

Comments on Statement of Basis

Comments 1 and 2: The emission inventories for 2005 and 2010 are inaccurate.

Response to Comment 1: Thank you for the information. The emission summary in the Statement of Basis was estimated using emission factors and the throughputs that the facility reported to the District in 2005 and 2010. The estimates were reported to the facility and the facility did not dispute the estimates at the time.

The differences in the estimates would not change any applicable requirements. Therefore, the Statement of Basis will not be republished at this time. Instead, your comments will be placed in and become part of the record.

Comment 3: In Section B, "Facility Description", the total emission reductions between 2005 and 2010 should be based on the revised values listed above.

Response to Comment 3: See response to Comments 1 and 2.

Comment 4: In Section B, "Facility Description", last paragraph, aqueous ammonia is stored in only two horizontal steel storage tanks. There are 3 tanks installed at the facility, but only two are in service.

Response to Comment 4: The District acknowledges the correction and will place this comment in the record. Since the aqueous ammonia tanks are considered "exempt" sources for the purpose of the District and Major Facility Review permit, no changes are required to the permit.

Comment 5: In Section C, Permit Content, I. Standard Conditions, (p.6, 2nd paragraph): Since only two aqueous ammonia storage tanks are in service, there is 40,000 gallons capacity.

Response to Comment 5: The District acknowledges the correction and will place this comment in the record. Since the aqueous ammonia tanks are considered "exempt" sources for the purpose of the District and Major Facility Review permit, no changes are required to the permit.

Comment 6: In Section C, Permit Content, I. Standard Condition, Changes to Permit (p.6): the addition of BAAQMD Regulation 2, Rule 9 is not identified in the Changes to Permit.

Response to Comment 6: The District acknowledges the correction and will place this comment in the record.

Comment 7: Under Section IV, Source Specific Applicable Requirements, Changes to Permit delete "diesel" from 3rd paragraph below S5 through S7, Electrical Generation Boilers (p.9). Boilers 5 through 7 previously fired on Fuel Oil No. 6.

Response to Comment 7: The District acknowledges the correction and will place this comment in the record.

Comments on Permit

Comment 1: In Section I. Standard Conditions, A. Administrative Requirements, (p.3) of the permit, SIP regulation 2, Rule 6 has not been added to the permit as stated in the Permit Evaluation/Statement of Basis document.

Response to Comment 1: The District has made the correction.

Comment 2: In Section XI, Title IV Acid Rain Permit (p. 66), the last name of the Alternate Designated Representative is misspelled. The correct spelling should be "Boudreaux".

Response to Comment 2: The District has made the correction.