

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
1	Title Page	1	The name of the facility owner was changed to Tesoro Refining & and Marketing Company, LLC and the facility contact was changed to Matthew W. Buell (Title V Application 25191).	BAAQMD	The name of the facility owner was changed to Tesoro Refining & and Marketing Company LLC (comma was deleted)	Agree	The permit was changed to "Tesoro Refining & Marketing LLC"
2	Title Page	2	The name of the Responsible Official was changed to Stephen W. Hansen (Title V Application 24693).	BAAQMD	The new Responsible Official should be changed to Thomas A. Lu. An application with forms was submitted on April 15, 2015.	Agree	Application 27121 is expected to be completed soon.
3	II. Equipment		Removed S-315, S-318, S-367, S-529, S-530, S-587, S-588, S-659, D-660S-809, and S-810 which have been demolished.	BAAQMD		Agree	All source deletions in draft permit except S-809 and S-810, which will also be removed from the permit.
4	II. Equipment	33	Corrected the permitted throughput for S-612 from 243K to 1,200K bbl/yr consistent with Condition 6740 Part 3 (Title V Application 23854).	BAAQMD			Change already in draft permit.
5	II. Equipment	17	In Table IIA, updated S-613 to reflect the vapor storage service (Title V Application 23982).	BAAQMD	Neither Application 23981 nor 23982 changed the tank description. The description should be Tank A-613, White, Organic Liquid - other/not spec. It is OK to add Vapor Recovery Tank. But note that there may be liquid in the tank. It is incorrect that the tank is abated by A-14 Vapor Recovery.	Agree	In the 9/1/15 meeting, it was agreed to keep the S-613 description as requested in Application 23981 and note in the Statement of Basis that this tank may contain organic liquids. In Table II-B, remove S-613 from the A-14 8-5-306 row. Address the issue of S-1025 being abated by one or both S-613 and A-14 (Comment # 156) in an administrative application.
6	II. Equipment		S-613 removal of 5000K bbl/yr capacity.	Tesoro		Agree	See Comment # 5.
7	II. Equipment		Removed S-659 and S-660, which have been demolished.	BAAQMD			Change already in draft permit.
8	II. Equipment	15	In Table IIA, updated S-690 to show the NSR review in 2005 Permit Application 11737.	BAAQMD			Change already in draft permit.
9	II. Equipment		Addition of Alkylation Spent Acid Tank to S714 in Table IIA	BAAQMD	It is correct that alkylation spent acid is stored, but removed "tank" from the description.	Agree	"Tank" removed from material stored.
10	II. Equipment	26	S-802, updated basis of limit from grandfathered to Firm Emission Limit 1994 Application 12722 Condition 11433 New Source Review.	BAAQMD			Change already in draft permit.

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11 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 1]	II. Equipment	10	Corrected capacity of S-850 to be consistent with the permitted capacity granted in NSR Permit Application 3318. An S-850 expansion to 70,000 BPD was proposed in the Clean Fuels Project (1995 Application 10912), but this expansion was never constructed. The 70,000 BPD capacity increase in Condition 8077 Part B6B for the Authority to Construct granted via Application 10912 should have been removed when the Permit to Operate was granted.	BAAQMD	This is incorrect. Application 10912 included a rate increase to 70,000 BPD and this increase was implemented. The actual rate increased to 70,000 BPD immediately after implementation of the permit. Thus there is no basis for the BAAQMD to make this change in the Title V.	Agree	The 70,000 BPD limit was applied for in the Clean Fuels Project Application 10912, an increase from the 65,000 BPD limit approved in RMEC Application 3318. In 2011 Tesoro told District the S-850 element of CFP was not constructed and did not surrender offsets for the S-850 emission increases. The 70,000 BPD limit was in the CFP AC, but since the AC expired, the 70,000 BPD limit is incorrect. Follow-up Tesoro investigation found that S-850 was indeed modified in the CFP, but without the additional of fugitive components. It was agreed in the 9/10/15 District/Tesoro meeting that the 70,000 BPD limit is valid.
12 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 4]	II. Equipment	22	In Table II-A1, removed the Grandfathered Limit designation for flares S-854, S-943, S-992, S-1012 and S-1013, all of which were constructed in 1979 or later. Revised the Basis for the capacity to Tesoro Flare Minimization Plan (except S-943, which is exempt from Regulation 12, Rule 12).	BAAQMD	S-854 was constructed in 1983 under Application 27769. S-992 was constructed in 1983 under Permit Application Number 28626. Therefore, S-854 and S-992 should have firm limits under NSR. S-1012 was constructed in 1976 and is grandfathered. S-1013 was constructed in 1983 under Permit Application Number 29050 and should have firm limits. S-943 was constructed in 1964 and is grandfathered. The grandfathered basis for S-943 should remain in the Title V.	Defer to Renewal	Some of the information is inconsistent with permit applications. Further information requested. There is agreement with all of Tesoro's comment except S-854 and S-1013, where the Title V permit shows source capacities that appear to be higher than that permitted in the original permit applications Tesoro identified. In the 9/10/15 District/Tesoro meeting, Tesoro indicated that an inquiry is being made to the flare vendors to determine the correct capacity of S-854 and S-1013. It was agreed to defer this capacity issue until the renewal. No capacity changes were made to the permit for S-854 and S-1013.
13 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 3]	II. Equipment		Updated the capacity of S904 from 6,789,000 mmbtu/yr to 6,132,000 mmbtu/yr in Table IIA	Tesoro	BAAQMD changed the limit with no basis. This limit of 6,132,000 MMBtu/year was based on Application 23194 which was cancelled and never implemented. There should be no change from the limits in the current Title V. The correct limit is 6,789,000 MMBtu/year. S-904 has a New Source Review Limit in Condition 22590, part 2. This has been added to the Title V Rev 5.	Disagree	The capacity change was based on the cancelled Application 23194, so the permit was changed back to 6,789,000 mmbtu/yr. However, S-904 is a grandfathered source that has never been modified and the combustion emissions have not been subject to Regulation 2-2. The limit of condition 22590 was to ensure Application 13076 was an alteration. Therefore, the S-904 firing rate limits are not NSR limits. The permit shows that S-904 is a grandfathered source.

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14	II. Equipment	28	In Table II-A1, revised S-908 indicating that it is a grandfathered source that has never been subject to the requirements of Regulation 2, Rule 2, New Source Review. S-908 was proposed to be modified in 1989 NSR Application 3318, but this element of the RMEC Project was dropped. S-908 was re-tubed via 2001 Application 2813, however the requirements of Regulation 2, Rule 2 did not apply.	BAAQMD	It is incorrect that S-908 was dropped from the RMEC project. The emissions calculations from S-908 are clearly included in the RMEC project emissions and addressed in the Engineering Evaluation. The emission reductions from S-908 were over twice the potential emissions increases from the new furnaces. The emissions were contemporaneous reductions and required to be completed in order to meet the RMEC project air permit conditions. The completion of permit condition 3318 Part 6 was not conducted until 1994. Engineering planning uncovered that the originally planned LoNOx burners would be too unreliable to meet the stringent air permit conditions. Therefore SCR was required to reliably meet the maximum allowed NOx emissions. A new permit condition construction schedule was negotiated with the BAAQMD. The Refinery Cap was adjusted after installation of the SCR to further reduce NOx emissions.	Disagree	It was the No 3 Crude Unit modification to increase capacity that was dropped from the RMEC Application 3318. S-908 is a furnace in the No 3 Crude Unit. S-908 was still altered to add NOx controls for the contemporaneous reductions required by the RMEC emission increases. However, S-908 is a grandfathered source initially operated in 1937 and has not been modified. Therefore the combustion emission from S-908 have never been subject to Regulation 2, Rule 2, and the firing rate limits are grandfathered limits. The permit shows that S-908 is a grandfathered source.
15	II. Equipment		Updated the capacity of S909 from 1,270,200 mmbtu/yr to 1,036,600 mmbtu/yr and added limits of condition 25161, part 1 in Table IIA	Tesoro			Change already in draft permit.
16	II. Equipment		Updated the capacity of S912 from 1,182,600 mmbtu/yr to 1,162,608 mmbtu/yr and added limits of condition 25161, part 1 in Table IIA	Tesoro			Change already in draft permit.

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17	II. Equipment	29	In Table II-A1, revised the permitted capacities and/or capacity bases of S-915, S-916, S-919, S-920 and S-921 based on 1991 NSR Application 6468.	BAAQMD	<p>916, 920, and 921 verified Application 6468 was completed in 1991. Prior to about 2000, environmental used LHV instead of HHV. Note that burner vendors still use LHV when they specify firing rates. Our understanding is that the BAAQMD Title V should use HHV, so I have converted the permit limits to HHV.</p> <p>The annual firing rate for S-920 was changed in Application 23341, Condition 25161, part 1. However that change was based on incorrectly identifying S-920 as a grandfathered source. The firing rate for S-920 should be corrected to the firm limit and the change in Condition 25161, part 1 should be removed.</p>	Rescinded in 8/26/15 Tesoro letter.	The firing rates for these sources have been changed to the same or higher rates than currently shown in Condition 16685. This condition was established in 2000 to address the capacity creep issue and the LHV/HHV issue. Increasing the firing rates to even higher firing rates based on the HHV conversion is inappropriate unless there is documentation that this is needed. More information has been requested.
18	II. Equipment	30	In Table II-A1, revised the capacity bases of S-917 based on 1987 NSR Application 164.	BAAQMD			Change already in draft permit.
19	II. Equipment	31	In Table II-A1, revised the permitted capacity and capacity bases of S-926 based on 1993 NSR Application 10912. The 145MM firing rate is based on Permit Condition 16685 which was not created via a permit application. (Note that S-926 Application 25523 has not been approved when this draft was completed).	BAAQMD	In the Engineering Evaluation for Application No. 10912, Section 4.1, S-926 is referenced in the BACT discussion. "BACT in not triggered for existing heaters S-937 and S-926, which will be retrofitted with low-NOx burners... No. 2 Reformer splitter reboiler, S-926, will be retrofitted with low-NOx burners solely for early compliance with proposed Regulation 9, Rule 10 and its maximum firing duty will not be increased. This type of combustion modifications are not subject to New Source Review requirements such as BACT". Therefore, S-926 is grandfathered and based on design and historical firing rate, 145 MMBtu/hour and 1,270,200 MMBtu/year are correct.	Agree	However, as indicted in the determination transmitted 7/29/15, the correct grandfathered limit is 130MM Btu/hr.
20	II. Equipment	32	In Table II-A1, revised the permitted capacities and/or capacity bases of S-928, S-929, S-930, S-931, S-932, S-933, S-934 and S-935 based on 1987 NSR Application 548.	BAAQMD	Application 548 was completed in 1988. Prior to about 2000, environmental used LHV instead of HHV. Note that burner vendors still use LHV when they specify firing rates. Our understanding is that the BAAQMD Title V should use HHV, so I have converted the permit limits to HHV.	Agree	Tesoro rescinded the HHV/LHV issue but found that the design data for S-934/935 was in error. The correct design data will be provided. It was also agreed to keep the 20MM capacities for S-928 through S-933.

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21	II. Equipment	Added 36	S-950's limit basis had "Condition #25161, Part 1" added.	Tesoro	Condition 25161 Part 1 specifies the capacity is 3,417,495 MMBtu/yr while the permit states 3,854,400 MMBtu/yr.	Agree	S-950 was changed to be consistent with Condition 25161.
22	II. Equipment	13	In Table IIA, updated and corrected capacity information for S-955 through S-960 (Title V Application 23882).	BAAQMD			Change already in draft permit.
23	II. Equipment	24	In Table II-A1, corrected the capacities of S-971, S-972 and S-1020, consistent with the capacities approved in 1978 NSR Permit Application 26645.	BAAQMD	Tesoro incorporated firing rates from Application 23322 implemented in April 2014. Depending on timing, we may want to try to incorporate all permit conditions. Data and Tables will be provided in May or June after the source tests.	Agree	Application 23322 updates incorporated.
24	II. Equipment		Clarified that S-971 and S-972 share a common stack downstream of A1433 in Table IIB. Removed S972 as a controlled source.	Tesoro		Agree	Also added a new row for A1433 that shows the NOx limit in condition 25476-10 as requested by Tesoro in Application 23322.
25 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 2]	II. Equipment	11	Corrected capacity of S-973 to be consistent with the permitted capacity granted in NSR Permit Application 27769. Added group firing rate for S-973 and S-974 and corrected Condition 8077 basis. The group capacity for Application 27769 was 159 MM Btu/hr for S-973, S-974 and S-991. S-991 was rated for 40 MM Btu/hr and has been removed from service. The correct group capacity for S-973 and S-974 is 159MM - 40MM = 119 MM Btu/hr.	BAAQMD	This is incorrect. Application 27769 included a group capacity for S-973, S-974 and S-991. The group was permitted to 159 MMBtu/hour. This is based on a grouped limit to address offsets or for keeping the grouped firing rate the same. The firing rate was granted regardless of which sources operated. So, if only S-973 and S-974 operate, the combined limit should still be 159 MM. Removal of S-991 should not have resulted in a lower grouped limit. This contradicts the capacity limits of S-973 and S-974 that have firm individual limits from Application 27769. It is incorrect to remove the PTE of S-991 from the grouped limit.	Address in Admin Permit Application	This rationale is inconsistent with that used in Application 17928 (where S-991 was deleted from the permit), and was not suggested by Tesoro in Application 19647 (where the two bubble conditions were merged) nor in Application 24056 (that addressed all Tesoro Appeal items for the Bubble Condition 8077). Offsets for Application 27769 were addressed by creating the Tosco Refinery Emissions Cap, so the rationale for grouping for offsets in this comment does not appear valid. In any case, this comment needs to be fully evaluated and the suggested change requires a permit application. Further info requested, and after receipt, it was agreed to change the group limit back to 159MM, and to document the change in the administrative application.
26	II. Equipment		Corrected furnace descriptions, firing rates and the fact that the limits are New Source Review	Tesoro		Agree	Tesoro clarified that this was in reference to S-973 and S-974, and the corrections were made in Application 27309.

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27	II. Equipment	25	In Table II-A1, corrected the capacity of S-1004 based on the 1996 maximum throughput data provided by Tesoro.	BAAQMD			Change already in draft permit.
28	II. Equipment		In Table II-A1, S-1005's capacity was reduced to 93 mmscf/day from 93.3 mmscf/day.	Change made by BAAQMD but not	Not sure of basis for change.	Agree	The correction was made as a typo that did not merit listing. The basis is to be consistent with Condition 24321.
29	II. Equipment		In Table IIA, corrected S-1009 Alkylation Unit to show that it is a NSR source permitted for 18,000 BPD via 1991 Tosco Application 3318.	BAAQMD	In the 8/26/15 Tesoro letter, Tesoro disagreed with this change, and provided information that supports the current capacity of S-1009.	Agree	The current capacity of S-1009 is as permitted in the Alkylation Unit expansion in Tosco CFP Application 10912.
30	II. Equipment		In Table II-A1, S-1020's capacity was increased to 26.0k BPD and 9,490K bbl/yr .	Tesoro		Agree	See Comment # 23.
31	II. Equipment	35	In Table II-A.1, revised S-1412 to the New Source Review limits determined in Permit Application 25758 that evaluated the unpermitted 1980 modification (Title V Application 25759).	BAAQMD			Change already in draft permit.
32	II. Equipment		In Table II-A1, "New source review" was removed from Limit basis for S-1469, 1471, 1472, 1475, 1476.	Change made by BAAQMD but not documented in the BAAQMD Permit Change List (9/17/14)		Agree	These engines were initially permitted as a Loss of Exemption in 2002 Application 4389 and were therefore not subject to NSR. In the 8-26-15 Tesoro letter Tesoro agreed to the change.
33	II. Equipment		Added Condition number 18947 as basis for S1475, s1476 in Table IIA	Tesoro			Change already in draft permit.

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34	II. Equipment	23	In Table II-A1, added capacities for flares S-1517 and S-1524 to be consistent with the other flares in Table II-A1.	BAAQMD	Condition 23129, parts 53 and 56 specify that 1517 shall fire only natural gas and that 1.314 MMscf/consecutive 12 month period should not be exceeded.	Agree	Section II, IV and VII show the purge gas throughput limit, but for some reason the 8,584,800 SCF/12mo purge gas limit did not get shown in Section VI. This will be corrected when Application 27030/27031 is approved (currently incomplete).
35	II. Equipment	2	S-1549 was added to Table II-A1 (Title V Application 20969).	BAAQMD	The source description was corrected to match the PTO.	Address in Admin Permit Application	Removed "Lubricity" but kept Innospec OLI 9085.x consistent with Condition 24649. Any further changes need to be proposed in a permit application.
36	II. Equipment	3	S-1552 was added to Table II-A1 (Title V Application 22153).	BAAQMD			Change already in draft permit.
37	II. Equipment		The limit on the hours of operation for S-1550 and S-1551 were removed (Title V Application 22170)	BAAQMD			Change already in draft permit.
38	II. Equipment		S-1553 was added to Table II-A (Title V Application 22170).	BAAQMD			Change already in draft permit.
39	II. Equipment		S-1554 was added to Table II-A1 (Title V Application 22824)	BAAQMD	Application lists 420,000,000 gallon limit while the permit lists 10,000K bbls. Only a change in units.	Agree	No change necessary.
40	II. Equipment	27	In Table II-A1, added S-1555 Reformate Splitter. This source was formerly combined with S-1004 No 2 Catalytic Reformer. It was separated from S-1004 because when it was modified in NSR Application 10912, it was permitted to processes reformate from the S-1020 No 3 Catalytic Reformer as well and has a higher NSR capacity limit than the grandfathered S-1004.	BAAQMD			Change already in draft permit.
41	II. Equipment	34	Added S-1557 Emergency Generator to Table II-A.1 (Title V Application 25958).	BAAQMD	CMB IC Engine Application 12/19/2013	Agree	No change necessary.
42	II. Equipment	20	In Table II-A1, revised footnotes 1, 2, and 3, and added footnote 4 clarifying the operation of the flares (Title V Application 24066).	BAAQMD	Note 3 does not exist in permit. Permit lists Note 1, 2, 4.	Agree	Note 3 is in the Description of S-1013.
43	II. Equipment		S-58 was added to Table II-A2 (Title V Application 21714)	BAAQMD			Change already in draft permit.
44			In Table II-A2, added "New Source Review" to the limits for Tanks Tank B-19, Tank B-21, Tank B-30, Tank B-49, and Tank B-50 per Condition 22455.	Tesoro		Disagree	The tanks were removed from the permit and are now in the Tesoro Logistic Operations E1200 Title V Permit. However, the tanks were not subject to NSR in Application 12592 that created Condition 22455. In 2005 the Amorco Wharf was modified by replacing 2 offloading 8000 bph pumps with two 14000 bph pumps. In order to avoid the requirements of Reg 2 Rule 2, the grandfathered limit of 70,080,000 bpy was put in a permit condition. This limit would only be a NSR limit if the requirements of Reg 2 Rule 2 were applicable. Only fugitive emissions were calculated and offset in Application 12592. The permit shows that S-55 Amorco Terminal is a Grandfathered Source.
45	II. Equipment		In Table II-B, removed S-9 Coke Silo Precipitator from table.	Tesoro			Change already in draft permit.

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46	II. Equipment	1	S-1024 Exempt Tank was removed from Table II-B and II-C. It was removed from service in 2012.	BAAQMD			Change already in draft permit.
47	II. Equipment		A-1553 was added to Table II-B (Title V Application 22170).	BAAQMD			Change already in draft permit.
48	II. Equipment		In Table II-B a row for A-14 was added abating S-1554 (Title V Application 22824)	BAAQMD			Change already in draft permit.
49	II. Equipment	12	In Table IIB, updated the operating parameters information for A-963 Steam Injection System abating S-963 Alkylation Plant Gas Turbine (Title V Application 23233).	BAAQMD			Change already in draft permit.
50	II. Equipment	14	In Table IIB, added CO abatement limits for S-952, S-953 and S-954, and updated NOx abatement limits for S-955 through S-960 (Title V Application 23882).	BAAQMD			Change already in draft permit.
51	II. Equipment	18	In Table IIB, updated A-14 to reflect the vapor storage service of S-613 (Title V Application 23982).	BAAQMD	S-613 does not vent to A-14. Removed S-613 from table.	Agree	See comment # 5.
52	II. Equipment	21	Added all flares to Table II-B to be consistent with District Policy and the other refinery Title V permits.	BAAQMD			Change already in draft permit.
53	II. Equipment		In Table IIB, removed effective/until 1/1/2012 from basis for A952, A953, A954, A955, A956, A957, A958, A959, A960	Tesoro			Included in Change List # 14. Change already in draft permit.
54	II. Equipment		In table II-B, A-952, A-953, A-954, A-955, A-956, A-957, A-958, A-959, A-960 applicable requirement was changed from "BAAQMD" to "SIP" and "until 1/1/2012" was removed from limit basis.	Tesoro			Included in Change List # 14. Change already in draft permit.
55	II. Equipment		A1550 and A1550 in Table IIB lists condition 24991 or 24491	NA	Condition 24991 is the number on Application 20977, but Condition 24491 is the Condition in Application 20977. Please clarify which is correct and make it consistent in the document.	N/A	24491 is the correct number. 24991 is not in the permit. Applies to Comments # 78 and 79.
56	II. Equipment		In Table IIC, removed S2, S57, S269, S271, S274, S368, S369, S377, S378, S406, S503, S1024	Tesoro	All except S274 have been demolished and should be removed from Table IIC. S274 is still existing and has been added back to Table IIC.	Agree	The permit was changed to show S-274.
57	II. Equipment	19	In Table II-C, removed S-369 and S-406, both removed from service in March 2012.	BAAQMD			Change already in draft permit.
58	III. Generally Applicable Requirements		Several dates for regulations have been updated.	Tesoro	Tesoro will defer review of the dates until the Title V renewal application.	Agree	
59	IV. Source-Specific Applicable Requirements	1	Added Permit Condition 27424 to Crude Oil Tank S-690 in Table IV-F.1 (Application 11724).	BAAQMD			Change already in draft permit.
60	IV. Source-Specific Applicable Requirements	2	S-1024 Exempt Tank was removed from Table IV-F1 and IV-F2. It was removed from service in 2012.	BAAQMD			Change already in draft permit.
61	IV. Source-Specific Applicable Requirements		Removed tanks 2, 57, 269, 315, 318, 367, 368, 369, 377, 378, 406, 503, 529, 530, 587 and 588 from Table IV-F1 and IV-F2 These tanks have been demolished.	Tesoro		Agree	All currently archived except S-57. Tesoro confirmed in the 8/26/15 letter that S-57 should remain in the permit.

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62	IV. Source-Specific Applicable Requirements	3	S-1549 was added to Tables IV-F.1 and IV-F.2 (Title V Application 20969).	BAAQMD			Change already in draft permit.
63	IV. Source-Specific Applicable Requirements	4	Removed 40 CFR 98 and CCR Title 17 Subchapter 10, Article 2, 95101-95130 from Table IV-A.1 (Title V Application 23869).	BAAQMD			Change already in draft permit.
64	IV. Source-Specific Applicable Requirements	5	Removed 40 CFR 98 and CCR Title 17 Subchapter 10, Article 2, 95101-95130 from Table IV-A.2 (Title V Application 23869).	BAAQMD			Change already in draft permit.
65	IV. Source-Specific Applicable	25	In Table IV-A.1, deleted 61.356(b)(6), 61.357(d)(7)(i), and 61.357(d)(7)(ii) (Title V Application 23854).	BAAQMD			Change already in draft permit.
66	IV. Source-Specific Applicable Requirements	33	In Tables IV-A.1, IV-B.3, and IV-C.4.3, added Condition 25798 (Title V Application 26273).	BAAQMD	This condition applies to some of our refinery sources, but not all. Remove this condition from the Facilitywide Table IV-A.1. This condition either needs to be in each table for the relevant sources or a new table should be created that includes the sources in the bubble. The relevant parts of Condition 8077 and 25798 should be in that new table. This change has not been made in the Title V Rev 5 document. Removed the Condition from Tables IV-B.3 and IV-C.4.3 because the relevant parts of the Condition have all been completed.	Defer to Renewal	The emissions cap only applies to some of the refinery sources. However, the approach for the refinery emissions cap is to included the pertinent parts of 8077 in the facility wide table. This would also apply to Condition 25798. This approach was taken in the 2011 Renewal and Tesoro did not comment on this approach during the public comment period of the Renewal. There is no objection if Tesoro wishes to add a table to the permit that covers only the sources covered by the emissions cap. It is suggested that Tesoro propose this change in the upcoming permit renewal application, which would be the appropriate place to propose a change in the permitting approach such as this.
67	IV. Source-Specific Applicable Requirements		Remove Refinery Cap Condition 8077 from Tables IV-A.1 and Table IV-A.2. The Refinery Cap Condition 8077 does not apply to all facility sources and Amorco does not have any sources in the Refinery Cap.	Tesoro	Tables IV-A.1 and Table IV-A.2 should not have the Refinery Cap Condition 8077 in the Facility-wide tables. Also, I don't think that Amorco has any sources in the Refinery Cap. This condition either needs to be in each table for the relevant sources or a new table should be created that includes the sources in the bubble. The relevant parts of Condition 8077 and 25798 should be in that new table. This change has not been made in the Title V Rev 5 document.	Defer to Renewal	The approach for the refinery emissions cap is to included the pertinent parts of 8077 in the facility wide table. This approach was taken in the 2011 Renewal and Tesoro did not comment on this approach during the public comment period of the Renewal. If Tesoro wishes to add a table to the permit that covers only the sources covered by the emissions cap, it is suggested that Tesoro propose this change in the upcoming permit renewal application, which would be the appropriate place to propose a change in the permitting approach such as this.
68	IV. Source-Specific Applicable		In Table IV-A.2 and IV-F.3 updated the requirements of 328.1.2 from Tank Degassing to Tank Cleaning	Tesoro	Regulation 328.1.2 in the current BAAQMD rule and in the SIP rule say degassing. Use the word degassing.	Agree	Tank "Cleaning" changed to Tank "Degassing".

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70 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 1]	IV. Source-Specific Applicable Requirements	11	In Table IV-B.3, corrected S-850 throughput limit consistent with the permitted capacity granted in NSR Permit Application 3318. An S-850 expansion to 70,000 BPD was proposed in the Clean Fuels Project (1995 Application 10912), but this expansion was never constructed. The 70,000 BPD capacity increase in Condition 8077 Part B6B and B6C for the Authority to Construct granted via Application 10912 should have been removed when the Permit to Operate was granted.	BAAQMD	This is incorrect. Application 10912 included a rate increase to 70,000 BPD and this increase was implemented. The actual rate increased to 70,000 BPD immediately after implementation of the permit. Thus there is no basis for the BAAQMD to make this change in the Title V.	Agree	See Response to Comment # 11.
71	IV. Source-Specific Applicable Requirements		In Table IV-B.3, do not add Condition 25798 Part 1,11,12 and 13. These conditions have been completed. See corrections in Section VI.	Tesoro		Agree	Condition 25798 for No 3 HDS Testing removed from Table IV-B.3.
72	IV. Source-Specific Applicable Requirements	13	In Table IV-B.6, revised source test requirement in Condition 22070, Part 1, from annual to biennial (Title V Application 23139).	BAAQMD	Removed source test frequency change. The Condition 22070 (Application 23139) source testing change for A-1005 will be excluded from the Rev 5 permit and incorporated at the time of Title V renewal. Note that this condition in Section VI does not identify the Application that created it.	Agree	The Source Test frequency returned to Annual.
73	IV. Source-Specific Applicable Requirements	8	Added Permit Condition 24834 to Table IV-B.10 for S-1020 (Title V Application 22624).	BAAQMD	This condition should be deleted in that Application 23322 overrides the requirements.	Agree	Only Part 1 is superceded by Condition 25476-1. 24834-2 and 3 remains as a record of the permitted fugitive emissions for NSR Application 22615.
74	IV. Source-Specific Applicable Requirements		Added Permit Condition 25476 Parts 1 and 24 to Table IV-B.10 for S-1020 (Application 23322)	Tesoro		Agree	Also added Parts 2 and 22
75	IV. Source-Specific Applicable Requirements		Need to add a new table for S-1555 Reformate Splitter and add Permit Condition 25476 Parts 2 and 24.	Tesoro	This table has not yet been added to the Title V.	Agree	Tesoro requested to provide table as part of App 23322 follow-up.
76	IV. Source-Specific Applicable Requirements		In Table IV-C.1.2, added "Applicability specified in Condition 23562" to NSPS applicability.	BAAQMD			Change already in draft permit.
77	IV. Source-Specific Applicable Requirements	28	In Tables IV-C.1.2, IV-C.2.1, IV-C.4.1, IV-C.4.2, IV-C.4.3, IV-C.4.4, IV-C.4.5, IV-C.4.6 (S-1470 only) and IV-H.2, added applicability specification for BAAQMD Regulation 10 and 40 CFR 60 Appendix F (Title V Application 23854).	BAAQMD	Also clarified that only S-1470 is subject to NSPS J. S-1160 has natural gas only firing requirement and is not subject to NSPS J.	Agree	Clarification added to 40 CFR 60 Subpart J in Table IV-C.4.6.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
78	IV. Source-Specific Applicable Requirements		In Table IV-C.1.3, BAAQMD Condition 24491 is cited.	Tesoro	In Application 20977, the permit condition 24491 was created. In our PTO for application 22169, the permit condition number 24991 is used. Please clarify that the correct number for the permit condition is 24491.	N/A	See comment # 55. 24491 is the correct number. 24991 is not in the permit.
79	IV. Source-Specific Applicable Requirements	7	Added S-1553 to Table IV-C.1.3, and deleted Condition 22491, Part 3 (Title V Application 22170).	BAAQMD	In Application 20977, the permit condition 24491 was created. In our PTO for application 22169, the permit condition number 24991 is used. Please clarify that the correct number for the permit condition is 24491.	N/A	See comment # 55. 24491 is the correct number. 24991 is not in the permit.
80	IV. Source-Specific Applicable Requirements		In Table IV-C.2.1, removed "except S1012" from NSPS J requirement applicability	BAAQMD			Change already in draft permit.
81	IV. Source-Specific Applicable Requirements		Added "by Date of Construction" to the title of table IV-C.2.1	Tesoro			Change already in draft permit.
82	IV. Source-Specific Applicable Requirements	23	In Table IV-C.2.1, deleted Condition 24323 Part 4 (Title V Application 24066).	BAAQMD			Change already in draft permit.
83	IV. Source-Specific Applicable Requirements		In Table-C.2.1, made slight wording change on [24324] Part 4 to better explain condition.	Tesoro		Agree	Revised by adding "including unscheduled maintenance to ensure continued safe operation"
84	IV. Source-Specific Applicable Requirements	35	In Table IV-C.2.2, for S-943 Butane Flare, added BAAQMD Regulation 8, Rule 5 and SIP Regulation 8, Rule 5 to be consistent with S-943 in Table II-B.	BAAQMD			Change already in draft permit.
85	IV. Source-Specific Applicable Requirements	16	Updated requirements for Regulation 9, Rule 8 in Table IV-C.3.2 for engines S-952, S-953 and S-954 (Title V Application 23882).	BAAQMD			Change already in draft permit.
86	IV. Source-Specific Applicable Requirements		In Table IV-C.3.2 and C.3.3, added CO abatement limits for S-952, S-953 and S-954, and updated NOx abatement limits for S-952 through S-960	BAAQMD			Change already in draft permit.
87	IV. Source-Specific Applicable Requirements	17	Updated requirements for Regulation 9, Rule 8 in Table IV-C.3.3 for engines S-955 through S-960 (Title V Application 23882).	BAAQMD			Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
88	IV. Source-Specific Applicable Requirements		Part 3 of Condition 23811 in Table IV-C.3.1, 3.4, 3.5, 3.6, 3.7 and 3.8 should cite section 93115.10(d)(1). Part 4 of Condition 23811 in Table IV-C.3.6 should cite Section 93115.10(f). Also corrected the ATCM citations.	NA		Agree	Corrected ACTM Citations and Condition 23811 in Tables IV-C.3.1, C.3.4, C.3.5, C.3.6, C.3.7 and C.3.8. The 23811 citations are now consistent with databank.
89	IV. Source-Specific Applicable Requirements	6	Added Table IV-C.3.7 for S-1552 Emergency Diesel Water Pump (Title V Application 22153).	BAAQMD			Change already in draft permit.
90	IV. Source-Specific Applicable Requirements	32	Added Table IV-C.3.8 for S-1557 Emergency Diesel Generator (Title V Application 25958).	BAAQMD	CMB IC Engine Application 12/19/2013		Change already in draft permit.
91	IV. Source-Specific Applicable Requirements		Added Table IV-C.4.1 for S902 - FCC Start Up Heater	Tesoro		Agree	Table IV-C.4.1 already in permit. Tesoro requested to clarify comment.
92	IV. Source-Specific Applicable Requirements	18	Corrected Table IV-C.4.2, Condition 8077 Part B7D removing the CO source test requirement (Title V Application 24057).	BAAQMD			Change already in draft permit.
93	IV. Source-Specific Applicable Requirements	15	Added Permit Condition 25161 to Tables IV-C.4.2 and C.4.4 (Title V Application 23425).	BAAQMD	Removed applicability for S920 because it was determined that S920 has a firm NSR limit [in Application 23322].	Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.
94	IV. Source-Specific Applicable Requirements	19	Revised Tables IV-C.4.2 and G.3 to reflect change in Conditions 13605, 20099, 21053, 21100 and 21849 to remove S-913 (Title V Application 24363).	BAAQMD			Change already in draft permit.
95	IV. Source-Specific Applicable Requirements		In Table IV-C.4.2, added Condition 25476 Parts 5, 6 and 24.	Tesoro		Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.
96	IV. Source-Specific Applicable Requirements	12	In Table IV-C.4.3, deleted Condition 18372 Part 21 and revised Part 22 (Title V Application 23007)	BAAQMD			Change already in draft permit.
97	IV. Source-Specific Applicable Requirements		In Table IV-C.4.3, abbreviation for total reduced sulfur was updated to TRS from TDS.	BAAQMD			Change already in draft permit.
98	IV. Source-Specific Applicable Requirements		In Table IV-C.4.3, added in BAAQMD Condition 23562 for NSPS J applicability.	BAAQMD	This condition does not apply to the sources in this table. See application 19874.	Agree	Condition 23562 and references to it are removed from Table IV-C.4.3.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
99	IV. Source-Specific Applicable Requirements		In Table IV-C.4.3, added in BAAQMD Condition 25476.	Tesoro		Agree	However, Table IV-C.4.3 is for sources subject to NSPS Subpart J. Since S-971 and S-972 are subject to NSPS Subpart Ja, a new table should be created. Tesoro requested to provide table as part of App 23322 follow-up.
100	IV. Source-Specific Applicable Requirements		In Table IV-C.4.3, removed BAAQMD Condition 25798 which had been added.	Tesoro	This was a temporary testing condition and has been completed. The bubble adjustments are retained but should not appear in this table. None of the other combustion tables have bubble limits in them.	Agree	See Comment # 71. Condition 25798 removed from Table IV-C.4.3.
101	IV. Source-Specific Applicable Requirements	26	In Table IV-C.4.4, deleted 40 CFR 61.349(a)(1)(i), 40 CFR 61.349(a)(1)(iii), 40 CFR 61.349(a)(1)(iv) and 61.357(d)(7)(i) (Title V Application 23854).	BAAQMD	Tesoro disagrees with striking out 40 CFR 61.349(a)(1)(i), 40 CFR 61.349(a)(1)(iii). Therefore, Tesoro rejected the deletion. Tesoro agrees with the correction in 40 CFR 61.349(a)(1)(iv). Tesoro agrees that the Refinery does not use biodegradation (activated sludge) to treat benzene-containing wastewater, so 40 CFR 61.357(d)(7)(i) can be deleted.	Agree	These corrections were specifically requested in the Title V Renewal appeal, Issues 9.2 and 9.2A.
102			In Table IV-C.4.4 added Condition 25161.	Tesoro			Change already in draft permit.
103	IV. Source-Specific Applicable Requirements	34	In Table IV-C.4.5, changed 9-10-111 to 9-10-112, deleted 9-10-306.1 and 306.3, added 9-10-502 and 502.2, and added Condition 25846 (Title V Application 25759).	BAAQMD			Change already in draft permit.
104	IV. Source-Specific Applicable Requirements		In Table IV-C.4.5, added Condition 25846.	Tesoro	Mr. Gregory Stone stated that Condition 25846 Part 5 would be removed. So this condition was deleted. Also note that the firing rate limit of 17.1 MMBtu per hour should be added to Condition 25846 Part 2.	Agree	Part 5 was deleted.
105	IV. Source-Specific Applicable Requirements		Added "(S-1470 Only)" condition to 40 CFR 60 Appendix F in table IV-C.4.6	Tesoro			Change already in draft permit.
106	IV. Source-Specific Applicable Requirements	29	In Table IV-C.4.7, deleted 40 CFR 60 Appendix F (Title V Application 23854).	BAAQMD			Change already in draft permit.
107	IV. Source-Specific Applicable Requirements	14	Revised Table IV-C.5.1 to incorporate 40 CFR 64 CAM requirements for S-963 Alkylation Plant Gas Turbine (Title V Application 23233).	BAAQMD	9-9-604 Changed from Determination of "Stack Gas Oxygen" to "HHV and LHV"	Agree	Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
108	IV. Source-Specific Applicable Requirements	20	Revised Table IV-D.7 S-1025 with language expansions and to remove the requirements of S-613 Vapor Storage Tank (Title V Application 23982).	BAAQMD			Change already in draft permit.
109	IV. Source-Specific Applicable Requirements	21	Added Table IV-D.10 with the requirements of S-613 Vapor Storage Tank (Title V Application 23982).	BAAQMD			Change already in draft permit.
110	IV. Source-Specific Applicable Requirements		In Table IV-F.1, bases were added for 1509, 1521, B19, 21, 30, 49, 50.				Change already in draft permit.
111	IV. Source-Specific Applicable Requirements	22	In Tables IV-F.1 and F.2, removed S-613 Vapor Storage Tank (Title V Application 23982).	BAAQMD	S-613 does have some liquid and should be in Tables IV-F.1 and F.2.	Agree	See Comment # 5.
112	IV. Source-Specific Applicable Requirements	10	Added S-1554 to Tables IV-F.1 and IV-F.2 (Title V Application 22824).	BAAQMD			Change already in draft permit.
113	IV. Source-Specific Applicable Requirements	9	Added BAAQMD Regulations 8-5-306.2 and 8-5-502.2 to Table IV-F.3.	BAAQMD			Change already in draft permit.
114	IV. Source-Specific Applicable Requirements	24	In Table IV-G.4, revised the 40 CFR 61 Subpart FF requirements for S-532 and S-1484 based on the determination that these sources process aqueous waste rather than non-aqueous waste (Title V Application 23854).	BAAQMD			Change already in draft permit.
115	IV. Source-Specific Applicable Requirements	27	In Table IV-G.5, revised the 40 CFR 61 Subpart FF requirements for S-606 and S-607 based on the determination that these sources process aqueous waste rather than non-aqueous waste (Title V Application 23854).	BAAQMD	Tesoro removed 61.348(e) per application 23854.	Agree	There were many changes requested in Tesoro Title V Appeal Items 9.3 and 9.3A, and in Application 23854, but 61.348(e) was not one of them. Tesoro was requested to check this comment. Tesoro did and 348(e) was removed. However, during the Tesoro review it was found that there may be additional Subpart FF changes and it was agreed to defer a comprehensive 61FF BWON review to the upcoming Title V Renewal Application.
116	IV. Source-Specific Applicable Requirements	30	In Table IV-G.8, deleted 40 CFR 60 Subpart QQQ 60.695(b) because the closed vent requirements in 40 CFR 60 Subpart QQQ do not apply to emission points vented to fuel gas systems as defined 60.691 (Title V Application 23854).	BAAQMD			Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
117	VI. Permit Conditions		Corrected Condition 8077 Source List, and Parts B7A and B7D (Title V Application 24057).	BAAQMD	B7A, B7B and B7D are verified. Cannot verify the following sources in the sources in the source list: S851 Ammonia Recovery Unit (Permitted by Application 27769) S854 East Air Flare (Permitted by Application 27769) S856 Spare DEA Stripper (Permitted by Application 27769) S1421 Sour Water Feed Tank (Permitted by Application 27769). In Application 11395 "Construction OF TK-757 (S-1421)in 1993, there was no discussion of adding Tank 757 to the Bubble.	Defer to Renewal	S-1421 was modified in Tosco Application 13395 and emissions increases were offset. The determination to add S-1421 to the 8077 source list was made in Tesoro Application 24056. In addition, per Comment # 56, S-1024 will be removed from the Source List. Any further changes will be made when the approach to how the Tesoro Refinery Emissions Cap Condition 8077 is handle. See Comment # 67.
118 [Discussed in 9/10/15 Tesoro/ District meeting, Agenda Item 1]	VI. Permit Conditions		Corrected Permit Condition 8077 Part B6B and B6C to show the correct S-850 permitted capacity, consistent with the permitted capacity of NSR Permit Application 3318. An S-850 expansion to 70,000 BPD was proposed in the Clean Fuels Project (1995 Application 10912), but this expansion was never constructed. The 70,000 BPD capacity increase in Condition 8077 Part B6B for the Authority to Construct granted via Application 10912 should have been removed with the Permit to Operate was granted.	BAAQMD	This is incorrect. Application 10912 included a rate increase to 70,000 BPD and this increase was implemented. The actual rate increased to 70,000 BPD immediately after implementation of the permit. Thus there is no basis for the BAAQMD to make this change in the Title V.	Agree	See Response to Comment # 11.
119 [Discussed in 9/10/15 Tesoro/ District meeting, Agenda Item 2]	VI. Permit Conditions		Corrected Permit Condition 8077 Part B7B to show the correct S-973 and S-974 group capacity, consistent with the permitted capacity of NSR Permit Application 27769. The group capacity for Application 27769 was 159 MM Btu/hr for S-973, S-974 and S-991. S-991 was rated for 40 MM Btu/hr and has been removed from service. The correct group capacity for S-973 and S-974 is 159MM - 40MM = 119 MM Btu/hr.	BAAQMD	This is incorrect. Application 27769 included a group capacity for S-973, S-974 and S-991. The group was permitted to 159 MMBtu/hour. This is based on a grouped limit to address offsets or for keeping the grouped firing rate the same. The firing rate was granted regardless of which sources operated. So, if only S-973 and S-974 operate, the combined limit should still be 159 MM. Removal of S-991 should not have resulted in a lower grouped limit. This contradicts the capacity limits of S-973 and S-974 that have firm individual limits from Application 27769. It is incorrect to remove the PTE of S-991 from the grouped limit.	Address in Admin Permit Application	See Response to Comment # 25.
120	VI. Permit Conditions		Revised Condition 8077, Parts B2A and B2B Refinery Emissions Cap mass emissions limits (Title V Application 26273).	BAAQMD			Change already in draft permit.
121	VI. Permit Conditions		Added Applications 24056 and 26272 to Condition 8077	Tesoro			Change already in draft permit.
122	VI. Permit Conditions		Deleted B12H in Condition 8077 because the requirements have been completed.	Tesoro		Agree	Further information requested showing the requirement has been completed. Document could not be found. Project was completed in the 1980's.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
123	VI. Permit Conditions		The word "Regenerator" was deleted from Permit Condition 11433.	Tesoro	This Consent Decree requirement was added to Condition 11433 via Application 15212 in 2007. Application 15212 and all subsequent applications, including 19647 and 17500, have had the wording that "the emissions limits from the FCCU Regenerator shall not exceed"... There is no basis to remove the word Regenerator. This strike-out would put Tesoro out of compliance with the limit. The word Regenerator must be retained.	Agree	Regenerator kept in 11433.
124	VI. Permit Conditions		Revised Condition 11433 to note FCCU Alteration via Application 23075.	BAAQMD			Change already in draft permit.
125	VI. Permit Conditions		Revised IC Engine Conditions 13509 and 15204 (Title V Application 23882).	BAAQMD			Change already in draft permit.
126	VI. Permit Conditions		Updated Condition 13605 with Application 24362.	Tesoro			Change already in draft permit.
127	VI. Permit Conditions		Revised Conditions 13605, 20099, 21053, 21100 and 21849 to remove S-913 from source test requirements since this source is no longer fired with the 40# fuel gas, the system that abates the sources (Title V Application 24363).	BAAQMD			Change already in draft permit.
128	VI. Permit Conditions		Condition 15204 should include CO Control for Application 16779 (1996).	Tesoro		Agree	Tesoro requested the CO emissions limit of 15204-3 be deleted via Tesoro Application 19419. Tesoro clarified comment 8/26/15.
129	VI. Permit Conditions		Condition 15204 updated with Application 23848.	Tesoro			Change already in draft permit.
130 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 3]			Updated Part #1 language in condition 16685	Tesoro	Removed language that BAAQMD inserted into Condition 16685 from Application 23194/23690. Application 23194/23690 was cancelled.	Disagree	The updated language in Condition 16685 clarifies that the firing rate limits in the condition are not limits created through New Source Review and is true and applies regardless of the cancellation of Application 23194. In the 9/10/15 Tesoro/District meeting, the clarifying language was discussed as related to S-904 (see comment #) and Tesoro agreed to provide the District Legal Division a position document. Tesoro currently has proposed a burner replacement in Permit Application 27054 and this issue will be addressed during the review and evaluation of that application.No changes were made to the permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
131	VI. Permit Conditions		Updated the firing rates in Condition 16685 based on the approved NSR firing rates as outlined in table 1	BAAQMD	Many of the changes in firing rate that the BAAQMD inserted are based on applications completed before 2003. For example, Application 6468 was completed in 1991. Prior to about 2003, environmental used LHV instead of HHV. Note that burner vendors still typically use LHV when they specify firing rates. Our understanding is that the BAAQMD Title V should use HHV, so Tesoro has converted the initial permit limits from LHV to HHV.	Rescinded in 8/26/15 Tesoro letter.	The firing rate limits are based on the Engineering Evaluation for Tesoro Application 23322. Tesoro reviewed the 1/4/2013 draft of this evaluation and the comments returned 1/10/2013 did not include any HHV/LHV issue. While there may be instances where a burner or furnace specification is in terms of LHV, this cannot be applied in blanket fashion since there are also specifications in HHV. Proposed changes to the firing rates in Condition 16685 need to be included in a permit application with supporting information.
132	VI. Permit Conditions		Updated the firing rates in Condition 16685 for S971 and S972 based on implementation of Application 23322.	Tesoro		Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.
133	VI. Permit Conditions		Updated the description of S973 and S974 in Condition 16685.	Tesoro		Agree	The descriptions of S-973 and S-974 are consistent with the data forms submitted by Tosco in 1984 when these sources were initially permitted via Application 26679. Tesoro has attempted to change the service of these sources many times, and each time the Tosco data forms are provided in support of the current description. This issue comes up every time a new person starts looking at the unit. The resolution is for Tesoro to correct the source numbers it uses for these furnaces. Alternatively, Tesoro can submit a permit application to request a correction if warranted.
134	VI. Permit Conditions		Corrected capacity of S-973 in Permit Condition 16685 to be consistent with the permitted capacity granted in NSR Permit Application 27769.	BAAQMD			Change already in draft permit.
135	VI. Permit Conditions		Removed "Cumulative Increase" as the basis for Condition 16685, Part 1.	BAAQMD	Some of the source firing rates in Condition 16685 are based on cumulative increase. Therefore cumulative increase was added back into language that had been deleted by BAAQMD.	Disagree	Cumulative increase implies that emission calculations were performed and the facility offset the increase. Permit condition 16685 was created without emission calculations in 1999. Many of the sources listed in 16685 are grandfathered sources and cumulative increase would not apply.
136 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 3]	VI. Permit Conditions		Condition 17322 and 22590 cites application 23194 for updated limits	Tesoro	Application 23194 was cancelled. The project was never constructed. Since the ATC/PTO was never implemented, the changes to the Conditions should not be incorporated into the PTO or TV.	Disagree	See response to Comment # 130. Cancellation of Authority to Construct added and firing rates returned to pre-Application 23194 limits. Clarifying language was not removed from the permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
137	VI. Permit Conditions		Item 1b. Has been added to Condition 17322 requiring a PSD application be submitted within 60 days of the receipt of the authority to construct for the S904 burner replacement project.	Tesoro	Application 23194 was cancelled. The project was never constructed. Since the ATC/PTO was never implemented, the changes to the Conditions should not be incorporated into the PTO or TV. Further, this requirement was deleted from the original ATC/PTO before the due date arrived.	Agree	Condition 17322 revised to reflect current condition language in Databank.
138	VI. Permit Conditions		Revised Permit Condition 18372 introduction, Parts 20, 21, 22, 29, 31, 32 and 33 as approved in Permit Application 23006.	BAAQMD			Change already in draft permit.
139	VI. Permit Conditions		Revised Condition 18372, Part 31A, for S-912 NOx Box Revision (Title V Application 21141).	BAAQMD			Change already in draft permit.
140	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-913 NOx Box Revision (Title V Application 21800).	BAAQMD			Change already in draft permit.
141	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-913 NOx Box Revision (Title V Application 22972).	BAAQMD			Change already in draft permit.
142	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-913 NOx Box Revision (Title V Application 25006).	BAAQMD			Change already in draft permit.
143	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-916 NOx Box Revision (Title V Application 23870).	BAAQMD			Change already in draft permit.
144	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-916 NOx Box Revision (Title V Application 24920).	BAAQMD			Change already in draft permit.
145	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-919 NOx Box Revision (Title V Application 22151).	BAAQMD			Change already in draft permit.
146	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-920 NOx Box Revision (Title V Application 22581).	BAAQMD			Change already in draft permit.
147	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-920 NOx Box Revision (Title V Application 26160).	BAAQMD			Change already in draft permit.
148	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-926 NOx Box Revision (Title V Application 21790).	BAAQMD			Change already in draft permit.
149	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-926 NOx Box Revision (Title V Application 22583).	BAAQMD			Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
150	VI. Permit Conditions		Revised Condition 18372 Part 31A, for S-915, S-928, S-929, 930, 931, 932, 933 and added Note 1.	Tesoro			Change already in draft permit.
151	VI. Permit Conditions		Updated Condition 18372 33A.2 for source test submittal timing from 45 to 60 days	Tesoro			Change already in draft permit.
152	VI. Permit Conditions		Added "Unchanged when S-1470 was altered by Application 26000 (July 2014)" to intro of Condition 18539	Tesoro			Change already in draft permit.
153	VI. Permit Conditions		Added "Administratively Changed by Application 23232 (April 2012. Added 40 CFR 64 CAM requirements for S963 Gas Turbine. " to intro of Condition 19528	Tesoro			Change already in draft permit.
154	VI. Permit Conditions		Added Parts 21, 22 and 23 to Condition 19528 to incorporate 40 CFR 64 CAM requirements for S-963 Alkylation Plant Gas Turbine (Title V Application 23233).	BAAQMD			Change already in draft permit.
155	VI. Permit Conditions		Deleted Condition 20682 because Sources S-659 and S-660 have been demolished.	Tesoro		Agree	Condition 20682 deleted. Condition is archived in Databank.
156	VI. Permit Conditions		Updated item 11 of condition 21849 added "and/or" and removed in the year prior to the Title V Permit Renewal	Tesoro		Address in Admin Permit Application	Removed reference to Title V Permti Renewal. In Part 11a, "and" is the correct term as permitted in Application 23981 because both S-613 bladder tank and the refinery vapor recovery system are required to properly abate S-1025 Loading Rack. In a 9/1/15 meeting at Tesoro, the S-1025 operation was reviewed with C. McDowell, and it appears that there may be periods where S-613 is out of service and only A-14 abates S-1025, and periods when A-14 is out of service, and S-613 provides a vapor surge capacity until A-14 is returned to service. It was agreed to address this issue in an future administrative application.
157	VI. Permit Conditions		Updated item 14 of condition 21849 to say "The owner/operator of S-1504 shall not transfer any material other than <u>fuel grade</u> ethanol."	Tesoro			Change already in draft permit.
158	VI. Permit Conditions		Revised Condition 21849 to update application record and to reflect S-613 Vapor Storage service (Title V Application 23982).	BAAQMD	Changed description of S-613 because it may have liquid.	Agree	See comment # 5.
159	VI. Permit Conditions		Revised source test requirement in Condition 22070, Part 1, from annual to biennial (Title V Application 23139) and added ". If the results for any source test exceed 7.5 lb/day total carbon or more than 150 ppm total carbon, the District approved source test frequency shall be annual."	BAAQMD	Application 23139 will be excluded from the Rev 5 permit and incorporated at the time of Title V renewal. Note that this condition does not identify the Applications that created it.	Agree	See Comment # 72.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
160 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 3]	VI. Permit Conditions		Condition 17322 and 22590 cites application 23194 for updated limits		Application 23194 was cancelled. The project was never constructed. Since the ATC/PTO was never implemented, the changes to the Conditions should not be incorporated into the PTO or TV.	N/A	Duplicate of Comment # 136. See response to Comment # 130. Cancellation of Authority to Construct added and firing rates returned to pre-Application 23194 limits. Clarifying language was not removed from the permit.
161	VI. Permit Conditions		Revised Condition 23129, Part 19 (Application 21744).	BAAQMD			Change already in draft permit.
162	VI. Permit Conditions		Revised Condition 23129 Part 56 to include purge gas (Title V Application 24066).	BAAQMD			Change already in draft permit.
163	VI. Permit Conditions		Deleted references to Sources S-659 and S-660 and A-9 from Condition 23129, Parts 38, 39 and 42 because the sources have been demolished.	Tesoro		Agree	Request is valid, but language is consistent with condition in Databank, and change in conditions is not made through the Title V permit. Suggest making the change administratively in Application 27030 (S-1517 Flare modification).
164	VI. Permit Conditions		Added S-1557 to Condition 23811 and updated intro (Title V Application 25958).	BAAQMD			Change already in draft permit.
165	VI. Permit Conditions		Added S-1552 to Permit Condition 23811 (Title V Application 22153).	BAAQMD			Change already in draft permit.
166	VI. Permit Conditions		Added S-58 to Permit Condition 23811 (Title V Application 21714). Updated ATCM references in the bases for Part 1 and Part 2.	BAAQMD			Change already in draft permit.
167	VI. Permit Conditions		Deleted Condition 24323 Part 4 (Title V Application 24066).	BAAQMD			Change already in draft permit.
168	VI. Permit Conditions		Revised Condition 24323 intro and Parts 8 and 10 S-1524 Flare Purge and Pilot Gas (Title V Application 22163).	BAAQMD			Change already in draft permit.
169	VI. Permit Conditions		Added S-1553 to Permit Condition 24491 and deleted Part 3 (Title V Application 22170).	BAAQMD	In Application 20977, the permit condition 24491 was created. In our PTO for application 22169, the permit condition number 24991 is used. Please clarify that the correct number for the permit condition is 24491.	N/A	See response to Comment # 55.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
170	VI. Permit Conditions		Added Permit Condition 24649 for S-1549 (Title V Application 20969).	BAAQMD	Changed condition to generic diesel additive, rather than product specific.	Address in Admin Permit Application	See Comment # 35. Condition language is consistent with the Application 20968 Engineering Evaluation and in Databank. Specific TACs were addressed. A change will require a permit application for a change in conditions.
171	VI. Permit Conditions		Added Permit Condition 24724 for Crude Oil Tank S-690 (Application 11724).	BAAQMD	verified as condition 24724		Change already in draft permit.
172	VI. Permit Conditions		Added Permit Condition 24834 S-1020 No 3 Reformer (Title V Application 22624)	BAAQMD	All parts of Condition 24834 have been deleted because the parts have either been completed or replaced with Condition 25476 from Application 23322.	Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.
173	VI. Permit Conditions		Added Permit Condition 25025 for S-1554 High Sulfur Vacuum Gas Oil Tank (Title V Application 22824).	BAAQMD			Change already in draft permit.
174	VI. Permit Conditions		Added Permit Condition 25161 (Title V Application 23425).	BAAQMD	The annual firing rate for S-920 was changed in Application 23341, Condition 25161, part 1. However that change was based on incorrectly identifying S-920 as a grandfathered source. The firing rate for S-920 should be corrected to the firm limit and the change in Condition 25161, part 1 should be removed.	Agree	See comment # 93. Tesoro requested to provide proposed changes as part of App 23322 follow-up.
175	VI. Permit Conditions		Added Condition 25476 (Title V Application 23322).	BAAQMD	Parts 14, 22, 23 and 28 have been noted as completed and should not be incorporated into the Section IV and VII of the Title V. These conditions will be completed before the Title V Revision 5 is issued.	Agree	Will be added once 23322 follow up is complete. Not sure how this is shown as BAAQMD identified because 23322 is not in the Rev 5 draft as requested by Matt Buell. Also, Part 14, Compliance with Subpart Ja, needs to be retained because this is not a requirement that can be 'completed'.
176	VI. Permit Conditions		Added Condition 25798 (Title V Application 26273).	BAAQMD	Parts 1-5 and 10-13 have been noted as completed and should not be incorporated into the Section IV and VII of the Title V.	Agree	Parts 1-5 and 10-13 have been noted as completed.
177	VI. Permit Conditions		Added Condition 25846 for S-1412 (Title V Application 25759).	BAAQMD	Mr. Gregory Stone stated that Condition 25846 Part 5 would be removed and Part 4 would be made such that the AP-42 factors used in the application were not limits. Also note that the firing rate limit of 17.1 MMBtu per hour should be added to Part 2.	Agree	See comment # 104.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
178	VII. Applicable Limits and Compliance Monitoring Requirements	26	In Tables VII-A.1 and VII-A.2, revised Condition 8077 Parts B2A and B2B Refinery Emissions Cap mass emissions limits (Title V Application 26273)	BAAQMD	Tables IV-A.1 and Table IV-A.2 should not have the Refinery Cap Condition 8077 in the Facility-wide tables. Also, I don't think that Amorco has any sources in the Refinery Cap. This condition either needs to be in each table for the relevant sources or a new table should be created that includes the sources in the bubble. The relevant parts of Condition 8077 and 25798 should be in that new table. This change has not been made in the Title V Rev 5 document.	Defer to Renewal	See Response to Comment # 66.
179	VII. Applicable Limits and Compliance Monitoring Requirements		In table VII-A.2 and VII-F.3 updated SIP 8-5-502 and 8-5-603.2 form tank degreasing to tank cleaning	BAAQMD	Regulation 328.1.2 in the current BAAQMD rule and in the SIP rule say degassing. Use the word degassing.	Agree	"Degassing" used in Tables VII-A.2 and VII-F.3
180 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 1]	VII. Applicable Limits and Compliance Monitoring Requirements	6	In Table VII-B.3, corrected S-850 throughput limit consistent with the permitted capacity granted in NSR Permit Application 3318. An S-850 expansion to 70,000 BPD was proposed in the Clean Fuels Project (1995 Application 10912), but this expansion was never constructed. The 70,000 BPD capacity increase in Condition 8077 Part B6B for the Authority to Construct granted via Application 10912 should have been removed when the Permit to Operate was granted.	BAAQMD	This is incorrect. Application 10912 included a rate increase to 70,000 BPD and this increase was implemented. The actual rate increased to 70,000 BPD immediately after implementation of the permit. Thus there is no basis for the BAAQMD to make this change in the Title V.	Agree	See Response to Comment # 11.
181	VII. Applicable Limits and Compliance Monitoring Requirements	9	In Table VII-B.6, revised the POC and CO2 source test frequency from annual to biennial (Title V Application 23139).	BAAQMD	Removed the source test frequency change so that the Title V Revision 5 is not significant. This change will be made in the renewal.	Agree	See Response to Comment # 72.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
182	VII. Applicable Limits and Compliance Monitoring Requirements	3	Added Permit Condition 24834 throughput limits to Table VII-B.10 for S-1020 (Title V Application 22624).	BAAQMD	Deleted the condition and replaced with Condition 25476 throughput limits.	Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.
183	VII. Applicable Limits and Compliance Monitoring Requirements	24	In Table VII-B.10, updated pH and liquid/gas ratio monitoring limits as determined by the performance test for 40 CFR 63 Subpart UUU (Title V Application 23854).	BAAQMD			Change already in draft permit.
184	VII. Applicable Limits and Compliance Monitoring Requirements		Added Condition 25476 (Title V Application 23322) to Table VII-B.10 for S-1020.	Tesoro		Agree	Will be added once 23322 follow up is complete.
185	VII. Applicable Limits and Compliance Monitoring Requirements		Need to add a new table for S-1555 Reformate Splitter and add Permit Condition 25476 Parts 2 for throughput limits.	Tesoro	This table has not yet been added to the Title V.	Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.
186	VII. Applicable Limits and Compliance Monitoring Requirements	23	In Table VII-C.1.1, deleted the CO CEM monitoring for the 121.9 tpy CO limit. The CO CEM is required by the Consent Decree, through Condition 11433 Part 11, for compliance with the 500 ppmvd at 0% O2 limit of Condition 11433 Part 9. But it is not required for determination compliance with the Condition 11433 Part 2 CO limit of 121.9 tpy (Title V Application 23854).	BAAQMD			Change already in draft permit.
187	VII. Applicable Limits and Compliance Monitoring Requirements	2	Added S-1553 to Table VII-C.1.3, and deleted Condition 22491, Part 3 (Title V Application 22170).	BAAQMD			Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
188	VII. Applicable Limits and Compliance Monitoring Requirements		Table V.II-C.1.3 Should cite condition 24991 vs 24491	Tesoro	In Application 20977, the permit condition 24491 was created. In our PTO for application 22169, the permit condition number 24991 is used. Please clarify that the correct number for the permit condition is 24491.	N/A	See Response to Comment # 55.
189	VII. Applicable Limits and Compliance Monitoring Requirements	19	In Table VII-C.2.1, for S-1524, deleted Condition 24323 Part 4 and all references to NSPS 60.18 (Title V Application 24066).	BAAQMD			Change already in draft permit.
190	VII. Applicable Limits and Compliance Monitoring Requirements	20	In Table VII-C.2.1, revised existing SO2 limit and added new SO2 limit pertaining to Consent Decree Condition 24324, Part 2 (Title V Application 24066).	BAAQMD			Change already in draft permit.
191	VII. Applicable Limits and Compliance Monitoring Requirements	28	In Table VII-C.2.2, for S-943 Butane Flare, added BAAQMD Regulation 8, Rule 5 and SIP Regulation 8, Rule 5 to be consistent with S-943 in Table II-B.	BAAQMD			Change already in draft permit.
192 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 5]			In Table VII-C.2.2, for S-943 Butane Flare, BAAQMD added source test requirements.	BAAQMD	Source testing can not be done on this stream. The design for the flare would demonstrate destruction efficiency. Removed source test from the table.	Defer to Renewal	Applies to Item # 216. The applicable requirement for S943 in Table IIB is BAAQMD 8-5-306 and SIP 8-5-306. This requirement is in the current permit. 8-5-502 requires a source test for the 8-5-306 Approved Emissions Control System. In the 9/10/15 District/Tesoro meeting, it was agreed that all S-943 tables in the Rev 5 permit will be returned to the version in the current permit (the 2011 Revewal). If there are changes to be made for S-943, it will be adressed in the upcoming renewal.
193	VII. Applicable Limits and Compliance Monitoring Requirements	12	Updated requirements for Regulation 9, Rule 8 in Table VII-C.3.2 for engines S-952, S-953 and S-954 (Title V Application 23882).	BAAQMD			Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
194	VII. Applicable Limits and Compliance Monitoring Requirements	13	Updated requirements for Regulation 9, Rule 8 in Table VII-C.3.3 for engines S-955 through S-960 (Title V Application 23882).	BAAQMD			Change already in draft permit.
195	VII. Applicable Limits and Compliance Monitoring Requirements	1	Added Table VII-C.3.7 for S-1552 Emergency Diesel Water Pump (Title V Application 22153).	BAAQMD			Change already in draft permit.
196	VII. Applicable Limits and Compliance Monitoring Requirements	25	Added Table VII-C.3.8 for S-1557 Emergency Diesel Generator (Title V Application 25958)	BAAQMD			Change already in draft permit.
197	VII. Applicable Limits and Compliance Monitoring Requirements	15	Corrected Tables VII-C.4.2 and VII-4.3, removing Condition 8077 Part B7A CO limit (Title V Application 24057).	BAAQMD			Change already in draft permit.
198	VII. Applicable Limits and Compliance Monitoring Requirements	16	Corrected Tables VII-C.4.2 and G.3 to reflect VOC and POC source test requirements for S-908, S909 and S912 in Conditions 13605, 20099, 21053, 21100 and 21849 (Title V Application 24363).	BAAQMD			Change already in draft permit.
199	VII. Applicable Limits and Compliance Monitoring Requirements	29	In Tables VII-C.4.2 and VII-C.4.3, corrected the Condition 16685 firing rate limits of S-915,S-919, S-928 through S-933, S-934, S-935, S-971 and S-972, consistent with the limits approved in 1988 NSR Permit Application 548 (Hydrocracker Expansion Project), 1992 NSR Permit Application 6468 (Diesel Modification Project) and 1978 NSR Permit Application 26645 (No 3 Reformer Project).	BAAQMD	Tesoro corrected the firing rates to be HHV per earlier comments in other sections. Application 6468 was completed in 1991. Prior to about 2000, environmental used LHV instead of HHV. Note that burner vendors still use LHV when they specify firing rates. Our understanding is that the BAAQMD Title V should use HHV, so I have converted the permit limits to HHV.	Rescinded in 8/26/15 Tesoro letter.	See Response to Comments # 17 and #131.
200	VII. Applicable Limits and Compliance Monitoring Requirements	11	Added Permit Condition 25161 to Tables VII-C.4.2 and C.4.4 (Title V Application 23425).	BAAQMD	Firing Rate S912 3,240 mmbtu/day. The annual firing rate for S-920 was changed in Application 23341, Condition 25161, part 1. However that change was based on incorrectly identifying S-920 as a grandfathered source. The firing rate for S-920 should be corrected to the firm limit and the change in Condition 25161, part 1 should be removed.	Agree	Tesoro requested to provide proposed changes as part of App 23322 follow-up.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
201	VII. Applicable Limits and Compliance Monitoring Requirements	7	In Table VII-C.4.3, corrected CO monitoring and ammonia slip limit for S-972 (Title V Application 23007).	BAAQMD			Change already in draft permit.
202	VII. Applicable Limits and Compliance Monitoring Requirements		Added Condition 25476 into Table VII-C.4.3	Tesoro		Agree	Will be added once 23322 follow up is complete.
203	VII. Applicable Limits and Compliance Monitoring Requirements	27	In Table VII-C.4.5, added S-1412 Firing Rate limit (Title V Application 25759).	BAAQMD	Tesoro added hourly firing rate.	Address in Admin Permit Application	Condition 25846 was approved and imposed via Tesoro Application 25758. It does not contain an hourly firing rate limit. A permit application is required for a change in conditions.
204	VII. Applicable Limits and Compliance Monitoring Requirements	10	Revised Table VII-C.5.1 to incorporate 40 CFR 64 CAM requirements for S-963 Alkylation Plant Gas Turbine (Title V Application 23233).	BAAQMD			Change already in draft permit.
205	VII. Applicable Limits and Compliance Monitoring Requirements	5	In Table VII-D.7 for S1025, corrected 8-33-308.1 POC limit to TOC and clarified 3000 ppm limit is expressed as methane (C1).	BAAQMD			Change already in draft permit.
206	VII. Applicable Limits and Compliance Monitoring Requirements		In Table VII-D.7 for S1025, corrected 8-33-308.1 POC limit to TOC and clarified 3000 ppm limit is expressed as methane (C1).	BAAQMD			Change already in draft permit.
207	VII. Applicable Limits and Compliance Monitoring Requirements		In Table D.7 changed monitoring requirement for liquid leak and vapor leak.	BAAQMD	Tesoro corrected monitoring requirement to 8-33-309.8 for daily visual inspections and weekly hydrocarbon analyzer.	Defer to Renewal	Confirmation requested. Change is consistent with table markups in App 23981. In a 9/1/15 meeting at Tesoro, the S-1025 operation was reviewed with C. McDowell, and it appears that there may be further changes required to Condition 21849 and/or the Tables IV-D.7 and VII-D.7. It was agreed to address this issue in the future Title V Renewal Application with a comprehensive applicability determination.
208	VII. Applicable Limits and Compliance Monitoring Requirements	17	Updated Table VII-D.7 for S-1025 Bulk Plant, moving S-613 Vapor Storage Tank requirements to a new table. (Title V Application 23982).	BAAQMD			Change already in draft permit.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
209	VII. Applicable Limits and Compliance Monitoring Requirements	18	Added Table VII-D.10 with the requirements of S-613 Vapor Storage Tank (Title V Application 23982).	BAAQMD			Change already in draft permit.
210	VII. Applicable Limits and Compliance Monitoring Requirements	4	Added S-1554 Condition 25025 limits to Table VII-F.3 (Title V Application 22824).	BAAQMD			Change already in draft permit.
211	VII. Applicable Limits and Compliance Monitoring Requirements	14	In Table VII-F.3, added TVP and throughput limits for S-690 consistent Condition 24724 added to Section VI (Application 11737).	BAAQMD			Change already in draft permit.
212	VII. Applicable Limits and Compliance Monitoring Requirements	21	Table VII-G.4, deleted the 40 CFR 61 Subpart FF requirements for 61.349(a)(1)(i) and 61.349(f), consistent with Table IV-G.4 (Title V Application 23854).	BAAQMD			Change already in draft permit.
213	VII. Applicable Limits and Compliance Monitoring Requirements	22	In Table VII-G.5, deleted the 40 CFR 61 Subpart FF requirements for 61.348(a)(1)(i) and 63.647(a), consistent with Table IV-G.5 (Title V Application 23854).	BAAQMD			Change already in draft permit.
214	VII. Applicable Limits and Compliance Monitoring Requirements	8	In Table VII-J.1, miscellaneous changes were made to the Regulation 8, Rule 18 section to reflect that total organic compounds are monitored. Methane is included as defined in Regulation 8-18-219.	BAAQMD			Change already in draft permit.
215	VII. Applicable Limits and Compliance Monitoring Requirements		In Table VII-J.2, changed SIP 8-28-402 to federally enforceable.	Tesoro			Change already in draft permit.
216 [Discussed in 9/10/15 Tesoro/District meeting, Agenda Item 5]	VII. Applicable Limits and Compliance Monitoring Requirements		In Table VII-K1, the BAAQMD states that source test would be the monitoring type for A39 API/DNF THERMAL OXIDIZER.		Source testing can not be done on this process stream. The design for thermal oxidizer would demonstrate destruction efficiency. Removed source test from the table.	Defer to Renewal	See Comment # 192.
217	X. Revision History		Removed Application 23138/23139 from the permit list and changed the revision to a minor revision.	Tesoro		Agree	Change made.
218	X. Revision History		Corrected Application 23322 for No. 3 Reformer, not No. 2 Reformer	Tesoro		Agree	Change made.

Tesoro Comment Number	Permit Section	Change List Item Number	Change	Change Identified By	Comments	Response	Rationale/Comments
219	IV. Source-Specific Applicable Requirements		Edit Table IV-A.2 to be the same as IV-A.1	Tesoro		Agree	Change made.
220	IV. Source-Specific Applicable Requirements		Add 60CFR61.346 to Table IV-G.2	Tesoro		Agree	Change made.