

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Robert Schlipf)  
MEETING DATE: June 15, 2005

ITEM: 8

SUBJECT: CONOCOPHILLIPS COMPANY, SAN FRANCISCO  
REFINERY, RODEO, CONTRA COSTA COUNTY - Reissuance  
of NPDES Permit

CHRONOLOGY: March 2000-NPDES Permit Reissued

DISCUSSION: ConocoPhillips operates a petroleum refinery that processes  
75,000 barrels per day of crude oil. This production results in a  
discharge of 2.7 million gallons per day (mgd) of treated  
wastewater, and 31 mgd of once-through cooling water to San  
Pablo Bay.

The attached Tentative Order (Appendix A) reissues the permit for ConocoPhillips. It contains production rate technology limits in accordance with federal regulations and water quality-based effluent limitations based on the California Toxics Rule, State Implementation Policy (SIP), and Basin Plan.

We received comments from ConocoPhillips, the National Marine Fisheries Service, and U.S. EPA (Appendix B). We resolved most comments and have made modifications to the Tentative Order as appropriate. However, one unresolved comment remains, related to our proposal to require implementation of pollution prevention. ConocoPhillips asserts that the requirement to implement pollution prevention is contrary to a 2001 Remand Order from the State Water Board (see comment 7, Appendix C). We disagree. Both the SIP and the Basin Plan require pollution prevention as one of the conditions for allowing a discharger a compliance schedule. In January 2005, ConocoPhillips proposed a plan containing pollution prevention measures to support its request for compliance schedules. The Tentative Order specifies schedules for eight pollutants. It is thus appropriate in the Tentative Order to require ConocoPhillips to implement pollution prevention for these pollutants.

While we have modified the pollution prevention requirement to clarify the basis for it, ConocoPhillips indicates that it will contest

this issue. We will continue to meet with ConocoPhillips prior to the Board meeting to ~~attempt resolution~~attempt resolution of this issue.

RECOMMEND-  
ATION:

Adoption of the Tentative Order

File Number:

2119.1051 (RAS)

Appendices:

- A. Tentative Order
- B. Correspondence
- C. Response to Comments