

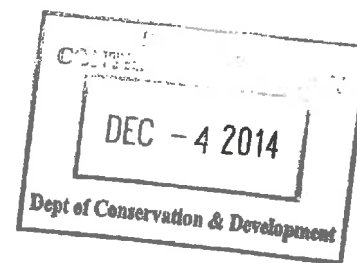
EXHIBIT #15



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

December 2, 2014

Lashun Cross
Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553



Subject: Phillips 66 Propane Recovery Project Recirculated DEIR

Dear Ms. Cross,

Bay Area Air Quality Management District (Air District) staff has reviewed Contra Costa County's (County) Recirculated Draft Environmental Impact Report (RDEIR) prepared for the Propane Recovery Project (Project) located at the Phillips 66 Refinery in Rodeo. The proposed Project consists of implementing refinery processing equipment improvements to recover propane and butane for sale off-site. The RDEIR analyzes two options for implementing the Project: use of a new steam boiler; or use of the existing steam power plant if the new boiler is not built.

Air District staff appreciates the County's responses to the issues raised by the Air District in its previous comment letters regarding the Project. As recommended in the Air District's comment letters (most recently from January 14, 2014), the RDEIR includes a cumulative health risk analysis and additional information on the Project's emission sources and emission estimates. Air District staff agrees with the conclusions of these additional studies.

The RDEIR also addresses the Air District's recommendation that the County fully explain the estimated decrease of GHG emissions anticipated to result from the Project. The RDEIR justifies the Project's GHG emission decrease based on the anticipated change in fuel gas use and the conclusion that accounting for the end use of propane and butane is too speculative to estimate downstream emissions.

Air District staff is available to assist the County in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.

Sincerely,

Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mary Piepho
BAAQMD Director Mark Ross

Jack P. Broadbent
EXECUTIVE OFFICER/APCO