



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
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July 31, 2009
via electronic submittal

Mr. Gerardo Rios
USEPA Region IX, Mail Stop AIR-3
75 Hawthorne Street
San Francisco, CA 94105

SUBJECT: Minor Revision to Title V Facility Permit
ConocoPhillips - Wilmington Refinery
1660 West Anaheim Street
Wilmington, CA 90744

REFERENCE: SCAQMD Facility ID: 800363
SCAQMD Application #'s 486519, 493550

Dear Mr. Rios:

The South Coast Air Quality Management District (AQMD) has received and reviewed a Title V application for a Minor Revision to the ConocoPhillips - Wilmington Refinery Facility Permit. ConocoPhillips is proposing to reclassify a prime IC engine as an emergency stand by IC engine. The proposed permit change qualifies as a minor revision and is subject to a 45-day EPA review (AQMD Rule 3003). The IC engine is listed in the table below.

	A/N	Equipment	Device ID	Permit Action	Section	Process	System
1	486519	Emergency Internal Combustion Engine	D670	PTO reclassify prime engine as emergency water pump	D	14	1

In addition, one local permit to construct was issued to ConocoPhillips-Wilmington for alteration of fuel storage and dispensing equipment, pursuant to Rule 3002(a), and prior to the issuance of the initial Title V permit. In accordance with device condition I30.1, ConocoPhillips filed an application for a Title V permit revision for this equipment within 90 days of the issuance of the facility's initial Title permit. This equipment alteration with no increase in emissions is also a minor revision and is subject to a 45-day EPA review (AQMD Rule 3003). Information on the application is provided below.

	A/N	Equipment	Device ID	Permit Action	Section	Process	System
2	493550	Fuel Storage and	D697	PTO for Phase II EVR	D	16	5

		Dispensing	D698 D700	upgrade to gasoline dispensing nozzles; PTC was issued as a local permit			
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The AQMD is required under Rule 3005(i) to provide a copy of the proposed permit to the EPA administrator for a 45-day review. As such, a copy of the proposed revision to the existing Title V permit is attached along with our analysis for your review. As agreed with your staff, we are submitting the required documents to the email address R9AirPermits_SC@epa.gov.

If you have any questions or wish to provide comments regarding this proposed permit, please contact Ms. Cynthia Carter (909) 396-2431 (ccarter@aqmd.gov) or Mr. Paul Park at (909) 396-2568 (ppark@aqmd.gov).

Sincerely,



Jay Chen, P.E.
Senior Manager
Refinery and Waste Management Permitting
Engineering and Compliance

Enclosures: 2- Engineering Evaluations, 2- Draft Title V permit, Section D (P14,S1; P16,S5)
JC:CC