



South Coast Air Quality Management District

South Coast
AQMD

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*Office of the Executive Officer
Wayne Nastri
909.396.2100, fax 909.396.3340*

Via email and US Mail

March 21, 2019

Marshall Waller
Phillips 66 Company
1660 West Anaheim Street
Wilmington, CA 90744

**SCAQMD Partial Approval of the Fenceline Monitoring Plans for the Phillips 66
Carson and Wilmington Refineries, (Facility ID 171109 – Carson Refinery and
Facility ID 171107 – Wilmington Refinery)
SCAQMD Rule 1180**

On August 1, 2018, the Phillips 66 Company (Phillips 66), submitted to the South Coast Air Quality Management District (SCAQMD) fenceline air monitoring plans for their Carson and Wilmington facilities pursuant to SCAQMD Rule 1180, and as required by the Health and Safety Code section 42705.6. SCAQMD staff had reviewed the plans and provided the refinery with comments. On November 30, 2018 Phillips 66 submitted revised drafts fenceline air monitoring plans (Plans) which were published for public comment on December 07, 2018. The public comment period closed on January 11, 2019. SCAQMD is pleased to inform you that sections 1 (with the exception of the "Backup Air Monitoring System" portion), 2, and 3 of Phillips 66 Plans for the Carson and Wilmington refineries have been approved, provided that Phillips 66 agrees to the additions and modifications outlined below and shown in Exhibits A and B:

1. Include one additional set of rotating (or two sets of fixed) open-path air monitoring instruments on the north-eastern portion of the Carson refinery to ensure that all monitoring paths are of adequate length. Also include one additional set of rotating (or two sets of fixed) open-path instruments to completely enclose the four large storage tanks on the western portion of the Carson refinery. All of these additional paths will include installation of both UV-DOAS and OP-FTIR technology to measure all air pollutants outlined in Table 3.2 of the Plan for open-path technologies. This change is reflected in Exhibit A.
2. For the Wilmington refinery provide a contingency plan to install additional OP-FTIR systems in case the detection capabilities of the proposed OP-FTIR systems (e.g.

detection limits for one or more of all measured pollutants) are found to be inadequate during the first six (6) months of operation. This is because SCAQMD is concerned that the path-lengths for all OP-FTIR equipment is longer than the 500 meter maximum recommended in the Rule 1180 Guidelines.

3. In the event Phillips 66 chooses to discontinue the use of the optical tent system at the Wilmington refinery, Phillips 66 shall submit a revised Plan for SCAQMD review to replace the optical tent system with a suitable open-path monitoring solution that satisfies the requirements of Rule 1180, and implement the revised Plan without interruption of fenceline monitoring.
4. Include one (1) additional set of point monitors, comprised of a hydrogen sulfide (H₂S) instrument and a black carbon (BC) instrument at the Wilmington refinery. With this addition, a total of four (4) H₂S and four (4) BC point monitor sets (each comprised of a H₂S instrument and BC instrument) will be installed at the Wilmington refinery fenceline. The locations of these monitors are shown in Exhibit B.
5. Provide GPS coordinates and heights above ground level for all proposed fenceline air monitoring equipment (e.g. open path monitors, reflectors, and point monitors).
6. Provide the location and specifications for meteorological stations to be installed at both Carson and Wilmington refineries.
7. Include measurements of nitrogen dioxide (NO₂), using either UV-DOAS or OP-FTIR, along all monitoring paths at both Carson and Wilmington refineries.
8. Provide tables with estimated detection limits for the shortest and the longest path-lengths proposed in each Plan.
9. Include a comprehensive list and a map of sensitive receptors (e.g. schools, residences, daycare centers, hospitals, nursing homes and recreational areas) and further discuss the potential impact of fugitive emissions on these receptors.

SCAQMD will continue to work with Phillips 66 to finalize and approve the remaining elements of each Plan (namely, the "Backup Air Monitoring System" portion of Section 1; Section 4 – Data Presentation to the Public; Section 5 – Data Management; Section 6 – Notification System, Quality Assurance Project Plan (QAPP) and Standard Operating Procedures (SOP) for air monitoring equipment). The SCAQMD intends that all elements of the Plans for Carson and Wilmington refineries will be in operation by the January 1, 2020 deadline in Health and Safety Code section 42705.6 for the fenceline air monitoring system.

Please have your authorized person sign in the space allocated below to agree with the conditions put forward in this letter, and return the signed copy to SCAQMD within fourteen (14) days from the date of this letter. In accordance with Rule 1180, Phillips 66 must commence fenceline air monitoring at both refineries no later than one year from the date of Plans approval, and Health and Safety Code section 42705.6 requires installation and operation by January 1, 2020. Your partial approval will become effective on the date of Phillips' signed certification below.

Phillips 66 certification:

I understand, accept, and agree to the conditions of the partial approval of the Phillips 66 Refinery Plans.


Name of Authorized Person


Position


Date

Should you have any questions regarding this approval letter, please contact Dr. Andrea Polidori at (909) 396-3283, or via email at apolidori@aqmd.gov.

Sincerely,



Wayne Natri,
Executive Officer
South Coast Air Quality Management District

Attachment
WN:MMM:JCL:AP:OP:ld

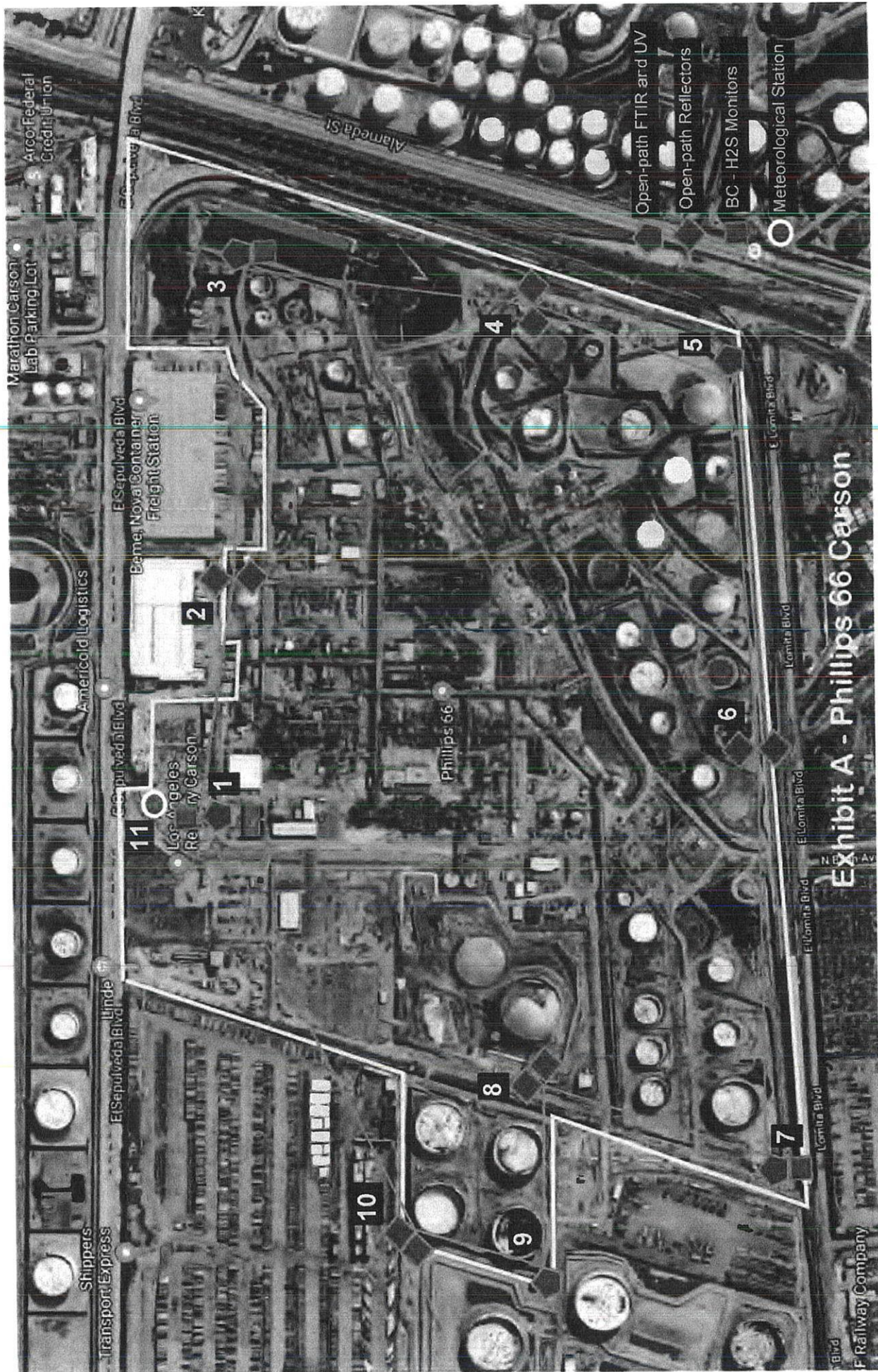


Exhibit A - Phillips 66 Carson

- Open-path FTIR and UV
- Open-path Reflectors
- BC - H2S Monitors
- Meteorological Station

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Shippers Transport Express
AmeriCold Logistics
Los Angeles Realty Carson
Phillips 66
F Railway Company

Marathon Carson Lab Parking Lot
Arcos Federal Credit Union
E Sepulveda Blvd
Alameda St
Sepulveda Blvd

Bemel Nova Container Freight Station
E Sepulveda Blvd
Lomita Blvd

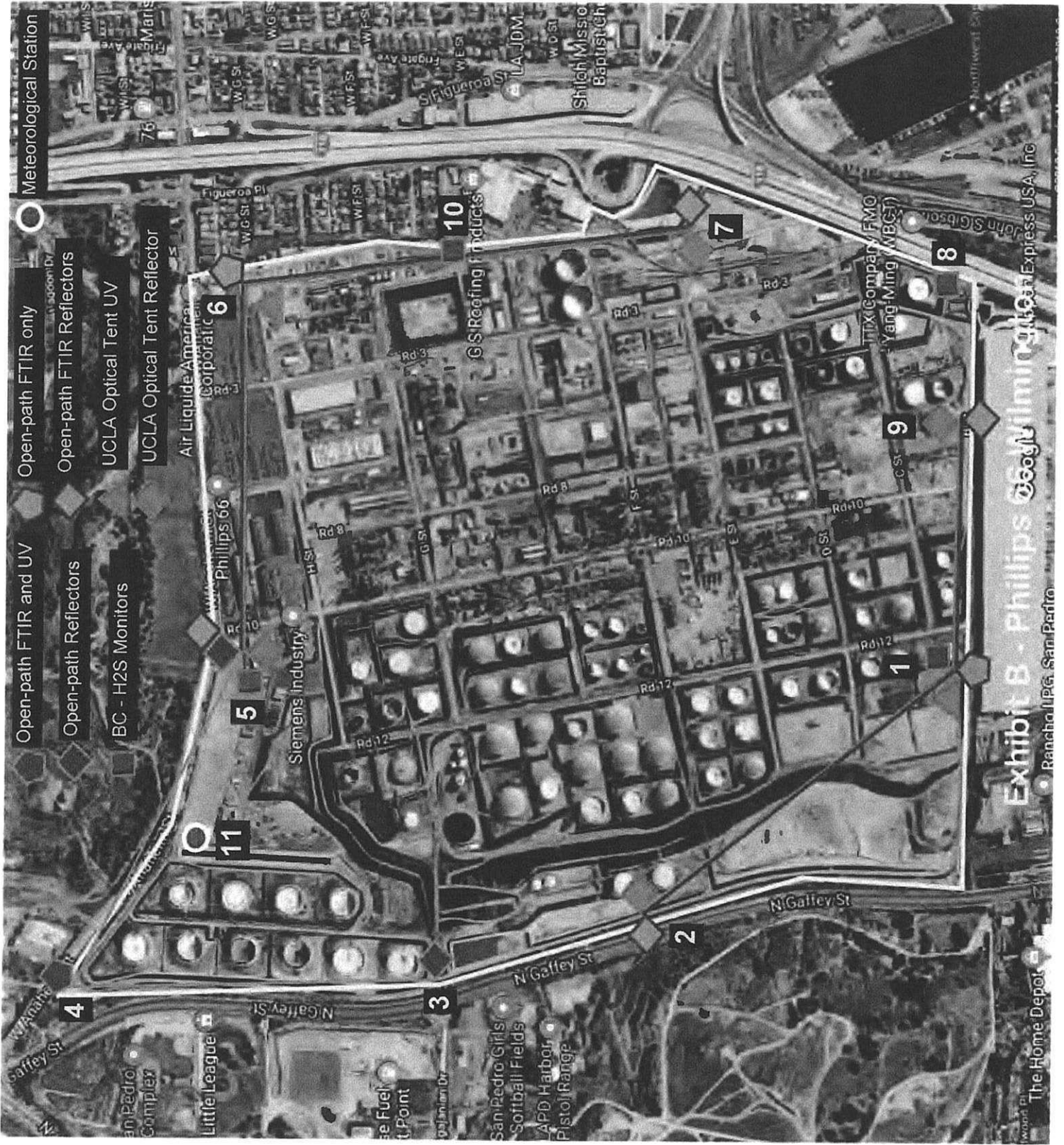
Los Angeles Realty Carson
Phillips 66
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Meteorological Station

Open-path FTIR only

Open-path FTIR Reflectors

UCLA Optical Tent UV

UCLA Optical Tent UV

Open-path FTIR and UV

Open-path Reflectors

BC - H2S Monitors

Air Liquide America
Corporate

Phillips 66

Siemens Industry

GS Roofing Products

ITX Company FMO
Yang Ming (BCST)

Exhibit B - Phillips 66 Wilmington, CA Express USA, Inc
Rancho LPG, San Pedro

The Home Depot

