

September 8, 2010

Ms. Deborah Jordan
Director, Air Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Jordan:

This is to inform you that the District is formally proposing the renewal Major Facility Review permit for the facility listed below to EPA for their 45-day review period:

ALAMEDA COUNTY
Tom Bates
(Vice-Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

CONTRA COSTA COUNTY
John Gioia
(Secretary)
David Hudson
Mark Ross
Gayle B. Uilkema

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht
(Chairperson)

SAN FRANCISCO COUNTY
Chris Daly
Eric Mar
Gavin Newsom

SAN MATEO COUNTY
Carol Klatt
Carole Groom

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Spering

SONOMA COUNTY
Shirlee Zane
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Facility #	App.#	Facility Name	Address, City	Type of Operation
B2626	17682	Valero Refining Co.	3400 East Second Street Benicia, CA 94510	Petroleum Refinery

The District has made a preliminary decision to issue the renewal Major Facility Review Permit, but the final decision on the permit issuance will consider public and EPA comments on the proposed permit.

The District published a notice inviting written public comment on the draft renewal Major Facility Review permit on May 26, 2010 in the Benicia Herald newspaper. The comment period ended on July 1, 2010. No comments were received from the public. EPA submitted one comment and the facility submitted 27 comments. In response to Valero's comments, the District made the following administrative changes to the public noticed version of the permit:

- Typographical errors, omissions, and editorial corrections
- Source identification correction
- Update regulation applicability
- Remove the Authority to Construct condition for the Gasoline Dispensing Station that is already in operation
- Corrections to make Condition 20820 language consistent with the final new source review engineering evaluation
- Document continuous parametric monitors
- Update the CAM analysis in the Statement of Basis

These are administrative amendments as defined by BAAQMD Regulation 2-6-201.

The District removed the 40 CFR Part 60, Subpart A, Section 60.18 requirement from Table IV - Generally Applicable Requirements. This had not been previously identified as an applicable requirement, and was inadvertently listed as such in the public notice draft. EPA commented that if it applies, the requirement should also be included in source-specific tables. The facility and an industry association commented and explained why this requirement should not apply, and the District agrees with this position.

The initial Title V permit for this facility was issued on December 1, 2003. Details of the previous revisions can be found in Section X of the permit "Revision History". All changes to the most recent version of the permit are clearly shown in strikeout/underline format.

The proposed permit, statement of basis, EPA's comment via e-mail, and Valero's comments with the District's responses can be viewed on the BAAQMD website at: <http://www.baaqmd.gov/Divisions/Engineering/Public-Notices-on-Permits.aspx>. We will also send the documents to you via the electronic permit submittal system. If you have any questions regarding this project, please call Dennis T. Jang, Senior Air Quality Engineer, at (415) 749-4707.

Very truly yours,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

JB:BFB:vch

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