

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

STAFF SUMMARY REPORT: John Madigan  
MEETING DATE: June 12, 2024

**ITEM: 5A**

**Phillips 66 Company, Rodeo Renewable Energy Complex (formerly San Francisco Refinery), Rodeo, Contra Costa County – Reissuance of NPDES Permit**

**DISCUSSION:**

This Revised Tentative Order (Appendix A) would reissue an NPDES permit for the Rodeo Renewable Energy Complex. The 1,100-acre refinery expects to process an average renewable feedstock (crop-based oils, rendered fats, and other biological oils) throughput of about 3.4 million gallons per day (mgd). Phillips 66 Company expects to treat and discharge about 2.5 mgd of process water, non-process water, cooling water, sanitary wastewater, groundwater, remediation wastewater, and stormwater to San Pablo Bay.

The Rodeo Renewable Energy Complex (formerly the San Francisco Refinery) previously refined about 3.5 mgd of crude oil. Phillips 66 Company began reducing crude throughput at the facility in September 2023 and ceased all crude refining in December 2023. Phillips 66 Company has since completed construction of a new renewable feedstock pretreatment unit and has solely processed renewable feedstock since February 2024.

We developed new technology-based effluent limitations for the new wastewater discharge based on best professional judgement as required by federal regulations when U.S. EPA has not promulgated effluent limit guidelines. We included limits for biochemical oxygen demand, total suspended solids, total residual chlorine, oil and grease, and pH based on Basin Plan Table 4-2 to ensure adequate treatment. In addition, we added new effluent limits for acute and chronic toxicity that conform to the *State Policy for Water Quality Control: Toxicity Provisions* that U.S. EPA approved in May 2023.

These effluent limitations, coupled with lower discharge flows, lower pollutant loads to San Francisco Bay when compared to the past. For example, selenium loads will be reduced substantially with the change from petroleum feedstocks to renewable feedstocks.

We received comments (Appendix B) from San Francisco Baykeeper on the Tentative Order and prepared a response to the comments (Appendix C). Baykeeper requests that the Board revise the Tentative Order to remove language allowing for the shutdown of the facility's Selenium Removal Plant. We revised the Tentative Order to require Phillips 66 Company to conduct a study that demonstrates that the Selenium Removal Plant does not remove a statistically significant amount of selenium before it decommissions the treatment unit.

The Revised Tentative Order also includes minor editorial and formatting changes.

**APPENDICES:**

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

Appendix A  
Revised Tentative Order

# Appendix B Comments

For an electronic copy of the comments, please contact John Madigan via email at [John.Madigan@waterboards.ca.gov](mailto:John.Madigan@waterboards.ca.gov) or at (510) 622-2405.

Appendix C  
Response to Comments