January 5, 2006

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

Subject: Minor Revision to Major Facility Review Permit

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing minor and significant revisions to the Major Facility Review Permit for the following facility:

Application Numbers	Facility Number	Facility Name	Address, City	Type of Operation
10622, 11626, 12995	A0016	ConocoPhillips – San Francisco Refinery	1380 San Pablo Avenue Rodeo, CA 94572	Petroleum Refinery

Application 10622:

The District proposed minor revisions and administrative amendments pursuant to Application 10622 on July 19, 2005. No comments on the proposed Minor Revision were received.

In addition to the changes that were proposed, the following corrections have been made to make the permit consistent:

- BAAQMD Condition 20989 was deleted from the Section IV table for S1008 and S1009 because the sources were deleted from the condition.
- BAAQMD Condition 20989 was deleted from the Section VII table for S1008 and S1009, as proposed, but the minimization of diversions and recordkeeping requirement in BAAQMD Condition 1440, part 3, which has been omitted in error from Section VII, was added.
- The monitoring in BAAQMD Regulation 8-8-501, omitted in error, was added to the Section VII table for S1008 and S1009.

Application 11626

The District proposed significant and minor revisions pursuant to Application 11626 on March 31, 2005. No comments on the proposed revisions were received.

ALAMEDA COUNTY Roberta Cooper Scott Haggerty Nate Miley Shelia Young

CONTRA COSTA COUNTY Mark DeSaulnier Mark Ross (Secretary) Michael Shimansky Gayle B. Uilkema (Vice-Chairperson)

MARIN COUNTY Harold C. Brown, Jr.

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY Chris Daly Jake McGoldrick Gavin Newsom

SAN MATEO COUNTY

Jerry Hill Marland Townsend (Chairperson)

- SANTA CLARA COUNTY
 - Erin Garner Liz Kniss Patrick Kwok Julia Miller

SOLANO COUNTY John F. Silva

SONOMA COUNTY Tim Smith Pamela Torliatt

Jack P. Broadbent EXECUTIVE OFFICER/APCO In addition to the changes that were proposed, the following corrections have been made:

- The citation of BAAQMD Condition 1694, part A.1a, has been amended for Source S438, from part A.1c because it is the only source in this condition that has a basis of "Cumulative Increase" for the throughput limit.
- The note "upon startup" has been deleted from the tables for Sources S36 and S461 because the sources have started up.
- The ammonia limit in BAAQMD Conditions 21096, part 3b, and 21097, part 3b, has been moved to a new part, part 3c, because it is not a federally enforceable limit and the other limits in BAAQMD Conditions 21096, part 3b, and 21097, part 3b, are federally enforceable.
- The note stating that BAAQMD Conditions 21096, part 3, and 21097, part 3, do not apply until startup have been deleted because the sources have started up.
- The SO2 limit for the heaters increased from 1,558 lb/day to 1,612 lb/day after startup of S36 and S461. This note was already in the Section VII tables for the heaters. Since S36 and S461 have started up, the 1,558 lb/day limit will be deleted and the 1,612 lb/day limit will remain.

The District has modified the TRS monitoring for S36 and S461 after reviewing the data generated by the proposed monitoring strategy. The District is also approving an alternative monitoring plan for the H2S limit in 40 CFR 60.104(a)(1). The details are in the modified statement of basis for Application 11626, dated November, 2005. All changes after public notice and EPA review are discussed at the end of each section under the caption "Changes after public notice."

Application 12995

The District proposed minor revisions and pursuant to Application 12995 on September 22, 2005. No comments on the proposed Minor Revision were received.

The District has decided to issue a permit with the above revisions.

Copies of the revised Major Facility Review Permit and the revised statement of basis for Application 11626 are enclosed for your information. If you have any questions on this action, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Sincerely,

Jack Broadbent Executive Officer/Air Pollution Control Officer

JB:BFB:bfc

Enclosure