



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

September 9, 2008

Mr. Mohsen Nazemi  
Assistant Deputy Executive Officer  
Engineering and Compliance Division  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 97165-4182

**Re: EPA Review of the Proposed Title V Permit for ConocoPhillips Company,  
Carson Refinery (Facility ID 800362)**

Dear Mr. Nazemi:

Thank you for the opportunity to review the proposed title V permit for the ConocoPhillips Company, Carson Refinery (Facility ID 800362) in Carson, CA.

EPA appreciates your and your staff's extensive efforts to resolve the issues we identified in a phone conference on July 16, 2008 and in a comment letter sent July 25, 2008. Based on a series of telephone conversations between our staffs, we understand that the District intends to make certain changes to the permit prior to issuance but that the District is currently unable to send us a letter committing to those changes. As you know, our preference is to receive a letter from your office summarizing how the District will resolve issues we raise to you prior to the end of the EPA review period. Nevertheless, in this instance, provided the changes to the permit are consistent with our previous discussions, we believe all of the issues from our July 25 letter will be satisfactorily resolved. Our understanding of the resolutions is discussed in the enclosed comments.

If, upon issuance of the final permit by SCAQMD, EPA finds that the permit does not satisfy the requirements for title V permits under 40 C.F.R. Part 70 and the District's title V program, EPA retains the authority under 40 C.F.R. §70.7(g)(1) to reopen the permit for the ConocoPhillips-Carson refinery.

Again, we appreciate the opportunity to review the proposed permit, and we look forward to working with you and your staff in the coming weeks to finalize an initial title V permit for the ConocoPhillips-Carson refinery. Please do not hesitate to contact me or Katherine Hoag (415-972-4119) and Joseph Lapka (415-947-4226) of my staff if you would like to discuss our comments further.

Sincerely,

 FOR

Gerardo C. Rios  
Chief, Air Permits Office

Enclosure