Ms. Deborah Jordan, Director Air Management Division **United States Environmental Protection Agency** 75 Hawthorne Street San Francisco, CA 94105

Dear Ms. Jordan:

The District is proposing minor and significant revisions to the Major Facility Review permit for the following facility pursuant to Application 11626:

ALAMEDA COUNTY Roberta Cooper Scott Haggerty Nate Milev

Facility Name	Address, City	Type of Operation
•		Petroleum Refinery
	Facility Name ConocoPhillips – San Francisco Refinery	ConocoPhillips – San 1380 San Pablo Ave.

The minor revisions will allow S36 and S461, Heaters, to operate without SCR for brief periods as long as the NOx limits are met and to add a schedule of compliance to the permit for alternative Subpart J monitoring at these sources. The significant revisions will allow total sulfur monitoring to be used as a surrogate for TRS monitoring on a permanent basis, with periodic checks of the ratio of TRS to total sulfur in fuel, and will allow a throughput increase at \$437/\$438, Hydrogen Plant.

The District is inviting public comment on the significant revisions. The notice inviting written public comment will be published in the Contra Costa Times. The final date for comments is May 13, 2005. This permit will be sent to EPA concurrently for review. The minor revisions are effective immediately. The significant revisions will not be effective until they are issued.

Enclosed for your information are copies of the statement of basis, which include the proposed amendments to the permit. If you have any questions regarding this project, please call Steve A. Hill, Permit Evaluation Manager, at (415) 749-4673, fax (415) 749-5030.

SANTA CLARA COUNTY Erin Garner

Liz Kniss Patrick Kwok Julia Miller

SOLANO COUNTY John F. Silva

SONOMA COUNTY Tim Smith Pamela Torliatt

Jack P. Broadbent EXECUTIVE **OFFICER/APCO** 

H:\PUB\_DATA\TITLE v permit appls\01 all...\a0016\sig...revisions\11626\A0016\_11626\_2005.doc

Sincerely,

Signed Jack P. Broadbent Executive Officer/Air Pollution Control Officer

Shelia Young

CONTRA COSTA COUNTY Mark DeSaulnier Erling Horn Mark Ross (Secretary) Gayle B. Uilkema (Vice-Chairperson)

> MARIN COUNTY Harold C. Brown, Jr.

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY Chris Daly Jake McGoldrick Gavin Newsom

SAN MATEO COUNTY Jerry Hill Marland Townsend (Chairperson)

## SAH:BFC:myl Enclosures