

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS	PAGES 24	PAGE 1
	APPL. NO. 504062	DATE 04/07/2010
	PROCESSED BY: Cynthia Carter	CHECKED BY <i>P. Park</i>

**PERMIT TO CONSTRUCT
MODIFICATION**

COMPANY NAME, LOCATION ADDRESS:

ConocoPhillips, Facility ID 800363
 1660 W. Anaheim Street
 Wilmington, CA 90744

EQUIPMENT DESCRIPTION:

Additions or modifications to the equipment description are underlined and **bolded**. New and modified conditions are underlined and **bolded**. Deletions to the equipment description and conditions are noted in **strikeouts**.

Section H of ConocoPhillips' Facility Permit, ID# 800363

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
System 1: WASTEWATER TREATMENT					S13.1, <u>S13.10</u>
TANK, F-2A (EAST WEST), FLOCCULATOR, COVERED, WITH A MIXER, WIDTH: 16 FT; HEIGHT: 12 FT; LENGTH 24 FT A/N: 366270 <u>504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u>	D499				
TANK, F-2B (CENTER), FLOCCULATOR, COVERED WITH A MIXER, WIDTH: 16FT; HEIGHT 12 FT; LENGTH: 24 FT A/N: 366270 <u>504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u>	D500				
TANK, F-2C (WEST EAST), FLOCCULATOR, COVERED, WITH A MIXER, WIDTH: 16 FT; HEIGHT: 12 FT; LENGTH 24 FT A/N: 366270 <u>504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u>	D501				
FLOATATION UNIT, FIXED ROOF, F-3A (EAST WEST). DISSOLVED AIR FLOATATION UNIT, WITH FROTH AND SLUDGE FLIGHT	D502	C524		VOC: 500 PPMV (5) [RULE 1176. 9-13-1996]	D182.2

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
SCRAPER, WIDTH: 16 FT; DEPTH: 12 FT; LENGTH: 81 FT A/N: <u>366270 504062</u> Permit to Construct Issued: <u>08/18/00</u> <u>TBD</u>					
FLOATATION UNIT, FIXED ROOF, F-3B (CENTER), DISSOLVED AIR FLOATATION UNIT, WITH FROTH AND SLUDGE FLIGHT SCRAPER, WIDTH: 16 FT; DEPTH: 12 FT; LENGTH: 81 FT A/N: <u>366270 504062</u> Permit to Construct Issued: <u>08/18/00</u> <u>TBD</u>	D503	C524		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	D182.2
FLOATATION UNIT, FIXED ROOF, F-3C (WEST EAST), DISSOLVED AIR FLOATATION UNIT, WITH FROTH AND SLUDGE FLIGHT SCRAPER, WIDTH: 16 FT; DEPTH: 12 FT; LENGTH: 81 FT A/N: <u>366270 504062</u> Permit to Construct Issued: <u>08/18/00</u> <u>TBD</u>	D504	C524		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	D182.2
TANK, FIXED ROOF, RECYCLE, SATURATION, F-4A, WASTE WATER, HEIGHT: 7 FT; DIAMETER: 5 FT A/N: <u>366270 504062</u> Permit to Construct Issued: <u>08/18/00</u> <u>TBD</u>	D505				
TANK, FIXED ROOF, RECYCLE, SATURATION, F-4B, WASTE WATER, HEIGHT: 7 FT; DIAMETER: 5 FT A/N: <u>366270 504062</u> Permit to Construct Issued: <u>08/18/00</u> <u>TBD</u>	D506				
TANK, FIXED ROOF, RECYCLE, SATURATION, F-4C, WASTE WATER, HEIGHT: 7 FT; DIAMETER: 5 FT A/N: <u>366270 504062</u> Permit to Construct Issued: <u>08/18/00</u> <u>TBD</u>	D507				

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
SUMP, PRIMARY OIL SKIMMING, WIDTH: 11 FT; DEPTH: 15 FT; LENGTH: 16 FT WITH A/N: <u>366270 504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u> FLOATING ROOF PRIMARY SEAL	D508				
SUMP, SECONDARY OIL SKIMMING, WIDTH: 11 10 FT; DEPTH: 9 11 FT; LENGTH: 11 FT WITH A/N: <u>366270 504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u> FLOATING ROOF PRIMARY SEAL, <u>LIQUID</u> <u>MOUNTED</u> <u>SECONDARY SEAL</u>	D509				
TANK, HOLDING, FIXED ROOF, TK-436, POLYMER FEED <u>FERROUS SULFATE</u> , 145 BBL; DIAMETER: 14 FT; HEIGHT: 16 FT A/N: <u>366270 504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u>	D512				
TANK, HOLDING, FIXED ROOF, TK-437, POLYMER FEED <u>FERROUS SULFATE</u> , 250 BBL; DIAMETER: 10 FT; HEIGHT: 15 FT A/N: <u>366270 504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u>	D513				
TANK, HOLDING, FIXED ROOF, TK-438, SLUDGE, 1500 BBL; DIAMETER: 22 FT; HEIGHT: 25 FT A/N: <u>366270 504062</u> Permit to Construct Issued: 08/18/00	D514			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
TBD					
TANK, HOLDING, FIXED ROOF, TK-439, SLUDGE, 1500 BBL; DIAMETER: 22 FT; HEIGHT: 25 FT A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD	D515			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	
TANK, SURGE, TK-461, STORMWATER AND WASTEWATER, WITH OIL SKIMMER, 1.3E+07 GALS; DIAMETER: 185 FT; HEIGHT: 79 FT 7 IN WITH A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD FLOATING ROOF, PAN PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY B OR BETTER PER RULE 219 (C)(4), WIPER TYPE	D516			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	H23.15
TANK, SURGE, TK-462, STORMWATER AND WASTEWATER, WITH OIL SKIMMER, 1.3E+07 GALS; DIAMETER: 185 FT; HEIGHT: 79 FT 7 IN WITH A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD FLOATING ROOF, PAN PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY B OR BETTER PER RULE 219 (C)(4), WIPER	D517			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	H23.15

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
TYPE					
TANK, SURGE, F-8, (CONTAINMENT STRUCTURE), FIXED COVER, WITH AN INTERNAL WEIR AND WATER SEAL, WIDTH: 19 FT; HEIGHT: 11 FT 5 IN; LENGTH: 150 FT WITH A/N: 366270 <u>504062</u> Permit to Construct Issued: 08/18/00 TBD FLOATING ROOF, PAN, LIQUID MOUNTED FLOW CHAMBER, FIXED COVER, WIDTH: 7 FT; DEPTH: 10 FT; LENGTH: 175 FT	D518	C526		HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	C6.2, D182.2, E193.3
OIL WATER SEPARATOR, F-1A (EAST), API, CAPACITY 305,000 GALLONS, WITH A PRV SET AT 4.5 INCHES OF WATER RELIEF PRESSURE, 360000 GALS/HR; WIDTH: 40 FT; DEPTH: 7 FT 8 IN; LENGTH: 138 FT WITH A/N: 366270 <u>504062</u> Permit to Construct Issued: 08/18/00 TBD OIL WATER SEPARATOR, F- 1A (EAST) API FOREBAY, WITH FIXED COVER OIL WATER SEPARATOR, F- 1A(EAST) API AFTERBAY, WITH FIXED COVER PRIMARY SEAL, LIQUID MOUNTED SECONDARY SEAL	D1543	C522		HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]; VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	C6.2, D182.2
OIL WATER SEPARATOR, F-1B (WEST), API, CAPACITY 305,000 GALLONS, WITH A PRV SET AT 4.5 INCHES OF WATER RELIEF	D1544	C522		HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]; VOC: 500 PPMV (5) [RULE 1176, 9-13-	C6.2, D182.2

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
PRESSURE, 360000 GALS/HR; WIDTH: 40 FT; DEPTH: 7 FT 8 IN; LENGTH: 138 FT WITH A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD OIL WATER SEPARATOR, F- 1B (WEST) API FOREBAY, WITH FIXED COVER OIL WATER SEPARATOR, F- 1B(WEST) API AFTERBAY, WITH FIXED COVER <u>PRIMARY SEAL, LIQUID MOUNTED</u> <u>SECONDARY SEAL</u>				1996]	
SUMP, G-13 , SLUDGE FROTH, 3,400 GALS, FIXED COVER, WIDTH: 7 FT 9 IN DEPTH: 7FT; LENGTH: 8 FT 6 IN A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD	D1550	C524		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
SUMP, G-19 , SLUDGE DEWATERING, 25,000 GALS, FIXED COVER WITH A PRV SET AT 1.1PSIG RELIEF PRESSURE, WIDTH: 11 FT DEPTH: 7 FT; LENGTH: 20 FT A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD	D1551	C522		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	C6.2, D182.2
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 366270 504062 Permit to Construct Issued: 08/18/00 TBD	D1608				H23.2
TANK, OB DIVERSION BOX, FIXED COVER, WIDTH: 5 FT; HEIGHT: 7 FT; LENGTH: 10 FT 3 IN A/N: 366270 504062	D1624	C522		HAP: (10) [40CFR 63 Subpart CC. #2. 6-23-2003]; VOC: 500 PPMV (5) [RULE 1176, 9-13- 1996]	C6.2, D182.2

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 12: WASTEWATER TREATMENT PLANTS					P13.2
Permit to Construct Issued: 08/18/00 <u>TBD</u>					
DRAIN SYSTEM COMPONENT A/N: 366270 <u>504062</u> Permit to Construct Issued: 08/18/00 <u>TBD</u>	D1647			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	H23.10

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CONDITIONS:

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

S13.1 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[RULE 1176, 9-13-1996]

[Systems subject to this condition: Process 12, System 1, 3]

S13.10 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60	SUBPART QQQ

[40CFR 60 Subpart QQQ, 10-17-2000]

[Systems subject to this condition : Process 2, System 4, Process 12, System 1]

DEVICE CONDITIONS

C6.2 The operator shall use this equipment in such a manner that the pressure being monitored, as indicated below, does not exceed 4.3 inches water column.

To comply with this condition, the operator shall install and maintain a(n) pressure gauge to accurately indicate the pressure of the closed vent system connecting this equipment to the carbon adsorption system.

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

[Devices subject to this condition: D518, D1543, D1544, D1551, D1624]

D. Monitoring/ Testing Requirements

D182.2 The operator shall test this equipment in accordance with the following specifications:

The test shall be conducted to determine the VOC concentration in the closed vent system and at the outlet of the carbon adsorption system and its control efficiency.

The test shall be conducted by April 30, 2001 in accordance with the source test protocol approved by the District. The source test protocol shall be submitted to the District at least 60 days prior to the test.

The District shall be notified of the date and time of the test at least 15 days prior to the test.

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Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

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

[Devices subject to this condition: D502, D503, D504, D518, D1543, D1544, D1551, D1624]

E. Equipment Operation/Construction Requirements

E193.3 The operator shall upon completion of construction, operate and maintain this equipment according to the following specifications:

The operator shall maintain a minimum 4.5 inches of water seal at the overflow outlet of this equipment.

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

[Devices subject to this condition: D518]

H. Applicable Rules

~~H23.10 This equipment is subject to the applicable requirements of the following rules or regulations:~~

Contaminant	Rule	Rule/Subpart
VOC	40CFR60,	SUBPART QQQ

~~[40CFR60 Subpart QQQ, 10-17-2000]~~

~~[Devices subject to this condition: D1647]~~

Note: The facility believes they made a modification to the wastewater system that triggered the applicability of Subpart QQQ and therefore this device condition will be replaced with the system condition S13.1

H23.15 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60,	SUBPART Kb

[40CFR60 Subpart Kb, 10-15-2003]

[Devices subject to this condition: D516]

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BACKGROUND:

ConocoPhillips Los Angeles Refinery operates a refinery as two separate locations in the city of Carson and Wilmington. At the Carson Plant crude oil is processed in the crude unit where it is heated and distilled into various hydrocarbon components which are further processed downstream at the Wilmington Plant. The Wilmington Plant is a major producer of fuel products, including gasoline for Southern California. This evaluation is for the Wilmington Plant where it is part of the NO_x and SO_x RECLAIM Program. In addition, Wilmington's initial Title V permit was issued on July 1, 2009.

This evaluation covers an application to modify the facility's waste water treatment system to comply with 40 CFR 60, Subpart QQQ, as listed in Table 1. The facility requested the following:

- Install secondary seals to two API Separators (D1543 & D1544) and Secondary Oil Skimming Sump (D509)
- Convert primary seals of the API Separators and Secondary Oil Skimming Sump to liquid mounted seals
- Correct dimensions to the Secondary Oil Skimming Sump (D509)

Table 1- Submitted Applications

A/N	Date Received	Equipment	Device ID	Requested Action	Previous A/N
504061	12/08/2009	Title V Facility Permit Amendment	N/A	• Revise Title V Permit	N/A
504062	12/08/2009	Wastewater Treatment System	D1543, D1544, D509	• Install secondary seals • Convert primary seals to liquid mounted seals • Correction dimensions	366270

PERMIT HISTORY

The modifications under the previous Permit to Construct (A/N 366270) that was issued on August 18, 2000, have been complete.

When ConocoPhillips submitted application AN 409297, the applicant requested several administrative changes to the devices, but the changes were never incorporated into the permit. The changes will be incorporated in this revision.

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COMPLIANCE HISTORY

In 2005, AQMD investigated whether there were compliance issues with Rule 1176(e)(2)(B)(iv)- "Hatches on covers shall be kept closed and free of gaps, except when opened for active inspection, maintenance, sampling, and repair." AQMD did a series of inspections of all the major refineries' waste water treatment system in the District's basin. The three main areas of concern with potential violations of this requirement were screens, main Oil-Water separators, and gas floatation units.

On April 20th, 2006, AQMD's Assistant Deputy Executive Officer, Mohsen Nazemi, resolved the issue and stated the "intent" of the rule was to let the facility continue their current practices for inspection, maintenance, sampling and repair (IMSR). Thus, the practice of opening hatches to clean and adjust the trough would not constitute a violation, even if they open the hatch often and keep it open for extended period of time. (See Attachment I for Memorandum). For more information, please refer to A/N 366270.

COMPLIANCE RECORD REVIEW:

As of April 2, 2010 a check of the AQMD Compliance Database for the past two years showed that this facility was issued 9 Notice of Violations (NOVs) and 1 Notice to Comply (NTC). There were issues with COP's Wastewater system (4 NOVs issued) within the past two years. However, all the

NOVs are back into compliance. One NOV and one Notice to comply is still pending, but the violation was not for the subject equipment. For detailed violation descriptions, refer to Appendix A.

FEE EVALUATION:

The fees paid for the applications submitted are as follows:

Table 2-Application Fees Submitted

A/N	Equipment	BCAT/ CCAT	Type	Status	Fee Schedule FY 09-10	Fee Required, \$	Fees Paid, \$
504061	Title V Facility Amendment Fee	555009	80	20	--	\$1,687.63	\$1,687.63
504062	Wastewater Treatment System	294962	80	20	E	\$5,148.93	\$5,148.93
	Expedited Permit Processing pursuant to Rule 301(u)	--	--	--	--	*	\$2,574.47
*Expedited fees not accepted					Total:	\$6,836.56	\$6,836.56
					Net Fee Due:		\$0.00

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PROCESS DESCRIPTION^a:

All wastewater generated at the Wilmington Plant is pretreated at the Oil Recovery Unit (ORU) prior to discharging to the Los Angeles Terminal Island Treatment Plant (TITP) through the City sewer system. The ORU pretreatment system consists of API separators, DAF units, and an observation basin. In addition to the ORU, the facility also maintains storm water systems with storage capacity capable of handling a 25-year frequency storm.

Wastewater generated from the south, central, and north areas of the refinery enter Collection Box B for initial pH adjustment and sulfide control using caustic, acid, and ferrous sulfate. The wastewater is then discharged to Box A, where it mixes with the wastewater flow from the LPG Loading/Unloading area and storm water holding Tanks 461 and 462. From Box A, wastewater enters the two API separators (F1A and F1B), which operate in parallel.

The API Separators have a capacity of 6,000 gpm each and remove gross liquid oil and sludge (oily sediment) with a mechanical system that skims floating liquid oil on top of the water and scrapes oily sludge from the bottom. The scrapers skim oil off the surface of the wastewater toward oil skimmers. The skimmers move oil to pumps that transfer it to Tanks 198 and 199. The scrapers then travel along the bottom of the separators pushing sludge toward a trough equipped with a screw conveyor. The screw moves the sludge to a sump where pumps transfer it to Tanks 438 and 439. If necessary, the effluent from the API separators can be treated with caustic, acid, and ferrous sulfate for pH adjustment and sulfide control.

The API Separators' effluent flow is divided between three DAF Units, F-3A/B/C, where the process of free oil separation and oily sludge removal continues. Chemicals are added to the API separator effluent to initiate the process of coagulation before the water enters the DAF Units. Air is dissolved into the effluent water under pressure in Flocculator Tanks F-2A/B/C. When released to atmospheric pressure in the DAF Units, the dissolved air forms bubbles that agglomerate with suspended oily particles of neutral buoyancy, causing them to rise to the surface where the "float" can be skimmed for oil recovery. Any heavy particles that settle to the bottom of the DAF Units are removed by a sludge system similar to the API separators.

The effluent flow from the DAF Units drains to the observation basin (OB). The OB serves as a clarification basin for final oil separation and visual inspection of the treated effluent. It has a capacity of 1.4 million gallons and provides 6 to 8 hours of residence time for trace amounts of remaining oil or float to separate. Skimmers in the basin remove any oil or float not removed in the API Separators or DAF Units, which is then pumped to Tanks 198 and 199. The treated wastewater flows over an overflow weir and is metered before discharging to the Los Angeles City Sewer System.

The skimmed oil from the API Separators and OB is collected in Tanks 198 and 199. Dry oil is drawn off the top of the tanks and is pumped to recovered oil tankage for reprocessing in the refinery process units. Sludge drawn off the middle of the tanks is heated with steam in Heat Exchanger E-1 and is recycled back to Tanks 198 and 199 for further oil separation. Water decanted from these tanks is recycled back to the API separators. Remaining sludge in Tanks 198 and 199 is sent to Tanks 438 and 439, where it is combined with sludge from the API Separators and DAF Units.

^a Process Description provided by ConocoPhillips

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The sludge from the API Separators, DAF Units, and Tanks 198 and 199 is collected in Tanks 438 and 439. Through settling and decanting, the sludge is concentrated to about 30% water. The decanted water is recycled back to the API Separators. The concentrated sludge is shipped via vacuum truck to the Carson Plant for further oil recovery in the Coker.

During rainstorms, the refinery water flow can exceed the design rate of Oil Recovery Unit. The primary equipment used for storm water handling includes storm water surge Tank F-8, impound storm Tanks 461 and 462, and five storm water surge high capacity pumps for transferring water from storm water surge Tank F-8 to Tanks 461 and 462.

EMISSIONS:

Please note that the emissions remain unchanged as a result of this modification.

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RULES EVALUATION:

PART 1 STATE REGULATIONS

California Environmental Quality Act (CEQA)

CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid or eliminate identified significant adverse impacts of these projects be considered. The CEQA Applicability Form (400-CEQA) indicates that the proposed project does not have any impacts which trigger the preparation of a CEQA document. The expected impacts of the project on the environment are not significant, this application is to install secondary seals on two API Separators and Secondary Oil Skimming Sump; therefore a CEQA analysis is not required.

PART 2 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>This modification meets all criteria in Rule 212 for permit approval. The installation of secondary seals on two API Separators and Secondary Oil Skimming Sump does not affect the operation 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>This modification 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); and (3) the modified permit unit does not have an increased cancer risk greater than, or equal to, one in a million (1×10^{-6}) during a lifetime of 70 years or pose a risk of nuisance.</p>	
Rule 401	Visible Emissions	November 9, 2001
(b)(1)	<p>No visible emissions have been reported and are not expected under normal operating conditions. Continued compliance is expected with proper operation and maintenance.</p>	
Rule 402	Nuisance	May 7, 1976
	<p>No nuisance complaints have been reported and are not expected provided that the operation is conducted according to design. Continued compliance with Rule 402 is expected.</p>	
Rule 404	Particulate Matter-Concentration	February 7, 1986
	<p>This rule requires particulate matter discharged into the atmosphere be less than the standard listed in Table 404(a) of this rule. The API Separators and the Secondary Oil Skimming Sump are not expected to have PM emissions. Therefore, compliance is expected.</p>	

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Rule 464	Wastewater Separators	December 7, 1990
	<p>The facility's API separators and Secondary Oil Skimming Sump are equipped with a combination of solid and floating covers in accordance with Rule 464(b). Because the facility complies with R1176, the requirements of R464 are met. Therefore, compliance is expected.</p>	

Rule 1173	Fugitive Emissions of Volatile Organic Compounds	December 6, 2002
	<p>This Rule specifies leak control, identification, operator inspection, maintenance, and recordkeeping requirements for valves pumps, compressors, pressure relief valves, and other components from which fugitive VOC emissions may emanate.</p> <p>No new fugitive components will be installed. Therefore, continued compliance with rule 1173 is expected.</p>	

Rule 1176	VOC Emissions from Wastewater Systems	September 13, 1996
	<p>This rule is intended to limit volatile organic compound (VOC) emissions from wastewater systems that are located at petroleum refineries, on-shore oil production fields, off-shore oil production platforms, chemical plants, and industrial facilities</p>	
(e)(1)	<p>Wastewater systems and closed vent systems (except sump and wastewater separator covers) shall not emit VOC emissions greater than 500 ppm.</p> <p>According to AQMD's compliance data base, COP was issued an NOV (#P26967) on 4/16/09 for their West API for having a gap greater than 1/2" and exceeding 500 ppm in emissions. The facility is in compliance for this NOV and is expected to continue to comply.</p>	
(e)(2)(A)	<p>Sumps and Wastewater Separators: The facility must have a floating cover equipped with seals, fixed cover with a closed vent system vented to an APC, or any other alternate control measure.</p> <p>COP currently complies with (2)(A)(i). The API's (D1543 & D1544) and one sump (D509) with floating covers.</p>	
(e)(2)(B)	<p>Sump and Wastewater Separator Covers, both fixed and floating shall meet all of the following requirements: ✓ = Complies</p>	
Specification:		Complies?
(i)	The cover material shall be impermeable to VOCs, and free from holes, tears, or openings.	✓
(ii)	Drains on covers shall be provided with a slotted membrane fabric cover, or equivalent, over at least 90 percent of the open area.	✓
(iii)	Gauging or sampling openings on the separator shall be covered. The covers shall be kept closed, with no visible gaps between the cover and the separator, except when the gauging or sampling device is actively being used.	✓
(iv)	Hatches on covers shall be kept closed and free of gaps, except when	✓

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Rule 1176	VOC Emissions from Wastewater Systems	September 13, 1996
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	opened for active inspection, maintenance, sampling, or repair.	
(v)	The perimeter of a cover, except for a floating cover, shall form a seal free of gaps with the foundation to which it is attached.	✓
(vi)	A floating cover shall be designed and maintained so that the gap between the separator or sump wall and the seal does not exceed 1/8 inch for a cumulative length of 97 percent of the perimeter of the separator. No gap between the wall and the seal shall exceed 1/2 inch.	✓

In 2005, AQMD investigated whether there were compliance issues with Rule 1176(e)(2)(B)(iv)- "Hatches on covers shall be kept closed and free of gaps, except when opened for active inspection, maintenance, sampling, and repair." AQMD did a series of inspections of all the major refineries' waste water treatment system in the District's basin. The three main areas of concern with potential violations of this requirement were screens, main Oil-Water separators, and gas floatation units.

On April 20th, 2006, AQMD's Assistant Deputy Executive Officer, Mohsen Nazemi, resolved the issue and stated the "intent" of the rule was to let the facility continue their current practices for inspection, maintenance, sampling and repair (IMSR). Thus, the practice of opening hatches to clean and adjust the trough would not constitute a violation, even if they open the hatch often and keep it open for extended period of time. (See Attachment I for Memorandum). For more information, please refer to A/N 366270.

(e)(3) Sewer Lines:

✓ = Complies

	Specification:	Complies?
	(A) All sewer lines shall be completely enclosed so that no liquid surface is exposed to the atmosphere. The manhole cover shall remain fully closed, except when opened for active inspection, maintenance, sampling, or repair	✓
	(B) All openings in the sewer line manhole covers shall be completely sealed.	✓
(e)(4)	Any new process drain installed after September 13, 1996, shall be equipped with water seal controls or any other alternative control measure which is demonstrated by the applicant to be equivalent, or more effective than water seal controls in reducing VOC emissions, as approved in writing by the Executive Officer. The new process drains that have been installed after September 13, 1996 are installed with a "p-trap" seal.	

(e)(5) Junction boxes:

✓ = Complies

	Specification:	Complies?
	(A) Junction boxes shall be totally enclosed with a solid, gasketed, fixed cover or a manhole cover. Each fixed cover shall be allowed to have an open vent pipe no more than four inches in diameter and at least three feet in length. Each manhole cover on junction boxes shall be allowed to have openings totaling no more than 12 square inches. The manhole cover shall remain fully closed, except when opened for active inspection, maintenance, sampling, or repair.	✓

(e)(6) COP Wilmington complies with paragraph B.

(e)(7) Additional Requirements for DSCs at Petroleum Refineries:

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Rule 1176	VOC Emissions from Wastewater Systems	September 13, 1996
	In COP's R1176 Plan (AN 332225), COP choose R1176(e)(7)(A).	
(f)(1)	Inspection and Monitoring Frequency: Per (f)(1)(A), at a minimum and TV permit conditions on carbon canisters require daily monitoring.	
	Therefore, COP is in compliance with this rule and is expected to continue to comply.	

Regulation XIII	New Source Review (NSR)	December 6, 2002
	NSR does not apply because this permit action does not result in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia.	

Rule 1401	New Source Review of Toxic Air Contaminants	March 7, 2008
	This rule has specific limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants listed in Table I of this rule.	
	Since this permit action is not considered to be a new permit unit, relocation, or modification that has an increase in emissions, this rule does not apply.	

Regulation XVII	PREVENTION OF SIGNIFICANT DETERIORATION (PSD)	
	As of July 25, 2007, the USEPA signed a new Limited PSD Delegation agreement with SCAQMD. SCAQMD now has the PSD responsibility for all new PSD sources and all modifications to existing PSD sources where the applicant is requesting to use SCAQMD's existing Regulation XVII to determine PSD applicability for a modification (and not the recent calculation methodology adopted by EPA as part of the NSR Reform).	
	Since this permit action does not have an increase in emissions of any attained criteria pollutants, a PSD applicability is not required.	

Regulation XX	RECLAIM	May 6, 2005
	ConocoPhillips is a RECLAIM facility. Therefore, it is subject to Regulation XX. Since this permit action will not result in an emission increase in RECLAIM pollutants, there are no RECLAIM requirements applicable to this modification.	

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Regulation XXX	Title V
	<p>ConocoPhillips has been designated as a Title V facility. On July 1, 2009, the initial permit became effective.</p> <p>This project is considered to be a "Minor Permit Revision". Meaning that the permit revision does not: require RACT, violate a regulatory requirement, require any significant change in monitoring terms or conditions in the permit, require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit, result in an emission increase of RECLAIM pollutants, result in an increase of emissions subject to NSR or HAP, change a permit condition to avoid an applicable requirement, install a new permit unit subject to NSPS, or modify or reconstruct an existing permit unit resulting in new or additional NSPS and/or NESHAP requirements</p> <p>Since this proposed permit is applicable for a minor permit revision, R3003(j)(1)(S) requires an EPA 45 day review.</p> <p>Therefore, the requirements of this regulation have been met and ConocoPhillips is expected to continue to comply.</p>

PART 3 FEDERAL REGULATIONS

40CFR Part 60 Subpart QQQ	STANDARDS OF PERFORMANCE FOR VOC EMISSIONS FROM PETROLEUM REFINERY WASTEWATER SYSTEMS
	<p>Subpart QQQ regulates refinery wastewater systems that were constructed, reconstructed, or modified after May 4, 1987 or a new, modified, or reconstructed aggregate facility shall comply with the requirements of §§60.692-2 and 60.692-3.</p> <p>In 2006, ConocoPhillips disclosed to the EPA and the District "through a voluntary internal audit that historical modifications to the refinery oily water sewer system at the Wilmington Plant might have caused the 'aggregate affected facility, including the oil water separators and slop oil system, to become subject to 40 CFR 60, Subpart QQQ". (See Attachment II for ConocoPhillips Self-Policing Disclosure letter)</p> <p>The installation of the secondary seals on the floating covers of the two API separators and the Secondary Skimming Sump for ConocoPhillips' wastewater treating system will be in accordance with §60.693-2(a) Alternative standards for oil-water separators. Their primary seals will be converted to liquid mounted seals to comply with §60.693-2(a)(1)(i)(A). Also see, LARW TV Semi-annual Monitoring Report submitted 2/26/2010 (see Deviation #7)</p>

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40CFR Part 61 Subpart FF	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) FOR BENZENE WASTE OPERATIONS
	<p>The provisions of this subpart apply to owners and operators of chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries.</p> <p>The provisions of this subpart apply to owners and operators of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by any facility listed in paragraph (a) of this section. The waste streams at hazardous waste treatment, storage, and disposal facilities subject to the provisions of this subpart are the benzene-containing hazardous waste from any facility listed in paragraph (a) of this section. A hazardous waste treatment, storage, and disposal facility is a facility that must obtain a hazardous waste management permit under subtitle C of the Solid Waste Disposal Act.</p> <p>§ 61.352 Alternative standards for oil-water separators.</p> <p>(a) As an alternative to the standards for oil-water separators specified in §61.347 of this subpart, an owner or operator may elect to comply with one of the following: (1) A floating roof meeting the requirements in 40 CFR 60.693-2(a).</p> <p>The facility has elected to comply with Subpart's FF Alternative standards for oil water separators. Since the facility is adding seals to the API separators that meet the requirements of §60.693-2, the facility complies with this subpart.</p>

40CFR Part 63 Subpart CC	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) FROM PETROLEUM REFINERIES
	<p>The equipment is subject to this regulation due to its potential to emit hazardous air pollutants including benzene.</p> <p>§ 63.647 Wastewater provisions: This subsection requires wastewater streams to comply with 40 CFR 61 Subpart FF. Since the subject equipment is subject to NSPS 40 CFR 61 Subpart FF, the requirements for NESHAP 40 CFR 63 Subpart CC are already fulfilled per § 63.647(a).</p> <p>Because of §63.640(q) it allows the permitting authority (SCAQMD) to allow consolidation of the monitoring, recordkeeping, reporting requirements of this subpart overlap with SCAQMD regulations' monitoring, recordkeeping, reporting requirements.</p> <p>Compliance with this subpart is expected.</p>

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CONCLUSION:

Based on the above evaluation ConocoPhillips is in compliance with all required rules and regulations and is expected to continue to comply. ConocoPhillips is also in accord with the permit equipment and conditions. (See Attachment III for their approval) Therefore, the following is recommended:

A/N	Recommendation
504062	Issue Permit to Construct with conditions listed in the Conditions Section
504061	Issue Minor Title V Facility Permit Revision

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APPENDICES:

- A. Compliance Status for NOV/NCs

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APPENDIX A: COMPLIANCE STATUS FOR NOVSNCS

NOTICE NO.	NOTICE TYPE	ISSUE DATE	FOLLOW UP STATUS	VIOLATION
D19705	NC	11/19/2009	PENDING	MISSING DATA FOR EACH NOX AND SOX CEMS OPERATIONS DURING THE 2007-2008 COMPLIANCE YEAR. PROVIDE 1)START AND END TIME OF EACH INTERVAL BEYOND MIDNIGHT. 2)REPORTED EMISSIONS FOR EACH INTERVAL. 3) CORRECT EMISSIONS FOR EACH INTERVAL,
P26972	NOV	3/5/2010	PENDING	INTERNAL COMBUSTION ENGINES EMERGENCY FIRE. D675, D076, D677AND D678 WERE OPERATED GREATER THAN 34 HRS. IN VIOLAITON OF PERMIT TO OPERATE CONDITION C1.75.
P26964	NOV	2/27/2009	INCOMP	DEVICE ID# 670 WAS OPERATED GREATER THAN 20 HOURS IN VIOLATION OF CONDITION C1.68. DEVICE ID# 670 IS AN IC. ENGINE
P26966	NOV	4/2/2009	INCOMP	THE AQMD WAS NOT NOTIFIED OF AN EXCEEDANCE OF THE 500,000 SCF DURING AN UNPLANNED FLARE EVENT WITHIN ONE HOUR.
P26967	NOV	4/16/2009	INCOMP	1) A GAP GREATER THAN 1/2 INCH WAS FOUND AT THE NORTH SIDE OF THE WEST API. 2) EMISSIONS GREATER THAN 500 PPM WERE FOUND AT THE API. 3) FAILURE TO COMPLY WITH ADMINISTRATIVE CONDITION #2 OF SECTION E.
P26969	NOV	6/3/2009	INCOMP	THE PRIMARY SEAL OF TANK 6, DEVICE ID#D549 WAS NOT REPAIRED IN 72 HOURS AND A WRITTEN REPORT OF THE VIOLATION WAS NOT SUBMITTED WITHIN 120 HOURS.
P26970	NOV	8/21/2009	INCOMP	FLARING OCCURRED BECAUSE OF A PREVENTABLE EQUIPMENT FAILURE AT SULFUR RECOVERY PLANT NO. 2
P48713	NOV	8/28/2008	INCOMP	1) Light service leak in excess of 50,000 ppm - 2 counts, 2) Leak at water separator cover exceeding 500 ppm-13 counts, 3) Waste water separator cover with openings or holes-1 count, 4) Equip. operating contrary to permit cond. & not in good oper. cond.

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NOTICE NO.	NOTICE TYPE	ISSUE DATE	FOLLOW UP STATUS	VIOLATION
P48714	NOV	8/28/2008	INCOMP	1) Light service leak of 50,000 ppm or greater - 2 counts, (2) Open end at process line - 1 count, (3) Light liquid leak of 3 drops per minute or more - 1 count, (4) Leak at wastewater separator cover exceeding 500 ppm.
P48715	NOV	8/28/2008	INCOMP	Leak or wastewater separator cover in excess of 500 ppm - 3 counts.

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ATTACHMENTS:

- I. AQMD Memorandum Wastewater Treatment System Compliance Issues
- II. ConocoPhillips Self-Policing Disclosure Letter For 40 CFR Subpart QQQ
- III. ConocoPhillips Approval of Draft Permit

ATTACHMENT I

AQMD Memorandum Wastewater Treatment System Compliance Issues



A/N 366270

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Engineering & Compliance

MEMORANDUM

DATE: April 21, 2006
TO: File
FROM: Bhaskar Chandan
SUBJECT: WWTS Compliance Issues - Meeting Notes

Date: April 20, 2006
Time: 2 PM
Attendees: Pang Mueller, Mohsen Nazemi, Laki Tisopulos, William Wong, Cher Snyder, Paul Park, Bhaskar Chandan
Topic: Rule 1176(e)(2)(B)(iv) Compliance Issues for ConocoPhillips and other area refineries
Handouts & References: Rule 1176, pp 5,6 & 7; Summary Sheet w/ Flow Diagram and Table listing all refineries and issues; Pang's 4/11/06 email and attached report titled Refinery Inspection; SC Refinery WWTS Pics PowerPoint presentation

Rule 1176(e)(2)(B)(iv): "Hatches on covers shall be kept closed and free of gaps, except when opened for active inspection, maintenance, sampling, or repair."

Pang opened the meeting by briefly explained the problem, and indicating that staff believes that refineries may be in violation of the above referenced rule. She then asked Paul to present each area of concern separately, starting with the Screens.

During Paul's presentation, various issues were discussed, and some questions were resolved. Following is my understanding of the issues resolved:

- Per Mohsen, the "intent" of the rule was to let the facility continue their current practices for inspection, maintenance, sampling and repair (IMSR), such that no design change was expected. Thus, *the practice of opening the hatches to clean and adjust the trough would not constitute a violation*, even if they open the hatch often and keep it open for extended period of time. It was generally agreed that we may not be able impose a requirement for the refinery to install a see through plexi-glass window to avoid opening the hatch for trough adjustments. We can probably impose conditions for the refinery to minimize excess emission during such cleaning. Also, the key work being "active" for IMSR, unattended open hatches may constitute a violation.

- Opening the hatches for cleaning the screens would constitute maintenance and as such is not a violation. However, we may again be able to impose requirements that they keep the hatch closed between screen removal and reinstallation (especially if it is completely taken out and cleaned at some other location). We can suggest to them to keep a spare screen which can be replaced quickly, so as to minimize emissions.
- Opening the hatches to skim the oil, primarily because the pumps are inadequate to handle the duty, may not be considered as active maintenance, and as such may constitute a violation. This can be considered as a design issue and not a maintenance issue. Pang said that she will have a meeting with ConocoPhillips to discuss this matter.
- Management felt that it was not fruitful to amend the Rule just because of one refinery. It would be best to handle the situation with the refinery and see if they would voluntarily comply with the rule intent.

In conclusion, management feels that only the oil skimming may be an issue, and Pang will advise the Engineers after she discusses this issue with ConocoPhillips.

Lastly, Pang discussed the source test issue at Chevron regarding their application for introducing heavy crude in the crude unit (unrelated to the WWTS issues).

Meeting was adjourned around 3:45 PM.

ATTACHMENT II:

ConocoPhillips' Self-Policing Disclosure Letter For 40 CFR Subpart QQQ



Cynthia Carter

From: marshall.g.waller conocophillips.com
Sent: Friday, February 12, 2010 10:36 AM
To: Cynthia Carter
Subject: RE: Wastewater Treatment Applications AN 504061/504062
Attachments: COP LARW ORU General Description.doc; W409Y1005.tif; W409Y1001.TIF; W409Y1002.tif; W409Y1003.tif; COP LARW Subpart QQQ Self-disclosure 02-06-06.pdf

Cynthia,

For #1, see attached general description of the ORU and P&ID's.

For #2, please see the attached self-disclosure that we submitted to EPA, with a copy to the District (Pang Mueller), which has an explanation of historical projects in the early 1990's that we believe triggered QQQ for the oil-water separators.

Marshall

From: Cynthia Carter [mailto:ccarter@aqmd.gov]
Sent: Tuesday, February 09, 2010 5:49 PM
To: Waller, Marshall:
Subject: Wastewater Treatment Applications AN 504061/504062

Marshall,

Could you provide me with some info for Wilmington's Wastewater applications.

1. A description of COP's Waste Water Treatment System's process
2. Elaborate on why and when historical modifications might have caused the aggregate affected facility subject to 40 CFR 60, Subpart QQQ.

Thank you.
Cynthia

From: marshall.g.waller conocophillips.com
Sent: Thursday, February 04, 2010 8:35 AM
To: Cynthia Carter
Subject: RE: revised flare venting conditions per Rule 1118

Thanks for the update.

Marshall

From: Cynthia Carter [mailto:ccarter@aqmd.gov]
Sent: Wednesday, February 03, 2010 3:08 PM

To: Waller, Marshall:
Subject: RE: revised flare venting conditions per Rule 1118

Hi Marshall,

Yes, I've been working on the evaluation (but I've been out of the office for a week and need to catch up with my other tasks). Hopefully I can get you a draft permit within the next two weeks.

-Cynthia

From: marshall.g.waller conocophillips.com
Sent: Wednesday, February 03, 2010 10:18 AM
To: Cynthia Carter
Subject: RE: revised flare venting conditions per Rule 1118

Cynthia,

Any progress on the wastewater treatment applications (AVN 504061 & 504062)? My project guys will be bugging me about this project pretty soon.

Marshall

From: Cynthia Carter [mailto:ccarter@aqmd.gov]
Sent: Wednesday, January 06, 2010 2:44 PM
To: Waller, Marshall:
Subject: RE: revised flare venting conditions per Rule 1118

Marshall,

No, I haven't had a chance to review the wastewater treatment applications (AN 504061 & 504062). Do you want these applications to be a priority? Does Carson have the same permit/applications?

Thanks,
Cynthia

Cynthia Carter
Air Quality Engineer
Refinery and Waste Management Permitting
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
(909)396-2431
ccarter@aqmd.gov

-----Original Message-----

From: marshall.g.waller conocophillips.com
Sent: Tuesday, January 05, 2010 1:52 PM
To: Cynthia Carter
Subject: RE: revised flare venting conditions per Rule 1118

Cynthia,



Los Angeles Refinery

1660 West Anaheim Street
Wilmington, CA 90744
Phone (310) 952-6000

Mr. John Kim
Environmental Protection Agency
Region IX
Mail Code AIR-5
75 Hawthorne Street
San Francisco, CA 94105

February 6, 2006

**Via Facsimile and
Certified Mail/Return Receipt Requested**

Re: ConocoPhillips Company Self-Policing Disclosure Letter – Facility ID No. 800363
NSPS Subpart QQQ – Wilmington Plant, Wilmington, CA

Dear Mr. Kim:

This letter follows up on the voice mail message I left with you, and a telephone discussion I had with Pang Mueller of the SCAQMD, on Friday, February 3rd, about the status of VOC Emissions for Petroleum Refinery Wastewater Systems (40 C.F.R. Part 60, Subpart QQQ) at ConocoPhillips Company's Los Angeles Refinery - Wilmington Plant. As I explained, ConocoPhillips is making a preliminary notification pursuant to the *EPA Policy on Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations* ("Self-Reporting Policy").

In response to questions from a Corporate Environmental Compliance Audit of the Wilmington Plant conducted in May of 2005, ConocoPhillips investigated whether the refinery's wastewater system (the U-118 Hydrogen Generation Unit and the southern wastewater header), could have triggered Subpart QQQ. Included in this analysis was information from the Ashland/ERM QQQ workshop held at the NPRA Conference in April 2003. After review and analysis of the facts, applicable statutes and regulations, and interpretative guidance, it appeared that construction of U-118 may have added a "new individual drain system" connected to a new junction box. Therefore, NSPS Subpart QQQ applicability might have been triggered for the "aggregate affected facility", which includes the Oil-water Separator.

ConocoPhillips retained the consulting firm that presented the NPRA workshop, ERM, to independently review the applicability of NSPS Subpart QQQ to U-118. After extensive review, on January 17, 2006, ERM concluded in its opinion that re-routing of the southern wastewater header, which immediately preceded construction of the U-118 drain system, constituted a "modification" of the aggregate facility that includes the Oil-water Separation Facilities. Based on this probable change in compliance status, ConocoPhillips will take appropriate actions to ensure continued compliance with the regulations, including continuing in compliance with local South Coast Air Quality Management District wastewater system rules.

ConocoPhillips acquired the Wilmington Plant following corporate mergers in 2001-2002 that included Tosco Corporation, which had purchased the facility from Union Oil Company of California (Unocal) on April 1, 1997. During its ownership of the Wilmington Plant, Unocal completed several construction projects after the effective date of Subpart QQQ that made

changes to the refinery's wastewater system. In 1998, Tosco made a review of previous construction projects, including the U-118 Hydrogen Generation Unit. That review concluded that the U-118 sewer system, and related re-routing of the southern wastewater header, was a "reconstruction" of older drain systems, which were completely demolished, that were located in the plot area occupied by the new U-118. Tosco concluded that the reconstruction triggered Subpart QQQ for only the U-118 individual drain system, including downstream junction boxes up to the Oil-water Separation Facilities, but not any facilities inside the Oil-water Separator. Based on updated guidance from the April 2003 QQQ workshop, ConocoPhillips' ongoing efforts to assess compliance, and ERM's 2006 detailed assessment of U-118, it appears that this prior interpretation may have been incorrect.

Because the 2006 ERM assessment of U-118 identifies a probable change in Subpart QQQ status at Wilmington Plant, ConocoPhillips is formally reporting potential noncompliance at the Wilmington Plant with NSPS Subpart QQQ, pursuant to the terms of the Self-Reporting Policy. Consistent with the Self-Reporting Policy, ConocoPhillips discovered the potential non-compliance based on findings from a corporate audit and further systematic investigative follow-up by the facility and an independent consultant. Also, ConocoPhillips voluntarily undertook the investigation that identified any potential non-compliance with the applicable regulations. Therefore, any potential non-compliance was not discovered as a result of any legally mandated monitoring or sampling requirement prescribed by statute, regulation, permit, judicial or administrative order, or consent agreement.

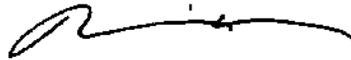
In addition, ConocoPhillips has promptly and voluntarily disclosed these issues to EPA, and disclosed any potential issue prior to: (1) the commencement of any federal, state or local agency investigation or the issuance of any request for information from any such agency; (2) receiving notice of any citizen suit; (3) the filing of any complaint by any third party; (4) the reporting of any violation to EPA or any other governmental agency by a "whistle blower" employee; or (5) imminent discovery of the non-reporting by any governmental agency.

To ConocoPhillips' knowledge, neither any specific potential violations (as that term is defined in the Self-Reporting Policy) or any closely related potential violations have occurred previously within the past three years at the Wilmington Plant, or within the past five years as part of a pattern at multiple facilities owned or operated by ConocoPhillips. Moreover, any potential non-compliance did not result in any serious harm, nor present any imminent and substantial endangerment to human health or the environment, and did not violate the terms of any judicial or administrative order or consent agreement. Finally, ConocoPhillips will fully cooperate with EPA and other agency requests for information regarding this issue.

Mr. Kim
February 6, 2006
Page 3

Notification of the issues described in this letter will also be provided by telephone to Ken Garing. If you have any questions concerning this disclosure or require any additional information, please contact me or ConocoPhillips' counsel, Siegmund Shyu, at 562-290-1723.

Very truly yours,



Miles Heller
Superintendent, Environmental Services

cc: Siegmund Shyu
Ken Garing - EPA NEIC
Pang Mueller - SCAQMD

Attachment III:

**ConocoPhillips Approval of
Draft Permit 04/06/2010**



Cynthia Carter

From: Waller, Marshall: [Marshall.G.Waller@conocophillips.com]
Sent: Tuesday, April 06, 2010 10:09 AM
To: Cynthia Carter
Subject: RE: DRAFT permit: Wastewater Treatment System AN 504062

Permit is OK. What's the timing look like on issuing this PTC?

Marshall

From: Cynthia Carter [mailto:ccarter@aqmd.gov]
Sent: Tuesday, April 06, 2010 9:30 AM
To: Waller, Marshall:
Subject: RE: DRAFT permit: Wastewater Treatment System AN 504062

Marshall,

Just to clarify, I didn't change the DRAFT permit per Linda's request. I only highlighted them.

Here are her changes bolded and underlined. Let me know if this is ok as well.

TANK, F-2A (WEST WEST), FLOCCULATOR, COVERED, WITH A MIXER, WIDTH: 16 FT; HEIGHT: 12 FT; LENGTH 24 FT A/N: 366270 Permit to Construct Issued: 08/18/00	D499
TANK, F-2C (WEST EAST), FLOCCULATOR, COVERED, WITH A MIXER, WIDTH: 16 FT; HEIGHT: 12 FT; LENGTH 24 FT A/N: 366270 Permit to Construct Issued: 08/18/00	D501
FLOATATION UNIT, FIXED ROOF, F-3A (WEST WEST), DISSOLVED AIR FLOATATION UNIT, WITH FROTH SLUDGE FLIGHT SCRAPER, WIDTH: 16 FT; DEPTH: 12 FT; LENGTH: 81 FT A/N: 366270 Permit to Construct Issued: 08/18/00	D502
FLOATATION UNIT, FIXED ROOF, F-3C (WEST EAST), DISSOLVED AIR FLOATATION UNIT, WITH FROTH AMD SLUDGE FLIGHT SCRAPER, WIDTH: 16 FT; DEPTH: 12 FT; LENGTH: 81 FT A/N: 366270 Permit to Construct Issued: 08/18/00	D504
TANK, HOLDING, FIXED ROOF, TK-436, 200,000 GALS FERROUS SULFATE , 145 BBL; DIAMETER: 14 FT; HEIGHT: 16 FT A/N: 366270 Permit to Construct Issued: 08/18/00	D512
TANK, HOLDING, FIXED ROOF, TK-437, 200,000 GALS FERROUS SULFATE , 250 BBL; DIAMETER: 10 FT; HEIGHT: 15 FT A/N: 366270 Permit to Construct Issued: 08/18/00	D513
SUMP, 3,400 GALS 3,400 GALS , SLUDGE FROTH, 3,400 GALS, FIXED COVER, WIDTH: 7 FT 9 IN DEPTH: 7 FT; LENGTH: 8 FT 6 IN	D1550

End of Engineering Evaluation

