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April 14, 2004

VIA E-MAIL and VIA HAND DELIVERY

Barry G. Young and Greg D. Solomon
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
byoung@baaqmd.gov, gsolomon@baaqmd.gov

Re: Comments on the Reopening of Chevron's Title V Permit, Facility No. A0110

Dear Messrs Young and Solomon:

I write in response to the BAAQMD's reopening of the Major Facility Review permit for Chevron Products Company's refinery in Richmond, California. On behalf of the Plumbers and Steamfitters Local 342 and International Brotherhood of Electrical Workers Local 302 (collectively, "Unions"), we incorporate all of our previous comments on the various versions of Chevron's Title V permit in response to BAAQMD's recent reopening of Chevron's permit and its February 24, 2004 request for public comment. We specifically incorporate by reference the September 27, 2002 and September 22, 2003 comments we submitted on Chevron's "draft" and "proposed" Title V permit. As a courtesy, a copy of each of those earlier comments is being attached to the copy of this letter being submitted by hand delivery.

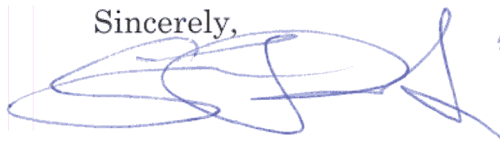
The Unions also join in the April 14, 2004 comments submitted by Communities for a Better Environment ("CBE") on the current reopening of Chevron's Title V permit. Like CBE, Unions are concerned about the general lack of organization in the permits, which creates confusion and precludes effective review and comment. Substantively, a few of the deficiencies in the reopened permit include unjustified increases in tank capacities and inadequate and unclear flare monitoring and control provisions. CBE's comments provide more detail on the permit's deficiencies, including tank capacity and flare monitoring and controls.

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As discussed with specificity in our previous comments on Chevron's Title V permit, the document does not assure Chevron's compliance with the requirements of Title V of the CAA or the District's rules implementing Title V. The permit's shortcomings mean that it fails to meet the most basic of Title V requirements: it does not provide one clear, comprehensive document that identifies, imposes and allows for effective enforcement of all applicable requirements. Instead, the permit confuses the issue of what requirements apply to the refinery, lessens monitoring and compliance requirements, and, in some cases, allows significant *increases* in emissions without proper review.

The District must correct the errors in Chevron's permit and re-circulate it for public review. Please contact us with any questions concerning these comments.

Sincerely,



Suma Peesapati

SP:bh

Attachments [via hand delivery]

cc: [w/o enclosures]

Ed Pike, EPA Region IX

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