



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 9, 2018

Don Bristol
Director, Environmental Department
Phillips 66 San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572

RE: Approval of Regulation 12, Rule 15 Air Monitoring Plan (AMP)

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
(Chair)
Karen Mitchoff
Mark Ross

MARIN COUNTY
Katie Rice
(Vice Chair)

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY
David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY
Margaret Abe-Koga
Cindy Chavez
Liz Kniss
Rod G. Sinks
(Secretary)

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Pete Sanchez
James Sperring

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



Dear Mr. Bristol:

The Bay Area Air Quality Management District has completed its review of the "BAAQMD Rule 12-15 Proposed Air Monitoring Plan", submitted July 3, 2018, and has determined that this AMP meets the requirements for approval under District Regulation 12, Rule 15: Petroleum Refining Emissions Tracking (Section 12-15-403). This letter confirms approval pursuant to Section 12-15-404.4 and notes three conditions not specified in the AMP itself that must be met so that approval can be maintained.

To maintain approval of the AMP, a Quality Assurance Project Plan (QAPP) must be submitted to the District within 6 months of the date of this letter to ensure that the fence line system is operational by the required deadline of one year from the date of this letter. Because the QAPP is necessarily specific to equipment that has yet to be purchased and installed, submittal of the QAPP to the District is considered part of the AMP implementation. Failure to submit an adequate QAPP would be considered an implementation deficiency and would be a basis for withdrawal of approval. Phillips 66 may request additional time if more than 6 months is needed to submit the QAPP due to factors beyond its control.

Secondly, Phillips 66 must, within 6 months of the date of this letter, select an approach to monitor H₂S and inform the District in writing of that selection. The District anticipates that a method for open path monitoring of H₂S will be validated in the next few months. To encourage the use of open path H₂S monitoring, the District will allow up to 2 years from the date of this letter to begin operation of such monitoring. Phillips 66 may request a deadline beyond two years beyond the date of this letter if it can show that additional time is needed due to factors beyond its control. If Phillips 66 instead chooses to use fixed measurements for H₂S monitoring using the EPA MACT siting procedures for benzene sampling at refineries, then such monitoring must be operational within one year of the date of this letter. Phillips 66 may request a deadline beyond one year if it can show that additional time is needed due to factors beyond its control. Due to this adjustment of timelines to allow for incorporation of newer proven technologies, the H₂S portions of this plan were not reviewed, and the conditional approval of the plan does not reflect

approval of proposed H₂S monitoring approaches, including listed detection limits. Phillips 66's selection and implementation of H₂S monitoring will be reviewed as an element of AMP implementation. Failure to implement H₂S monitoring in a timely and adequate manner would be basis for withdrawal of approval.

Thirdly, Phillip's 66 proposed using a threshold of a monthly average concentration of benzene greater than 5 ppb observed by the currently operating UV open path system to evaluate whether coverage between the refinery and Rodeo is warranted. Given the limitations of a 5ppb monthly average to indicate the potential for emissions across the fenceline, the District will also be evaluating data from the passive two-week integrated samples required by 40 CFR 63.658 to track the fenceline benzene concentrations near Rodeo to determine whether more coverage is needed.

If you have any questions regarding this determination, please contact Paul Grazzini (Enforcement issues) at 415-749-4783 for compliance issues or Kate Hoag at 415-749-4619 for technical issues.

Sincerely,



Jeff Gove
Director of Compliance and Enforcement

JG:pg