

Attachment D
Response to Comments on Permit for Facility B2626 – Section VII

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|-----|---------|----------------|-----------------|---------------------------------------|------------|----------------------------------|--|---|--|-------------------------|-------------|
| 1. | 4/14/04 | NEW | Refinery | All | VOC | SIP 8-10-301 and BAAQMD 8-10-302 | Add rows for SIP and BAAQMD Regulation 8, Rule 10 as shown in Attachment D.1. | BAAQMD Reg 8, Rule 10 was recently modified to include monitoring provisions. Therefore, detailed applicability should be added to Table VII-Refinery wide applicability. | Changes made | N/A | N/A |
| 2. | 4/14/04 | NEW | A6.1 | S7 S20 S34 | CO | BAAQMD Condition 21233, Part 9 | Change Monitoring Frequency from P/A to P/SA. | These sources are subject to semi-annual, not annual CO source testing per Condition 21233 Part 7A.2 (>25 MM Btu/hr). | Changes made | N/A | N/A |
| 3. | 4/14/04 | NEW | A6.1 A6.2 | S7 S20 S34 S24 S26 S35 | CO | BAAQMD 9-10-305 | Delete BAAQMD Condition 19466, Part 10 shown as the second Monitoring Requirement Citation. On the Future Effective Date, delete “for 21233 Part 7A” since it is not necessary to differentiate between two Monitoring Requirement Citations. | See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8. | Changes not made. The two “conflicts” are related, but not the same. 19466, Part 10 demonstrates compliance with 9-10-305 CO not to exceed 400 ppm @ 3% O ₂ , operating day average. NOx Box Condition 21233 Part 7 is an “as found” Source test to verify operation within the “Box”; Part 8 is a CO Source Test for sources with NOx CEMs; and Part 9 requires the installation of a CO CEM if 2 5-year tests show CO > 200 ppm. Moreover, all of Condition 21233 is for NOx CEM equivalency, which is a different purpose than Condition 19466, Part 10. | N/A | N/A |

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| 4. | 4/14/04 | NEW | A6.1 A6.2 A18 | S7 S20 S34 S24 S26 S35 S173 | O2 | None | In the Monitoring Type description, delete “semiannual” (Table VII-A6.1), “semiannual or annual” (Table VII-A6.2), or “annual” (Table VII-A18). | The monitoring frequencies are already noted in the previous column. | Changes made | N/A | N/A |
| 5. | 4/14/04 | NEW | A6.2 | S24 S26 S35 | CO | Condition 21233, Part 9 | Change the Monitoring Requirement Citation from “P/A” to “P/SA (Note: Part 9 is N/A for S35)”. | Corrections provide the correct source testing frequencies for the different duty ratings of these sources. | Changes made | N/A | N/A |
| 6. | 4/14/04 | NEW | A6.2 | S35 | O2 | None | Make a note that Part 4B in the Future Effective Date and Monitoring Requirement Citation columns applies only to S24 and S26 and not to S35. | S35 (F-2906) is a small unit (<25 MM Btu/hr) and is not subject to the O2 limit requirement per Condition 21233, Part 3B or the O2 CEM requirement per revised Condition 21233, Part 2. Therefore it is not necessary to show the NOx Box O2 requirements for this source. | Change not made. | N/A | N/A |
| 7. | 4/14/04 | NEW | A8.1, A9 | S16, S18, S19 | Opacity | 6-301 | Add future effective date of June 1, 2004. | For consistency with Section VI future effective date for Condition 19466. | Changes made | N/A | N/A |
| 8. | 4/14/04 | NEW | A8.1, A9 | S16, S18, S19 | VOC, HAP | None | Delete line beginning with Future Effective Date “12/4/03 (if any >1E6 scf/24hr vent gas flared)”. | Flares are already subject to video recording because monitors were installed by January 1, 2003, as documented in line above. | Changes made | D15 District will review later | A3 |
| 9. | 4/14/04 | NEW | A8.2 | S17 | Opacity | BAAQMD 6-301 | Replace Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type with None, N, and N/A, respectively. | The S17 Butane Flare is not subject to Permit Condition 20806. | Changes made | D14 Will be in Rev 1 | A25 |

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| 10. | 4/14/04 | NEW | A10 | S21 S22 | CO | BAAQMD Condition 10574, Part 32 | Replace Condition 19466, Part 10 as the Monitoring Requirement Citation with Condition 21233, Part 8. | See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8. | Changes not made. The two “conflicts” are related, but not the same. 19466, Part 10 demonstrates compliance with 9-10-305 CO not to exceed 400 ppm @ 3% O ₂ , operating day average. NOx Box Condition 21233 Part 7 is an “as found” Source test to verify operation within the “Box”; Part 8 is a CO Source Test for sources with NOx CEMs; and Part 9 requires the installation of a CO CEM if 2 5-year tests show CO > 200 ppm. Moreover, all of Condition 21233 is for NOx CEM equivalency, which is a different purpose than Condition 19466, Part 10. | N/A | N/A |

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| 11. | 4/14/04 | NEW | A10 A11 A12 A15 A16 A19 | S21 S22 S23 S25 S30 S31 S33 S40 S41 S220 | CO | BAAQMD 9-10-305 | Delete entire row for deletion of BAAQMD Condition 19466, Part 10. | See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8. | Changes not made. The two “conflicts” are related, but not the same. 19466, Part 10 demonstrates compliance with 9-10-305 CO not to exceed 400 ppm @ 3% O ₂ , operating day average. NOx Box Condition 21233 Part 7 is an “as found” Source test to verify operation within the “Box”; Part 8 is a CO Source Test for sources with NOx CEMs; and Part 9 requires the installation of a CO CEM if 2 5-year tests show CO > 200 ppm. Moreover, all of Condition 21233 is for NOx CEM equivalency, which is a different purpose than Condition 19466, Part 10. | N/A | N/A |
| 12. | 4/14/04 | NEW | A10 A11 A12 A15 A16 A19 | S21 S22 S23 S25 S30 S31 S32 S33 S40 S41 S220 | CO | BAAQMD Condition 21233, Part 9 | Change Monitoring Requirement Citation from Condition 21233, Part 7A to Part 8. Change Monitoring Frequency from P/A to P/SA. | These sources are subject to semi-annual, not annual CO source testing per Condition 21233 Part 8 (>25 MM Btu/hr with NOx CEMS), | Changes made. | N/A | N/A |
| 13. | 4/14/04 | NEW | A10, A11, A15 | S21 S22 S23 S40 | NOx | 9-10-301 | Delete future effective date of 7/1/02. | Future effective date has passed. | Changes made. | N/A | N/A |

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| 14. | 4/14/04 | NEW | A15 | S40 | CO | BAAQMD Condition 9296, Part D3 | Replace BAAQMD Condition 19466, Part 10 with Condition 21233, Part 8. | See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8. | Changes not made. The two “conflicts” are related, but not the same. 19466, Part 10 demonstrates compliance with 9-10- 305 CO not to exceed 400 ppm @ 3% O ₂ , operating day average. NOx Box Condition 21233 Part 7 is an “as found” Source test to verify operation within the “Box”; Part 8 is a CO Source Test for sources with NOx CEMs; and Part 9 requires the installation of a CO CEM if 2 5- year tests show CO > 200 ppm. Moreover, all of Condition 21233 is for NOx CEM equivalency, which is a different purpose than Condition 19466, Part 10. | N/A | N/A |

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|-----|---------|----------------|-----------------|---------|----------------|-----------------|---|---|--|-------------------------|-------------|
| 15. | 4/14/04 | NEW | A18 | S173 | CO | BAAQMD 9-10-305 | Delete BAAQMD Condition 19466, Part 10 as one of the Monitoring Requirement Citations. | See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8. | Changes not made. The two “conflicts” are related, but not the same. 19466, Part 10 demonstrates compliance with 9-10-305 CO not to exceed 400 ppm @ 3% O ₂ , operating day average. NOx Box Condition 21233 Part 7 is an “as found” Source test to verify operation within the “Box”; Part 8 is a CO Source Test for sources with NOx CEMs; and Part 9 requires the installation of a CO CEM if 2 5-year tests show CO > 200 ppm. Moreover, all of Condition 21233 is for NOx CEM equivalency, which is a different purpose than Condition 19466, Part 10. | N/A | N/A |
| 16. | 4/14/04 | NEW | A18 | S173 | O ₂ | None | In the Monitoring Requirement Citation column, delete Part 4B from the Future Effective Date and Monitoring Requirement Citation columns. | S173 (F-902) is a small unit (<25 MM Btu/hr) and is not subject to an O ₂ limit per Condition 21233, Part 3B. Therefore it is not necessary to show the NOx Box O ₂ requirements for this source. | Changes made. | N/A | N/A |

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| 17. | 4/14/04 | NEW | A22.1, A22.2 | S1030 S1031 S1032 S1033 | NOx | BAAQMD Condition 19177, Part 18(a) | <p>Modify existing row for 18(a) to cite revised numbering to Part 18(a)(1) and add notation that 2.5 ppmv natural gas firing NOx limit applies only to Phase I.</p> <p>Add new row for new Phase II NOx limit of 2.0 ppmv for natural gas firing and 2.5 ppmv for 3-hour transition period from refinery gas to natural gas as defined in Part 18(a)(2).</p> | Provides consistency with modifications made to this condition in the November 10, 2003 Authority to Construct extension for Phase II construction and operation. | Changes Made. Updated 19177 conditions to agree with the latest version issued November, 2003. | N/A | N/A |

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| 18. | 4/1 4/0 4 9/2 2/0 3 | Complete, but reverse the comment to delete Part 18(c). The Part 18(c) ammonia injection monitoring requirement was added to the PTO after issuance of the ATC. The PTO, with the new monitoring requirement, was issued after initial source test was conducted and approved by BAAQMD, without determination of correlation for prediction of NH3 slip. Reverse the requested changes to show Condition 19177, Part 21 initial source as the monitoring method. | A22 .1, A22 .2 | S1030, S1032, S1031, S1033 | NH3 | Condition 19177, Part 18(c) and 19(e) | <ol style="list-style-type: none"> 1. Change the Monitoring Requirement Citation from Condition 19177, Part 21 to Part 18(c) 2. Change the Monitoring Frequency from P/E to C. 3. Change the Monitoring Type from "Initial source test" to "Ammonia injection rate recording and emission calculations". | <p>Condition 19177, Part 21 initial source testing has been completed. New language added to Condition 19177, 18(c) requires ammonia injection monitoring correlated with source test data as the method to demonstrate ongoing compliance with the NH3 emission limits.</p> <p>Proposed changes provide consistency with modifications to the July 22, 2003 version of PTO No. 2488 for the Cogen turbine and heat recovery steam generator (S1030 and S1031).</p> | Changes made. The ammonia injection monitoring requirements were from an early version of the Authority to Construct conditions. The requirement was removed prior to the formal transmittal of the Authority to Construct, but the databank version of the condition was not updated. | D43 Done for Phase 1, not for Phase II. | N/A |

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| 19. | 4/14/04 | NEW | A22.2 | S1030, S1032, S1031, S1033 | NOx | 40 CFR 60 Subpart Db 60.44b(e), 60.44b(l)(1) | <p>Delete 60.44b(e) as one of the Citation of Limit references.</p> <p>Delete 60.46b(h)(1) as one of the Monitoring Requirement Citations requiring initial performance testing.</p> <p>Delete 60.46b(h)(2) as the Monitoring Requirement Citation for annual source testing. Delete the annual source testing requirement.</p> | <p>The S1031 and S1033 cogeneration heat recovery steam generators are not subject to the 40 CFR 60.44b(a) or 60.44b(e) NOx limits because they were constructed after 7/9/1997, and therefore, are subject to the 40 CFR 60.44b(l)(1) NOx limit of 0.20 lb/MM Btu.</p> <p>The cogeneration heat recovery steam generators are not subject to 40 CFR 60.44b(j) and therefore, are not subject to the 60.46b(h) performance testing requirements.</p> <p>The cogeneration heat recovery steam generators are not subject to the emission averaging period defined in 40 CFR 60.49b(h)(4) because they each have a heat input capacity greater than 250 million Btu/hr (as referred to in 40 CFR 60.48b(g)(1)).</p> | <p>Changes made.</p> <p>60.44b(l)(1) is already in the table.</p> <p>60.44b(j) is not applicable because the natural gas contains nitrogen in quantities greater than 0.3 wt%.</p> <p>This rationale was copied from B24 and does not apply here.</p> | N/A | N/A |
| 20. | 4/14/04 | NEW | B1 | S8 S10 S12 | Opacity | BAAQMD 6-301 | <p>In the Monitoring Frequency column, after "P/M" add the following:</p> <p>“(for S-10 and S-12, when returned to service).</p> | <p>Modify table to reflect the different monitoring frequencies and conditions noted in BAAQMD Condition 19466, Part 3.</p> | Changes made. | N/A | N/A |

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| 21. | 4/14/04 | NEW | B2 | S11 | FP | BAAQMD 6-310 | In the Monitoring Frequency column, after "P/A" add the following: "starting after ST Plan approved)". | Modify table to reflect the source test plan noted in BAAQMD Condition 19466, Part 7. | Changes made. | N/A | N/A |
| 22. | 4/14/04 | NEW | B4 | S176 | Opacity | BAAQMD 6-301 | In the Monitoring Frequency column, change P/M to "P/E when dry salt is added to the tank". | Modify table to reflect the conditions that trigger event-driven source testing as noted in BAAQMD Condition 19466, Part 3. | Changes made. | N/A | N/A |
| 23. | 4/14/04 | NEW | B4 | S176 | FP | BAAQMD 6-310 | In the Monitoring Frequency column, change P/A to P/E. | Modify table to reflect the conditions that trigger event-driven source testing as noted in BAAQMD Condition 19466, Part 7. | Changes made. | N/A | N/A |
| 24. | 4/14/04 | NEW | B6 | S232 | Opacity | BAAQMD 6-301 | Replace the Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type with None, N, and N/A, respectively. | This source has been deleted from BAAQMD Condition 19466, Part 3. | Changes made. | N/A | N/A |
| 25. | 4/14/04 | NEW | C4 | S160 | Opacity | BAAQMD 6-301 | Change Monitoring Requirement Citation from Condition 19466, part 2c to Condition 19466, Part 3. | Condition Part 2c requires monitoring for 8-2-301. The correct monitoring requirement for 6-301 is Condition 19466, Part 3. | Changes made. | N/A | N/A |

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| 26. | 4/14/04 9/22/03 | No | D1 | S29 | All | Entire table | Re-number table from VII-D1 to VII-C5 and move cooling tower S-29 into the Miscellaneous Sources Subsection C. | MOD 4/14/04 New tables VII-D1 through D8 have been added to the permit for process units with permit conditions. There are not two Tables IV-D1 and the table numbers in Section IV and VII do not match (S-29 is IV is D1 but in VII is D). Tables VII-D for S-29 (and IV-D1 for S-29) should be renumbered to avoid confusion in the permit. | Change made. | D61 District will review later | N/A |
| 27. | 4/14/04 | NEW | D3, D5, D6, D8 | S1007 S1012 S1014 S211 | POC | BAAQMD Condition 18043, Part 1 | Make the following changes Monitoring Requirement Citation: BAAQMD Regulation 8, Rule 18 Monitoring Frequency: As required Monitoring Type: Method 21 portable hydrocarbon detector | Make the monitoring requirements consistent with other permit conditions that require fugitive emission monitoring per BAAQMD Reg 8, Rule 18. | Changes made. | N/A | N/A |
| 28. | 4/14/04 | NEW | H4.2, H5.2, J36, J37, J39 | S150 S194 S195 S199 S200 S131 S197 S198 | Outlet Temperature (H4.2 and H5.2) and VOC (J36, J37, J39) | 11879, Parts 4 11882, Part 4 11888, Parts 4 13319, Part 4 | To the Citation of Limit add the following averaging period language: “averaged over 3-consecutive hours”. | A-57 abates organic emissions from wastewater equipment subject to 40 CFR 61 Subpart FF. Per 40 CFR 61.355(i)(3), an existing applicable requirement in the Title V permit, compliance of a control device and parameter to be monitored (i.e., temperature) is based on an averaging period determined by source test. | Changes made. | N/A | N/A |

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| 29. | 4/14/04 | NEW | I | Components | VOC | BAAQMD Regulation 8, Rule 18 and SIP Regulation 8, Rule 18 | Modify monitoring requirements for BAAQMD Reg 8, Rule 18 and add monitoring requirements for new SIP 8-18 as shown in Attachment D.4. | BAAQMD recently adopted new version of Regulation 8, Rule 18 Organic Compounds – Equipment Leaks with new monitoring requirements. SIP version of 8-18 is now different than BAAQMD version, therefore both should be incorporated into permit. | Changes made. | N/A | N/A |
| 30. | 4/14/04 9/22/03 | Partial. Did not change for S-207, but made most changes for S-210. Corresponding changes were made in Section IV and VI for S-207. Therefore, the permit is not inconsistent. | J9 | S207 | Several | Several | Change monitoring requirements for BAAQMD Permit Conditions for S207 as shown in Attachment D.2. | Refinery transitioning from methanol to ethanol for MTBE Phaseout. It is necessary to incorporate these changes to permit conditions at this time to allow operation of the MTBE phaseout project shortly after the planned Title V Permit issue date of 12/1/2003. NEW COMMENT: The changes for the MTBE phaseout project have been made inconsistently in the Title V permit. These changes are necessary for consistency. | Changes made. | D81 District will review later | N/A |

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| 31. | 4/14/04 9/22/03 | No in Section VII. (NOTE: Corresponding changes have been made in Section IV, therefore, permit is inconsistent) | J11, J12 | S87, S88, S89, S91 | NA | NA | Change titles of tables as listed below and regroup tanks in Table VII-J11 and J12. New title for J11: Internal Floating Roof Tank with Secondary Seal and Solid Guide Poles; MACT Exempt S-89 (TK-1761) New Title for J12: Internal Floating Roof Tanks with Secondary Seals and Slotted Guidepoles; MACT Exempt S-87, S-88, S90, S-91 (TK-1760, TK-1759, TK-1762, TK-1763) | Tanks in tables VII-J11 and VII-J12 need to be regrouped. S87, S88, S89, S90, S91 are all Internal Floating Roof Tanks with resilient-toroid primary seals and zero-gap secondary seals. Seals in all tanks were installed after 2/1/1993. S87, S88, S90, and S91 have slotted guide poles (table J12) and S89 has solid guide poles (table J11). NEW COMMENT: Changes have been made in Section IV but need to be made in Section VII for consistency. | Changes made. | D84 District will review later | N/A |
| 32. | 4/14/04 | NEW | J13 | S210 | POC | BAAQMD Condition 9296, Part 2 | Change Monitoring Requirement Citation for BAAQMD Condition 9296 Part 3 from the detailed 8-18 citations to a single reference to 8-18, rolled up. | Listed 8-18 citations are not complete and approach is not consistent with other similar references to BAAQMD 8-18 as the monitoring requirement citation. | Changes made. | N/A | N/A |
| 33. | 4/14/04 | NEW | J18 | S227 | VOC | 8-5-306 | Change monitoring frequency from "P/A" to "N" | Correct error. Source is not subject to monitoring for 8-5-306 because it is vented to fuel gas recovery system (per SOB). | Changes made. | N/A | N/A |

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| 34. | 12/1/03 | No | A1, A2, A3, A4, A5, A6.1, A6.2, A8.1, A8.2, A9, A10, A11, A12, A13.2, A15, A16, A18, A19, A20, B1, B2, B4, B6, B7, C4 | S1, S2, S3, S4, S5, S6, S7, S8, S10, S11, S12, S16, S17, S18, S19, S20, S21, S22, S23, S24, S25, S26, S30, S31, S32, S33, S34, S35, S40, S41, S43, S44, S46, S160, S173, S176, S220, S232, S233, S237 | Multiple | BAAQMD Conditions 19466 and 20806 | Modify the Permit to include the future effective dates (April 1, 2004 for Condition No. 19466 and June 1, 2004 for Condition No. 20806) in the relevant tables in Section VII. | The future effective dates for Conditions Nos. 19466 and 20806 were not incorporated into the relevant tables in Section VII. | Changes not made. It was agreed not to make this change since the final revision will be issued after 6/1/04. | N/A | A5 |
| 35. | 12/1/03 | No | A15 | S40 | O2 | None | Change FE to "N" | In the absence of a reference to a specific regulatory limit, there is no federally enforceable O ₂ limit provision in this table | Change made. | | 9 |
| 36. | 12/1/03 9/22/03 | No | A23 | S243 | Hours of Operation | Condition 18744, Part 2 | Delete entire row. | Condition 18744, Parts 2 through 6 are redundant with Reg 9, Rule 8. | Changes not made. Will consider later. The condition language is consistent with the District's standard condition for Backup Generators. | | 17 |

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| 37. | 12/1/03 | No | J30 | S230 | Vapor Pressure | 40 CFR 60 NSPS Kb 60.110b(c) | Delete monitoring requirement row | Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68FR59328). | Changes made. | | 23 |
| 38. | 12/1/03 | No | J30 | S230 | NA | Title row for 40 CFR 60 NSPS Kb | Change "NSPS Kb" to "NONE" Change "40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels at Petroleum Refineries RECORDKEEPING ONLY" to "40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels (10/15/2003 Exempt per 60.110b(b) [low vapor pressure]." | Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68FR59328). | Changes made. | | 23 |
| 39. | 12/1/03 | No | J41 | S208 | NA | NA | Add row: NONE 40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels (10/15/2003). Exempt per 60.110b(a)(1) [capacity < 75 cu m] | Source is no longer subject to NSPS Kb based on 10/15/2003 changes to NSPS Kb (68FR59328) that deleted recordkeeping requirements | Changes made. | | 23 |
| 40. | 9/22/03 | No | A8.2 | S17 | None | None | Change table title from "Flares" to "Butane Flare" | Editorial correction. | Change not made. Made in Section IV but inadvertently left out. Will complete in next revision. | D16 Change made | |
| 41. | 9/22/03 | No. Changed the FE to "Y". Should be changed because there is no O2 limit. | A15 | S40 | O2 | None | Delete "N" as FE status. | Editorial correction. | Change inadvertently not made. Will be corrected in next revision. | D25 Mistake corrected | |

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|-----|---------|---|-----------------|------------|------------|----------------|---|--|---|--|-------------|
| 42. | 9/22/03 | No. This change should be made because S173 is not included in 19466, Part 14 because it does not have a NOx CEM. | A18 | S173 | NOx | 9-10-303 | Delete Condition 19466, Part 14 from Monitoring Requirement Citation. | Consistent with deletion of Condition 19466, Part 14 from Section IV for this source. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision. | D30 Good improvement, will review later | |
| 43. | 9/22/03 | No | A18, A19 | S173, S220 | CO | 9-10-305 | Delete BAAQMD Regulation 9-10-502 from Monitoring Requirement Citation. | Consistent with similar change made throughout Section VII of the BAAQMD draft permit for sources subject to Condition 19466, Part 10. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision. | D28 Good improvement, will review later | |

**Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)**

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|-----|---------|----------------|-----------------|------------------|--------------------|---------------------------------|--|---|---|--|-------------|
| 44. | 9/22/03 | No. | A20 | S237 | Opacity, PM | 6-301, Condition 16027, Part 10 | <ol style="list-style-type: none"> 1. Delete “Condition 19466, Part 3” as the Monitoring Requirement Citation and replace with “None”. 2. Delete “P/M” as the Monitoring Frequency and replace with “N”. 3. Delete “Visible Inspections” as the Monitoring Type and replace with “N/A”. 4. Delete entire row for PM with Condition 19466, Part 10 as the Limit and Condition 19466, Part 3 as the Monitoring Requirement Citation. | S237 is a refinery fuel gas fired boiler. CAPCOA periodic monitoring guidelines do not recommend visible emissions monitoring for gaseous-fueled combustion equipment. None of Valero’s other fuel gas fired heaters and boilers require periodic monitoring for visible emissions in the Title V permit. Visible emissions from this source are unlikely, and have not been a problem in the past. | Change not made. S-237 was not deleted from Part 3 since there is a SCR Unit on the source. Consistent with the CAPCOA guidelines, the combustion of gaseous fuel is not the concern. Testing to comply with 6-301 will verify that ammonia injection will not cause visible emissions. | D35 Not in the scope of this revision | |
| 45. | 9/22/03 | No | A21 | S240, S241, S242 | Hours of Operation | Condition 18748, Part 2 | Delete entire row. | Condition 18748, Parts 2 through 4 are redundant with Reg 9, Rule 8. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. The condition language is consistent with the District’s standard condition for standby engines.. | D38 Insufficient argument | |

Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|------------|-------------|-----------------------|------------------------|------------------|--------------------|-----------------------|------------------------|--|---|------------------------------------|--------------------|
| 46. | 9/22/03 | No | A21 | S240, S241, S242 | Hours of Operation | 9-8-330.2 | Delete entire row. | Condition 18748, Parts 2 through 4 are redundant with Reg 9, Rule 8. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. The condition language is consistent with the District's standard condition for standby engines.. | D39 Insufficient argument | |

**Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)**

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|-----|---------|---|-----------------|--------------|------------|---------------------------------|---|---|---|---------------------------|-------------|
| 47. | 9/22/03 | No. Added the shield, but did not make these changes in Section VII | A22.1 | S1030, S1032 | Sulfur | 40 CFR 60, Subpart GG 60.333(b) | <ol style="list-style-type: none"> 1. Change Monitoring Requirement Citation back from 60.334(b)(2) to 60.335(d) because the latter contains the use of the daily grab sample as ASTM Method to determine fuel sulfur content. 2. Add ASTM Method D 3246 81 back as the Monitoring Type with “Initial” to indicate that this is the method that was used for initial compliance demonstration. 3. Add “and Condition 19177, Part 35” after 60.335(d) as the Monitoring Requirement Citation. | See Table IX-B-10.1 comments for shielding the Subpart GG initial compliance method with Condition 19177, Part 35 which requires a TRS CEM on fuel gas. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. | D40 Insufficient argument | |

Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Respons | Appeal Item |
|-----|---------|--|-----------------|------------------|--------------------|----------------|--|--|---|--|-------------|
| 48. | 9/22/03 | No | A23 | S243 | Hours of Operation | 9-8-330.2 | Delete entire row. | Condition 18744, Parts 2 through 6 are redundant with Reg 9, Rule 8. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. The condition language is consistent with the District's standard condition for standby engines.. | D49 Insufficient argument | |
| 49. | 9/22/03 | No. There are still two Table IV-C4's for different sources. | C4.1, C4.2 | S160, S167, S168 | Multiple | Entire table | <ol style="list-style-type: none"> 1. Number Table VII-C4.1 for S160 Seal Oil Sparger. 2. Number Table VII-C4.2 for S167 and S168 Seal Oil Spargers. | Provides consistency with table numbering in Section IV of the Title V permit. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision. | D56 Good improvement, will review later | |
| 50. | 9/22/03 | No | F | S129 | Multiple | Condition 98 | Delete rows with Condition 98 limits and monitoring requirements. | See Attachment C.1 for rationale for deletion of Condition 98. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. | D67 Not in the scope of this revision | |

Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|-----|---------|----------------------------------|--|---|------------|-------------------------------------|---|--|---|---|-------------|
| 51. | 9/22/03 | No. This was an editorial change | J1, J2, J3, J4, J5, J6, J7, J8, J9, J10, J11, J12, J13, J32, J33, J34, J35 | S57, S58-64, S66-68, S72-S80, S81-85, S86-92, S97, S101, S103-J34, S105, S112, S163, S207, S210 | VOC | None (Limit: Certification reports) | <ol style="list-style-type: none"> Change Limit to "Certification reports on tank inspections" Change Monitoring Frequency to "P/E within 60 days after tank inspection" | <ol style="list-style-type: none"> Delete reference to "source test" because floating roof tanks are not subject to any source tests that require reporting under 8-5-404. Clarify required frequency for floating roof tank inspection reports. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision. | D77 Good improvement, will review later | |
| 52. | 9/22/03 | No | J7 | S97 | | New | <p>Add header row for BAAQMD Permit Conditions and add the following:</p> <p>Type of Limit: LEAVE BLANK FE Y/N: Y Citation of Limit: LEAVE BLANK Monitoring Requirement Citation: BAAQMD Condition 10633, Part 1 Monitoring Frequency: P/D Monitoring Type: Record</p> | Add monitoring requirement for permit condition 10633, Part 1, but do not cite the throughput in Table IIA as the limit because under Reg 2, Rule 6, the BAAQMD does not provide authority for applying fuel flow monitoring requirements on the Table IIA annual throughput limits for these grandfathered sources. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision. | D80 Good improvement, will review later | |

Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|-----|---------|---|--|---|------------|---------------------------|---|--|---|---------------------------|-------------|
| 53. | 9/22/03 | Partial. Change made only in Tables J14, J38, J41 <u>Change still needs to be made in J40 (S205, S206)</u> | J14, J21, J22, J23, J25, J26, J38, J40, J41 | S55, S108, S110, S113-115, S117, S120, S122, S123, S170, S171, S180, S193, S196, S205, S206, S208, S234, S235, S239 | VOC | BAAQMD Regulation 8-5-117 | Delete this monitoring requirement (BAAQMD 8-5-117) | Tank is not subject to the low vapor pressure exemption of 8-5-117 | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. | D87 Insufficient argument | |
| 54. | 9/22/03 | No. Result is that some tanks have 8-5-604 monitoring requirement and some tanks do not. Therefore the permit is inconsistent | J17, J21, J22, J23, J24, J25, J26, J27, J28, J36, J37, J39 | S108, S110, S113-115, S117, S120, S122, S123, S131, S133, S143, S150, S158, S170, S171, S180, S199, S200, S234, S235, S239, S1013 | VOC | BAAQMD 8-5 | Add the following monitoring requirement for determination of applicability.: Type of Limit: VOC Citation of Limit: [None] FE Y/N: Y Limit: Determination of applicability Monitoring Requirement Citation: BAAQMD 8-5-604 Monitoring Frequency: P/E Monitoring Type: Look-up table or sample analysis | Correct omissions | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. | D93 Insufficient argument | |

Attachment D
Response to Comments on Permit for Facility B2626 – Section VII (Continued)

| .in | Date | 4/14/04 Status | Permit Location | Sources | Limit Type | Limit Citation | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|-----|---------|----------------|-------------------------|--|------------|---|--|--|---|--|-------------|
| 55. | 9/22/03 | No. | J36, J37, J38, J39, J40 | S131, S150, S193, S196, S199, S200, S205, S206 | VOC | 63.647(a) 61.343(a)(1)(i)(B) or 61.343(a)(1)(i)(A) 63.647(a) 61.349(a)(1)(i) | Delete rows. | Delete duplicate requirements. These requirements are included in the fugitive component table and are monitored under the Fugitives Monitoring Program. | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. | D103 Insufficient argument | |
| 56. | 9/22/03 | No | J41 | S208 | VOC | BAAQMD Condition 8771 Part 2 | Delete row. | Condition 8771 parts 1 and 2 have been deleted from the permit conditions in Section VI and replaced with Regulation 8, Rule 18. | Change made. | | 10 |
| 57. | 9/22/03 | No | new table J42 | LPG Spheres | Several | | Add new Table VII-J42 for the LPG Spheres (See Attachment D.3) | Add applicability for these tanks to account for new BAAQMD 8-5 requirements | Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision. | D106 Good improvement, will review later | |