

December 16, 2004

Valero Benicia Asphalt Plant
3001 Park Road
Benicia, CA 90748-1257

Attention: Mr. Doug Comeau, Refinery Manager

Application Number: 9297
Plant Number: A0901
Equipment Location: Same as above

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EXECUTIVE OFFICER/APCO

Dear Mr. Comeau:

The requirement for public and EPA review of the proposed reopening of your Major Facility Review Permit has been completed.

Following is the chronology of events for this permit reopening:

- The formal notice of reopening pursuant to BAAQMD Regulation 2-6-415 was sent on December 15, 2003.
- The notice was published in the Benicia Herald on March 1, 2004.
- The final date for comments was March 31, 2004, but was extended to April 14, 2004.
- The permit was amended in response to comments.
- The proposed permit was sent to EPA for review on August 25, 2004.
- EPA commented on the permit on October 8, 2004, the last day of the EPA review period.

The District has decided to issue the permit. Several changes have been made in response to EPA comments. In addition to these changes, two minor changes have been made in response to comments from the facility. In particular, the monitoring frequency for BAAQMD Condition 1240, I.1 in Table VII-L has been corrected to monthly to properly reflect the permit condition on which it is based. The details are in the final Statement of Basis, dated December 2004. A formal response to your comments will be transmitted to you within 30 days of this letter.

EPA in its October 8, 2004, letter identified a number of issues requiring follow-up and, as appropriate, further revision to the permit. The District is committed to addressing these issues through a cooperative effort with EPA. Among the most important issues are those identified in Attachment 1 to the October 8 letter. The District's first step in addressing the Attachment 1 issues will be a proposed determination to be transmitted to EPA on or before January 6, 2005.

