

July 28, 2004

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

Re: **Shell Oil Products US – Martinez Refinery – Facility #A0011**  
Administrative Amendment to Major Facility Review Permit

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District has made an administrative amendment to the Major Facility Review Permit for Shell Oil Products US – Martinez Refinery (Facility Number A0011).

The main purpose of this administrative amendment application is to incorporate requirements contained in a Consent Decree (Civil Action No. H-01-0978) between Equilon Enterprises LLC and the U.S. EPA, which requires Shell to re-route all sulfur recovery unit sulfur pit emissions to an abatement device such that unabated emissions from the sulfur pit are either eliminated, or are included and monitored as part of the applicable sulfur recovery plant's emissions subject to the 40 CFR 60, Subpart J (NSPS J) limit for SO<sub>2</sub>. All of the revisions are listed and discussed in the Engineering Evaluation, which will serve as the Statement of Basis for this application.

This is an administrative amendment pursuant to BAAQMD Regulation 2-6-201 because it is:

1. A change in the descriptions of applicable requirements that add detail but do not affect substantive requirements, and
2. A change in a source description that is not an alteration of applicable requirements.

In this case, EPA has determined that the emissions from the sulfur pit at S1765 are subject to 40 CFR 60.104(a)(2). The permit, issued on December 1, 2003, has this requirement. The emissions from the S1765 sulfur pit will now be controlled by A4181, Thermal Oxidizer, when they are not abated by A1765, Thermal Oxidizer. Therefore, the description of A4181 has changed, without altering applicable requirements. Moreover, since the change is a result of an EPA order, it cannot be amended due to public comment and EPA review is not necessary.

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(Chairperson)  
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Tim Smith  
Pamela Torliatt

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

A copy of the engineering evaluation is enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Very truly yours,

Jack P. Broadbent  
Executive Officer/  
Air Pollution Control Officer

JPB:BGY:bg

Enclosure

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