

December 16, 2004

Suma Peesapati
Adams Broadwell Joseph & Cardozo
851 Gateway Boulevard, Suite 900
South San Francisco, CA 94080

Subject: Plumbers and Steamfitters Local 342 and International Brotherhood of Electrical Workers Local 302 (collectively, Unions) Comments on draft Chevron permit proposed on 2/24/04

Dear Ms. Peesapati:

This letter responds to your letter dated April 14, 2004, concerning the draft reopened Title V permit for Chevron's Richmond Refinery.

The April 14 letter incorporated by reference prior comments on the draft initial permit. We respond by referring to our response to those prior comments.

The April 14 letter expressed concern about the organization of the permits. The District is reviewing the format for its Title V permits, and expects to revise that format in the near future.

The April 14 letter expressed agreement with CBE's April 14 comments on the draft permit. We have responded to those comments separately, and refer to that response.

The District disagrees with all of the unsupported conclusions regarding the effectiveness and validity of the draft permit. Where comments have pointed out specific deficiencies or readily-implemented improvements, the District has made appropriate changes to the proposed permit. The Unions' April 14 letter did not contain any such comments.

The District has decided to issue the permits. All comments have been posted on the District's website. The final permit, final statement of basis, and all final responses to comments will be posted shortly. The web address is: http://www.baaqmd.gov/pmt/title_v/public_notices.asp. If you have any questions, please call Steve Hill, Manager, Permit Evaluation, at: 415-749-4673.

Very truly yours,

Brian Bateman,
Director of Engineering

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