial confined space atmospheric readings were zero ppm of VOC and subsequent readings throughout the day were also zero ppm.

Probable Cause: Due to an administrative oversight, the vessel depressurization record was not maintained for the required 5-years.

Corrective actions or preventative steps taken: Phillips 66 will review the requirements of retaining the vessel depressurization records.

May have resulted in a deviation from:

Deviation No:	024-25	Source Number(s):	1010	Permit:	27818-7a/b
Event Started:	5/22/2025 6:59 AM	Abatement Device(s) :		AQMD:	
Stopped:	5/24/2025 8:59 PM	Emission Point(s):		Other:	

Event Description: Unit 235 SO2, CO and incinerator temperature monitors indicated excesses as detailed below:
•SO2 50 ppm @ 0% O2 on a 1-hour basis was exceeded for 15 hours (+552 ppm) from 05/22/2025 at 8:59 PM to 05/23/2025 at 11:59 AM.
•SO2 250 ppm @ 0% O2 on a 12-hour basis was exceeded for 11 hours (+170 ppm) from 05/23/2025 at 4:59 AM to 5/23/2025 at 3:59 PM.
•SO2 50 ppm @ 0% O2 on a 24-hour basis was exceeded for 29 hours (+183 ppm) from 05/23/2025 at 12:59 AM to 5/24/2025 at 6:59 AM.
•CO 75 ppm @ 7% O2 on a 1-hour basis was exceeded for 7 hours (+69 ppm) from 05/22/2025 at 3:59 PM to 05/22/2025 at 9:59 PM
•Incinerator temperature was below 1409 Degrees Fahrenheit from 05/23/2025 at 12:33 AM to 05/23/2025 at 9:15 AM.

Probable Cause: The excesses occurred during a routine startup of Unit 235. Operational steps taken during the startup resulted in the excesses. It should be noted that there are no startup exemptions for this unit in the permit.

Corrective actions or preventative steps taken: Startup was completed and SO2 concentration, CO concentration and incinerator temperatures came into compliance.

May have resulted in a deviation from:

Deviation No:	025-25	Source Number(s):	600	Permit:	
Event Started:	5/29/2025 9:57 AM	Abatement Device(s) :	622; 623; 624; 625	AQMD:	1-441
Stopped:	5/29/2025 9:57 AM	Emission Point(s):		Other:	

Event Description: BAAD issued two Notices of Violations (NOV) #A64779 and #A64780 alleging Phillips 66's failure to comply with a Regulation 1-441 information request due to deficiencies in responses.

Probable Cause: BAAD issued NOVs

Corrective actions or preventative steps taken: Phillips 66 will discuss the NOVs with BAAD.

May have resulted in a deviation from:

Deviation No:	026-25	Source Number(s):	97	Permit:	27819-6
Event Started:	6/20/2025 4:36 PM	Abatement Device(s) :	626	AQMD:	
Stopped:	6/20/2025 4:36 PM	Emission Point(s):		Other:	

Event Description: Phillips 66 has been monitoring the TOC concentration at S97 (Tank 100) with a hand-held flame-ionization detector (FID) since start-up, March 8th, 2024. On December 12, 2024, Phillips 66 began to sample S97 (Tank 100) using an on-site GC. On June 20, 2025 a GC sample was not analyzed, however a handheld FID reading was taken. Although, Phillips 66 performed monitoring with one of the methods specified in the cited permit condition, this deviation is reported out of abundance of caution.

Probable Cause: GC sample was not collected.

Corrective actions or preventative steps taken: Phillips 66 will continue to monitor for TOC at S97 (Tank 100) in accordance with the permit requirements.

May have resulted in a deviation from:

Deviation No:	027-25	Source Number(s):	460; 599	Permit:	
Event Started:	5/1/2024	Abatement Device(s) :		AQMD:	8-18-401
Stopped:	6/26/2025	Emission Point(s):		Other:	40 CFR 60.482-7a(c)(1)

Event Description: During a review of the leak detection and repair (LDAR) program, Phillips 66 identified that there were in-service components in otherwise idled units. A total of 3,089 missing valves, pumps, compressors, and PRV's were identified and re-added to the LDAR database. Monitoring began promptly once the issue was identified. During the inspection process nine valves were found leaking in S460 and S599.

Probable Cause: The missed components were linked to idled units in the LDAR database causing them to be inadvertently removed from their routine monitoring schedule.

Corrective actions or preventative steps taken: A thorough review was conducted, and the 3,089 missing components were re-added and monitored by July 11, 2025.

May have resulted in a deviation from:

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:	

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.

May have resulted in a deviation from:

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.

May have resulted in a deviation from:

Deviation No:	071-24	Source Number(s):	600	Permit:	100412 Part 9; 27649 Part 9
Event Started:	10/25/2024 9:30 AM	Abatement Device(s) :	623; 625	AQMD:	
Stopped:	6/26/2025	Emission Point(s):		Other:	

Event Description: Daily monitoring at S600 outlet of A623 and/or A625 has exceeded the 10 ppm TOC limit and 2.6 lb/day and 956 pounds per any consecutive rolling 12-month period TOC limit for the days summarized in the table below. The deviation for 956 lbs per any consecutive 12- month period was previously submitted under Title V deviation number 068-24 sent on October 24, 2024.

Date	Carbon Outlet concentration (ppm)	Emissions (lbs/day)
10/25/2024	5095	496
10/26/2024	3544	346
10/27/2024	3943	384
10/28/2024	4117	401
10/29/2024	3938	388
10/30/2024	2732	266
10/31/2024	3144	306
11/1/2024	4694	457
11/2/2024	7243	705
11/3/2024	5975	581

Probable Cause: Elevated hydrocarbon concentrations coming from the process unit are above PTU design expectations. The elevated inlet concentrations are suspected of leading to TOC concentrations at the exhaust stack that are above the permit limit. Phillips 66 suspects that the cause may be that the carbon beds are not large enough to adsorb the TOC and may also at least partially be related to the natural gas blanketing on some of the storage tanks used to feed S600.

Corrective actions or preventative steps taken: Upon discovery, Phillips 66 increased the frequency of carbon changeouts at A623 and A625. Currently, carbon is being changed out as needed and as frequently as once per day. As of October 24, 2024, Phillips 66 began operation of the rental vapor control skid (A-1011) at the PTU after receipt of a temporary permit to operate. Phillips 66 will continue to evaluate other control technologies to mitigate TOC exceedances at the PTU.
On June 26, 2025, per agreement with BAAD, S600 emissions were controlled rental Thermal Oxidizer (TO). S600 emissions are in compliance with permitted limits.

May have resulted in a deviation from:

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.

May have resulted in a deviation from:

Deviation No:	082-24	Source Number(s):	97	Permit:	277819C
Event Started:	12/29/2024 6:00 AM	Abatement Device(s) :	626	AQMD:	
Stopped:	1/1/2025 6:00 AM	Emission Point(s):		Other:	

Event Description: Subsequent sampling by Phillips 66 indicated that the TOC concentration exceeded the 10 ppm TOC limit at S97 (Tank 100) from 12/29/2024 to 01/01/2025. In addition, Permit Condition 277819 (c) emission limit was exceeded.

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: Using GC analysis 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.

May have resulted in a deviation from:

Deviation No:	083-24	Source Number(s):	455	Permit:	
Event Started:	12/24/2024	Abatement Device(s) :		AQMD:	1-523
Stopped:	1/2/2025	Emission Point(s):		Other:	

Event Description: The recirculation rate flowmeter on the Unit 240 Cooling Tower (S-455) became inoperative for more 24 hours on 12/17/2024. An inoperative monitor report was not submitted by the next business day, 12/18/2024, as required. The flowmeter was identified as inoperative on 1/2/2025 and an inoperative monitor notification was submitted on 1/2/2025 (BAAQMD ID# 200898).

Probable Cause: Due to an administrative error, the inoperative monitor was not identified in time to submit the required notification by the next business day. Upon discovering that the flowmeter was inoperative, a report was submitted.

Corrective actions or preventative steps taken: Upon discovery of this issue, the inoperative monitor notification was submitted on January 2, 2025 (BAAQMD ID# 200898). The internal communication process will be updated to ensure any operational issues with this meter are identified.

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: Environmental Specialist 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#)
6/1/2024	9:15 AM	6/3/2024	4:55 PM	☑	005-25	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.
☑	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The NOx CEMS analyzer at U110 became inoperative on 6/1/2024 at 9:15 a.m.. An inoperative monitor notification should have been submitted by the next business day, 6/3/2024, but was not submitted until 6/4/2024.

Started		Stopped			Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
7/26/2024	12:37 PM	8/9/2024	9:00 AM	☑	015-25	600	623; 625	

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.
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: This issue was identified by BAAQMD as a part of Reg1-Part 441 meeting request on 1/23/2025. The meter in question (R130:FI2322).was suspected of going in-op on 7/26/24 12:37 through 7/28/24 10:38, and again on 7/31/24 15:45 to 8/5/24 10:54 and again on 8/5/24 at 18:38 through 8/9/24 09:00. All periods the meter appeared to maintain a steady flow of 2000.0 scfm. Out of abundance of caution, Phillips 66 is assuming that the meter was potentially inoperative for the entire duaration from 7/26/24 12:37 to 8/9/2024 09:00 and the flow exceeded the permitted limit of 2200 SCFM for single bed operation.

12/18/2024	8:56 PM	12/23/2024	1:03 AM	☑	042-25	455		

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.
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The recirculation flowmeter on U240 S-455 Cooling Tower began malfunctioning on 12/18/2024 at 8:56 PM. The flowmeter began reading correctly again 12/23/2024 at 1:03 AM.

1/1/2025	7:46 AM	1/2/2025	8:16 AM	☑	029-25	13		

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.
☑	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The NOx analyzer at U240 B301 became inoperative on 1/1/2025 at 7:46 AM. Various repairs to the system were made and analyzers returned to service 1/2/25 at 8:16 AM.

1/10/2025	8:51 AM	1/17/2025	3:00 PM	☑	030-25	455		

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.
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The recirculation flowmeter on U240 S-455 Cooling Tower became inoperative on 1/10/25 at 8:51 AM. The Cooling Tower flowmeter returned to service on 1/17/2025 at 3:00 PM.

Started		Stopped			Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
1/25/2025	6:55 AM	1/26/2025	7:00 AM	☑	004-25	461		

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.
☑	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The NOx analyzer at U250 B701 became inoperative on 1/25/2025 at 6:55 AM. Various repairs to the system were made and analyzers returned to service 1/26/25 at 7:00 AM.

2/4/2025	1:25 PM	2/5/2025	8:34 PM	☑	007-25	455		

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.
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The flowmeter on U240 S-455 Cooling Tower became inoperative on 2/4/2025 1:25 PM. The Cooling Tower flowmeter returned to service on 2/5/2025 at 8:34 PM.

2/12/2025	5:45 PM	2/14/2025	1:28 AM	☑	031-25	455		

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.
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The recirculation flowmeter on U240 S-455 Cooling Tower began malfunctioning on 2/12/25 at 5:45 PM. The Cooling Tower flowmeter returned to service on 2/14/2025 at 1:28 AM.

2/15/2025	4:40 AM	2/17/2025	12:50 AM	☑	032-25	9		

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.
☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The U240 B2 (S9) NOx and O2 CEMS began malfunctioning on 2/15/25 at 4:40 AM. The CEMS analyzer returned to service on 2/17/2025 at 12:50 AM.

Started		Stopped			Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
2/20/2025	6:30 AM	2/24/2025	10:45 AM	☑	017-25	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.
☑	☐	☐	☐	☑	☐	☑	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The NOx and O2 analyzer at U110 H-1 began malfunctioning on 02/22/2025 at 6:30 AM. The analyzer was calibrated, validated, and returned to service on 02/24/2025 at 10:45 AM.
The CO analyzer at U110 H-1 began malfunctioning on 02/20/2025 at 7:45 PM. The analyzer was calibrated, validated, and returned to service on 02/24/2025 at 10:45 AM.

2/26/2025	11:20 AM	3/4/2025	5:27 AM	☑	033-25	455		

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.
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The flowmeter on U240 S-455 Cooling Tower began malfunctioning on 2/26/25 at 11:20 AM. The Cooling Tower returned to operation on 3/4/2025 at 5:27 AM. Initial RCA was submitted on 2/28/2025 (BAAD RCA ID# 201048).

2/28/2025	11:07 PM	3/3/2025	2:24 PM	☑	034-25	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.
☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The exhaust gas flow meter readings at Unit 237 A-599 were invalid beginning on 2/28/2025 at 11:07 PM. A false reading above the limit was indicated for one hour between 11 am and 12 pm on 3/3/2025. The exhaust gas flow meter returned to operation on 3/3/2025 at 2:24 PM. Initial RCA was submitted on 3/3/2025 (BAAD RCA ID# 201054).

3/8/2025	8:14 AM	3/10/2025	8:20 AM	☑	035-25	13		

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.
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Event Description: The NOx analyzer at U240 B301 began malfunctioning on 3/8/2025 at 8:14 AM. Various repairs to the system were made and analyzers returned to service on 3/10/25 at 8:20 AM.

Started		Stopped			Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
5/2/2025	2:00 PM	5/5/2025	7:35 AM	☑	036-25	11		

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.
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Event Description: The NOx and O2 analyzer at U240 B201 began malfunctioning on 05/02/2025 at 2:00 PM. The analyzer was calibrated, validated, and returned to service on 05/05/2025 at 7:35 AM.

5/2/2025	6:45 PM	5/5/2025	11:20 AM	☑	037-25	45		

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.
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Event Description: The NOx analyzer at U246 B801 began malfunctioning on 05/02/2025 at 6:45 PM. The analyzer was calibrated, validated, and returned to service on 05/05/2025 11:20 AM.

5/9/2025	5:05 PM	5/12/2025	11:05 AM	☑	038-25	600		

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.
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Event Description: The CAI in-line FID at S600 began malfunctioning on 05/09/2025 at 5:05 PM. The analyzer was calibrated, validated, and returned to service on 05/12/2025 11:05 AM.

5/24/2025	7:30 AM	5/28/2025	1:00 PM	☑	039-25	1010		

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.
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Event Description: The O2 analyzer at U235 began malfunctioning on 05/24/2025 at 7:30 AM. Replacement analyzer was installed and began operating on 5/28/2025 at 1:00 PM.

Started		Stopped			Deviation #	Source (S#)	Abatement Device (A#)	Emission Point (P#)
6/16/2025	7:30 AM	6/17/2025	10:00 AM	☑	040-25	12		

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.
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Event Description: The NOx analyzer at U240 B-202 began malfunctioning on 06/16/2025 at 7:30 AM. The analyzer was calibrated, validated, and returned to service on 06/17/2025 at 10:00 AM.

6/28/2025	7:55 AM	6/30/2025	10:30 AM	☑	041-25	461		

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.
☑	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Event Description: The NOx analyzer at U250 B701 began malfunctioning on 06/28/2025 at 7:55 AM. The analyzer was calibrated, validated, and returned to service on 06/30/2025 10:30 AM.