San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572-1354
phone 510.799.4411
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September 8, 2005

ESDR-454-05
CP 05-A-01-C

VIA E-MAIL (bcabral@baaqmd.gov) & CERTIFIED MAIL – 7004 0550 0000 2565 8168

Ms. Brenda Cabral
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: **ConocoPhillips**
San Francisco Refinery – Plant No. A0016
Comments on Revision 3 of Title V Permit

Dear Ms Cabral:

ConocoPhillips has reviewed the proposed revisions dated August 2, 2005 to the Major Facility Review ("Title V") Permit for its San Francisco Refinery. Attached is a table with comments on Revision 3 of the Title V permit. In addition, there are supporting attachments referenced in the comments that are enclosed.

If you have any questions, or require additional information, please contact Mr. Philip Stern at (510) 245-4452.

Sincerely,

Philip C. Stern
Environmental Superintendent

Attachments

ConocoPhillips' Comments on Title V Permit, Revision 3 (Sept. 8, 2005)

Comment Number	Source(s)	Permit Conditions/ Tables Affected	Change Requested and Rationale
1	Flares: S296 and S398	Table IV-L.1 (p.132); Table IV-L.2 (p.134); Table VII-L (p.404).	Change the "description of requirement" columns in Tables IV-L.1 and IV-L.2 for line 60.104(a)(1) from the current language to read as follows: "Operate and maintain a flare gas recovery system to control continuous or routine combustion in the Flaring Device. Use of a flare gas recovery system on a flare obviates the need to continuously monitor and maintain records of hydrogen sulfide in the gas as otherwise required by 40 C.F.R. § 60.105(a)(4) and 60.7. Periodic maintenance may be required for properly designed and operated flare gas recovery systems. Permitee will take all reasonable measures to minimize emissions while such periodic maintenance is being performed." In Table VII-L, change the "Emission Limit" column for line 60.104(a)(1) to: "Flares are exempt since ConocoPhillips operates and maintains a flare gas recovery system to control continuous or routine combustion in the flares." The refinery has entered into a Consent Decree with U.S. EPA that specifically addresses compliance with Subpart J at flares. The CD describes four options for complying with Subpart J. The language proposed in this comment is a direct quote of Paragraphs 139(a) and 148 of the CD, which is the option the refinery intends to follow. (The relevant pages from the CD are included at Attachment A.) Therefore it has already been approved and accepted by U.S. EPA. In addition, using the CD language for purposes of Title V will ensure that the CD and Title V requirements are consistent.
2	Sulfur Plants: S1001, S1002, and S1003	Section VI, Condition 19278, part 4 (p.313); Table IV-U (p.163); Table VII-U (p.417)	Delete the requirement to monitor visible emissions on a monthly basis. There is no evidence that a sulfur plant under normal operations has any potential to cause visible emissions. Monitoring visible emissions will require ConocoPhillips to employ a person skilled in opacity monitoring, which is overly burdensome in this situation. In numerous other similar situations, the District has concluded that no visible emissions monitoring is necessary. Furthermore, if there ever were emissions that might cause opacity, those emissions would contain sulfur compounds that are already monitored by a CEMS, so visual opacity monitoring is unnecessary and redundant.

3	Combustion Turbines: S352, S353, S354	Table VII-Q.1 (p.409)	Insert an averaging period of three hours for the turbines' NOx emission limit. Specifically, in Table VII-Q.1 (p.409), first row, insert "(3 hr average)" after "9 ppmv" in the row for BAAQMD 9-9-301.3. Neither the Title V permit nor the underlying rule (9-9-301.3) currently specify the averaging period to use for calculating compliance with the 9 ppmv limit. BAAQMD has issued a memo stating that the most appropriate averaging period for this limit is a 3 hour average (copy attached at Attachment B), so this averaging period should be specifically added to the permit so there is no ambiguity.
4	Combustion Turbines and Duct Burners: S352, S353, S354, S355, S356, S357, S438	Table IV-A.34 (p.113) Table IV-Q.1 (p.147); Table IV-Q.2 (p.154); Table IV-A.34 (p.393) Table VII-Q.1 (p.411); Table VII-Q.2 (p.414).	Add an explicit option to use an approved Alternative Monitoring Plan ("AMP") for monitoring the H2S content of fuel gas. Specifically: • In each of Tables IV-A.34 (p.113), IV-Q.1 (p.147), and IV-Q.2 (p.154), insert a new row after 60.105(a)(4) in the NSPS Subpart J section that lists an applicable requirement as "60.13(i)" and description as "alternative monitoring plan for fuel gas H2S concentration" • In each of Tables VII-A.34 (p.393), VII-Q.1 (p.411), VII-Q.2 (p.414), add the phrase "or approved alternative monitoring plan under 40 CFR § 60.13(i)" to the monitoring requirement citation column for the H2S limit. ConocoPhillips monitors certain low-sulfur fuel gas a process analyzer and/or grab samples rather than a continuous H2S analyzer. The fuel gas is very low in H2S content (<10 ppm H2S) and complies with the Subpart J fuel gas H2S limit in 40 CFR § 60.104(a)(1). The refinery applied to EPA for an AMP in May 2004 and is waiting for EPA's approval. However, the Title V permit should be revised as indicated to specifically allow the AMP once it is approved.
5	S36, S461	Table IV-A.24 (p.87), Table IV-A.35 (p.115), Table VII-A.24 (p.374), and Table VII-A.35 (p.396),	Add an explicit option to use an approved Alternative Monitoring Plan ("AMP") for monitoring the H2S content of fuel gas. Specifically: • In each of Tables IV-A.24 (p.87) and IV-A.35 (p.116), insert a new row after 60.105(a)(4) in the NSPS Subpart J section that lists an applicable requirement as "60.13(i)" and description as "alternative monitoring plan for fuel gas H2S concentration" • In each of Tables VII-A.24 (p.374) and VII-A.35 (p.396), add the phrase "or approved alternative monitoring plan under 40 CFR § 60.13(i)" to the monitoring requirement citation column for the H2S limit. ConocoPhillips applied to U.S. EPA for approval of an AMP and is still waiting for EPA's response. The permit changes requested here will explicitly allow ConocoPhillips to rely on EPA's approval once it is issued.

6	S195, S196, S388, S433, and Tanks 235, 236, and 237	IV-BB.1, IV-BB.5, IV-BB.27, IV-BB.28, VII-BB.1, VII-BB.5, VII-BB.27, and VII-BB.29	Fix mistakes in the permit by changing the applicable requirements for these tanks to reflect the proper applicability of Regulation 8-8 and NSPS Subpart QQQ. Specifically, the citations of BAAQMD Rule 8-8-304 should be changed to BAAQMD Rule 8-8-305 and the references to 40 CFR Part 60, Subpart QQQ should be removed in order to reflect the proper classification of these tanks under Rule 8-8 and Subpart QQQ. ConocoPhillips previously provided this comment to the District in its May 24, 2005, comments on draft Revision 2 of the Title V permit and other prior occasions. A copy of the May 24, 2005 comments, which provide more detail on the specific changes to be made, is attached as Attachment C. This comment is also one of the issues for which ConocoPhillips has filed an appeal of the Title V permit.
7	Cooling Towers: S453, S454.	Table II-A (p.14)	Change the capacity listed for S453 and S454 from the current capacity to a combined capacity, since U236 and U238 share a common cooling tower. In particular change the "Capacity" column for these two sources to "13,500 gpm (combined rate for S453 and S454)." (Note that his combined capacity was represented in the original permit application submitted to J. Elliot on July 6, 2004, and was described further in a January 13, 2005 email to B. Cabral from J. Ahlskog.)
8	Various Cooling Towers: S452 (U230); S453 (U236); S454 (U238); S455 (U240); S457 (U228); S458 (U200); S500 (U220/250)	Section VI, Permit Condition 22121 (pp.330 to 331)	<u>Permit Condition 22121, Part 2</u> Revise the proposed condition to allow oxidation reduction potential ("ORP") monitoring at cooling towers instead of chlorine monitoring. Specifically, revise part 2 of condition 22121 to add the following sentence: "As an alternative, continuous ORP monitoring may be used in lieu of twice daily chlorine sampling." ORP monitoring is equivalent to chlorine monitoring. ORP monitoring is continuous on-line direct measurement of oxidizing potential in cooling water. Although ORP is not a direct measurement of chlorine concentration in water, it is an indicator of the effectiveness of chlorine as an oxidizer. The amount of chlorine residual in the water and the ORP are proportional. ORP monitoring is used to determine whether bleach should be added to the cooling water. Introduction of VOCs into cooling water that causes an increase in chlorine demand will change the chlorine residual concentration and the measured ORP value. (Note: This comment was also included in ConocoPhillips' 5/24/05 comments on the draft of Revision 2 of the Title V permit, which are attached at Attachment C.) <u>Permit Condition 22121, Part 4</u> Add the following sentence to the end of Part 4: "COP shall submit a proposal to BAAQMD with the proposed analytical method within 90 days of issuance of this permit

			revision." BAAQMD's proposed condition does not specify the precise TDS laboratory analysis to be used. ConocoPhillips primarily uses conductivity measurement to estimate TDS. There is a well known, standard correlation between TDS and conductivity. Thus, COP believes it is appropriate that a proposal be provided to BAAQMD that describes the correlation and requests approval for the conductivity method. <u>Permit Condition 22121, Part 6</u> Delete the last two sentences of Part 6, because they do not accurately reflect BAAQMD rules. VOC emissions caused by an episodic event such as a leak would not trigger permitting requirements. <u>Permit Condition 22121, Part 8</u> Delete Subpart 8.a. Resources would be better used by conducting the inspection and others rather than recording that the inspection was done. Instead, a log should be created in which the operator records any unusual findings, such as indication of hydrocarbon as listed in Subpart 8e After subpart 8.b, add the following: "or records of ORP monitoring."
9	S456	Permit Condition 22122 (p.331)	<u>Permit Condition 22122, Part 2</u> Add the following sentence to the end of Part 2: "COP shall submit a proposal to BAAQMD with the proposed analytical method within 90 days of issuance of this permit revision." BAAQMD's proposed condition does not specify the precise TDS laboratory analysis to be used. ConocoPhillips primarily uses conductivity measurement to estimate TDS. There is a well known, standard correlation between TDS and conductivity. Thus, COP believes it is appropriate that a proposal be provided to BAAQMD that describes the correlation and requests approval for the conductivity method. <u>Permit Condition 22122, Part 4</u> Delete the last two sentences of Part 4, because they do not accurately reflect BAAQMD rules. VOC emissions caused by an episodic event such as a leak would not trigger permitting requirements.

10	S456	Table IV-CC (p.287); Table VII-CC.2 (p.475)	Delete all requirements based on Regulation 8-2. BAAQMD has determined that this requirement does not apply to cooling towers but has inadvertently left the requirement in the permit for this one cooling tower.
11	Sulfur Plants and Sulfur Pits: S301, S302, and S303; S1001, S1002, S1003	Table II-A (pp.11 and 14); Section VI, Permit Condition 20989 (pp. 324 and 325).	In Table II-A, change the throughput limit to 271 long ton/day (combined capacity for S-301, 302, and 303 and also for S-1001, 1002, and 1003). In condition 20989, change the annual throughput limit to 98,915 long tons and remove the asterisks (since these sources are no longer grandfathered). In both cases, the Title V permit already indicates that these new limits become effective after execution of A/C 5814. This A/C has been executed so the throughputs should be updated and the grandfathered status (i.e., the asterisks) removed.
12	Marine Terminal: S425, S426	Table VII-S (p.410)	Delete the throughput limit of 2.8 E6 bbl/yr because it is a clerical error. This limit refers to condition 20989, Part A as the source, but Condition 20989 does not contain this limit for S425 and S426. Condition 20989 does contain this limit for S-432, which is right below S-425 and S-426 in Condition 20989, so the limit on S425 and S426 is purely a clerical error.

Attachment A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA, STATE OF ILLINOIS, STATE OF LOUISIANA, STATE OF NEW JERSEY, COMMONWEALTH OF PENNSYLVANIA, NORTHWEST CLEAN AIR AGENCY, Plaintiffs, v. CONOCOPHILLIPS COMPANY, Defendant.	H-05-0258 CIVIL ACTION NO. _____ JUDGE

CONSENT DECREE

monitoring requirements for sulfuric acid plants will satisfy the notice requirements of 40 C.F.R. § 60.7(a) and the initial performance test requirement of 40 C.F.R. § 60.8(a).

J. NSPS Applicability of Flaring Devices

138. NSPS Applicability of Flaring Devices. COPC owns and operates the Flaring Devices that are identified in Appendix A. These Flaring Devices are or will become affected facilities as that term is used in the NSPS at such time as COPC certifies compliance and accepts NSPS applicability under Paragraphs 142 - 143.

139. Compliance Methods for Flaring Devices. For each Flaring Device, COPC will elect to use one or any combination of following compliance methods:

(a) Operate and maintain a flare gas recovery system to control continuous or routine combustion in the Flaring Device. Use of a flare gas recovery system on a flare obviates the need to continuously monitor and maintain records of hydrogen sulfide in the gas as otherwise required by 40 C.F.R. §§ 60.105(a)(4) and 60.7;

(b) Operate the Flaring Device as a fuel gas combustion device and comply with NSPS monitoring requirements by use of a CEMS pursuant to 40 C.F.R. § 60.105(a)(4) or with a predictive monitoring system approved by EPA as an alternative monitoring system pursuant to 40 C.F.R. § 60.13(i);

(c) Eliminate the routes of continuous or intermittent, routinely-generated fuel gases to a Flaring Device and operate the Flaring Device such that it receives only process upset gases, fuel gas released as a result of relief valve leakage or gases released due to other emergency malfunctions; or

(d) Eliminate to the extent practicable routes of continuous or intermittent, routinely-generated fuel gases to a Flaring Device and monitor the Flaring Device by use of a CEMS and a flow meter; provided however, that this compliance method may not be used unless COPC: (i) demonstrates to EPA that the Flaring Device in question emits less than 500 pounds per day of SO_2 under normal conditions; (ii) secures EPA approval for use of this method as the selected compliance method; and (iii) uses this compliance method for five or fewer of the Flaring Devices listed in Appendix A.

140. For the compliance method described in Paragraph 139(b), to the extent that COPC seeks to use an alternative monitoring method at a particular Flaring Device to

demonstrate compliance with the limits at 40 C.F.R. § 60.104(a)(1), COPC may begin to use the method immediately upon submitting the application for approval to use the method, provided that the alternative method for which approval is being sought is the same as or is substantially similar to the method identified as the "Alternative Monitoring Plan for NSPS Subpart J Refinery Fuel Gas" attached to EPA's December 2, 1999, letter to Koch Refining Company LP.

141. Compliance Plan for Flaring Devices (Paragraphs 141 - 142). For each Covered Refinery, COPC will submit a Compliance Plan for Flaring Devices to EPA and the Applicable Co-Plaintiff by no later than December 31, 2007. The Plan will have the objective of reducing to the extent practicable: (i) the routing of continuous or intermittent, routinely-generated fuel gas streams that contain hydrogen sulfide of greater than 230 mg/dscm (0.10 gr/dscf) to Flaring Devices; and (ii) the characterization of streams that COPC considers to be the result of alleged malfunctions, process upsets, and/or relief valve leakage by taking into consideration the source and frequency of the stream.

142. In each Refinery's Compliance Plan for Flaring Devices, COPC will:

(a) Certify compliance with one of the four compliance methods set forth in Paragraph 139 and accept NSPS applicability for at least (i) 50% of the system-wide Flaring Devices identified in Appendix A; and (ii) one Flaring Device per Refinery where such Refinery has three or more Flaring Devices;

(b) Identify the Paragraph 139 compliance method used for each Flaring Device that COPC identifies under Subparagraph 142(a);

(c) Describe the activities that COPC has taken or anticipates taking, together with a schedule, to meet the objectives of Paragraph 141 at each Refinery; and

(d) Describe the anticipated compliance method and schedule that COPC will undertake for the remaining Flaring Devices identified in Appendix A.

143. By no later than December 31, 2011, COPC will certify compliance to EPA and the Applicable Co-Plaintiff with one of the four compliance methods in Paragraph 139 and will accept NSPS applicability for all of the Flaring Devices in Appendix A.

144. Performance Tests. By no later than ninety (90) days after bringing a Flaring Device into compliance by using one or more of the methods in Paragraph 139, COPC will conduct a flare performance test pursuant to 40 C.F.R. §§ 60.8 and 60.18, or an EPA-approved equivalent method. In lieu of conducting the velocity test required in 40 C.F.R. § 60.18, COPC may submit velocity calculations that demonstrate that the Flaring Device meets the performance specification required by 40 C.F.R. § 60.18.

145. The combustion in a Flaring Device of process upset gases or fuel gas that is released to the Flaring Device as a result of relief valve leakage or other emergency malfunctions is exempt from the requirement to comply with 40 C.F.R. § 60.104(a)(1).

146. Good Air Pollution Control Practices. On and after the Date of Entry of this Decree, COPC, at all times, including during periods of startup, shutdown, and or Malfunction, will, to the extent practicable, maintain and operate the Flaring Devices in Appendix A, and associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions pursuant to 40 C.F.R. § 60.11(d).

147. Compliance with Consent Decree Constitutes Compliance with Certain NSPS Subpart A Requirements. For Flaring Devices that become affected facilities under NSPS Subpart J pursuant to Paragraphs 142 and 143, entry of this Consent Decree and compliance with the relevant monitoring requirements of this Consent Decree for Flaring Devices will satisfy the notice requirements of 40 C.F.R. § 60.7(a) and the initial performance test requirement of 40 C.F.R. § 60.8(a).

148. Periodic Maintenance of Flare Gas Recovery Systems. The Parties recognize that periodic maintenance may be required for properly designed and operated flare gas recovery systems. To the extent that COPC currently operates or will operate flare gas recovery systems, COPC will take all reasonable measures to minimize emissions while such periodic maintenance is being performed.

149. Safe Operation of Refining Processes. The Parties recognize that under certain conditions, a flare gas recovery system may need to be bypassed in the event of an emergency or in order to ensure safe operation of refinery processes. Nothing in this Consent Decree precludes COPC from temporarily bypassing a flare gas recovery system under such circumstances.

K. CERCLA/EPCRA

150. To the extent that, during the course of COPC's development of the Compliance Plans for Flaring Devices required by Paragraph 141, COPC discovers information possibly demonstrating a failure by COPC to comply with the reporting requirements for continuous releases of SO_2 pursuant to Section 103(c) of CERCLA and/or Section 304 of EPCRA, including the regulations promulgated thereunder, a voluntary disclosure by COPC of any such violations will not be deemed "untimely" under EPA's Audit Policy or any Co-Plaintiff's audit policy, solely on the ground that it is submitted more than twenty-one (21) days after it is discovered, provided all such disclosures are made by no later than December 31, 2007 (the due date for the Compliance Plans for Flaring Devices).

Attachment B

OFFICE MEMORANDUM

December 15, 1998

TO: ALL DIVISION PERSONNEL

FROM: DIRECTOR, COMPLIANCE AND ENFORCEMENT

SUBJECT: **AVERAGING PERIOD FOR EXCESS EMISSIONS FROM SOURCES SUBJECT TO REGULATION 9, RULE 9**

Effective immediately, the Compliance and Enforcement Division will refrain from issuing a Notice of Violation for excess emissions indicated by the one-hour averaging standard contained in Regulation 9, Rule 9. Staff has reviewed this matter and determined that a three-hour averaging time would be more appropriate to these sources. Permit Services Division staff will commence a review of the rule to amend language to reflect this change. Many source permits already contain conditions reflecting this change.

In the interim, until the rule is modified and adopted by the Board of Directors, I will hold in abeyance, all violations reported to the Division by Source Test Section of the Technical Services Division unless they indicate the source did exceed the limit when averaged for three hours.

Technical Services Division has agreed to provide this additional information. Questions in this matter may be referred to the Director, Compliance and Enforcement Division.

If permit conditions call for 3 hours, go with 3 hours.
If no condition, follow the M.O.P. (1 hours)

Attachment C

San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572-1354
phone 510.799.4411
fax 510.245.4476

ConocoPhillips

May 24, 2005

ESDR-300-05
CP 05-A-01-C

CERTIFIED MAIL – 7004 2510 0006 0775 3119

Ms. Brenda Cabral
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: **ConocoPhillips**
San Francisco Refinery – Plant No. A0016
Comments on Revision 2 of Title V Permit

Dear Ms Cabral:

ConocoPhillips has reviewed the proposed revisions dated April 14, 2005 to the Major Facility Review ("Title V") Permit for its San Francisco Refinery.

BAAQMD is proposing Condition 22121 to monitor chlorine residual in cooling towers (BAAQMD sources 452, 455, 457, 458, and 500). We believe that oxidation reduction potential (ORP) monitoring is equivalent monitoring to chlorine monitoring.

ORP monitoring is a continuous on-line direct measurement of oxidizing potential in cooling water. Although ORP is not a direct measurement of chlorine concentration in water, it is an indicator of the effectiveness of chlorine as an oxidizer. The amount of chlorine residual in the water and the ORP are proportional. ORP monitoring is used to determine whether bleach should be added to the cooling water. Introduction of VOCs into cooling water that causes an increase in chlorine demand will change the chlorine residual concentration and the measured ORP value.

ConocoPhillips requests the proposed permit language for Condition 22121 to be revised as follows:

> *2. The owner/operator shall take a sample of the cooing tower water every shift (twice per day) at each cooling tower above and analyze for chlorine content as an indicator of hydrocarbon leakage into the cooling water.* ***As an alternative, continuous ORP monitoring may be used in lieu of twice daily chlorine sampling.*** *(Regulation 2-6-503)*

On June 8, 2004, a request for permit revisions to the Title V permit were requested for BAAQMD 8-8 and 40 CFR Subpart QQQ applicability on storage tanks. This request has not yet been addressed. We are resubmitting this request as an attachment.

If you have any questions, or require additional information, please contact Ms. Valerie Uyeda at (510) 245-5249.

Sincerely,

Philip C. Stern
Environmental Superintendent

Attachment

ConocoPhillips

San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572-1354
phone 510.799.4411
fax 510.245.4476

June 8, 2004

ESDR-233-04
05-A-01-C

VIA E MAIL

Mr. Steve Hill
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: Title V Permit Corrections

Dear Mr. Hill:

ConocoPhillips Company requests that the attached changes for storage tanks be made either by administrative amendment to the current Title V permit ("TV permit") or in Revision 1 of the TV permit for its San Francisco Refinery (Plant #A0016).

We recently reviewed the applicability of BAAQMD 8-8 and 40 CFR Subpart QQQ and discovered that some storage tanks had the wrong applicability listed in the permit. We have summarized the changes in Attachment 1. Attachment 2 contains revised Table IV's and Attachment 3 contains revised Table VII's based on the Draft Revision 1 of the TV permit.

If you have any questions or need further clarifications, please contact Ms. Valerie Uyeda at (510) 245-5249.

Sincerely,

Philip C. Stern
Environmental Superintendent

Attachments

cc: Julian Elliot, BAAQMD Permit Engineer

Attachment 1
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016)
Title V Permit for BAAQMD 8-8 and 40 CFR Subpart QQQ

Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
1	S-195 (Tank 501)	IV-B5	Regulation Title or Description of Requirement	173	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Tank is not a sludge-dewatering unit. Tank receives API bottoms (sludge) and Dissolved Air Floatation Unit flocculant, which falls within the definition of oil-water separator slop oil per 8-8-205. Tank should be classified as a slop oil vessel per BAAQMD 8-8-213. The standard at 8-8-305 applies.
2	S-195 (Tank 501)	IV-B5	Regulation Title or Description of Requirement	174-175	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Tank receives API bottoms (sludge) and Dissolved Air Floatation Unit flocculant. Tank does not receive floating oil or solids that accumulate on the surface of the API separator. Since tank does not receive slop oil as defined at 40 CFR 60.691 QQQ does not apply.
3	S-195 (Tank 501)	VII-B5	Monitoring Requirement Citation	415	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
4	S-195 (Tank 501)	VII-B5	Monitoring Requirement Citation	415	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.
5	S-196 (Tank 502)	IV-B5	Regulation Title or Description of Requirement	173	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
6	S-196 (Tank 502)	IV-B5	Regulation Title or Description of Requirement	174-175	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.

Attachment 1
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016)
Title V Permit for BAAQMD 8-8 and 40 CFR Subpart QQQ

Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
7	S-196 (Tank 502)	VII-B5	Monitoring Requirement Citation	415	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
8	S-196 (Tank 502)	VII-B5	Monitoring Requirement Citation	415	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.
9	S-388 (Tank 276)	IV-B5	Regulation Title or Description of Requirement	173	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
10	S-388 (Tank 276)	IV-B5	Regulation Title or Description of Requirement	174-175	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.
11	S-388 (Tank 276)	VII-B5	Monitoring Requirement Citation	415	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
12	S-388 (Tank 276)	VII-B5	Monitoring Requirement Citation	415	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.
13	S-433 (MOSC Tank)	IV-B1	Regulation Title or Description of Requirement	168	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
14	S-433 (MOSC Tank)	IV-B1	Regulation Title or Description of Requirement	169-170	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.

Attachment 1
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016)
Title V Permit for BAAQMD 8-8 and 40 CFR Subpart QQQ

Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
15	S-433 (MOSC Tank)	VII-B1	Monitoring Requirement Citation	411	Delete BAAQMD 8-8-304 and add BAAQMD 8-8-305 applicability. Same as Comment 1.
16	S-433 (MOSC Tank)	VII-B1	Monitoring Requirement Citation	411	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Same as Comment 2.
17	No source number - Tank 235	IV-B27	Regulation Title or Description of Requirement	269-270	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Tank receives treated water and does not receive oily wastewater as defined at 40 CFR 60.691; therefore, QQQ does not apply.
18	No source number - Tank 235	VII-B27	Monitoring Requirement Citation	455-456	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. See Comment 17.
19	No source number - Tank 236	IV-B27	Regulation Title or Description of Requirement	269-270	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. See Comment 17.
20	No source number - Tank 236	VII-B27	Monitoring Requirement Citation	455-456	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. See Comment 17.
21	No source number - Tank 237	IV-B28	Regulation Title or Description of Requirement	271	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. Tank is out of service and does not receive oily wastewater as defined at 40 CFR 60.691; therefore, QQQ does not apply.
22	No source number - Tank 237	VII-B28	Regulation Title or Description of Requirement	456-457	Delete NSPS Title 40 Part 60 Subpart QQQ applicability. See Comment 21.

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table IV – B1
Source-Specific Applicable Requirements
NSPS Kb Low Vapor Pressure Permitted Wastewater Sludge Tank: with Vapor Recovery to Fuel Gas
S-433 (F224-MOSC)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date	
BAAQMD - Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (11/27/02) EXEMPT**			
8-5-117	Exemption, Low Vapor Pressure	Y		
BAAQMD - Regulation 8, Rule 8	**Organic Compounds, Wastewater (Oil-Water Separators) (6/15/1994) REQUIREMENTS FOR SLUDGE DEWATERING UNITS**			
8-8-113	Exemption, Secondary Wastewater Treatment Processes and Stormwater Sewer Systems (segregated) are exempt from 8-8-301, 8-8-302, 8-8-306, 8-8-308	Y		
8-8-303	Standards: Gauging and Sampling Devices	Y		
~~8-8-304~~	~~Standards: Sludge dewatering Unit~~	~~Y~~		
8-8-304	Standards: Slop Oil Vessels	Y		
8-8-504	Monitoring and Records: Portable Hydrocarbon Detector	Y		
8-8-602	Manual of Procedures: Determination of Emissions	Y		
8-8-603	Manual of Procedures: Inspection Procedures	Y		
NESHAPS Title 40 Part 63 Subpart CC	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refining (8/18/95) REQUIREMENTS FOR EMISSION POINTS ROUTED TO FUEL GAS**			
40 CFR 63.640(c)(2)	Applicability and Designation of Storage Vessels	Y		
40 CFR 63.640(d)(5)	Exemption for emission points routed to fuel gas system	Y		
~~**NSPS Title 40 Part 60 Subpart QQQ**~~	~~**NSPS Subpart QQQ VOC Emissions from Petroleum Refinery Wastewater Systems REQUIREMENTS FOR FIXED ROOF TANKS ROUTED TO FUEL GAS**~~			
~~40 CFR 60.690(a)(1)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.690(a)(3)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.691~~	~~Definitions: Closed Vent System: If gas or vapor from regulated equipment are routed to a process (e.g., petroleum refinery fuel gas system), the process shall not be considered a closed vent system and is not subject to the closed vent system standards.~~	~~Y~~		
~~40 CFR 60.692-1~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(a)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(b)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-3~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(1)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table IV – B1
Source-Specific Applicable Requirements
NSPS Kb Low Vapor Pressure Permitted Wastewater Sludge Tank: with Vapor Recovery to Fuel Gas
S-433 (F224-MOSC)

~~40 CFR 60.692-3(a)(2)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	¥		
~~40 CFR 60.692-3(a)(3)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	¥		
~~40 CFR 60.692-3(a)(4)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	¥		
~~40 CFR 60.692-3(a)(5)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	¥		
~~40 CFR 60.692-3(f)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	¥		
~~40 CFR 60.692-6~~	~~Standards: Delay of Repair~~	¥		
~~40 CFR 60.692-6(a)~~	~~Standards: Delay of Repair~~	¥		
~~40 CFR 60.692-6(b)~~	~~Standards: Delay of Repair~~	¥		
~~40 CFR 60.697~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(a)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(e)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(e)(1)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(e)(2)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(e)(3)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(e)(4)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(f)(1)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.697(f)(2)~~	~~Recordkeeping Requirements~~	¥		
~~40 CFR 60.698(c)~~	~~Reporting Requirements~~	¥		
NSPS Title 40 Part 60 Subpart Kb	**NSPS Subpart Kb for Tanks (12/14/2000) REQUIREMENTS FOR RECORDKEEPING ONLY**			
40 CFR 60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984	Y		
40 CFR 60.110b(c)	Applicability and Designation of Affected Facility; Exemptions for storage vessels > or = to 75 cu m	Y		
40 CFR 60.116b(a)	Monitoring of Operations; Record retention	Y		
40 CFR 60.116b(b)	Monitoring of Operations; Permanent record requirements	Y		
40 CFR 60.116b(e)	Monitoring of Operations; Determine TVP	Y		
40 CFR 60.116b(e)(3)	Monitoring of Operations; Determine TVP-other liquids	Y		
40 CFR 60.116b(f)	Monitoring of Operations; Waste storage tanks (indeterminate or variable composition)	Y		
40 CFR 60.116b(g)	Monitoring of Operations; Exemption from 40 CFR 60.116b(c) and 40 CFR 60.116b(d) for tanks with closed vent system and control device	Y		

Attachment 2

Correction to ConocoPhillips San Francisco Refinery Plant A0016 Title V Permit for BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table IV – B1

Source-Specific Applicable Requirements

NSPS K/Ke Low Vapor Pressure Permitted Wastewater Sludge Tank with Vapor Recovery to Fuel Gas

S-433 (F224-MOSC)

BAAQMD Condition 7353	APPLICABLE TO S-433
BAAQMD Condition 20773	

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table IV – B5
Source-Specific Applicable Requirements
NSPS Kb Low Vapor Pressure Permitted Fixed Roof Wastewater Sludge Tanks
S-195 (Tank 501), S-196 (Tank 502), S-388 (Tank 276/F205)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date	
BAAQMD - Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (11/27/02) EXEMPT**			
8-5-117	Exemption, Low Vapor Pressure	Y		
BAAQMD - Regulation 8, Rule 8	**Organic Compounds, Wastewater (Oil-Water Separators) (6/15/1994) REQUIREMENTS FOR SLUDGE DEWATERING UNITS**			
8-8-113	Exemption, Secondary Wastewater Treatment Processes and Stormwater Sewer Systems (segregated) are exempt from 8-8-301, 8-8-302, 8-8-306, 8-8-308	Y		
8-8-303	Standards: Gauging and Sampling Devices	Y		
~~8-8-304~~	~~Standards: Sludge dewatering Unit~~	~~Y~~		
~~8-8-305~~	~~Standards: Slop Oil Vessels~~			
8-8-504	Monitoring and Records: Portable Hydrocarbon Detector	Y		
8-8-602	Manual of Procedures: Determination of Emissions	Y		
8-8-603	Manual of Procedures: Inspection Procedures	Y		
NESHAPS Title 40 Part 63 Subpart CC	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refining (8/18/95) REQUIREMENTS FOR TANKS ALSO SUBJECT TO NSPS Kb**			
40 CFR 63.640(c)(2)	Applicability and Designation of Storage Vessels	Y		
40 CFR 63.640(n)(1)	Applicability and Designation of Affected Source Overlap for Storage Vessels--Existing Group 1 or Group 2 also subject to Kb only subject to Kb and 63.640(n)(8).	Y		
40 CFR 63.640(n)(8)	Applicability and Designation of Affected Source Overlap for Storage Vessels--Additional requirements for Kb storage vessels	Y		
NSPS Title 40 Part 60 Subpart Kb	**NSPS Subpart Kb for Tanks (12/14/2000) REQUIREMENTS FOR RECORDKEEPING ONLY**			
40 CFR 60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984	Y		
40 CFR 60.110b(c)	Applicability and Designation of Affected Facility; Exemptions for storage vessels > or = to 75 cu m	Y		
40 CFR 60.116b(a)	Monitoring of Operations; Record retention	Y		
40 CFR 60.116b(b)	Monitoring of Operations; Permanent record requirements	Y		
40 CFR 60.116b(d)	Monitoring of Operations; 30-day notification for TVP exceedances	Y		
40 CFR 60.116b(e)	Monitoring of Operations; Determine TVP	Y		
40 CFR 60.116b(e)(3)	Monitoring of Operations; Determine TVP-other liquids	Y		
40 CFR 60.116b(f)	Monitoring of Operations; Waste storage tanks (indeterminate or variable composition)	Y		
~~NSPS Title 40 Part 60 Subpart QQQ~~	~~NSPS Subpart QQQ VOC Emissions from Petroleum Refinery Wastewater Systems REQUIREMENTS FOR STORAGE VESSELS NOT SUBJECT TO NSPS Kb CONTROL REQUIREMENTS (60.112b)~~			
~~40 CFR 60.690(a)(1)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.690(a)(2)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table IV – B5
Source-Specific Applicable Requirements
NSPS Kb Low Vapor Pressure Permitted Fixed Roof Wastewater Sludge Tanks
S-195 (Tank 501), S-196 (Tank 502), S-388 (Tank 276/F205)

~~40 CFR 60.692-1~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(a)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(b)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-3~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(1)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(2)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(3)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(4)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(5)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(f)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-6~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.692-6(a)~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.692-6(b)~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.697~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(a)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(1)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(2)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(3)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(4)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(f)(1)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(f)(2)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.698(e)~~	~~Reporting Requirements~~	~~Y~~		
BAAQMD Condition 1860	**APPLICABLE TO S-388**			
Part 1	No detectable VOC emissions [Basis: Cumulative Increase]	Y		
Part 2	Requirement to vent to fuel gas recovery system [Basis: Cumulative Increase]	Y		
Part 3	Requirement to include S-388 in fugitive inspection program to verify compliance with Part 1 [Basis: Cumulative Increase]	Y		
BAAQMD Condition 20773				
Part 1	Requirement to verify exempt status of tank based on true vapor pressure of contents [Basis: Regulation 8-5-117, 2-6-409.2]	Y	4/1/04	
Part 2	Record retention requirement [Basis: Regulation 2-6-409.2]	Y	4/1/04	
BAAQMD Condition 20989, Part A	Throughput limits for sources S-195 [Basis: 2-1-234.3]	N		
BAAQMD Condition 20989, Part A	Throughput limits for source S-196, S-388 [Basis: 2-1-234.3]	Y		

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ
Table IV – B27
Source-Specific Applicable Requirements
NSPS Kb Exempt Fixed Roof Wastewater Tanks Vented to Fuel Gas
Tank 235, Tank 236

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date	
BAAQMD - Regulation 8, Rule 5	Organic Compounds, Storage of Organic Liquids (11/27/02) EXEMPT			
8-5-117	Exemption, Low Vapor Pressure	Y		
NESHAPS Title 40 Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants for Petroleum Refining (8/18/95) REQUIREMENTS FOR EMISSION POINTS ROUTED TO FUEL GAS			
40 CFR 63.640(c)(3)	Wastewater streams and treatment operations associated with petroleum refining process units meeting the criteria of section 63.640(a)	Y		
40 CFR 63.640(d)(5)	Exemption for emission points routed to fuel gas system	Y		
~~NSPS Title 40 Part 60 Subpart QQQ~~	~~NSPS Subpart QQQ VOC Emissions from Petroleum Refinery Wastewater Systems REQUIREMENTS FOR FIXED ROOF TANKS ROUTED TO FUEL GAS~~			
~~40 CFR 60.690(a)(1)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.690(a)(3)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.691~~	~~Definitions: Closed Vent System: If gas or vapor from regulated equipment are routed to a process (e.g., petroleum refinery fuel gas system), the process shall not be considered a closed vent system and is not subject to the closed vent system standards.~~	~~Y~~		
~~40 CFR 60.692-1~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(a)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(b)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-3~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(1)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(2)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(3)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(4)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(5)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(f)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-6~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.692-6(a)~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.692-6(b)~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.697~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(a)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(1)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(2)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(3)~~	~~Recordkeeping Requirements~~	~~Y~~		

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ
Table IV – B27
Source-Specific Applicable Requirements
NSPS Kb Exempt Fixed Roof Wastewater Tanks Vented to Fuel Gas
Tank 235, Tank 236

~~40 CFR 60.697(a)(4)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(f)(1)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(f)(2)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.698(e)~~	~~Reporting Requirements~~	~~Y~~		
NSPS Title 40 Part 60 Subpart Kb	**NSPS Subpart Kb for Tanks (12/14/2000) REQUIREMENTS FOR RECORDKEEPING ONLY**			
40 CFR 60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984	Y		
40 CFR 60.110b(c)	Applicability and Designation of Affected Facility; Exemptions for storage vessels > or = to 75 cu m	Y		
40 CFR 60.116b(a)	Monitoring of Operations; Record retention	Y		
40 CFR 60.116b(b)	Monitoring of Operations; Permanent record requirements	Y		
40 CFR 60.116b(e)	Monitoring of Operations; Determine TVP	Y		
40 CFR 60.116b(e)(3)	Monitoring of Operations; Determine TVP-other liquids	Y		
40 CFR 60.116b(f)	Monitoring of Operations; Waste storage tanks (indeterminate or variable composition)	Y		
40 CFR 60.116b(g)	Monitoring of Operations; Exemption from 40 CFR 60.116b(c) and 40 CFR 60.116b(d) for tanks with closed vent system and control device	Y		
BAAQMD Condition 20773				
Part 1	Requirement to verify exempt status of tank based on true vapor pressure of contents [Basis: Regulation 8-5-117, 2-6-409.2]	Y	4/1/04	
Part 2	Record retention requirement [Basis: Regulation 2-6-409.2]	Y	4/1/04	

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table IV – B28
Source-Specific Applicable Requirements
NSPS Kb Exempt Fixed Roof Wastewater Tank
Tank 237

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date	
BAAQMD - Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (11/27/02) EXEMPT**			
8-5-117	Exemption, Low Vapor Pressure	Y		
40 CFR 63 Subpart CC	**National Emission Standards for Hazardous Pollutants for Petroleum Refining (8/18/95) REQUIREMENTS FOR GROUP 2 WASTEWATER SOURCES**			
40 CFR 63.640(c)(3)	Wastewater streams and treatment operations associated with petroleum refining process units meeting the criteria of section 63.640(a)	Y		
40 CFR 63.641	Definitions: Group 1 and Group 2 Wastewater Streams	Y		
40 CFR 63.654(a)	Reporting and Recordkeeping Requirements: Wastewater – no reporting and recordkeeping requirements for wastewater except for Group 1 wastewater streams	Y		
~~**NSPS Title 40 Part 60 Subpart QQQ**~~	~~**NSPS Subpart QQQ VOC Emissions from Petroleum Refinery Wastewater Systems REQUIREMENTS FOR FIXED ROOF TANKS NOT ROUTED TO FUEL GAS**~~			
~~40 CFR 60.690(a)(1)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.690(a)(2)~~	~~Applicability and Designation of Affected Facility~~	~~Y~~		
~~40 CFR 60.692-1~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(a)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-1(b)~~	~~Standards: General~~	~~Y~~		
~~40 CFR 60.692-3~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(1)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-3(a)(2)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~**40 CFR 60.692-3(a)(3)**~~	~~**Standards: Oil-Water Separators (includes storage vessels)**~~	~~Y~~		
~~**40 CFR 60.692-3(a)(4)**~~	~~**Standards: Oil-Water Separators (includes storage vessels)**~~	~~Y~~		
~~**40 CFR 60.692-3(a)(5)**~~	~~**Standards: Oil-Water Separators (includes storage vessels)**~~	~~Y~~		
~~40 CFR 60.692-3(f)~~	~~Standards: Oil-Water Separators (includes storage vessels)~~	~~Y~~		
~~40 CFR 60.692-6~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.692-6(a)~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.692-6(b)~~	~~Standards: Delay of Repair~~	~~Y~~		
~~40 CFR 60.697~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(a)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(1)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(2)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(e)(3)~~	~~Recordkeeping Requirements~~	~~Y~~		

Attachment 2
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ
Table IV – B28
Source-Specific Applicable Requirements
NSPS Kb Exempt Fixed Roof Wastewater Tank
Tank 237

~~40 CFR 60.697(e)(4)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(f)(1)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.697(f)(2)~~	~~Recordkeeping Requirements~~	~~Y~~		
~~40 CFR 60.698(e)~~	~~Reporting Requirements~~	~~Y~~		
NSPS Title 40 Part 60 Subpart Kb	**NSPS Subpart Kb for Tanks (12/14/2000) REQUIREMENTS FOR RECORDKEEPING ONLY**			
40 CFR 60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984	Y		
40 CFR 60.110b(c)	Applicability and Designation of Affected Facility; Exemptions for storage vessels > or = to 75 cu m	Y		
40 CFR 60.116b(a)	Monitoring of Operations; Record retention	Y		
40 CFR 60.116b(b)	Monitoring of Operations; Permanent record requirements	Y		
40 CFR 60.116b(d)	Monitoring of Operations; 30-day notification for TVP exceedances	Y		
40 CFR 60.116b(e)	Monitoring of Operations; Determine TVP	Y		
40 CFR 60.116b(e)(3)	Monitoring of Operations; Determine TVP-other liquids	Y		
40 CFR 60.116b(f)	Monitoring of Operations; Waste storage tanks (indeterminate or variable composition)	Y		
BAAQMD Condition 20773				
Part 1	Requirement to verify exempt status of tank based on true vapor pressure of contents [Basis: Regulation 8-5-117, 2-6-409.2]	Y	4/1/04	
Part 2	Record retention requirement [Basis: Regulation 2-6-409.2]	Y	4/1/04	

Attachment 3
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table VII – B1
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Low Vapor Pressure Permitted Wastewater Sludge Tanks with Vapor Recovery to Fuel Gas
S-433 (F224 - MOSC)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-5 - Organic Compounds - STORAGE OF ORGANIC LIQUIDS						
	Exempt per 8-5-117. Low vapor pressure						
POC	8-5-117 & Condition 20773, Part 1	Y	4/1/04	Exemption from Regulation 8-5 when true vapor pressure is less than 25.8 mm Hg (0.5 psia).	2-6-409.2 & Condition 20773, Part 2	P/E	Vapor pressure determination upon material change
BAAQMD 8-8	**BAAQMD 8-8 – Organic Compounds – Wastewater (Oil Water Separators)**						
VOC	BAAQMD 8-8-303	Y		Vapor tight gauging and sampling devices	BAAQMD 8-8-504 8-8-603	N	Portable hydrocarbon detector
~~VOC~~	~~BAAQMD 8-8-304~~	~~Y~~		~~Combined collection/destruction efficiency of 95% by weight.~~	~~BAAQMD 8-8-602~~	~~N~~	~~Source test or EPA Method 25 or 25A~~
VOC	BAAQMD 8-8-305.1	Y		Slop oil tank vessel roof criteria; includes gap criteria	BAAQMD 8-8-305.1	Periodic initially & semi-annually	Visual inspection
NONE	**40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries**						
	Exempt per 63.640(d)(5). Emission point routed to fuel gas system.						
NSPS QQQ	**40 CFR 60 Subpart QQQ – VOC Emissions from Petroleum Refinery Wastewater Systems**						
~~VOC~~	~~40 CFR 60.692-3(a)~~	~~Y~~		~~Fixed roof closure standards~~	~~40 CFR 60.692-3(a)(4)~~	~~periodic initially and semi-annually~~	~~Visual inspection~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.697(c)~~	~~periodic when problem is identified~~	~~Records~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.698(c)~~	~~periodic initially and semi-annually~~	~~Report~~
NSPS Kb	**40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels**						
	MONITORING FOR RECORDKEEPING ONLY						

Attachment 3
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table VII – B1
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Low Vapor Pressure Permitted Wastewater Sludge Tanks with Vapor Recovery to Fuel Gas
S-433 (F224 - MOSC)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	40 CFR 60.110b(c)	Y		True vapor pressure less than 3.5 kPa.	40 CFR 60.116b (b)	~~periodic~~ initially and upon change of service	Record
BAAQMD Permit	**PERMIT CONDITIONS**						
throughput	BAAQMD Condition 7353, Part 4	Y		138,700 bbl/yr	BAAQMD Condition 7353, Part 5	P/W	records

Attachment 3
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table VII – B5
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Low Vapor Pressure Permitted Wastewater Sludge Tanks
S-195 (Tank 501), S-196 (Tank 502), S-388 (Tank 276/F205)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-5 - Organic Compounds - STORAGE OF ORGANIC LIQUIDS						
	Exempt per 8-5-117. Low vapor pressure						
POC	8-5-117 & Condition 20773, Part 1	Y	4/1/04	Exemption from Regulation 8-5 when true vapor pressure is less than 25.8 mm Hg (0.5 psia).	2-6-409.2 & Condition 20773, Part 2	P/E	Vapor pressure determination upon material change
BAAQMD 8-8	**BAAQMD 8-8 – Organic Compounds – Wastewater (Oil Water Separators)**						
VOC	BAAQMD 8-8-303	Y		Vapor tight gauging and sampling devices	BAAQMD 8-8-504 8-8-603	N	Portable hydrocarbon detector
~~VOC~~	~~BAAQMD 8-8-304~~	~~Y~~		~~Combined collection/destruction efficiency of 95% by weight.~~	~~BAAQMD 8-8-602~~	~~N~~	~~Source test or EPA Method 25 or 25A~~
VOC	BAAQMD 8-8-305.1	Y		Slop oil tank vessel roof criteria; includes gap criteria	BAAQMD 8-8-305.1	Periodic initially & semi-annually	Visual inspection
NESHAPS CC and NSPS Kb	**40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries** **40 CFR 60 Subpart Kb - NSPS for VOL Storage Vessels at Petroleum Refineries** **RECORDKEEPING ONLY**						
Vapor pressure	40 CFR 63.640(n)(1) 60.110b(c)	Y		True vapor pressure less than 3.5 kPa.	40 CFR 63.640(n)(8) 60.116b(b)	P/E	Record
Vapor pressure		Y		TVP exceedances (> 5.2 kPa).	40 CFR 63.640(n)(8) 60.116b(d)	periodic within 30 days of exceedance	Notification
~~NSPS QQQ~~	~~40 CFR 60 Subpart QQQ – VOC Emissions from Petroleum Refinery Wastewater Systems~~						
~~VOC~~	~~40 CFR 60.692-3(a)~~	~~Y~~		~~Fixed roof closure standards~~	~~40 CFR 60.692-3(a)(4)~~	~~periodic initially and semi-annually~~	~~Visual inspection~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.697(c)~~	~~periodic when problem is identified~~	~~Records~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.698(c)~~	~~periodic initially and semi-annually~~	~~Report~~

Attachment 3
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table VII – B5
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Low Vapor Pressure Permitted Wastewater Sludge Tanks
S-195 (Tank 501), S-196 (Tank 502), S-388 (Tank 276/F205)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
BAAQMD Permit	PERMIT CONDITIONS						
Condition 1860 applies to S-388 only							
VOC	BAAQMD Condition 1860, Part 1	Y		fugitive emissions (300 ppm as methane above background)	BAAQMD Condition 1860, Part 3	periodic as required by BAAQMD Regulation 8, Rule 18	VOC monitor
throughput	BAAQMD Condition 20989, Part A	N		S-195: 5.0 E 4 bbl/yr	BAAQMD Condition 20989, Part A	P/M	Records
throughput	BAAQMD Condition 20989, Part A	Y		S-196: 5.0 E 4 bbl/yr S-388: 153,300 ton/yr	BAAQMD Condition 20989, Part A	P/M	Records

Attachment 3
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for
BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table VII – B27
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Exempt Fixed Roof Wastewater Tanks Vented to Fuel Gas
Tank 235, Tank 236

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-5 - Organic Compounds - STORAGE OF ORGANIC LIQUIDS Exempt per 8-5-117. Low vapor pressure						
POC	8-5-117 & Condition 20773, Part 1	Y	4/1/04	Exemption from Regulation 8-5 when true vapor pressure is less than 25.8 mm Hg (0.5 psia).	2-6-409.2 & Condition 20773, Part 2	P/E	Vapor pressure determination upon material change
NONE	**40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries** Exempt per 63.640(d)(5). Emission point routed to fuel gas system.						
NSPS Kb	**40 CFR 60 Subpart Kb - NSPS for VOL Storage Vessels at Petroleum Refineries** RECORDKEEPING ONLY						
Vapor pressure	40 CFR 60.110b(c)	Y		True vapor pressure less than 3.5 kPa.	40 CFR 60.116b(b)	P/E	Record
~~NSPS QQQ~~	~~40 CFR 60 Subpart QQQ – VOC Emissions from Petroleum Refinery Wastewater Systems~~						
~~VOC~~	~~40 CFR 60.692-3(a)~~	~~Y~~		~~Fixed roof closure standards~~	~~40 CFR 60.692-3(a)(4)~~	~~periodic initially and semi-annually~~	~~Visual inspection~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.697(c)~~	~~periodic when problem is identified~~	~~Records~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.698(c)~~	~~periodic initially and semi-annually~~	~~Report~~

Attachment 3
Corrections to ConocoPhillips San Francisco Refinery (Plant A0016) Title V Permit for BAAQMD 8-8 and 40 CFR 60 Subpart QQQ

Table VII – B28
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Exempt Fixed Roof Wastewater Tank
Tank 237

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-5 - Organic Compounds - STORAGE OF ORGANIC LIQUIDS Exempt per 8-5-117. Low vapor pressure						
POC	8-5-117 & Condition 20773, Part 1	Y	4/1/04	Exemption from Regulation 8-5 when true vapor pressure is less than 25.8 mm Hg (0.5 psia).	2-6-409.2 & Condition 20773, Part 2	P/E	Vapor pressure determination upon material change
NONE	40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries NO MONITORING REQUIREMENTS FOR GROUP 2 WASTEWATER SOURCES						
NSPS Kb	40 CFR 60 Subpart Kb - NSPS for VOL Storage Vessels at Petroleum Refineries RECORDKEEPING ONLY						
Vapor pressure	40 CFR 60.110b(c)	Y		True vapor pressure less than 3.5 kPa.	40 CFR 60.116b(b)	P/E	Record
Vapor pressure		Y		TVP exceedances (> 5.2 kPa).	40 CFR 60.116b(d)	periodic within 30 days of exceedance	Notification
~~NSPS QQQ~~	~~40 CFR 60 Subpart QQQ – VOC Emissions from Petroleum Refinery Wastewater Systems~~						
~~VOC~~	~~40 CFR 60.692-3(a)~~	~~Y~~		~~Fixed roof closure standards~~	~~40 CFR 60.692-3(a)(4)~~	~~periodic initially and semi-annually~~	~~Visual inspection~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.697(e)~~	~~periodic when problem is identified~~	~~Records~~
~~VOC~~		~~Y~~		~~Problems identified during 40 CFR 60.692-3(a) inspections that could result in VOC emissions~~	~~40 CFR 60.698(e)~~	~~periodic initially and semi-annually~~	~~Report~~