February 8, 2005

Ms. Deborah Jordan Acting Director, Air Management Division **United States Environmental Protection Agency** 75 Hawthorne Street San Francisco, CA 94105

Dear Ms. Jordan:

Attached is the response to the refinery's comments on the reopening below, as promised in the issuance letters of December 16, 2004:

Facility #	Facility Name	Application #
A0901	Valero Benicia Asphalt Plant	9297

The District made some changes in response to comments. The details are in the final Statement of Basis, finalized on December 16, 2004, and in Attachments A and B to this letter.

This letter also responds to comments that did not result in changes to the permit. The response is organized in the same manner as the comments and uses the numbering system in the comments. Attachment A contains the responses to comments on Sections II, III, IV, VI, VIII, and IX. Attachment B contains the responses to comments on Section VII. Since the comments are extensive, they have not been attached. They may be found on the District's website.

If you have any questions regarding this letter, please call Steve A Hill, Air Quality Engineering Manager, at (415) 749-4673.

Sincerely yours,

Jack P. Broadbent Executive Officer / APCO

ALAMEDA COUNTY Roberta Cooper Scott Haggerty (Chairperson) Nate Miley Shelia Young

CONTRA COSTA COUNTY

Mark DeSaulnier Erling Horn Mark Ross Gayle Uilkema (Secretary)

MARIN COUNTY Harold C. Brown, Jr.

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly Jake McGoldrick Gavin Newsom

SAN MATEO COUNTY

Jerry Hill Marland Townsend (Vice-Chairperson)

SANTA CLARA COUNTY

Erin Garner Liz Kniss Patrick Kwok Julia Miller

SAH:myl

Attachment B

Enclosures: Attachment A

SOLANO COUNTY John F. Silva

 $\label{eq:hamiltonian} h:\pub_data\title v permit appls\01 application files\a0901\reopen -9297\1.0 working docs\A0901_response to facility comments.doc$

Tim Smith Pamela Torliatt

Jack P. Broadbent EXECUTIVE OFFICER/APCO