



Benicia Refinery • Valero Refining Company - California

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Submitted via email to jfinkle@baaqmd.gov

September 1, 2021

Draft Amendments to Regulation 2-1 and 2-5
Valero Comments

Jacob Finkle
Engineering Division
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Dear Mr. Finkle:

Valero Refining Company – California (Valero) offers the following comments regarding the Bay Area Air Quality Management District's (BAAQMD) draft language on Rules 2-1 and 2-5 posted on July 23, 2021. Valero's Benicia refinery is located within the BAAQMD jurisdiction, providing transportation fuels and high quality employment opportunities in the Bay Area. As a permitted facility, the Benicia refinery will be impacted by the draft language referenced above.

Valero appreciates the efforts of BAAQMD to improve air quality in overburdened communities. However, Valero believes a more thorough assessment of impacts to the permitting process should be completed by BAAQMD staff prior to Rule adoption. The following proposed updates are of particular concern:

- The update to 2-5-113, which removes an exemption for many small internal combustion engines, and
- The reduction in acute trigger levels in Table 2-5-1

These two proposed changes to Rule 2-5 will likely significantly increase the number of permit applications submitted to BAAQMD without any improvement to air quality in the Bay Area. BAAQMD staff has not yet reported the expected increase in permit applications associated with these two updates or any expected reduction in emissions or exposure. Valero believes these proposed changes should be removed from the draft Rule 2-5 since the impacts have not been assessed.

Valero also supports and incorporates by reference the comments submitted by the Western States Petroleum Association (WSPA) and the California Council for Environmental and Economic Balance (CCEEB). Valero is a member of both groups.

Please contact me at (707) 745-7475 if you have any questions.

Sincerely,

A handwritten signature in purple ink that reads 'Taryn Wier'.

Taryn Wier
Manager Environmental Engineering