



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

October 25, 2010

Mr. Brian Bateman
Director of Engineering
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RE: EPA Review of Proposed Title V/Major Facility Review Permit for Valero Refining Company (Benicia) (Facility #B2626)

Dear Mr. Bateman:

Thank you for the opportunity to review the proposed Bay Area Air Quality Management District ("District") Title V Major Facility Review permit ("Title V permit") for the Valero Refining Company (Benicia) (Facility #B2626) that was received electronically on September 9, 2010. We also appreciate the discussions our staff have had on a number of issues related to this permit such as the applicability of certain regulations. However, in reviewing this permit, we are concerned that several issues remain unresolved. We are hopeful that District staff will continue working with us to address these issues before issuing the final permit for this facility in order to avoid a reopening of the permit. Thus, we are providing the enclosed comments to aid our future discussions.

Again, I thank you and your staff for your efforts to prepare this complex permit and for the time spent discussing it with us. If you have any questions or if you would like to discuss this matter further, please call me or have your staff call Andrew Chew at (415) 947-4197.

Sincerely,


Gerardo C. Rios
Chief, Air Permits Office

Enclosure