Bay Area Air Quality Management District

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San Francisco, CA 94109
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Permit Evaluation
and
Statement of Basis
for
MAJOR FACILITY REVIEW PERMIT
Minor Revision

for

ConocoPhillips – San Francisco Refinery
Facility #A0016

Facility Address:
1380 San Pablo Avenue
Rodeo, CA 94572

Mailing Address:
1380 San Pablo Avenue
Rodeo, CA 94572

October 2005

Application 10115

Application Engineer: Brenda Cabral
Site Engineer: Brenda Cabral

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Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

The District issued the initial Title V permit to this facility on December 1, 2003.

The purpose of this action is to allow a daily throughput increase of petroleum fluid, excluding diesel, from 80,000 barrels per day to 113,150 barrels gasoline/day and deletion of the daily diesel throughput limit. The annual limit for petroleum fluids will remain at 33 million barrels per year. This change in conditions was reviewed through BAAQMD Application 10115, which is attached and forms part of this statement of basis.

The proposed changes to the permit are shown in "~~strikeout~~/underline" format. In this action, the District is soliciting public comment only on the revisions proposed in this action. When the permit is finalized, the tracking marks will be removed.

This statement of basis does not address the factual and legal basis for any other permit terms. These are addressed in the comprehensive statements of basis that were prepared for the initial issuance of the permit and subsequent reopenings and revisions. These are available on request.

B. Facility Description

The facility description can be found in the statement of basis that was prepared for the reopening issued on December 16, 2004. It is available on request from the Engineering Division of the District.

C. Permit Content

Additional information concerning the legal and factual basis of the Title V permit conditions is presented below. The information is organized by the relevant section of the Title V permit.

I. Standard Conditions

No changes to Section I are proposed.

II. Equipment

The following changes are proposed in this action:

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S#	Description	Make or Type	Model	Capacity
318	U76 Gasoline/Mid Barrel Blending Unit	NA	NA	~~80,000~~ 113,150 bbl/day petroleum fluids except diesel, ~~gasoline~~ ~~41,200 bbl/day diesel~~ No daily limit for diesel

III. Generally Applicable Requirements

No changes to this section are proposed in this action.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements for permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) listed following the corresponding District Rules. SIP rules are District rules that have been approved by EPA into the California State Implementation Plan. SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes". If the SIP rule is not the current District rule, the SIP rule or the necessary portions of the SIP rule are cited separately after the District rule. The SIP portions will be federally enforceable; the non-SIP versions will not be federally enforceable, unless EPA has approved them through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)

- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions (unless they have been assigned a District permit condition number, in which case they are included as BAAQMD permit conditions). The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a crosSreference between the limits and monitoring requirements. A discussion of changes to monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Changes to permit:
A daily throughput limit and daily recordkeeping requirement has been imposed on S318.

Table IV – N
Source-specific Applicable Requirements – Process Vessels
S304 – U-229 MID-BARREL UNIONFINING UNIT (U-229 LIGHT NAPHTHA HYDROTREATER WHEN MODIFIED IN ACCORDANCE WITH A/C 5814);
S305 – U-230 PREFRACTIONATOR / NAPHTHA HYDROTREATER;
S306 – U-231 PLATFORMING UNIT; S307 – U-240 UNICRACKING UNIT;
S308 – U-244 REFORMING UNIT; S309 – U-248 UNISAR UNIT;
S318 – U-76 GASOLINE / MID-BARREL BLENDING UNIT;
S319 – U-215 GASOLINE FRACTIONATING UNIT;
S322 – U-40 RAW MATERIALS RECEIVING; S435 – REFORMATE SPLITTER;
S436 – DEISOPENTANIZER; S437 – HYDROGEN PLANT;
S460 – U-250 ULSD HYDROTREATER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 2	**Organic Compound – Miscellaneous Operations (6/15/94)** **APPLICABLE TO S307 ONLY**		
8-2-301	Miscellaneous Operations: emissions shall not exceed 15 lb/day and 300 ppm carbon on a dry basis	Y	
BAAQMD Regulation 8, Rule 9	**Organic Compound – Vacuum Producing Systems (7/20/83)**		
8-9-301	Vacuum Producing System POC emissions must be controlled by combustion or venting to fuel gas systems	Y	
8-9-601	Determination of Emissions	Y	
BAAQMD Regulation 8, Rule 10	Organic Compound – Process Vessel Depressurization (1/21/2004)		
8-10-301	Depressurization Control Options	N	

Table IV – N
Source-specific Applicable Requirements – Process Vessels
S304 – U-229 Mid-Barrel Unionfining Unit (U-229 Light Naphtha Hydrotreater when modified in accordance with A/C 5814); S305 – U-230 Prefractionator / Naphtha Hydrotreater; S306 – U-231 Platforming Unit; S307 – U-240 Unicracking Unit; S308 – U-244 Reforming Unit; S309 – U-248 Unisar Unit; S318 – U-76 Gasoline / Mid-Barrel Blending Unit; S319 – U-215 Gasoline Fractionating Unit; S322 – U-40 Raw materials Receiving; S435 – Reformate Splitter; S436 – Deisopentanizer; S437 – Hydrogen Plant; S460 – U-250 ULSD Hydrotreater

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-10-302	Opening of Process Vessels	N	
8-10-302.1	organic compounds cannot exceed 10,000 ppm (methane) prior to release to atmosphere	N	
8-10-302.2	Organic compound concentration of a refinery process vessel may exceed 10,000 ppm prior to release to atmosphere provided total number of such vessels during 5-year period does not exceed 10%	N	
8-10-401	Turnaround Records. Annual report due February 1 of each year with initial report of process vessels due 4/1/2004.	N	
8-10-501	Monitoring prior to and during process vessel opening	Y	
8-10-502	Concentration measurement using EPA Method 21	Y	
8-10-503	Recordkeeping	N	
8-10-601	Monitoring Procedures	N	
SIP Regulation 8, Rule 10	**Organic Compound – Process Vessel Depressurization (7/20/83)**		
8-10-301	Process Vessel Depressurizing. POC emissions shall be vented through a knock-out pot and then abated in one of the following ways, to as low a vessel pressure as possible, but at least until pressure is reduced to less than 1000 mm Hg:	Y	
8-10-301.1	recovery to the fuel gas system	Y	
8-10-301.2	combustion at a firebox or incinerator	Y	
8-10-301.3	combustion at a flare	Y	
8-10-301.4	containment such that emissions to atmosphere do not occur	Y	
8-10-401	Turnaround Records. The following records shall be kept for each process unit turnaround, and retained for at least 2 years and made available to the District on demand during inspections:	Y	
8-10-401.1	date of depressurization event	Y	
8-10-401.2	approximate vessel hydrocarbon concentration when emissions to atmosphere begin	Y	
8-10-401.3	approximate quantity of POC emissions to atmosphere	Y	
BAAQMD	**APPLICABLE TO S304 ONLY**		

Table IV – N
Source-specific Applicable Requirements – Process Vessels
S304 – U-229 Mid-Barrel Unionfining Unit (U-229 Light Naphtha Hydrotreater when modified in accordance with A/C 5814); S305 – U-230 Prefractionator / Naphtha Hydrotreater; S306 – U-231 Platforming Unit; S307 – U-240 Unicracking Unit; S308 – U-244 Reforming Unit; S309 – U-248 Unisar Unit; S318 – U-76 Gasoline / Mid-Barrel Blending Unit; S319 – U-215 Gasoline Fractionating Unit; S322 – U-40 Raw materials Receiving; S435 – Reformate Splitter; S436 – Deisopentanizer; S437 – Hydrogen Plant; S460 – U-250 ULSD Hydrotreater

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Condition 21095			
Part 1	Daily throughput limit [Basis: 2-1-234]	Y	when modified in accordance with A/C 5814
Part 2	Daily throughput records [Basis: 2-1-234]	Y	when modified in accordance with A/C 5814
BAAQMD Condition 6671	**APPLICABLE TO S307 ONLY**		
Part 1	Abatement requirement for E-421 condenser vent at A-50 scrubber [Basis: Regulation 8-2-301]	Y	
Part 2	Efficiency requirement for A-50 scrubber raw material throughput [Basis: Regulation 8-2-301]	Y	
Part 3	Requirement to treat A-50 blowdown at wastewater treatment plant [Basis: Cumulative Increase]	Y	
Part 4	Daily A-50 monitoring requirement [Basis: Cumulative Increase]	Y	
Part 5	Monitoring record requirement [Basis: Cumulative Increase]	Y	
Part 6	Annual source test requirement [Basis: Regulation 2-6-409.2]		
BAAQMD Condition 20620	**APPLICABLE TO S307 AND S308 ONLY**		
Part 1	Application requirement for 40 CFR63, Subpart UUU	Y	
Part 2	Submittal requirement for Operation, Maintenance, and Monitoring Plan	Y	4/11/05
BAAQMD	**APPLICABLE TO S460 ONLY**		

Table IV – N
Source-specific Applicable Requirements – Process Vessels
S304 – U-229 Mid-Barrel Unionfining Unit (U-229 Light Naphtha Hydrotreater when modified in accordance with A/C 5814); S305 – U-230 Prefractionator / Naphtha Hydrotreater; S306 – U-231 Platforming Unit; S307 – U-240 Unicracking Unit; S308 – U-244 Reforming Unit; S309 – U-248 Unisar Unit; S318 – U-76 Gasoline / Mid-Barrel Blending Unit; S319 – U-215 Gasoline Fractionating Unit; S322 – U-40 Raw materials Receiving; S435 – Reformate Splitter; S436 – Deisopentanizer; S437 – Hydrogen Plant; S460 – U-250 ULSD Hydrotreater

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Condition 21094			
Part 1	Daily throughput limit [Basis: Regulation 2-1-234]	Y	startup date
Part 2	Throughput records [Basis: Regulation 2-1-234]	Y	startup date
BAAQMD Condition 21099	**APPLICABLE TO S304, S460 ONLY**		
Part 1	Light hydrocarbon control valve requirements [Basis: BACT]	Y	startup/modification date
Part 2	Light hydrocarbon flange/connector requirements [Basis: BACT]	Y	startup/modification date
Part 3	Centrifugal compressor requirements [Basis: BACT]	Y	startup/modification date
Part 4	Light hydrocarbon centrifugal pump requirements [Basis: BACT]	Y	startup/modification date
Part 5	Monitoring and repair program requirement [Basis: BACT]	Y	startup/modification date
Part 6	ULSD project component count report requirement [Basis: BACT, Cumulative Increase, Toxic Management Policy]	Y	startup/modification date
40 CFR 63 Subpart UUU	**National Emission Standards for Hazardous Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (4/11/02) [APPLICABLE TO S307 AND S308 ONLY]**	Y	Notification by 8/9/02; compliance by 4/11/05
BAAQMD Condition 20989, Part A	Throughput limits for S304, S305, S306, S307, S435, S436, S437 (S304 only until modified in accordance with A/C 5814) [Basis: 2-1-234.3]	Y	
BAAQMD Condition 20989, Part	Throughput limits for S308, S309, S318, S319 [Basis: 2-1-234.3]	N	

Table IV – N
Source-specific Applicable Requirements – Process Vessels
S304 – U-229 MID-BARREL UNIONFINING UNIT (U-229 LIGHT NAPHTHA HYDROTREATER WHEN MODIFIED IN ACCORDANCE WITH A/C 5814);
S305 – U-230 PREFRACTIONATOR / NAPHTHA HYDROTREATER;
S306 – U-231 PLATFORMING UNIT; S307 – U-240 UNICRACKING UNIT;
S308 – U-244 REFORMING UNIT; S309 – U-248 UNISAR UNIT;
S318 – U-76 GASOLINE / MID-BARREL BLENDING UNIT;
S319 – U-215 GASOLINE FRACTIONATING UNIT;
S322 – U-40 RAW MATERIALS RECEIVING; S435 – REFORMATE SPLITTER;
S436 – DEISOPENTANIZER; S437 – HYDROGEN PLANT;
S460 – U-250 ULSD HYDROTREATER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
A			
BAAQMD Condition 22549	**[APPLICABLE TO S318 ONLY]**		
Part 1	Daily petroleum liquid throughput limit excluding diesel [Cumulative Increase]	Y	
Part 2	Daily records of petroleum liquid throughput limit [Cumulative Increase]	Y	

S318 was mistakenly omitted from Table IV-AA, which has applicability for specific source for fugitive requirements. Applicability of NSPS, Subpart GGG, was determined in Application 12312, issued in 1998.

Table IV- AA
Fugitive Sources: Applicable Requirements

Process Unit	BAAQMD Reg. 8-18	BAAQMD Reg. 8-28	NSPS Part 60, Subpart GGG; BAAQMD Reg. 10-59	NSPS Part 60, Subpart QQQ; BAAQMD Reg. 10-69	NSPS Part 60, Subpart VV; BAAQMD Reg. 10-52	NESHAP Part 61, Subpart J	NESHAP Part 61, Subpart FF; BAAQMD Reg. 11-12	NESHAP Part 61, Subpart V; BAAQMD Reg. 11-7	NESHAP Part 63, Subpart CC
Refinery-wide applicability	**Y**	**Y**	**N**	**N**	**N**	**N**	**Report only**	**N**	**Y**
Specific Unit applicability									

Table IV- AA
Fugitive Sources: Applicable Requirements

Process Unit	BAAQMD Reg. 8-18	BAAQMD Reg. 8-28	NSPS Part 60, Subpart GGG; BAAQMD Reg. 10-59	NSPS Part 60, Subpart QQQ; BAAQMD Reg. 10-69	NSPS Part 60, Subpart VV; BAAQMD Reg. 10-52	NESHAP Part 61, Subpart J	NESHAP Part 61, Subpart FF; BAAQMD Reg. 11-12	NESHAP Part 61, Subpart V; BAAQMD Reg. 11-7	NESHAP Part 63, Subpart CC
U76 Gasoline/Mid Barrel Blending Unit (S318)	**Y**	**N**	**Y**	**N**	**Y**	**N**	**N**	**N**	**Y**
Unit 267 (S350)	**Y**	**Y**	**Y**	**N**	**Y**	**N**	**N**	**N**	**Y**
Unit 228 (S370)	**Y**	**Y**	**Y**	**N**	**Y**	**N**	**N**	**N**	**Y**
Hydrogen Manufacturing Unit (S437)	**Y**	**Y**	**Y**	**N**	**Y**	**N**	**N**	**N**	**Y**
Unit 100 (S324, S1007, S388 per Condition 1860, Part 3)	**Y**	**Y**	**N**	**Y**	**N**	**N**	**N**	**N**	**Y**
Unit 233 (S338)	**Y**	**Y**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 that provides that a major facility review permit shall contain the following information and provisions:

"409.10 A schedule of compliance containing the following elements:

10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;

10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and

10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at

> least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted."

No changes to this section are proposed in this action.

VI. Permit Conditions

Each permit condition is identified with a unique numerical identifier, up to five digits.

All changes to existing permit conditions are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all 'strike-out' language will be deleted and all "underline" language will be retained, subject to consideration of comments received.

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

Changes to permit:

A daily throughput and recordkeeping condition was imposed on S318.

CONDITION 22549
Source 318, U76 Gasoline/Mid Barrel Blending Unit

1. The owner/operator shall ensure that the daily throughput of petroleum liquids, excluding diesel, at S318, U76 Gasoline/Mid Barrel Blending Unit, does not exceed 113,150 barrels/day. No daily limit is placed on diesel. [Cumulative Increase]

2. The owner/operator shall keep daily records of throughput of all petroleum fluids at S318, U76 Gasoline/Mid Barrel Blending Unit, in a District-approved log. These records shall be kept for at least five years and shall be made available to the District upon request. [Cumulative Increase]

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements that apply to each source. The summary includes a citation for each monitoring requirement, frequency, and type. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

Changes to permit:

The change to the annual throughput limit and the new daily limit were incorporated into Table VII-N.

Table VII – N
Applicable Limits and Compliance Monitoring Requirements
S304 – U-229 MID-BARREL UNIONFINING UNIT (U-229 LIGHT NAPHTHA HYDROTREATER WHEN MODIFIED IN ACCORDANCE WITH A/C 5814);
S305 – U-230 PREFRACTIONATOR / NAPHTHA HYDROTREATER;
S306 – U-231 PLATFORMING UNIT; S307 – U-240 UNICRACKING UNIT;
S308 – U-244 REFORMING UNIT; S309 – U-248 UNISAR UNIT;
S318 – U-76 GASOLINE / MID-BARREL BLENDING UNIT;
S319 – U-215 GASOLINE FRACTIONATING UNIT;
S322 – U-40 RAW MATERIALS RECEIVING; S435 – REFORMATE SPLITTER;
S436 – DEISOPENTANIZER; S437 – HYDROGEN PLANT
S460 – U-250 ULSD HYDROTREATER

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQMD 8-10-301	Y		abatement of emissions from process vessel depressurization is required until pressure is reduced to less than 1000 mm Hg	8-10-401.2 (SIP) and 8-10-501 & 502 (non-SIP)	P/E	Records
VOC (S307 only)	BAAQMD Condition 6671, Part 2 and 8-2-301	Y		emission streams with 15 lb/day AND 300 ppm total carbon on a dry basis prohibited	BAAQMD Condition 6671, Part 4 BAAQMD Condition 6671, Part 6	P/D P/A	visual inspection source test
throughput (S304 only)	BAAQMD Condition 21095, Part 1	Y	when modified in accordance with A/C 5814	12,198 bbl/day (monthly average)	BAAQMD Condition 21095, Part 2	P/D	records
throughput (S460 only)	BAAQMD Condition 21094, Part 1	Y	startup	35,000 bbl/day (monthly average)	BAAQMD Condition 21094, Part 2	P/D	records

Table VII – N
Applicable Limits and Compliance Monitoring Requirements
S304 – U-229 MID-BARREL UNIONFINING UNIT (U-229 LIGHT NAPHTHA HYDROTREATER WHEN MODIFIED IN ACCORDANCE WITH A/C 5814);
S305 – U-230 PREFRACTIONATOR / NAPHTHA HYDROTREATER;
S306 – U-231 PLATFORMING UNIT; S307 – U-240 UNICRACKING UNIT;
S308 – U-244 REFORMING UNIT; S309 – U-248 UNISAR UNIT;
S318 – U-76 GASOLINE / MID-BARREL BLENDING UNIT;
S319 – U-215 GASOLINE FRACTIONATING UNIT;
S322 – U-40 RAW MATERIALS RECEIVING; S435 – REFORMATE SPLITTER;
S436 – DEISOPENTANIZER; S437 – HYDROGEN PLANT
S460 – U-250 ULSD HYDROTREATER

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
throughput	BAAQMD Condition 20989, Part A	Y		S304: 3.47 E 6 bbl/yr (only until modified in accordance with A/C 5814) S305: 9.23 E 6 bbl/yr S306: 5.66 E 6 bbl/yr S307: 1.39 E 7 bbl/yr S435: 6.6 E 6 bbl/yr S436: 4.7 E 6 bbl/yr S437: 9.1 E 9 ft3/yr	BAAQMD Condition 20989, Part A	P/M	records
throughput	BAAQMD Condition 20989, Part A	N		S308: 5.11 E 6 bbl/yr S309: 6.6 E 8 bbl/yr S318: 3.3 E 7 bbl/yr S319: 3.51 E 6 bbl/yr	BAAQMD Condition 20989, Part A	P/M	records
throughput	BAAQMD Condition 22549, Part 1	Y		S318: 113,150 bbl/day (except for diesel, which does not have a daily limit)	BAAQMD Condition 22549, Part 2	P/D	records

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements. If a rule or permit condition requires ongoing testing, the requirement will also appear in Section VI of the permit.

No changes to the test method section are proposed.

IX. Permit Shield:

No changes to permit shields are proposed in this revision.

X. Revision History

The revision history will be updated when the minor revision is issued.

XI. Glossary

No changes to the glossary are proposed in this revision.

D. Alternate Operating Scenarios

No alternate operating scenario has been requested for this facility.

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APPENDIX A

ENGINEERING EVALUATION FOR APPLICATION 10115

ENGINEERING EVALUATION
CONOCOPHILLIPS SAN FRANCISCO REFINERY; PLANT 16
APPLICATION 10115

BACKGROUND

ConocoPhillips has applied for an increase in daily throughput at:

S318, Gasoline/Mid-Barrel Blending Unit 76

from 80,000 barrels gasoline/day to 113,150 barrels gasoline/day and deletion of the daily diesel throughput limit. There has been no change to the annual throughput limit.

The gasoline blending is a batch process. Due to the current daily throughput limit, ConocoPhillips has been obliged to stop blending on some days and resume blending the next day. Allowing the throughput increase will give the refinery some flexibility while not increasing the daily or annual emissions.

This is a minor revision of the Major Facility Review permit for the following reasons:

- The change is not considered a major modification under 40 CFR Parts 51 (NSR) or 52 (PSD).
- The change is not considered a modification under 40 CFR Parts 60 (NSPS), 61 (NESHAPS), or Section 112 of the Clean Air Act (HAP).
- There is no significant change or relaxation of monitoring.
- No term is established to allow the facility to avoid an applicable requirement.
- No case-by-case determination has been made.
- No facility-specific determination for ambient impacts, visibility analysis, or increment analysis on portable sources has been made.
- No new federal requirement has been imposed.

EMISSION CALCULATIONS

S318, U76 Gasoline/Mid Barrel Blending Unit, is a source of fugitive emissions only. The facility has stated that there will be no piping modifications and that the resulting daily throughput increase will not result in an increase of fugitive VOC emissions. This is consistent with the use of the CAPCOA correlation equation method for estimating fugitive emissions, which is based on the number of components and their contents independent of throughput.

The upstream sources are tanks that contain blendstocks. The downstream sources are gasoline and diesel tanks. All of the permitted gasoline and

blendstock tanks have annual throughput limits. The applicant has stated that the limits at the permitted upstream and downstream tanks will not be exceeded. The emissions from the diesel tanks are negligible due to diesel's low vapor pressure. Therefore, the emissions at the tanks are not expected to increase.

CUMULATIVE INCREASE AND OFFSETS

Since no emissions increase is expected, the throughput increase is not subject to offsets.

TOXIC RISK MANAGEMENT

Since no emissions increase is expected, the throughput increase is not subject to the District's Risk Management Policy.

STATEMENT OF COMPLIANCE

BACT

Since no emissions increase is expected, and S318 is a source of fugitive VOC emissions only, the source is not subject to BACT. Increasing the daily throughput limits of S318 will not increase fugitive VOC emissions. This is because the CAPCOA correlation equation method for estimating fugitive leaks is a per component factor, which is independent of throughput.

REGULATION 8, RULE 18

The components at this gasoline blending source are expected to comply with BAAQMD Regulation 8, Rule 18, Equipment Leaks. They are included in the facility's fugitive component inspection program.

MONITORING ANALYSIS

The monthly recordkeeping required by BAAQMD Condition 20989 is sufficient to ensure compliance with the annual limit. Daily recordkeeping will be imposed to ensure compliance with the daily limit.

NSPS

The source is subject to 40 CFR 60, Subpart GGG, as stated in the previous application for this source, Application 12412. This NSPS requires compliance with Subpart VV of the same part. The source is expected to continue to comply with this standard.

CEQA

This application is not subject to CEQA because it is ministerial pursuant to Permit Handbook Chapter 3.4. It is also exempt because it is an application to modify permit conditions for an existing source that does not involve any increases in emissions or physical modifications pursuant to BAAQMD Regulation 2-1-312.1.

NESHAPS

The parts of S318, Gasoline/Mid-Barrel Blending Unit 76, that are in organic HAP service are expected to continue to comply with 40 CFR 63, Subpart CC. "In organic HAP service as defined by 40 CFR 60.641 means "that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP's…"

PSD

PSD is not triggered because there is no emissions increase.

PERMIT CONDITIONS

CONDITION 22549

Source 318, U76 Gasoline/Mid Barrel Blending Unit

1. The owner/operator shall ensure that the daily throughput of petroleum liquids, excluding diesel, at S318, Gasoline Blending, does not exceed 113,150 barrels/day. No daily limit is placed on diesel. [2-1-301, Cumulative Increase]

2. The owner/operator shall keep daily records of throughput of all petroleum fluids at S318, Gasoline Blending, except for diesel, in a District-approved log. These records shall be kept for at least five years and shall be made available to the District upon request. [2-1-301, Cumulative Increase]

RECOMMENDATION

Issue a daily throughput condition and recordkeeping requirement to S318, U76 Gasoline/Mid Barrel Blending Unit

By: _____

Brenda Cabral **Date**
Senior Air Quality Engineer