

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 9	PAGE 1
	APPL. NO. 493550	DATE May 26, 2009
	PROCESSED BY: Jon Uhl	CHECKED BY <i>[Signature]</i>

PERMIT TO OPERATE EVALUATION
ALTERATION / MODIFICATION
Permit to Construct was issued March 5, 2009

COMPANY NAME, LOCATION ADDRESS:

ConocoPhillips Company, SCAQMD ID # 800363
1600 W. Anaheim Street
Wilmington, CA 90744

EQUIPMENT DESCRIPTION:

Additions to the equipment description are underlined. New conditions are underlined. Deletions to the equipment description and conditions are noted in strikeouts.

Note: Move from Section H to Section D; remove condition I30.1

Section D of ConocoPhillips-Wilmington Facility Permit, ID# 800363

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 16 : PETROLEUM MISCELLANEOUS					
System 5 : FUEL STORAGE AND DISPENSING					S13.4
STORAGE TANK, UNDERGROUND, METHANOL COMPATIBLE, GASOLINE, WITH PHASE I VAPOR RECOVERY SYSTEM OPW (VR-102-A/H), 10000 GALS Permit to Construct issued: 3/5/09 A/N: 493550	D697			ROG: (9) [Rule 461, OPW Phase I, Healy Phase II EVR Conditions, 3-7-2008]	I30.1
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR, W/O ISD: VR-201, GASOLINE, 2 TOTAL Permit to Construct issued: 3/5/09 A/N: 493550	D698			ROG: (9) [Rule 461, OPW Phase I, Healy Phase II Conditions, 3-7-2008]	I30.1
FUEL DISPENSING NOZZLE, NO PHASE II CONTROL, DIESEL FUEL, 2 TOTAL Permit to Construct issued: 3/5/09 A/N: 493550	D700				I30.1

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CONDITIONS:

The following permit conditions shall apply to comply with all applicable District, State, and Federal standards. Additions and deletions to the conditions are noted in underlines and strikeouts, respectively.

SYSTEM CONDITIONS

S13.4 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	461

[RULE 461, 6-3-2005; RULE 461 3-7-2008]

[Systems subject to this condition: Process 16, System 5]

DEVICE CONDITIONS

I. Administrative

~~S30.1 In accordance with Rule 3002(a)(3), the permit for this equipment is being issued as a non Title V permit. The facility permit holder shall file an application for a Title V permit revision for this equipment within 90 days of the issuance of the facility's initial Title V permit.~~

~~[RULE 3002, 11-14-1997]~~

~~[Devices subject to this condition: D697, D698, D700]~~

APPENDIX B: Rule Emission Limits

See Attachment A for:

Rule 461, P/C, OPW Phase I, Healy Phase II EVR Conditions, 3-7-2008

COMPLIANCE WITH PERMIT CONDITIONS - RECORDS:

Copies of the records submitted by ConocoPhillips are included in Attachment B.

Condition S13.4: ConocoPhillips submitted the latest Periodic Compliance Inspection dated 6/12/2008. Equipment was also inspected following alterations on 4/22/2009. Complies.

Rule 461, Phil-Tite Phase I, VST w/o ISD Phase II Conditions, 3-7-2008 :

- 8) ConocoPhillips submitted the results of the Leak Rate Test of the Drop Tube Overfill Prevention Devices and Spill Container Drain Valve, Test Procedure TP-201.1D, dated 4/22/2009. Startup test required: Complies.
- 9) ConocoPhillips submitted the results of a Leak Rate and Cracking Pressure of P/V Vent Valves, Test Procedure TP-201.1E, dated 4/22/2009. Startup test and retest every 3 years required: Complies.
- 10) ConocoPhillips submitted the results of a Static Torque Rotatable Phase I Adaptor, Test Procedure TP-201.1B, dated 4/22/2009. Startup test required: Complies
- 11) ConocoPhillips submitted the results of a Dynamic Back Pressure , Test Procedure TP-201.4, dated 4/22/2009. Startup test required: Complies.

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- 12) ConocoPhillips submitted the results of a Static Pressure Leak Decay Test, Test Procedure TP-201.3, dated 4/22/2009. Startup test required: Complies.
- 13) ConocoPhillips submitted Exhibit 8 of CARB Executive Order VR-201-H. Complies
- 14) ConocoPhillips submitted Exhibit 4 of CARB Executive Order VR-201-H. Complies
- 15) ConocoPhillips submitted Exhibit 5 of CARB Executive Order VR-201-H. Complies
- 16) ConocoPhillips submitted Exhibit 7 of CARB Executive Order VR-201-H. Complies
- 17) ConocoPhillips submitted documentation of installation per manufacturer's manual. Complies

BACKGROUND HISTORY:

This application for equipment modification was submitted on 12/4/2008; P/C was issued 3/5/2009. Installation and testing was completed 4/22/2009. The facility's normal operating schedule is 24 hours/day, 7 days/week, 52 weeks/year. Table 1 summarizes the permit history; Table 2 lists the applications submitted for this modification.

Table 1, Permit History

A/N	Date	Application		Permit		Description
		Status	Type	Status	Number	
493550	3/3/09	25	50			P/C for Phase II EVR upgrade
489764	1/21/09	32	25			Rule 461 compliance plan
414040	5/22/03	26	50			P/C for Phase I EVR upgrade
326088	3/29/97	31	40	Active	F6180	

Table 2, AQMD Applications Submitted

A/N	Date Submitted	Date Deemed Complete	Equipment	Type	Status	Previous A/N
493550	December 4, 2008	January 27, 2009	Fuel Storage and Dispensing, Rule 461	50	25	414040
494026	January 14, 2009	January 27, 2009	Facility Permit Amendment RECLAIM	80	21	n/a

FEE SUMMARY

Table 3, Fee Summary

A/N	Equipment	Type	Schedule	Fee Required	Fee Submitted
493550	Fuel Storage and Dispensing Rule 461	50	A	\$1287.22	\$1287.22
495026	Facility Permit Amendment RECLAIM	80	n/a	\$843.80	\$843.80

COMPLIANCE RECORD REVIEW

The facility has received 15 Notices of Violation since January 1, 2007. None of the NOV's apply to the fuel storage and dispensing equipment that was altered. ConocoPhillips-Wilmington has been in compliance with Rule 461 since testing was completed on 4/22/2009.

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PROCESS DESCRIPTION

The storage and dispensing equipment is used for storing gasoline and diesel fuel and dispensing these products into motor vehicles. The storage tank is an underground tank with a capacity of 10,000 gallon for gasoline. The tank is methanol compatible and currently equipped with an OPW Phase I enhanced vapor recovery system. The dispensing nozzles are equipped with a Healy Phase II enhanced vapor recovery system.

On April 1, 2001, the California Air Resources Board's (CARB's) Enhanced Vapor Recovery (EVR) regulations became state law. The EVR Phase I and II requirements apply to both new and existing gasoline dispensing facilities. The deadline for EVR Phase I was April 1, 2005 and an OPW Phase I EVR system was installed on the underground storage tank (see A/N 414040, PTO evaluation dated 3/10/2009)

Phase II EVR system components reduce emissions associated with the gasoline dispensing nozzles. The deadline for existing gasoline dispensing facilities to upgrade to EVR Phase II systems was April 1, 2009. This application addresses the EVR Phase II requirements.

To comply with EVR Phase II regulations, ConocoPhillips submitted A/N 493550 to modify the existing fuel dispensing equipment adding a Healy Phase II Enhanced Vapor Recovery (EVR) System not including in-station diagnostics (ISD). The VST Phase II EVR system was certified by CARB on December 24, 2008 [Executive Order VR-201-H, see Attachment C], and certified to be at least 95 percent efficient when installed and maintained according to Executive Order VR-201-H. ConocoPhillips completed installation and testing of the Phase II EVR System on 4/22/2009.

EMISSION CALCULATIONS

There are no changes in the emissions calculation from the permit to construct evaluation.

The Emission Calculations are based on the emission factors used in the Rule 461 permit processing program in Permit Processing System (PPS). This modification results in an emission decrease, since the EVR Phase II system will reduce the ROG emissions by further enhancing the emission control of gasoline dispensing operations.

ROG Emissions

Gasoline Throughput = 10,000 gal/month

ROG Emissions from:	Uncontrolled Emission Factor (lb/1000 gal)	Uncontrolled Emissions (lb/month)	Control Efficiency (%)	Controlled Emissions (lb/month)
Filling	8.40	84.0	95 ^{1,2}	4.20
Breathing	0.10	1.0	75 ²	0.25
Dispensing	8.30	83.0	96 ^{2,3}	3.32
Spillage	0.42	4.2	0 ²	4.20
Total		172.2		11.97

¹ On May 23, 2007, CARB certified the OPW system to be at least 98% percent efficient if installed and maintained according to Executive Order VR-102-H, see Attachment C.

² Control efficiency is from Rule 461 permit processing program in Permit Processing System (PPS).

³ On August 28, 2008, CARB certified the Healy Phase II EVR system to be at least 95% efficient if installed and maintained according to Executive Order VR-201-H, see Attachment C.

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Benzene Emissions

Benzene emissions = ROG emissions * Benzene content

Benzene Emissions from:	Benzene Content ⁴ (%wt)	Uncontrolled Emissions (lb/month)	Controlled Emissions (lb/month)
Filling	0.3	0.25	0.01
Breathing	0.3	0.00	0.00
Dispensing	0.3	0.25	0.01
Spillage	1.0	0.04	0.04
Total		0.55	0.07

⁴ Benzene Content is from Rule 461 permit processing program in Permit Processing System (PPS).

AEIS Hourly Emissions

Emittant Type	Emissions	
	Uncontrolled	Controlled
ROG	172.2 lb/month	11.97 lb/month
	5.74 lb/day	0.40 lb/day
	0.24 lb/hr	0.02 lb/hr
Benzene	0.55 lb/month	0.07 lb/month
	0.018 lb/day	0.0022 lb/day
	758. x 10 ⁻⁶ lb/hr	91. x 10 ⁻⁶ lb/hr

NSR Emissions

Emissions	Maximum Daily Uncontrolled (lbs/day)	Maximum Daily Controlled (lbs/day)	30-day Average Controlled (lbs/day)	Annual Controlled (lbs/year)
ROG	5.74	0.40	0.40	144
Benzene	0.018	0.0022	2177. x 10 ⁻⁶	0.78

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RULES EVALUATION:

PART 1 STATE REGULATIONS

California Environmental Quality Act (CEQA)

This modification is not a significant project.

PART 2 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>This modification meets all the criteria in Rule 212 for permit approval. The new modification was designed so it can operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.</p> <p>The modification of the fuel storage and dispensing equipment does not constitute a significant project because (1) the modified permit unit is not located within 1000 feet of a school; (2) the emissions increase does not exceed the daily maximum specified in subdivision (g) of this rule (30 lbs/day VOC); and (3) the modified permit unit does not have an increase in emissions of toxic air components or pose a risk of nuisance.</p> <p>Rule 212 public notice is not required.</p>	
Rule 402	Nuisance	May 7, 1976
	<p>Nuisance complaints are not expected under normal operating conditions.</p>	
Rule 461	Gasoline Transfer And Dispensing	March 7, 2008
	<p>This equipment complies with the current provisions of District Rule 461. The required addition and testing of a CARB-certified EVR Phase I system has been completed (see A/N 414040). ConocoPhillips-Wilmington has submitted the required Rule 461(i) compliance plan (A/N 489764). The required addition and testing of a CARB-certified EVR Phase II system has been completed (this application, A/N 493550).</p>	
Rule 1170	Methanol Compatible Fuel Storage And Transfer	May 6, 1988
	<p>At least one of the tanks located at the facility is methanol compatible. Therefore, this facility complies with the provisions of this rule.</p>	

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REG XIII	New Source Review (NSR)	December 6, 2002
	Application Deemed Complete Year: 2009	
	<p>There is no emission increase of any nonattainment air contaminant due to this modification. To comply with CARB's EVR regulations, ConocoPhillips-Wilmington installed CARB-certified EVR Phase I and Phase II systems. The EVR Phase I and Phase II systems will reduce the ROG emissions since they further enhance emission control from the gasoline delivery and dispensing operations.</p>	
	A/N	NSR ROG Emissions, lbs/day
	326088 (PTO F6180)	0
	493550	0
Rule 1303(a)	BACT	
	<p>BACT is not required; no increase of any nonattainment air contaminant, any ozone-depleting compound or ammonia. The CARB-certified EVR Phase II system is the current BACT for the gasoline dispensing nozzles. The CARB-certified EVR Phase I system is the current BACT for the underground storage tank.</p>	
Rule 1303(b)(1)	Modeling	
	Modeling is not required for VOC/ROG.	
Rule 1303(b)(2)	Offsets	
	There is no emission increase; no offsets are required.	
Rule 1303(b)(3)	Sensitive Zone Requirements	
	No Emission Reduction Credits are required.	
Rule 1303(b)(4)	Facility Compliance	
	Facility complies with all applicable rules and regulations of the District.	
Rule 1303(b)(5)	Major Polluting Facilities	
	<p>Requirements do not apply. ConocoPhillips-Wilmington is an existing major polluting facility; however, this is not a major modification. VOC emission increase is less than 1 lb/day.</p>	

Rule 1401	New Source Review Of Toxic Air Contaminants	March 7, 2008
	Application Deemed Complete Year: 2009	
	<p>ConocoPhillips-Wilmington installed Phase I and Phase II EVR systems to reduce emissions. This modification causes no increase in the cancer burden, MICR, acute HI or chronic HI at any receptor location. Exempt from Rule 1401 requirements per Rule 1401(g)(1)(B): Modification with No Increase in Risk.</p>	

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Regulation XX	RECLAIM	May 11, 2001
	This fuel storage and dispensing equipment is not a source of NOx or SOx emissions.	

Regulation XXX	Title V	March 16, 2001
	<p>ConocoPhillips – Wilmington has been issued a Title V permit effective on July 1, 2009. This is a “minor permit revision” as defined in Rule 3000(b)(12)(A) to remove condition I30.1 and incorporate the permit to operate for equipment previously issued a non-Title V permit to construct in accordance with Rule 3002(a)(3). Condition I30.1 requires a Title V permit revision application for this equipment within 90 days of the issuance of the facility’s initial Title V permit.</p> <p>The permit to operate has no changes from the permit to construct terms and conditions, except removal of condition I30.1. The equipment alteration results in no increase in any criteria pollutant or HAPs. The modified permit unit is not subject to any new or additional NSPS or NESHAP requirements.</p> <p>A minor permit revision is subject to a 45-day EPA review, Rule 3003(j), (k), (l) & (m) and not subject to public participation requirements, Rule 3006.</p>	

PART 3 FEDERAL REGULATIONS

40CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commences after July 23, 1984
	Subpart Kb does not apply to the underground storage tank; the tank capacity is less than 75 cubic meters (19,813 gal). Per §60.110b - Applicability, Subpart Kb applies to storage vessels with a capacity greater than or equal to 75 cubic meters.

40CFR Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
	Subpart CC does not apply. The underground storage tank and fuel dispensing equipment do not meet the description of any of the emission points listed in paragraphs §63.640(c)(1) through (c)(7).

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RECOMMENDATION:

Issue a Permit to Operate with the requirements listed in the Facility Permit, Appendix B and the conditions listed in the Conditions section.

Revise Facility Permit: Delete existing Section D
Move Section H description & conditions to Section D; remove condition I30.1
Delete from Section H

ATTACHMENTS:

- A: ConocoPhillips (ID#800363) Facility Permit, Section D: Facility Description and Equipment Specific Conditions
Section H: Permit to Construct and Temporary Permit to Operate
Appendix B: Rule 461, OPW Phase I, Healy Phase II EVR Conditions 3-7-2008
- B: Compliance Records: Periodic Compliance Inspection, dated 6/12/2008
Compliance Testing Results, dated 4/22/2009
- C: CARB Executive Order VR-102-H, OPW Phase I Vapor Recovery System, 5/23/2007
CARB Executive Order VR-201-H, Vapor Systems Technologies, Inc, Phase II Enhanced Vapor Recovery (EVR) System Not Including In-Station Diagnostics (ISD), 8/28/2008



**FACILITY PERMIT TO OPERATE
CONOCOPHILLIPS COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 16 : PETROLEUM, MISCELLANEOUS					
System 5 : FUEL STORAGE AND DISPENSING					S13.4
STORAGE TANK, UNDERGROUND, METHANOL COMPATIBLE, GASOLINE, WITH PHASE I VAPOR RECOVERY SYSTEM OPW (VR-102-A/H), 10000 GALS A/N : 493550	D697			ROG: (9) [RULE 461, OPW Phase I, Healy Phase II EVR Conditions, 3-7-2008]	
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, 2 TOTAL A/N : 493550	D698			ROG: (9) [RULE 461, OPW Phase I, Healy Phase II EVR Conditions, 3-7-2008]	
FUEL DISPENSING NOZZLE, NO PHASE II CONTROL, DIESEL FUEL, 2 TOTAL A/N : 493550	D700				

* (1)(1A)(1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5)(5A)(5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2)(2A)(2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8)(8A)(8B) Denotes 40 CFR limits (e.g. NSPS, NESHAPS, etc.)
 (10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CONOCOPHILLIPS COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 – Accidental Release Prevention, 5-24-1996]



**FACILITY PERMIT TO OPERATE
CONOCOPHILLIPS COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

F25.1 The permit holder of this facility shall not install, alter, or operate a refinery process unit or other non-Rule 219 exempt equipment without a valid RECLAIM/TitleV permit issued by the AQMD pursuant to Rule 201 - Permit to Construct, Rule 203 - Permit to Operate, Rule 2004 - Requirements, and Rule 3002 - Requirements, as applicable.

Notwithstanding the above, the provisions of Rules 201, 203, 2004, and 3002 shall not apply to installations or alterations that involve only the equipment listed in Table 1 below, nor shall they apply to the operation of equipment listed in Table 1, when directly associated with permitted process units or other permitted equipment.

Notwithstanding the above, all new equipment listed in Table 1, including associated fugitive components installed with such equipment, shall have Best Available Control Technology installed in conformance with the Best Available Control Technology Guidelines in effect at the time of the installation.

TABLE 1

- (a) Heat Exchanger (including air-cooler, reboiler, cooler, condenser, and shell and tube exchanger)
- (b) In-line Mixer
- (c) Pump
- (d) Knockout Pot - Compressor inlet (immediate inlet) and interstage
- (e) Knockout Pot - Fuel Gas System (downstream of fuel gas mix drums)

This condition applies only to the facility that processes petroleum as defined in the Standard Industrial Classification Manual as Industry No. 2911 - Petroleum Refining, as well as its directly associated sulfur recovery plant which may be located outside of the facility.

[RULE 2004, 5-11-2001; RULE 2004, 4-6-2007]

F34.2 The operator shall not sell refinery gas containing sulfur compounds in excess of 40 ppmv, calculated as hydrogen sulfide, averaged over 4-hour period.

[RULE 431.1, 6-12-1998]



**FACILITY PERMIT TO OPERATE
CONOCOPHILLIPS COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

F52.1 This facility is subject to the applicable requirements of the following rules or regulation(s):

40CFR79

40CFR80

California Code of Regulations, Title 13, Division 3, Chapter 5

[40CFR 79, 7-1-1999; 40CFR 80, 7-1-1999; CCR Title 13, 9-24-1999]

F52.2 This facility is subject to the applicable requirements of the following rules or regulation(s):

CONSENT DECREE CIVIL NO. H-05-0258. The facility shall send the District a copy of the semiannual updates sent to the EPA of the specific requirement of emission standards and limitations from the Consent Decree as well as dates of compliance for the requirement not yet fulfilled.

[CONSENT DECREE CIVIL NO. H-05-0258, 8-11-2008]

F52.3 This facility is subject to the applicable requirements of the following rules or regulation(s):

40 CFR 60 SubpartA

40 CFR 61 SubpartA

40 CFR 63 SubpartA

[40CFR 60 Subpart A, 5-16-2007; 40CFR 61 Subpart A, 5-16-2007; 40CFR 63 Subpart A, 5-16-2007]

F60.1 The emission limits identified in Section D and H of the permit shall be defined as emissions discharged to the atmosphere from the originating equipment.



**FACILITY PERMIT TO OPERATE
CONOCOPHILLIPS COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS
The operator shall comply with the terms and conditions set forth below:

SYSTEM CONDITIONS

S13.4 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	461

[RULE 461, 6-3-2005; RULE 461, 3-7-2008]

[Systems subject to this condition : Process 16, System 5]



**FACILITY PERMIT TO OPERATE
CONOCOPHILLIPS COMPANY**

**APPENDIX B: RULE EMISSION LIMITS
[RULE 461, OPW Phase I, Healy Phase II EVR Conditions 3-7-2008]**

GASOLINE TRANSFER AND DISPENSING, CONDITIONS

1. Operation of this equipment shall be in compliance with all data and specifications submitted with the application under which this permit was issued, unless otherwise noted below.
2. Except for diesel transfers, Phase I vapor recovery systems shall be in full operation whenever fuel is being transferred into storage tanks.
3. Except for diesel transfers, Phase II vapor recovery systems shall be in full operation whenever fuel is being transferred into motor vehicles, as defined in Rule 461.
4. All Phase I and Phase II vapor recovery equipment at this facility shall be installed, operated and maintained to meet all California Air Resources Board certification requirements.
5. The District at its discretion may wish to witness the installation and/or performance testing of the Healy Phase II EVR System Not Including ISD. At least seventy-two (72) hours prior to the installation and performance testing of the Healy Phase II EVR System Not Including ISD, the applicant shall notify the AQMD at telephone number (866) 770-9140.
6. New equipment installations and subsequent service and repairs for any certified component for which this permit was issued, shall only be performed by a current and certified person who has successfully completed the manufacturer's training course and appropriate International Code Council (ICC) certification. Completion of any AQMD training course does not constitute as a substitute for this requirement. Proof of successful completion of any manufacturer training course shall be with the manufacturer.
7. At least seventy-two (72) hours prior to back-filling any underground storage tank or piping, the SCAQMD shall be notified by e-mail at r461backfill@aqmd.gov or by facsimile at telephone number (909) 396-3606. Such notification shall include the name of the owner or operator; the name of the contractors; the location of the facility; and the scheduled start and completion dates of the back-filling procedure. The back-filling procedure shall not commence until inspected by a District representative.



**FACILITY PERMIT TO OPERATE
CONOCOPHILLIPS COMPANY**

**APPENDIX B: RULE EMISSION LIMITS
[RULE 461, OPW Phase I, Healy Phase II EVR Conditions 3-7-2008]**

- 8. Depending on the system configuration, a leak rate test of the drop tube/drain valve assembly shall be conducted to quantify the pressure integrity of both the drop tube and drain valve seal or a leak rate test of the drop tube overflow prevention device and drain valve shall be conducted to quantify the pressure integrity of the drop tube overflow prevention device and the pressure integrity of the spill container drain valve. Either test shall be conducted as a performance test and as a reverification test. The test shall be conducted in accordance with test procedure method TP-201.1C (October 8, 2003) or TP-201.1D (October 8, 2003), respectively. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.

- 9. A leak rate and cracking pressure test of pressure/vacuum relief vent valves shall be conducted within ten days (10) after the start of operation of the OPW Phase I EVR equipment and at least once every three (3) years thereafter to determine the pressure and vacuum at which the pressure/vacuum vent valve actuates, and to determine the volumetric leak rate at a given pressure. The test shall be conducted in accordance with the test procedure method TP-201.1E (October 8, 2003). Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test. This test result shall be kept on site for three (3) years and made available to District representatives upon request.

- 10. A static torque test of rotatable Phase I adaptors shall be conducted to quantify the amount of static torque required to start the rotation of the rotatable Phase I adaptors. The test shall be conducted in accordance with the test procedure method outlined in TP-201.1B (October 8, 2003) as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.

- 11. The Phase II vapor recovery system shall be installed, operated, and maintained such that the maximum allowable pressure through the riser, and underground piping does not exceed the dynamic back pressure described by the California Air Resources Board Executive Order by which the system was certified:

Nitrogen flowrates
(CFH)
60

Dynamic back pressure
(inches of water)
0.50

Dynamic back pressure tests shall be conducted to determine the Phase II system vapor recovery back pressures. The tests shall be conducted in accordance with CARB test procedure TP-201.4, Methodology 4 and 6 (July 3, 2002); as a performance test. This test shall be a one-time test and



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APPENDIX B: RULE EMISSION LIMITS [RULE 461, OPW Phase I, Healy Phase II EVR Conditions 3-7-2008]

the records kept permanently on site. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of tests.

12. A static pressure leak decay test shall be conducted to demonstrate that the storage tanks, the remote and/or nozzle vapor recovery check valves, associated vapor return piping and fittings are free from vapor leaks. The test shall be conducted in accordance with CARB test procedure method TP-201.3 (March 17, 1999) as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.
13. The static pressure leak decay test TP-201.3, shall be conducted in accordance with Exhibit 8 of CARB Executive Order VR-201-H. Verification of completing each step as outlined shall be documented by submitting a copy of Exhibit 8 to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
14. A static pressure performance test for the Healy clean air separator using both the vacuum decay procedure and the positive pressure procedure shall be conducted to quantify the vapor tightness of the Healy clean air separator tank pressure management system. These tests shall be conducted in accordance with Exhibit 4 of CARB Executive Order VR-201-H as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
15. A vapor to liquid volume ratio test shall be conducted to quantify the vapor to liquid (v/l) volumetric ratio of the Healy clean air separator system. The test shall be conducted in accordance with Exhibit 5 of CARB Executive Order VR-201-H as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
16. A nozzle bag test shall be conducted on the Healy Phase II EVR nozzles to verify the integrity of the vapor valve. The test shall be conducted on any newly installed or replaced Healy Phase II EVR nozzles and in accordance with Exhibit 7 of CARB Executive Order VR-201-H. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
17. Unless AQMD Rule 461 requires a more frequent testing or inspection schedule, the owner/operator shall be responsible to perform the inspections as outlined in the ARB approved



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[RULE 461, OPW Phase I, Healy Phase II EVR Conditions 3-7-2008]

installation, operation, and maintenance manual for the Healy Phase II EVR system, as well as all the required vapor recovery system tests as per the current and appropriate ARB executive order.

- 18. The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to any of the above mentioned testing requirements. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the tests to be performed.
- 19. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB executive order requirements, whichever is more stringent.
- 20. Should the facility dispense more than 600,000 gallons of gasoline per calendar year and if the facility undergoes a major modification as defined by CARB's Advisory Letter Number 336, "Enhanced Vapor Recovery Implementation Update" dated April 15, 2005; the operator shall immediately cease all gasoline dispensing operations and file an application for a new permit to construct/operate to install a CARB certified ISD system. Gasoline dispensing operations shall not resume until the ISD system has been granted a permit to construct/operate and has been fully installed, tested, and operative.
- 21. Should the facility dispense more than 600,000 gallons of gasoline in any calendar year and if the facility does not undergo a major modification as defined by CARB's Advisory Letter Number 336, "Enhanced Vapor Recovery Implementation Update" dated April 15, 2005; the operator shall file an application for a new permit to construct/operate to install a CARB certified ISD system. The ISD system shall be fully installed, tested, and operative based on the following table:

<u>Gasoline throughput per calendar year</u>	<u>Date</u>
Greater than 1.8 million gallons	September 1, 2009
Between 600,000 and 1.8 million gallons	September 1, 2010

- 22. All records and test results that are required to be maintained by Rule 461 shall be kept on site for five years and made available to District representatives upon request.



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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 14 : ELECTRICITY GENERATION					
System 1: EMERGENCY IC ENGINES					
INTERNAL COMBUSTION ENGINE, EMERGENCY WATER PUMP, DIESEL FUEL, CATERPILLAR, MODEL 3306A, 200 HP A/N: 486519	D670		NOX: PROCESS UNIT*; SOX: PROCESS UNIT	NOX: 469 LBS/1000 GAL DIESEL (1)[RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; SOX: 6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005]	B61.5, C1.84, D135.1, E193.6, H23.30, H23.35

* (1)(1A)(1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5)(5A)(5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2)(2A)(2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8)(8A)(8B) Denotes 40 CFR limits (e.g. NSPS, NESHAPS, etc.)
 (10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 – Accidental Release Prevention,5-24-1996]



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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

- F25.1 The permit holder of this facility shall not install, alter, or operate a refinery process unit or other non-Rule 219 exempt equipment without a valid RECLAIM/TitleV permit issued by the AQMD pursuant to Rule 201 - Permit to Construct, Rule 203 - Permit to Operate, Rule 2004 - Requirements, and Rule 3002 - Requirements, as applicable.

Notwithstanding the above, the provisions of Rules 201, 203, 2004, and 3002 shall not apply to installations or alterations that involve only the equipment listed in Table 1 below, nor shall they apply to the operation of equipment listed in Table 1, when directly associated with permitted process units or other permitted equipment.

Notwithstanding the above, all new equipment listed in Table 1, including associated fugitive components installed with such equipment, shall have Best Available Control Technology installed in conformance with the Best Available Control Technology Guidelines in effect at the time of the installation.

TABLE 1

- (a) Heat Exchanger (including air-cooler, reboiler, cooler, condenser, and shell and tube exchanger)
- (b) In-line Mixer
- (c) Pump
- (d) Knockout Pot - Compressor inlet (immediate inlet) and interstage
- (e) Knockout Pot - Fuel Gas System (downstream of fuel gas mix drums)

This condition applies only to the facility that processes petroleum as defined in the Standard Industrial Classification Manual as Industry No. 2911 - Petroleum Refining, as well as its directly associated sulfur recovery plant which may be located outside of the facility.

[RULE 2004, 5-11-2001; RULE 2004, 4-6-2007]

- F34.2 The operator shall not sell refinery gas containing sulfur compounds in excess of 40 ppmv, calculated as hydrogen sulfide, averaged over 4-hour period.

[RULE 431.1, 6-12-1998]



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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

F52.1 This facility is subject to the applicable requirements of the following rules or regulation(s):

40CFR79

40CFR80

California Code of Regulations, Title 13, Division 3, Chapter 5

[40CFR 79, 7-1-1999; 40CFR 80, 7-1-1999; CCR Title 13, 9-24-1999]

F52.2 This facility is subject to the applicable requirements of the following rules or regulation(s):

CONSENT DECREE CIVIL NO. H-05-0258. The facility shall send the District a copy of the semiannual updates sent to the EPA of the specific requirement of emission standards and limitations from the Consent Decree as well as dates of compliance for the requirement not yet fulfilled.

[CONSENT DECREE CIVIL NO. H-05-0258, 8-11-2008]

F52.3 This facility is subject to the applicable requirements of the following rules or regulation(s):

40 CFR 60 SubpartA

40 CFR 61 SubpartA

40 CFR 63 SubpartA

[40CFR 60 Subpart A, 5-16-2007; 40CFR 61 Subpart A, 5-16-2007; 40CFR 63 Subpart A, 5-16-2007]

F60.1 The emission limits identified in Section D and H of the permit shall be defined as emissions discharged to the atmosphere from the originating equipment.



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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

B. Material/Fuel Type Limits

B61.5 The operator shall not use diesel fuel containing

Compound	Weight percent
Sulfur compounds greater than	0.05

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : D669, D670, D671, D672, D673, D674, D675, D676, D677, D678, D679, D680, D681, D683, D1553, D1657, D1658]

C. Throughput or Operating Parameter Limits

C1.84 The operator shall limit the operating time to no more than 20 hour(s) in any one year.

To comply with this condition, the operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

The operator shall maintain an engine operating log which, on a monthly basis, shall list all engine operations in each of the following areas:

- A. Emergency use hours of operation
- B. Maintenance and testing hours
- C. Other operating hours (Describe the reason for the operation)

In addition, each time the engine is started manually, the log shall include the date of operation and the time reading in hours at the beginning and end of the operation.



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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

The operation of the engine of 20 hours per year shall be allowed as follows:

1. Mechanical breakdown of Pump #349 or electrical outage which causes Pump #349 to become inoperable or
2. Maintenance and testing purposes.

[RULE 1110.2; RULE 1303(a)-BACT; RULE 1303(b)(1)-Modeling; RULE 1303(b)(2)-Offsets; RULE 1304(a)-Modeling and Offset Exemption; RULE 1470 6-7-2007]

[Devices subject to this condition : D670]

D. Monitoring/Testing Requirements

D135.1 The operator shall inspect, adjust, and certify the ignition or fuel injection timing of this engine a minimum of once every 3 years of operation. Inspections, adjustments, and certifications shall be performed by a qualified mechanic and performed in accordance with the engine manufacturer's specifications and procedures.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : D669, D670, D671, D672, D673, D674, D675, D676, D677, D678, D679, D680, D681, D1553, D1658, D1768]

H. Applicable Rules

H23.30 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	DISTRICT RULE	1110.2
CO	DISTRICT RULE	1110.2

[RULE 1110.2, 2-1-2008]

[Devices subject to this condition :D670, D732]



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The operator shall comply with the terms and conditions set forth below:

H23.35 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	DISTRICT RULE	1470
	[RULE 1470, 6-1-2007]	
	[Devices subject to this condition :D670]	

End of EPA Submittal

