



May 24, 2005

San Francisco Refinery
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ESDR-300-05
CP 05-A-01-C

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Ms. Brenda Cabral
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

**Subject: ConocoPhillips
San Francisco Refinery – Plant No. A0016
Comments on Revision 2 of Title V Permit**

Dear Ms Cabral:

ConocoPhillips has reviewed the proposed revisions dated April 14, 2005 to the Major Facility Review ("Title V") Permit for its San Francisco Refinery.

BAAQMD is proposing Condition 22121 to monitor chlorine residual in cooling towers (BAAQMD sources 452, 455, 457, 458, and 500). We believe that oxidation reduction potential (ORP) monitoring is equivalent monitoring to chlorine monitoring.

ORP monitoring is a continuous on-line direct measurement of oxidizing potential in cooling water. Although ORP is not a direct measurement of chlorine concentration in water, it is an indicator of the effectiveness of chlorine as an oxidizer. The amount of chlorine residual in the water and the ORP are proportional. ORP monitoring is used to determine whether bleach should be added to the cooling water. Introduction of VOCs into cooling water that causes an increase in chlorine demand will change the chlorine residual concentration and the measured ORP value.

ConocoPhillips requests the proposed permit language for Condition 22121 to be revised as follows:

*2. The owner/operator shall take a sample of the cooling tower water every shift (twice per day) at each cooling tower above and analyze for chlorine content as an indicator of hydrocarbon leakage into the cooling water. **As an alternative, continuous ORP monitoring may be used in lieu of twice daily chlorine sampling.** (Regulation 2-6-503)*

On June 8, 2004, a request for permit revisions to the Title V permit were requested for BAAQMD 8-8 and 40 CFR Subpart QQQ applicability on storage tanks. This request has not yet been addressed. We are resubmitting this request as an attachment.

If you have any questions, or require additional information, please contact Ms. Valerie Uyeda at (510) 245-5249.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip C. Stern". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Philip C. Stern
Environmental Superintendent

Attachment