

Attachment B

The remaining comments are found in Attachment 1 to the letter. The attachment consists of a table of comments, which is reproduced here, with responses added to the table. Comments 1-35, 39-44, 63-66, 69-73 79, and 80 concern corrections to the monitoring of oxygen (O2). The rest are miscellaneous corrections.

Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
1	S-2 (U-229, B-301)	VII-A.1	Monitoring Type	321	<p>Change monitoring type from “CEM source test” to “O2 Monitor”. This heater has an O2 monitor and not a CEM.</p> <p>Response: The monitoring type for oxygen exhaust concentration was incorrectly identified as either a CEM or a source test. In fact, the heater is equipped with a continuous oxygen monitor. Since oxygen is not a pollutant, this is acceptable. Therefore, the monitoring type has been changed to “O2 monitor”.</p>
2	S-3 (U-230, B-201)	VII-A.2	Monitoring Frequency	323	<p>Change monitoring frequency from “P/SA” to “C”. This heater has an O2 monitor that runs continuously.</p> <p>Response: The monitoring frequency for oxygen exhaust concentration was incorrectly identified as periodic, corresponding to performance of a source test. In fact, the heater is equipped with a continuous oxygen monitor, which is preferable. Therefore, the frequency has been changed to “continuous”.</p>
3	S-3 (U-230, B-201)	VII-A.2	Monitoring Type	323	<p>Change monitoring type from “source test” to “O2 monitor”. This heater has an O2 monitor.</p> <p>Response: See response to Comment 1; this proposed change has been made.</p>
4	S-4 (U-231, B-101)	VII-A.3	Monitoring Frequency	324	<p>Change monitoring frequency from “P/SA” to “C”. This heater has an O2 monitor that runs continuously.</p> <p>Response: See response to Comment 2; this proposed change has been made.</p>
5	S-4 (U-231, B-101)	VII-A.3	Monitoring Type	324	<p>Change monitoring type from “source test” to “O2 monitor”. This heater has an O2 monitor.</p> <p>Response: See response to Comment 1; this proposed change has been made.</p>

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
6	S-5 (U-231, B-102)	VII-A.4	Monitoring Frequency	326	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
7	S-5 (U-231, B-102)	VII-A.4	Monitoring Type	326	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
8	S-7 (U-231, B-103)	VII-A.5	Monitoring Frequency	328	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
9	S-7 (U-231, B-103)	VII-A.5	Monitoring Type	328	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
10	S-8 (U-240, B-1)	VII-A.6	Limit	329	Delete line for O2 that contains the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples). Response: This monitoring table included an erroneous O2 monitoring citation to Regulation 1-520.8 with "CEM for NOx and O2 (or CO2)" listed as the limit, although this is obviously not a limit. Because of its size, this source requires an O2 monitor to satisfy 1-520.1. Therefore, the limit citation has been deleted, and the citation of 1-520.8 has been changed to 1-520.1.
11	S-8 (U-240, B-1)	VII-A.6	Monitoring Type	329	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
12	S-9 (U-240, B-2)	VII-A.7	Monitoring Frequency	332	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
13	S-9 (U-240, B-2)	VII-A.7	Monitoring Type	332	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
14	S-10 (U-240, B-101)	VII-A.8	Monitoring Type	333	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
15	S-11 (U-240, B-201)	VII-A.9	Monitoring Frequency	335	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
16	S-11 (U-240, B-201)	VII-A.9	Monitoring Type	335	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
17	S-12 (U-240, B-202)	VII-A.10	Monitoring Frequency	337	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
18	S-12 (U-240, B-202)	VII-A.10	Monitoring Type	337	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
19	S-13 (U-240, B-301)	VII-A.11	Monitoring Type	338	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
20	S-14 (U-240, B-301)	VII-A.12	Monitoring Type	340	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
21	S-15 (U-244, B-501)	VII-A.13	Monitoring Type	342	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
22	S-16 U-244, B-502)	VII-A.14	Monitoring Type	343	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
23	S-17 U-244, B-503)	VII-A.15	Monitoring Type	345	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
24	S-18 U-244, B-504)	VII-A.16	Monitoring Type	347	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
25	S-19 (U-244, B-505)	VII-A.17	Monitoring Type	348	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
26	S-20 (U-244, B-505)	VII-A.18	Monitoring Frequency	350	Change monitoring frequency from "P/A" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
27	S-20 (U-244, B-505)	VII-A.18	Monitoring Type	350	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
28	S-22 (U-248, B-606)	VII-A.20	Monitoring Frequency	353	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
29	S-22 (U-248, B-606)	VII-A.20	Monitoring Type	353	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
30	S-29 (U-200, B-5)	VII-A.21	Monitoring Frequency	354	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
31	S-29 (U-200, B-5)	VII-A.21	Monitoring Type	354	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
32	S-30 (U-200, B-101)	VII-A.22	Monitoring Frequency	356	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
33	S-30 (U-200, B-101)	VII-A.22	Monitoring Type	356	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
34	S-31 (U-200, B-501)	VII-A.23	Monitoring Frequency	357	Change monitoring frequency from "P/A" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
35	S-31 (U-200, B-501)	VII-A.23	Monitoring Type	357	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
36	S-36 (U-200, New Heater)	II-A IV-A.24 VII-A.24	Description	8, 83-86, 358-360	Change name from "U200, B-N001" to "U200, B102". This will match the equipment number used on the P&IDs for the project. Response: This administrative change has been made to the permit.
37	S-36 (U-200, New Heater)	IV-A.24	Future Effective Date	85	Change from "startup date" to "after initial performance test" for BAAQMD Condition 21097 Parts 3a and 3b. This will allow us time to adjust the equipment and abatement device for optimum performance. Response: The original Future Effectiveness Date, listed as "startup date" is imprecise. The more precise "after initial performance test" proposed by the facility is acceptable.
38	S-36 (U-200, New Heater)	VI	PC 21097	306	Change note after part 3b to read: "Part 3a and 3b shall not apply until after the conclusion of the initial performance testing of S-36." Response: See response to Comment 37; this proposed change has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
39	S-36 (U-200, New Heater)	VII-A.24	Limit	359	<p>Delete lines for O2 and NOx that contain the Limit “CEM for NOx and O2 (or CO2)”. This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).</p> <p>Response: This monitoring table included an erroneous O2 monitoring citation to Regulation 1-520.8 with “CEM for NOx and O2 (or CO2)” listed as the limit, although this is obviously not a limit. Because of its size, this source is not subject to 1-520. Therefore, this citation has been deleted.</p>
40	S-36 (U-200, New Heater)	VII-A.24	Monitoring Type	359	<p>Change monitoring type from “CEM” to “O2 monitor”. This heater has an O2 monitor.</p> <p>Response: See response to Comment 1; this proposed change has been made.</p>
41	S-43 (U-200, B-202)	VII-A.25	Monitoring Type	361	<p>Change monitoring type from “CEM” to “O2 monitor”. This heater has an O2 monitor.</p> <p>Response: See response to Comment 1; this proposed change has been made.</p>
42	S-43 (U-200, B-202)	VII-A.25	Limit	361	<p>Delete lines for O2 and NOx that contain the Limit “CEM for NOx and O2 (or CO2)”. This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).</p> <p>Response: This monitoring table included an erroneous O2 monitoring citation to Regulation 1-520.8 with “CEM for NOx and O2 (or CO2)” listed as the limit, although this is obviously not a limit. Because of its size, this source is not subject to 1-520. Therefore, this citation has been deleted.</p>

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
43	S-44 (U-200, B-201)	VII-A.26	Limit	364	<p>Delete lines for O2 and NOx that contain the Limit “CEM for NOx and O2 (or CO2)”. This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).</p> <p>Response: This monitoring table included an erroneous O2 monitoring citation to Regulation 1-520.8 with “CEM for NOx and O2 (or CO2)” listed as the limit, although this is obviously not a limit. Because of its size, this source is not subject to 1-520. Therefore, this citation has been deleted.</p>
44	S-44 (U-200, B-201)	VII-A.26	Monitoring Type	364	<p>Change monitoring type from “CEM” to “O2 monitor”. This heater has an O2 monitor.</p> <p>Response: See response to Comment 1; this proposed change has been made.</p>
45	S-107 (Tk 150)	IV-B18	Source List	234-241	<p>Move tank from Table IV-B18 to IV-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 8/14/03 (see ESDR 283-03)</p> <p>Response: Tanks are grouped into tables for specific requirements and monitoring based common designs and applicable requirements. This tank has recently been retrofitted with a “zero-gap” secondary seal. Therefore, the requirements in Tables IV-B13 and VII-B13 rather than Tables IV-B18 and VII-B18 are applicable and this tank has been added to the applicable tables and deleted from the non-applicable tables.</p>

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
46	S-107 (Tk 150)	VII-B18	Source List	442-444	<p>Move tank from Table VII-B18 to VII-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 8/14/03 (see ESDR 283-03)</p> <p>Response: Tanks are grouped into tables for specific requirements and monitoring based common designs and applicable requirements. This tank has recently been retrofitted with a “zero-gap” secondary seal. Therefore, the requirements in Tables IV-B13 and VII-B13 rather than Tables IV-B18 and VII-B18 are applicable and this tank has been added to the applicable tables and deleted from the non-applicable tables.</p>
47	S-124 (Tk 169)	IV-B18	Source List	234-241	<p>Move tank from Table IV-B18 to IV-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 3/04/04 (see ESDR 094-04)</p> <p>Response: See response to Comment 45; this proposed change has been made.</p>
48	S-124 (Tk 169)	VII-B18	Source List	442-444	<p>Move tank from Table VII-B18 to VII-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 3/04/04 (see ESDR 094-04)</p> <p>Response: See response to Comment 46; this proposed change has been made.</p>
49	S-126 (Tk 172)	II-A	Make or Type	9	<p>Change from “external floating roof with dome” to “internal floating roof with dome” as originally requested in Attachment 3 of ConocoPhillips’ appeal filed 12/30/03 with BAAQMD Hearing Board.</p> <p>Response: This tank was originally built as an external floating roof tank, but was subsequently retrofitted with a dome. Such tanks are treated as internal floating roof tanks. The terms “external floating roof with dome” and “internal floating roof with dome” are interchangeable. Therefore, the proposed change is editorial and has been made.</p>

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
50	S-257 (Tk 1004)	II-A	Make or Type	10	Change from “external floating roof with dome” to “internal floating roof with dome” as originally requested in Attachment 3 of ConocoPhillips’ appeal filed 12/30/03 with BAAQMD Hearing Board. Response: See response to Comment 49; this proposed change has been made.
51	S-258 (Tk 1005)	II-A	Make or Type	10	Change from “external floating roof with dome” to “internal floating roof with dome” as originally requested in Attachment 3 of ConocoPhillips’ appeal filed 12/30/03 with BAAQMD Hearing Board. Response: See response to Comment 49; this proposed change has been made.
52	S-296, S-398 (Flares)	IV-L	Regulation Title or Description of Requirement	131	Fix typo in the description. Change “durinf” to “during” Response: This editorial correction has been made.
53	S-296, S-398 (Flares)	VII-L	Monitoring Requirement Citation	391	Change citation “BAAQMD Condition 21092, Part 2” to “BAAQMD Condition 18255, Part 2”. PC 21092 is for S-300 (coker), not for the flares. Response: The original citation of Condition 21092 was incorrect; this permit condition does not apply to these sources. This editorial correction has been made.
54	S-301 (Sulfur Pit U-234)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814. Response: This molten sulfur pit receives the sulfur produced at one of the facility sulfur plants. The sulfur plants have an increased daily capacity that will go into effect when the modifications permitted in Application 5814 are completed. This future capacity was included in the permit for the sulfur plants, but not for the sulfur pits, which was an oversight. This editorial correction has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
55	S-302 (Sulfur Pit U-236)	II-A	Capacity	10	<p>Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.</p> <p>Response: See response to Comment 54; this proposed change has been made.</p>
56	S-303 (Sulfur Pit U-238)	II-A	Capacity	10	<p>Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.</p> <p>Response: See response to Comment 54; this proposed change has been made.</p>
57	S-301 (Sulfur Pit U-234)	VI	PC 20989	315	<p>Change wording to similar wording as S-1001: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.</p> <p>Response: This molten sulfur pit receives the sulfur produced at one of the facility sulfur plants. The sulfur plants have an increased annual throughput limit that will go into effect when the modifications permitted in Application 5814 are completed. This future capacity was included in the permit for the sulfur plants, but not for the sulfur pits, which was an oversight. This editorial correction has been made.</p>
58	S-302 (Sulfur Pit U-236)	VI	PC 20989	315	<p>Change wording to similar wording as S-1002: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.</p> <p>Response: See response to Comment 57; this proposed change has been made.</p>

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
59	S-303 (Sulfur Pit U-238)	VI	PC 20989	315	<p>Change wording to similar wording as S-1003: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.</p> <p>Response: See response to Comment 57; this proposed change has been made.</p>
60	S-301 (Sulfur Pit U-234)	VII-U	Limit	404	<p>Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")</p> <p>Response: In addition to the current annual throughput limit, this table should have been changed to cite the future throughput limit as discussed in the response to Comment 57; this proposed change has been made.</p>
61	S-302 (Sulfur Pit U-236)	VII-U	Limit	404	<p>Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")</p> <p>Response: See response to Comment 60; this proposed change has been made.</p>
62	S-303 (Sulfur Pit U-238)	VII-U	Limit	404	<p>Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")</p> <p>Response: See response to Comment 60; this proposed change has been made.</p>
63	S-336 (U-231, B-104)	VII-A.29	Monitoring Frequency	368	<p>Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.</p> <p>Response: See response to Comment 2; this proposed change has been made.</p>
64	S-336 (U-231, B-104)	VII-A.29	Monitoring Type	368	<p>Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.</p> <p>Response: See response to Comment 1; this proposed change has been made.</p>

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65	S-337 (U-231, B-105)	VII-A.30	Monitoring Frequency	370	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously. Response: See response to Comment 2; this proposed change has been made.
66	S-337 (U-231, B-105)	VII-A.30	Monitoring Type	370	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
67	S-350	IV-O	Regulation Title or Description of Requirement	139	Change "Condition 21092" in heading to "Condition 21093". Condition 21092 is for S-300, not S-350. Response: The original citation of Condition 21092 was incorrect; this permit condition does not apply to this source. This editorial correction has been made.
68	S-350	VI	PC 383 and PC 21093	274, 302	Revised permit conditions 383 and 21093 are duplicative of each other. Please eliminate PC 21093 altogether and keep the revised PC 383. Response: Permit condition 21093 is duplicative of modified Condition 383. Citations of Condition 21093 have been deleted with no change in applicable requirements or monitoring.
69	S-351 (U-267, B-601/ B-602)	VII-A.31	Limit	371	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples). Response: This monitoring table included an erroneous O2 monitoring citation to Regulation 1-520.8 with "CEM for NOx and O2 (or CO2)" listed as the limit, although this is obviously not a limit. Because of its size, this source is not subject to 1-520. Therefore, this citation has been deleted.

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70	S-351 (U-267, B-601/ B-602)	VII-A.31	Monitoring Type	372	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
71	S-371 (U-228, B-520)	VII-A.32	Monitoring Type	374	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
72	S-372 (U-228, B-521)	VII-A.33	Monitoring Type	377	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
73	S-438 (U-110, H-1)	VII-A.34	Monitoring Type	379	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.
74	S-460 (U-250 Diesel Hydrotreater)	II-A	Description	13	Change name from "ULSD Hydrotreater" to "Diesel Hydrotreater". This is the name ConocoPhillips intends to call this unit. Response: This administrative change has been made to the permit.
75	S-460 (U-250 Diesel Hydrotreater)	VI	PC 20989	316	Change annual average from 11.68E6 bbls to 12.8E6 bbls. (35,000 bpd * 365 days/yr). Current limit of 11.68E6 is equivalent to 32,000 bpd annual average. Response: The permit holder has proposed to correct the annual throughput limit in Permit Condition 20989 for S-460. However, because S-460 has a monthly throughput limit in Condition 21094, an additional limit is not necessary in Condition 20989. Therefore, the limit in Condition 20989 has been deleted.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
76	S-461 (U-250, New heater)	II-A IV-A.35 VII-A.35	Description	13 113-116 380-382	Change name from "U-250, B-1" to "U-250, B-701". This matches the name on the P&IDs for this heater. Response: This administrative change has been made to the permit.
77	S-461 (U-250, New heater)	IV-A.35	Future Effective Date	115	Change from "startup date" to "after initial performance test" for BAAQMD Condition 21096 Parts 3a and 3b. This will allow us time to adjust the equipment and abatement device for optimum performance. Response: The original Future Effectiveness Date, listed as "startup date" is imprecise. The more precise "after initial performance test" proposed by the facility is acceptable.
78	S-461 (U-250, New heater)	VI	PC 21096	304	Change note after part 3b to read: "Part 3a and 3b shall not apply until after the conclusion of the initial performance testing of S-461." Response: See response to Comment 77; this proposed change has been made.
79	S-461 (U-250, New heater)	VII-A.35	Limit	381	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples). Response: This monitoring table included an erroneous O2 monitoring citation to Regulation 1-520.8 with "CEM for NOx and O2 (or CO2)" listed as the limit, although this is obviously not a limit. Because of its size, this source is not subject to 1-520. Therefore, this citation has been deleted.
80	S-461 (U-250, New heater)	VII-A.35	Monitoring Type	381	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor. Response: See response to Comment 1; this proposed change has been made.

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Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
81	S-463 (Butane Caustic Treatment System)	VI	PC 20989	316	<p>Change annual average to a bbls/yr basis rather than lbs/yr for consistency with Table II-A. 1000 bbls/day * 365 days/yr = 36500 bbls/yr.</p> <p>Note: The pounds per year listed in this permit are too low. 1000 bbls/day is equivalent to 203,162 lbs/day. 73.365 E6 lbs/365 days equal 201,000 lbs/day, which is equivalent to throughput limit of 989 bbls/day.</p> <p>Response: The basis for the emission calculations for S-463 in Application 5814 was operation 24 hr/day and 365 day/yr. Therefore, since S-463 has a capacity of 1,000 bbl/day in Table II-A, it should have an annual throughput limit of 365,000 bbl/yr in Condition 20989. The current limit is slightly lower. This limit correction and change of units has been made.</p>
82	S-463 (Butane Caustic Treatment System)	VII-V	Limit	406	<p>Change limit from "73.365 E6" bbl/yr to "36,500 bbls/yr". See related comment for S-463 above.</p> <p>Note: The pounds per year listed in this permit are too low. 1000 bbls/day is equivalent to 203,162 lbs/day. 73.365 E6 lbs/365 days equal 201,000 lbs/day, which is equivalent to throughput limit of 989 bbls/day.</p> <p>Response: See response to Comment 81; this proposed change has been made.</p>
83	S-1001 (Sulfur Plant U-234)	VII-U	Limit	404	<p>Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"</p> <p>Response: See response to Comment 60; this proposed change has been made.</p>
84	S-1002 (Sulfur Plant U-236)	VII-U	Limit	404	<p>Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"</p> <p>Response: See response to Comment 60; this proposed change has been made.</p>

Attachment B

Comment Number	Source	Section and Table #	Requirement	Permit Page #	Comment / Response
85	S-1003 (Sulfur Plant U-238)	VII-U	Limit	404	<p>Add limit for A/C 5814. After “89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303” add “(98,915 long ton after modified in accordance with A/C 5814)”</p> <p>Response: See response to Comment 60; this proposed change has been made.</p>
86		IX A-1	Permit Shield	467	<p>Delete Table IX-B.1 in its entirety and insert the permit shield provisions shown Attachment 2 into Table IX-A.1.</p> <p>Response: See response to Comment Letter-1; this proposed change has been made.</p>