

**Attachment E& F
Response to Comments on Permit for Facility B2626 – Section VIII**

| Line # | Date | 4/14/04 Status | Permit Location | Source | Applicable Requirement | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|---------------|-------------|-----------------------|------------------------|---------------|---------------------------------|--|---|---|------------------------------------|--------------------|
| 1. | 4/14/04 | NEW | VIII | | BAAQMD Regulation 8-5-306 | Add the following note to BAAQMD Regulation 8-5-306: “* NOTE: This source test has been deleted without replacement in the MOP, but is still called out in the regulation. “ OR BAAQMD should modify either the MOP to add an applicable source test as Volume IV, ST-4 or should modify 8-5-603.1 to call for an applicable and available source test. | Test Method listed calls for a source test that is not available in the MOP (Volume IV, ST-4) | Change not made. Not in the scope of Revision 1. | N/A | N/A |
| 2. | 4/14/04 | NEW | VIII | | 40 CFR 60 Subpart A 60.18(c)(1) | Delete this test method. | This test method was added by BAAQMD when they added 60.18 to the flare tables. Now that 60.18 has been deleted from the flare tables, this test method should be removed from Section VIII. Test method is not applicable to this permit. 40 CFR 60.18 is not included in this permit. | Change made. | N/A | 11 |

Attachment E & F
Response to Comments on Permit for Facility B2626 – Section VIII (Continued)

| Line # | Date | 4/14/0- Status | Permit Location | Sources | Applicable Requirements | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|--------|---------|-------------------|--------------------|--------------------------------|-----------------------------|---|--|--|-------------------------------|----------------|
| 3. | 4/14/04 | NEW | VIII | S1,S2, S4, S1004 | 40 CFR 63 Subpart UUU | Add new header row: Applicable Requirement: 40 CFR 63 Subpart UUU Description of Requirement: National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (4/11/02) | 40 CFR 63 Subpart UUU requirements have been added to Section IV of the permit. Test methods for performance testing need to be added to Section VIII for consistency. | Changes not made. Need citations for the procedures to add in the acceptable test method column. | N/A | N/A |
| 4. | 4/14/04 | NEW | VIII | S1004 Catalytic Reformer | 40 CFR 63.1567(b) (3) | Add the following row: Applicable Requirement: 40 CFR 63.1567(b)(3) Description of Requirement: Performance Test for Inorganic HAP (HCl) Emissions From Catalytic Reforming Units Acceptable Test Methods: Method 26A (40 CFR 60, Appendix A) | Test Method is required for 40 CFR 63 Subpart UUU performance testing. | Changes made | N/A | N/A |

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| Line # | Date | 4/14/0-Status | Permit Location | Sources | Applicable Requirements | Proposed Change | Rationale | District Response | 9/22/03 Item & Response | Appeal Item |
|--------|---------|---------------|-------------------------------|----------------------------|-------------------------|---|---|---|-------------------------------|-------------|
| 5. | 4/14/04 | NEW | VIII | S5 Catalytic Cracking Unit | 40 CFR 63.1564(b)(2) | Add the following row: Applicable Requirement: 40 CFR 63.1564(b)(2) Description of Requirement: Performance Test for PM Emissions from Catalytic Cracking Units Acceptable Test Methods: Method 5B of 5F (40 CFR 60, Appendix A) | Test Method is required for 40 CFR 63 Subpart UUU performance testing. | Changes made | N/A | N/A |
| 6. | 4/14/04 | NEW | VIII | S5 Catalytic Cracking Unit | 40 CFR 63.1564(b)(2) | Add the following row: Applicable Requirement: 40 CFR 63.1564(b)(2) Description of Requirement: Compute PM Emission Rate of Coke Burn-Off Acceptable Test Methods: Equations 1 and 2 of 63.1564 | Test Method is required for 40 CFR 63 Subpart UUU performance testing. | Changes made | N/A | N/A |
| F1 | 4/14/04 | NEW | IX-A5 | Multiple | 40 CFR 60 VV and GGG | Delete permit shield. | The regulations shown in this permit shield are applicable and should not be shielded. | Change not made. This permit shield was added in response to an EPA Comment. Will consider for Rev 2 when there is more time to sort out the conflict between the two comments. | EPA#17 | N/A |
| F2 | 9/22/03 | No | B-9, B-10.1, 10.2, 23, 24, 25 | Multiple | Multiple | Renumber tables. | Provides correct number sequencing. It appears that permit shield tables have been deleted but the remaining tables have not been renumbered to fill the gaps created by the deletions. | Changes made. | F5 District will review later | N/A |