# APPENDIX 8

**Phillips 66**
Los Angeles Refinery – Wilmington or MT Plant
1660 West Anaheim Street
Wilmington, CA 90744
P.O. Box 758
Wilmington, CA 90748-0758
Telephone (310) 952-6000
www.phillips66.com

**CERTIFIED MAIL RETURN RECEIPT REQUESTED**

August 26, 2016

Richard M. Francis
U.S. EPA Region 9
75 Hawthorne St. (ENG-2-2)
San Francisco, CA 94105-3901

**PHILLIPS 66 COMPANY LOS ANGELES REFINERY**
**RESPONSE TO: Email - Seeking Additional Documentation re 10/15/2016 EPA Information Request**
**INSPECTION DATE: August 25-28, 2015**
**WILMINGTON PLANT; EPA ID NO. CAD008237679**

Dear Mr. Francis:

Enclosed is Phillips 66 Company's response to your e-mail request for additional documentation, dated August 1, 2016, but not received by its intended recipient (Cheryl Cobb) until August 15, 2016.

Your e-mail request for additional documentation reads as follows:

- My team and I are getting ready to finalize our report for the RCRA inspection conducted in August, 2015. We apologize for the delay, but there have been some external circumstances that has delayed the process. I am writing now in regards to the response to my 10/15/2015 information request letter that was dated 11/12/2015. Please note that this request for additional information falls under the same authority granted EPA under Section 3007(a) of the resource Conservation and Recovery Act (RCRA). In the October 2015 Request for Information, Question 4, EPA asked Phillps 66 to provide documentation showing removal of material from Tank 0 at the Wilmington facility. In your November 2015 response, Phillips 66 provided a single "Vacuum Truck Loading/Offloading Form" dated 08/08/2012 and noted with the term "Lab Oil" on the document. EPA requests that Phillps 66 provide all such forms used for the unloading of Tank 0 for the past three years.

Phillips 66 has attached copies of all documents in its possession, custody, or control responsive to your request as Exhibit 1 to this letter. The reason that the number of responsive documents is small relates to the nature and limited movement of the material being transported. As we have explained previously, movement of the oil-bearing secondary material from Tank 0 occurs solely within the facility boundary. Therefore, refinery personnel do not retain copies of the Vacuum Truck Loading/Offloading Forms in the normal course of business as we would for manifests and/or bills of lading used to transport waste offsite. We do, however, record movements of the oil-bearing secondary material moved from Tank 0 via spreadsheet and, as a courtesy, are providing a hard copy of that data.

If you have any questions, please contact Cheryl Cobb at (310) 952-6210.

Sincerely,

Marshall G Waller
Environmental Director

Enclosures

| | DATE | DATE | DATE | DATE | DATE | Date |
|---|---|---|---|---|---|---|
| RECOVERED OIL 2016 | 1/14/2016 | 2/9/2016 | 2/26/2016 | 3/10/2016 | 3/22/2016 | 4/12/2016 |
| UNIT OF AREA | GAL | GAL | GaL | GAL | GAL | GAL |
| LAB | 500 | 825 | 650 | | 770 | 368 |

| | DATE | DATE | DATE | DATE | DATE | Date |
|---|---|---|---|---|---|---|
| RECOVERY OIL 2015 | 1/26/2015 | 2/23/2015 | 3/20/2015 | 4/8/2015 | 4/17/2015 | 5/7/2015 |
| UNIT OF AREA | GAL | GAL | GaL | GAL | GAL | GAL |
| LAB | 700 | 750 | 600 | | 600 | |

| | DATE | DATE | DATE | DATE | DATE | Date |
|---|---|---|---|---|---|---|
| RECOVERY OIL 2014 | 1/21/2014 | 2/17/2014 | 3/4/2014 | 4/14/2014 | 5/7/2014 | 5/29/2014 |
| UNIT OF AREA | GAL | GAL | GaL | GAL | GAL | GAL |
| LAB | 700 | 600 | | 600 | | |

| | DATE | DATE | DATE | DATE | DATE | Date |
|---|---|---|---|---|---|---|
| RECOVERY OIL 2013 | | 2/1/2003 | 3/5/2013 | 4/8/2013 | 5/29/2013 | |
| UNIT OF AREA | GAL | GAL | GaL | GAL | GAL | GAL |
| LAB | | 400 | 400 | 400 | 400 | 400 |

xhibit 1
66 COMPANY
covered Oil 2013-2016

| DATE | DATE | DATE | DATE | DATE | DATE | DATE | DATE | DATE |
|---|---|---|---|---|---|---|---|---|
| 4/13/2016 | 5/4/2016 | 5/26/116 | 5/27/2016 | 6/21/2016 | 7/18/2016 | 8/1/2016 | | |
| GAL | GAL | GAL | GAL | GAL | GAL | GAL | GAL | GAL |
| 0 | 714 | | 400 | 625 | 750 | | | |

| DATE | DATE | DATE | DATE | DATE | DATE | DATE | DATE | DATE |
|---|---|---|---|---|---|---|---|---|
| 6/22/2015 | 7/31/2015 | 8/11/2015 | 9/11/2015 | 9/24/2015 | 11/6/2015 | 11/8/2015 | 12/3/2015 | |
| GAL | GAL | GAL | GAL | GAL | GAL | GAL | GAL | GAL |
| | 600 | | | 600 | | 165 | 30 | |

| DATE | DATE | DATE | DATE | DATE | DATE | DATE | DATE | DATE |
|---|---|---|---|---|---|---|---|---|
| 6/3/2014 | 7/3/2014 | 8/3/2014 | 9/12/2014 | 9/25/2014 | 10/6/2014 | 11/20/2014 | 12/11/2014 | 12/30/20 |
| GAL | GAL | GAL | GAL | GAL | GAL | GAL | GAL | GAL |
| 600 | 600 | 550 | | 0 | 550 | 600 | 700 | |

| DATE | DATE | DATE | DATE | DATE | DATE |
|---|---|---|---|---|---|
| 7/24/2013 | 8/22/2013 | | 10/10/2013 | 11/1/2013 | |
| GAL | GAL | GAL | GAL | GAL | GAL |
| 400 | 400 | 400 | 400 | 400 | |