

ATTACHMENT A
Proposed Renewal Major Facility Review Permit
Valero Benicia Asphalt Plant – Plant No. A0901
Public Comments – 7/7/2010
BAAQMD Responses – 8/16/2010

Item	Location	Comment	Explanation	BAAQMD Response
1. Permit Corrections				
1a	Various conditions	Correct typographical errors/spelling errors/punctuation errors remove miscellaneous underlining and shading	Administrative changes	- Agreed to administrative changes.
1b	<u>Section IV</u> Table IV-I, S19 Table IV-J, S20 Table IV-K, S21 <u>Section VI</u> Condition 19329	Add comment for deletion of Condition 19329 upon expiration of NOx IERCs from Facility ID B2626	For consistency with similar comments in B2626 Title V permit for Condition 19329 for expiration of NOx IERCs following startup of VIP CO furnaces.	- Agreed. Comments were added for clarification.
1c	Condition 1240, Atmospheric PRD Removal, AN 19193	<u>Table II A</u> S19 – Delete ‘and/or asphalt plant refinery fuel gas’ <u>Table IIB</u> A4 abatement of S18 – Delete row A44 – Delete row A45 – Delete rows S19 – Delete rows <u>Section IV</u> Table IV – J.1 – Delete Table IV – J.2 – Renumber to Table IV –I Table IV – I – Revise table title Table IV – I – Add row for Part I.3 Table IV – I – Delete row for Part I.3b Table IV – K.1 – Delete	For consistency with final engineering evaluation for Application 19193 and completion of the atmospheric PRD removal project, except do not delete Condition 1240, I.16a semiannual source test (see item 2c for explanation). Deleted Tables IV-X2 and VII-X2 because with removal of this atmospheric PRD, there are no atmospheric PRDs subject to BAAQMD 8-28 and SIP 8-28 at the facility. Table VII-A monitoring requirements for Regulation 9-1-313 and SIP 9-1-313 were incorrect	- Agreed. S-19 is no longer operated on refinery fuel gas per NSR A/N 19193. - Agreed. Omissions were corrected in the appropriate table II. - Agreed. Omissions were corrected in the appropriate tables IV.

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Item	Location	Comment	Explanation	BAAQMD Response
		Table IV – K.2 – Renumber to Table IV – J Table IV – J – Revise table title Table IV – J – Revise description for Part 1240.I.5a Table IV – J – Add row for Part 1240.I.11 Table IV – J – Delete row for Part I.11b Table IV – J – Delete row for Part I.16b2 Table IV – W0 – Revise row for S18 Table IV – W0 – Revise row for S18 booster compressor Table IV – W0 – Delete row for Fuel gas system Table IV – W0 – Revise Note (5) Table IV – X2 – Delete table for BAAQMD and SIP Regulation 8, Rule 28 Section VI 1240.I Description - Revise 1240.I.3 – Revise 1240.I.3a – Delete 1240.I.3b – Delete 1240.I.5 – Revise 1240.I.5a – Revise 1240.I.11 – Revise 1240.I.11a – Delete 1240.I.11b – Delete	in previous revisions of Facility A0901 Title V permit. The H2S CEM previously required by Condition 1240.I.13 was required for monitoring compliance with 40 CFR 60 Subpart J H2S requirements for refinery fuel gas and not for monitoring compliance with Regulation 9-1-313. As shown in the refinery Facility B2626 Title V permit, the correct monitoring requirement citation, monitoring frequency, and monitoring type for Regulation 9-1-313 and 9-1-313.2 are “None”, “N” and “NA”, respectively	- Agreed. Omissions were corrected in the appropriate Section VI.

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Item	Location	Comment	Explanation	BAAQMD Response
		<p>1240.I.12 – Delete 1240.I.13 – Delete 1240.I.16b1 – Delete (add deletion basis comment) 1240.I.16b2 – Delete 1240.II.6 – Delete</p> <p><u>Section VII</u> Table VII – A – Rows for H2S, BAAQMD/SIP Regulation 9-1-313.2 – Delete requirements for H2S CEM Table VII – J.1 – Delete table Table VII – J.2 – Renumber to Table VII – I Table VII – I – Revise table title Table VII – K.1 – Delete table Table VII – K.2 – Renumber to Table VII-J Table VII – J – Revise table title Table VII – X2 – Delete table for BAAQMD and SIP Regulation 8, Rule 28</p> <p><u>Section VIII</u> Row for BAAQMD 8-28 – Delete</p>		<p>-Agreed. Regulation 9-1-313.2 is for sulfur recovery plant, not for fuel gas monitor per Subpart J. Deleted Regulation 9-1-323.2 requirement.</p> <p>-Agreed. Omissions were corrected in the appropriate Section VIII.</p>
1d	Application 21641 Addition of A17, Archiving of A4, S14, and S15	<p><u>Table IIA</u> S15 – Delete</p> <p><u>Table IIB</u> A4 – Delete rows for abatement of S15, S17, and A2</p>	For consistency with final engineering evaluation for Application 21641. Archiving of S14 was initially handled as an administrative action and was documented in the draft T5	- Agreed. Incorporated NSR Application 21641 (minor TV revision) to the Valero Asphalt plant’s TV permit renewal since all sources share the same Condition 1240, and it is logical to update the condition when there is a need to add a renamed source or archive sources.

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Item	Location	Comment	Explanation	BAAQMD Response
		<p>A17 – Add rows for abatement of S17 and A2</p> <p><u>Section IV</u> Table IV-G: Delete table for S15 Table IV-H: 1240.I.19 – change minimum operating temperature to 1570F 1240.II.8 – revise description Table IV-W0: Delete row for S15 Table IV-Y: Delete table for A4 Table IV-X: Add table for A17</p> <p><u>Section VI</u> 1240, Introduction – Add AN 21641 explanation 1240.I.18d – Delete S15 1240.I.18g – Add A17; Delete A4 1240.I.18i – Add A17; Delete A4 1240.I.19 – Revise 1240.I.19d –Add 1240.I.19e – Add 1240.II.8 – Revise 1240.II.59 Introduction – Revise to delete S14 1240.II.59 – Delete 1240.II.60 – Delete 1240.II.61 – Delete 1240.II.62 Introduction – Revise to delete S15 1240.II.62 – Delete</p>	<p>renewal permit and SOB as an administrative change. However, BAAQMD later added archiving of S14 and S15 into AN 21641 along with archiving A4 and adding A17. For completeness, all actions related to the NSR review associated with S14 archiving and with the other actions in AN 21641 should be incorporated in the renewal T5 permit.</p>	<p>- Agreed. Appropriate changes were made to Tables IV.</p> <p>- Agreed. Appropriate changes were made to Section VI.</p>

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		1240.II.62a – Delete 1240.II.62b – Delete 1240.II.63 – Delete 1240.II.64a – Delete 1240.II.64b – Delete 1240.II.65 Introduction for S17 – Revise 1240.II.65 – Revise 1240.II.68 – Revise <u>Section VII</u> Table VII-G: Delete table for S15 Table VII-Y: Delete table for A4 Table VII-X: Add table for A17 <u>Section X</u> Under Renewal (Application 18289) – Add Application 21641		- Agreed. Appropriate changes were made to Tables VII. - Agreed. Added the note for adding Application 21641 (a minor TV revision) in Section X.
1e	Source test submittal within 60 days of completion of test	Change time for submittal of source test reports to within 60 days of the test in the following Conditions: <u>Section VI</u> 1240.I.16a 21233.6.A 21233.7 21233.7.A.1 21233.7.A.2	Consistent with changes made in refinery (Facility B2626) permit	- Agreed. Submittal of source test result was allowed up to 60 days in Condition 1240.I.16a since Source test contractors are unable to consistently provide written test results to allow Valero adequate time to review and submit reports to BAAQMD within 60 days of a source test. - No. Condition 21233, Parts 6A, 7, 7A1, 7A2 are boilerplate conditions for all facilities with the NOx boxes. To be consistent with all other facilities, no change is made at this time.
2. Regulatory Applicability Corrections				

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2a	Table IV-Z, S71	Correct 9-8-110.4 to 9-8-110.5. Add effective date for CCR, Title 17, Section 93115 (CARB ATCM)	Consistent with latest versions of BAAQMD and CARB rules.	- Agreed. Corrected effective date for CARB ATCM.
2b	Table VII-H, S17	Row for Opacity for SIP 6-301: Correct "Condition 1240, part II.58b" to "Condition 1240, part I.19" Row for FP for SIP 6-310: Correct "Condition 1240, part II.58b" to "Condition 1240, part I.19"	Correct error. Condition 1240, Part I.19 applies to A17, which is abatement device for S17. Condition 1240, Part II.58b applies to A31 and S24, which are not abatement devices for S17.	- Agreed. Corrected all errors requested.
2c	S19, Vacuum Heater (F-4601)	<p>Table IIA S19 – Delete Condition 19329, Part 1 and replace with Condition 1240, Part I.5a</p> <p>Table IV-J BAAQMD Regulation 2, Rule 9 – Delete BAAQMD/SIP Regulation 9, Rule 10 – Delete Permit Condition 19329 , All Parts – Delete Permit Condition 21233, All Parts – Delete Permit Condition 1240.I.16a – Reverse deletion of this condition per A/N 19193 (BAP PRD Atmospheric Removal).</p> <p>Section VI Permit Condition 1240, Part I.16a -</p>	Pursuant to permit application #7123 (March, 2003), the allowable heat input for S19, Vacuum heater was increased from 33 to 40 MMBtu/hr and is subject to BACT requirements (Condition 1240.I.5b – 50 ppm CO, and Condition 1240.I.8 – 25 ppm NOx). Since the permit to operate for these revisions was issued after January 15, 1994, this source is not an affected unit per 9-10-200. Therefore, BAAQMD/SIP Regulation 9, Rule 10 and associated Regulation 2, Rule 9, and Conditions 19329 and 21233 should be deleted for this source. The source test at Condition 1240, Part I.16a to determine compliance with the BACT requirements (Condition 1240.I.5b	-Agreed. Omissions were corrected in the appropriate Sections IIA, IV-J, VI, VII-J.

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		<p>– Reverse deletion of this condition per A/N 19193 (BAP PRD Atmospheric Removal). Permit Condition 19329, Part 1 – Delete S-19 for A0901 Permit Condition 21233, Part 1 – Delete S-19 for A0901 Permit Condition 21233, Part 5A – Delete row in table for S-19 for A0901</p> <p><u>Table VII-J</u> Rows for NOx, BAAQMD Reg 9-10 – Delete Row for NOx, Condition 1240.I.8 – Remove 9-10-502 source test, reinstate Condition 1240.I.16a source test, correct condition number, and change source test frequency from ‘Initial’ to ‘S/A’ Rows for O2, Condition 21233 and BAAQMD Reg 9-10 – Delete Rows for CO, Condition 1240.I.5b and 5c – Reinstate 1240.I.16a source test, correct condition number, and change source test frequency from ‘Initial’ to ‘S/A’ Row for CO, Condition 21233 – delete Row for throughput, Condition 1240.I.5a – replace BAAQMD 9-10-</p>	<p>– 50 ppm CO, and Condition 1240.I.8 – 25 ppm NOx) is applicable and should be reinstated (reverse deletion per A/N 19193).</p>	

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		502 fuel flow monitor with Condition 1240.I.5 fuel flow monitor Row for throughput, Condition 19329 - delete		
2d	Table VII-T, S68	Row for Hours of Operation for 9-8-330.2 and 330.3: Correct "9-1-530" to "9-8-530"	Editorial Correction.	- Agreed. All editorial corrections were made as requested.
2e	Table VII-Z, S71	Row for Hours of Operation for 9-8-330.2 and 330.3: Correct "9-1-530" to "9-8-530"	Editorial Correction.	- Agreed. All editorial corrections were made as requested.
3. Editorial Corrections				
3a	Section II	S19, Move "F-4601" S23, Delete "Valero LP"		- Agreed. All editorial corrections were made as requested.
3b	Section IV	Delete blank rows. Table IVA, 61.342(c)(1): Correct "comply" Table IVA, 61.355(a)(6): Correct "Calculate" Table IVB, Part II.45: Correct "gasketed" Table IVD, 8-5-305.3: Correct "panels" Table IVD, 61.342(c)(1)(iii): Correct "comply" Renummer Tables IV-H through IV-AA as IV-G through IV-Z Table IV-S, Part II.84: Correct "gasketed" Table IX- W1: 60.590 and 60.590a: Correct "designation" Table IV- W1: 60.590(a)(3) and 60.590a(a)(3): Correct "equipment" and "process" Table IV- W1: 60.590(e) and 60.590a(e): Correct "Process", "definition", and "process" Table IV- W1: 60.593(b)(3)(i) and 60.593a(b)(3)(i): Correct "judgment" and "resolution" Table IV- W1: 60.593(b)(3)(ii) and 60.590a(b)(3)(ii): Correct "procedure" and "determination"		- Agreed. All editorial corrections were made as requested.

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		Table IV- W1: 60.593(d) and 60.593a(d): Correct “light” Table IV-Y, 8-5-306.1: Correct “Systems” Table IV-Z, 93115.5(b): Correct “use”		
3c	Section VI	Condition 1240, Intro text: Correct “one” Condition 1240, Part I.5b: Correct “ppmvd” Condition 1240, Part I.6: Correct “Emergency” Condition 1240, Part II.45: Correct “gasketed” Condition 1240, Part II.84: Correct “gasketed”		- Agreed. All editorial corrections were made as requested.
3d	Section VII	Table VII-B, Condition 1240, Part II.94: Correct “whenever” Table VII-C, Condition 1240, Part II.93 and II.94: Correct “whenever” Table VII-F, Condition 1240, Part II.93: Correct “whenever” Re-number Tables VII-H through IV-AA as IV-G through IV-Z Table VII-O, Condition 1240, Part II.94: Correct “whenever” Table VII-Q, Condition 1240, Part II.93: Correct “whenever” Table VII-R, Condition 1240, Part II.94: Correct “whenever” Table VII-S, Condition 1240, Part II.93: Correct “whenever” Table VII-T, Condition 22851, Part 1: Correct “Records” Table VII-V, Condition 1240, Part II.93: Correct “whenever”		- Agreed. All editorial corrections were made as requested.
3e	Section VIII	BAAQMD 8-5-328.1, 8-5-605: Correct “inside” BAAQMD 8-15-305: Add “(liquid asphalt or emulsified liquid product)” BAAQMD 8-18 rows: Correct 8-18-6xx citation numbers 60.482-4a and 60.482-7a: Correct citations		- Agreed. All editorial corrections were made as requested.
4. Statement of Basis Comments				
4a	Statement of Basis	Correct typographical errors. Add/revise explanations of changes in these public comments.		- Agreed. Corrected typographical errors and updated changes.
4b	CAM Analysis	Replace CAM analysis with final updated version dated May 14, 2010 (on CD).		- Agreed. Updated the CAM analysis.