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From: Chew.Andrew@epamail.epa.gov [mailto:Chew.Andrew@epamail.epa.gov] **On Behalf Of** r9airpermits_BA@epamail.epa.gov
Sent: Wednesday, June 30, 2010 6:02 PM
To: Thu Bui; Dennis Jang; Douglas Hall
Cc: Kelly.Shaheerah@epamail.epa.gov
Subject: Fw: MFR- Public Notice - Proposed Renewal Permit - Valero Refining - Plant #: B2758-9 -- App.#: 18261

Dear all,

I would like to thank you for notifying us of the proposed renewal of Valero Refining Company's (#B2626) title V permit (App. #18261) during the 30-day public comment period. We have been made aware of the proposed permit, engineering evaluation, and other supporting documentation on May 26, 2010.

During this period, we noticed that requirements under section 60.18 of title 40 of the CFR were absent from Sections IV, VI, and VII (Source-Specific Applicable Requirements, Permit Conditions, Applicable Limits & Compliance Monitoring Requirements, respectively) and from their tables, although these critical requirements are applicable to flares (e.g., equipment #S-16, S-17, S-18, and S-19). While the Generally Applicable Requirements in Table IV indicate that section 60.18 of title 40 of CFR applies, the mention of this section is not sufficient to assure compliance with the set of applicable requirements. Therefore, we recommend that the District add requirements of Subpart A of Part 60 in title 40 of the CFR with sufficient specificity in the appropriate sections and tables of the permit to assure compliance and continue to keep us apprised of your findings and determinations.

If you have any questions, please feel free to contact me. Thank you again.

- Andrew

Out of the office: Thurs., 7/1 through Mon., 7/5

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