

Attachment 1  
 Corrections to ConocoPhillips San Francisco Refinery (Plant A0016)  
 Title V Permit – March 1, 2004 Draft

Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
1	S-2 (U-229, B-301)	VII-A.1	Monitoring Type	321	Change monitoring type from "CEM source test" to "O2 Monitor". This heater has an O2 monitor and not a CEM.
2	S-3 (U-230, B-201)	VII-A.2	Monitoring Frequency	323	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
3	S-3 (U-230, B-201)	VII-A.2	Monitoring Type	323	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
4	S-4 (U-231, B-101)	VII-A.3	Monitoring Frequency	324	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
5	S-4 (U-231, B-101)	VII-A.3	Monitoring Type	324	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
6	S-5 (U-231, B-102)	VII-A.4	Monitoring Frequency	326	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
7	S-5 (U-231, B-102)	VII-A.4	Monitoring Type	326	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
8	S-7 (U-231, B-103)	VII-A.5	Monitoring Frequency	328	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
9	S-7 (U-231, B-103)	VII-A.5	Monitoring Type	328	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
10	S-8 (U-240, B-1)	VII-A.6	Limit	329	Delete line for O2 that contains the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
11	S-8 (U-240, B-1)	VII-A.6	Monitoring Type	329	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
12	S-9 (U-240, B-2)	VII-A.7	Monitoring Frequency	332	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
13	S-9 (U-240, B-2)	VII-A.7	Monitoring Type	332	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.

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14	S-10 (U-240, B-101)	VII-A.8	Monitoring Type	333	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
15	S-11 (U-240, B-201)	VII-A.9	Monitoring Frequency	335	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
16	S-11 (U-240, B-201)	VII-A.9	Monitoring Type	335	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
17	S-12 (U-240, B-202)	VII-A.10	Monitoring Frequency	337	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
18	S-12 (U-240, B-202)	VII-A.10	Monitoring Type	337	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
19	S-13 (U-240, B-301)	VII-A.11	Monitoring Type	338	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
20	S-14 (U-240, B-301)	VII-A.12	Monitoring Type	340	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
21	S-15 (U-244, B-501)	VII-A.13	Monitoring Type	342	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
22	S-16 U-244, B-502)	VII-A.14	Monitoring Type	343	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
23	S-17 U-244, B-503)	VII-A.15	Monitoring Type	345	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
24	S-18 U-244, B-504)	VII-A.16	Monitoring Type	347	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
25	S-19 (U-244, B-505)	VII-A.17	Monitoring Type	348	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
26	S-20 (U-244, B-505)	VII-A.18	Monitoring Frequency	350	Change monitoring frequency from "P/A" to "C". This heater has an O2 monitor that runs continuously.
27	S-20 (U-244, B-505)	VII-A.18	Monitoring Type	350	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
28	S-22 (U-248, B-606)	VII-A.20	Monitoring Frequency	353	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.

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29	S-22 (U-248, B-606)	VII-A.20	Monitoring Type	353	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
30	S-29 (U-200, B-5)	VII-A.21	Monitoring Frequency	354	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
31	S-29 (U-200, B-5)	VII-A.21	Monitoring Type	354	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
32	S-30 (U-200, B-101)	VII-A.22	Monitoring Frequency	356	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
33	S-30 (U-200, B-101)	VII-A.22	Monitoring Type	356	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
34	S-31 (U-200, B-501)	VII-A.23	Monitoring Frequency	357	Change monitoring frequency from "P/A" to "C". This heater has an O2 monitor that runs continuously.
35	S-31 (U-200, B-501)	VII-A.23	Monitoring Type	357	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
36	S-36 (U-200, New Heater)	II-A IV-A.24 VII-A.24	Description	8, 83-86, 358-360	Change name from "U200, B-N001" to "U200, B102". This will match the equipment number used on the P&IDs for the project.
37	S-36 (U-200, New Heater)	IV-A.24	Future Effective Date	85	Change from "startup date" to "after initial performance test" for BAAQMD Condition 21097 Parts 3a and 3b. This will allow us time to adjust the equipment and abatement device for optimum performance.
38	S-36 (U-200, New Heater)	VI	PC 21097	306	Change note after part 3b to read: "Part 3a and 3b shall not apply until after the conclusion of the initial performance testing of S-36."
39	S-36 (U-200, New Heater)	VII-A.24	Limit	359	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).

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40	S-36 (U-200, New Heater)	VII-A.24	Monitoring Type	359	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
41	S-43 (U-200, B-202)	VII-A.25	Monitoring Type	361	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
42	S-43 (U-200, B-202)	VII-A.25	Limit	361	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
43	S-44 (U-200, B-201)	VII-A.26	Limit	364	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
44	S-44 (U-200, B-201)	VII-A.26	Monitoring Type	364	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
45	S-107 (Tk 150)	IV-B18	Source List	234-241	Move tank from Table IV-B18 to IV-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 8/14/03 (see ESDR 283-03)
46	S-107 (Tk 150)	VII-B18	Source List	442-444	Move tank from Table VII-B18 to VII-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 8/14/03 (see ESDR 283-03)
47	S-124 (Tk 169)	IV-B18	Source List	234-241	Move tank from Table IV-B18 to IV-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 3/04/04 (see ESDR 094-04)
48	S-124 (Tk 169)	VII-B18	Source List	442-444	Move tank from Table VII-B18 to VII-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 3/04/04 (see ESDR 094-04)

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49	S-126 (Tk 172)	II-A	Make or Type	9	Change from “external floating roof with dome” to “internal floating roof with dome” as originally requested in Attachment 3 of ConocoPhillips’ appeal filed 12/30/03 with BAAQMD Hearing Board.
50	S-257 (Tk 1004)	II-A	Make or Type	10	Change from “external floating roof with dome” to “internal floating roof with dome” as originally requested in Attachment 3 of ConocoPhillips’ appeal filed 12/30/03 with BAAQMD Hearing Board.
51	S-258 (Tk 1005)	II-A	Make or Type	10	Change from “external floating roof with dome” to “internal floating roof with dome” as originally requested in Attachment 3 of ConocoPhillips’ appeal filed 12/30/03 with BAAQMD Hearing Board.
52	S-296, S-398 (Flares)	IV-L	Regulation Title or Description of Requirement	131	Fix typo in the description. Change “durinf” to “during”
53	S-296, S-398 (Flares)	VII-L	Monitoring Requirement Citation	391	Change citation “BAAQMD Condition 21092, Part 2” to “BAAQMD Condition 18255, Part 2”. PC 21092 is for S-300 (coker), not for the flares.
54	S-301 (Sulfur Pit U-234)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.
55	S-302 (Sulfur Pit U-236)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.
56	S-303 (Sulfur Pit U-238)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.

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57	S-301 (Sulfur Pit U-234)	VI	PC 20989	315	Change wording to similar wording as S-1001: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.
58	S-302 (Sulfur Pit U-236)	VI	PC 20989	315	Change wording to similar wording as S-1002: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.
59	S-303 (Sulfur Pit U-238)	VI	PC 20989	315	Change wording to similar wording as S-1003: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.
60	S-301 (Sulfur Pit U-234)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")
61	S-302 (Sulfur Pit U-236)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")
62	S-303 (Sulfur Pit U-238)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")
63	S-336 (U-231, B-104)	VII-A.29	Monitoring Frequency	368	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
64	S-336 (U-231, B-104)	VII-A.29	Monitoring Type	368	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
65	S-337 (U-231, B-105)	VII-A.30	Monitoring Frequency	370	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
66	S-337 (U-231, B-105)	VII-A.30	Monitoring Type	370	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.

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67	S-350	IV-O	Regulation Title or Description of Requirement	139	Change "Condition 21092" in heading to "Condition 21093". Condition 21092 is for S-300, not S-350.
68	S-350	VI	PC 383 and PC 21093	274, 302	Revised permit conditions 383 and 21093 are duplicative of each other. Please eliminate PC 21093 altogether and keep the revised PC 383.
69	S-351 (U-267, B-601/B-602)	VII-A.31	Limit	371	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
70	S-351 (U-267, B-601/B-602)	VII-A.31	Monitoring Type	372	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
71	S-371 (U-228, B-520)	VII-A.32	Monitoring Type	374	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
72	S-372 (U-228, B-521)	VII-A.33	Monitoring Type	377	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
73	S-438 (U-110, H-1)	VII-A.34	Monitoring Type	379	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
74	S-460 (U-250 Diesel Hydrotreater)	II-A	Description	13	Change name from "ULSD Hydrotreater" to "Diesel Hydrotreater". This is the name ConocoPhillips intends to call this unit.
75	S-460 (U-250 Diesel Hydrotreater)	VI	PC 20989	316	Change annual average from 11.68E6 bbls to 12.8E6 bbls. (35,000 bpd * 365 days/yr). Current limit of 11.68E6 is equivalent to 32,000 bpd annual average.
76	S-461 (U-250, New heater)	II-A IV-A.35 VII-A.35	Description	13 113-116 380-382	Change name from "U-250, B-1" to "U-250, B-701". This matches the name on the P&IDs for this heater.

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77	S-461 (U-250, New heater)	IV-A.35	Future Effective Date	115	Change from “startup date” to “after initial performance test” for BAAQMD Condition 21096 Parts 3a and 3b. This will allow us time to adjust the equipment and abatement device for optimum performance.
78	S-461 (U-250, New heater)	VI	PC 21096	304	Change note after part 3b to read: “Part 3a and 3b shall not apply until after the conclusion of the initial performance testing of S-461.”
79	S-461 (U-250, New heater)	VII-A.35	Limit	381	Delete lines for O2 and NOx that contain the Limit “CEM for NOx and O2 (or CO2)”. This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
80	S-461 (U-250, New heater)	VII-A.35	Monitoring Type	381	Change monitoring type from “CEM” to “O2 monitor”. This heater has an O2 monitor.
81	S-463 (Butane Caustic Treatment System)	VI	PC 20989	316	Change annual average to a bbls/yr basis rather than lbs/yr for consistency with Table II-A. 1000 bbls/day * 365 days/yr = 36500 bbls/yr.  Note: The pounds per year listed in this permit are too low. 1000 bbls/day is equivalent to 203,162 lbs/day. 73.365 E6 lbs/365 days equal 201,000 lbs/day, which is equivalent to throughput limit of 989 bbls/day.



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82	S-463 (Butane Caustic Treatment System)	VII-V	Limit	406	Change limit from "73.365 E6" bbl/yr to "36,500 bbls/yr". See related comment for S-463 above.  Note: The pounds per year listed in this permit are too low. 1000 bbls/day is equivalent to 203,162 lbs/day. 73.365 E6 lbs/365 days equal 201,000 lbs/day, which is equivalent to throughput limit of 989 bbls/day.
83	S-1001 (Sulfur Plant U-234)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"
84	S-1002 (Sulfur Plant U-236)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"
85	S-1003 (Sulfur Plant U-238)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"
86		IX A-1	Permit Shield	467	Delete Table IX-B.1 in its entirety and insert the permit shield provisions shown Attachment 2 into Table IX-A.1.