VALERO
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VIA AIRBORNE EXPRESS NO. 2545828554

April 13, 2004

Mr. Jack Broadbent, Executive Officer / Air Pollution Control Officer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Attn.: Mr. Arthur Valla
Permit Services Division

Re: Valero Refining Company – California
Benicia Fuels Refinery (Plant No. B2626)
Comments on Draft Title V Permit, Revision 1

Dear Mr. Valla:

Enclosed please find Valero Refining Company – California's comments on the draft Major Facility Review ("Title V") Permit, Revision 1, for Valero Refining's Benicia Fuels Refinery (Application No. 16423, Plant No. B2626). Valero's comments are based on a review of the draft Title V permit revision 1 that was released by the District on February 24, 2004 for public review. Valero understands that the public comment period, which includes a 14-day extension granted by the District, closes on April 14, 2004.

Valero appreciates the District's earlier consideration of the written comments submitted on September 22, 2003, regarding the initial draft permit, and where appropriate, those comments are restated here. Valero has conducted a similar, comprehensive review of this latest draft Title V Permit and is submitting additional comments to further improve the quality and accuracy of the document. Valero's comments are organized into 7 sections (Attachments A through G) which include subsections that support the proposed language changes or further clarify Valero's position.

Comments in Attachments A through F correspond to sections in the Title V permit. These attachments are organized as "rationale" tables that provide a line-by-line explanation of each proposed change. Comments are sorted by date, so that the new comments dated April 14, 2004,

are listed at the front of each attachment and comments from previous review periods are located at the back of each attachment.

Due to the many changes made to Condition #21233, the "NOx Box" condition, a separate Attachment G has been prepared to address these changes. The comments shown in Attachment G include proposed changes that are specific to Valero as well as proposed changes submitted by the Western States Petroleum Association (WSPA).

Valero appreciates the opportunity to comment on the draft Revision 1 Title V Permit for the Valero Benicia Fuels Refinery. If you have any questions concerning Valero's comments, please contact Ms. K. Sky Bellanca, Environmental Engineer, at (707) 745-7807.

Sincerely,
VALERO REFINING COMPANY – CALIFORNIA

Clark Hopper
Environmental Manager, Benicia Refinery

Attachments

cc (w/o attachments): Mr. Steve Hill – Permit Services, BAAQMD
cc (w/ attachments): Ms. Sky Bellanca – Valero

Attachment A
Comments on Permit for Facility B2626 – Sections I, II, and III

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
1.	4/14/04 9/22/03	Partial. Did not change throughput column.	IIA	S151	NA	Make throughput description column for S151 the same as S156.	Wastewater retention ponds S151 and S156 serve the same function and therefore should have the same process description.
2.	4/14/04	NEW	IIA	S211		Change Capacity to read "22.8 kBBL/day alkylate (limit …" Change Throughput to read "…(based on 22.8 kBBL/day alkylate)…"	Add the word "alkylate" to clarify the limit for the unit.
3.	4/14/04	NEW	IIA	S220	NA	Add equipment number F-4460.	Clarify the corresponding equipment number for the source.
4.	4/14/04	NEW	IIC	A60 A62	40 CFR 60.44b(e)	Delete citation 60.44b(e) for A-60 and A-62 SCR applicable requirements.	Cogeneration heat recovery steam generators are subject to NSPS Db 60.44b(l(1) NOx limit because they were constructed after 7/9/1997.
5.	4/14/04	NEW	III	NA	SIP Regulation 8, Rule 3 SIP Regulation 8, Rule 4	Delete rows for SIP Regulation 8, Rule 3 and SIP Regulation 8, Rule 4	Update permit. The current version of BAAQMD 8-4 (10/16/2002) was incorporated into the SIP on 8/26/2003 (68 FR 51187) and the current version of BAAQMD 8-3 (11/21/2001) was incorporated into the SIP on 1/2/2004 (69 FR 34-40).
6.	4/14/04	NEW	III	NA	BAAQMD Regulation 8, Rule 3 BAAQMD Regulation 8, Rule 4	Change FE from "N" to "Y". Change date of BAAQMD 8-4 from 5/15/96 to 10/16/2002	Update permit. The current version of BAAQMD 8-4 (10/16/2002) was incorporated into the SIP on 8/26/2003 (68 FR 51187). The current version of BAAQMD 8-3 (11/21/2001) was incorporated into the SIP on 1/2/2004 (69 FR 34-40).

Attachment A
Comments on Permit for Facility B2626 – Sections I, II, and III (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
7.	4/14/04	NEW	III	NA	BAAQMD Regulation 8, Rule 10	Delete citation.	BAAQMD Reg 8, Rule 10 was recently modified to include monitoring provisions. Therefore, BAAQMD Reg 8, Rule 10 and SIP Reg 8, Rule 10 should be moved from Table III to Table IV-Refinery with the detailed regulatory applicability shown in Attachment B.1.
8.	4/14/04	NEW	III	NA	BAAQMD Regulation 8, Rule 28-302	Change federal enforceability from "N" to "Y"	This citation has been included in the SIP approved version of Regulation 8, Rule 28 adopted December 9, 1994.
9.	4/14/04	NEW	III	NA	Regulation 11-12	Move regulation from Section III to Section IV, Table IV-Refinery	Regulation 11 Rule 12 incorporates the Benzene Waste NESHAP (40 CFR 61 Subpart FF), which is included in Table IV – Refinery and which requires routine monitoring.
10.	12/1/03	No	III	NA	BAAQMD Regulation 10-1	Modify the Permit to change FE to "N"	Although 40 CFR Part 60 Subpart A is incorporated into the District rules by Regulation 10-1, the Regulation itself is not SIP approved and is therefore not federally enforceable.
11.	12/1/03	No	III	NA	Regulation 11-12	Change FE from "Y" to "N"	Although the 40 CFR 61 Subpart FF (National Emission Standard for Benzene Emissions from Benzene Waste Operations) is incorporated into the District rules by Regulation 11-12, the Regulation itself is not SIP approved and therefore is not federally enforceable.

Attachment A
Comments on Permit for Facility B2626 – Sections I, II, and III (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
12.	9/22/03	No	I.K	N/A	40 CFR 68	Change the third sentence of this standard condition from: "The permit holder shall also certify compliance with the requirements of Part 68..." to "The permit holder shall also certify compliance with the program requirements of Part 68..."	Part 68 requires Process Safety Management Programs to be in place, and audits to be performed for adequacy every 3 years. Without the requested change, any deviation identified through the Part 68 programs or audits could be considered Title V permit violations. This performance-based regulation is intended to identify and correct deficiencies in order to continue improving the programs rather than to be an enforcement tool.
13.	9/22/03	No	IIA	S77	NA	Change Throughput as follows: "7.4 MMBBL/365-day Gasoline (Based on prior MTBE production of 4.5 kBBL/day plus 5.8 MMBBL/year of MTBE receipts through S-207)" Source remains a Grandfathered Source	S-77 no longer stores MTBE and will store Gasoline as a result of the MTBE Phaseout Project. Change is needed to properly reflect operation of source.
14.	9/22/03	No.	IIA	S207	NA	Change Description to: Tank, External Floating Roof, GOLD, Mogas/Components, Welded, Pontoon (TK 1740)" Change Throughput by deleting "5.8 MMBBL/365-day (MTBE);" and replacing "MTBE/mogas" with "mogas/components"	Correct description and throughput to reflect change in service for this tank from MTBE to mogas/components. Refinery is transitioning from methanol to ethanol for MTBE Phaseout. It is necessary to incorporate these modified permit conditions at this time to allow operation of the MTBE phaseout project shortly after the planned Title V Permit issue date of 12/1/2003.

Attachment A
Comments on Permit for Facility B2626 – Sections I, II, and III (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
15.	9/22/03	No. Still incorrectly refers to railcar unloading and to Mogas/component service.	IIA	S209	N/A	Change Description to: "Loading, Truck, 5 Loading Arms (Total). Bottom/Submerged fill. Methanol/ethanol service	Correct description to add ethanol and to delete incorrect references to mogas/components and to railcar unloading. Refinery transitioning from methanol to ethanol for MTBE Phaseout. It is necessary to incorporate these modified permit conditions at this time to allow operation of the MTBE phaseout project shortly after the planned Title V Permit issue date of 12/1/2003.
16.	9/22/03	Tank description changes not made as requested. Throughput column changes COMPLETE	IIA	S210	N/A	Change Description to: "Tank, External Floating Roof, UN, Methanol/ethanol, Welded (TK-1820) Change Throughput column by changing "methanol" to "methanol/ethanol"	Correct description to add ethanol and to delete incorrect reference to mogas components. Refinery transitioning from methanol to ethanol for MTBE Phaseout. It is necessary to incorporate these modified permit conditions at this time to allow operation of the MTBE phaseout project shortly after the planned Title V Permit issue date of 12/1/2003.

Attachment A
Comments on Permit for Facility B2626 – Sections I, II, and III (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
17.	9/22/03	No	IIB	New	NA	Add the following: S-#: None Description:TK-2710 Fresh Acid Tank Make or Type: N/A Model:N/A Capacity:[Leave blank] Throughput:Exempt S-#: None Description:Cogeneration Plant Cooling Tower Make or Type: N/A Model:N/A Capacity:[Leave blank] Throughput:Exempt	Correct omissions
18.	9/22/03	Partial. Only 9 of 27 requested date changes were made. Nine of the 11 FE status changes were made.	III	N/A	Several	Change dates as shown in Attachment A.1 Change SIP dates to date that regulation was incorporated into the SIP in the Federal Register. Update dates as required for other regulations.	Update and consistency

Attachment A.1
Table III Modifications – Facility B2626

Table III
Generally Applicable Requirements
(Not Requiring Routine Monitoring)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD · Regulation 1	General Provisions and Definitions (05/02/2001)	N
SIP· Regulation 1	General Provisions and Definitions (SIP Approved) (06/28/1999)	Y
BAAQMD · Regulation 2 · Rule 1	Permits, General Requirements (08/01/2001)	N
SIP Regulation 2 · Rule 1	Permits, General Requirements (SIP Approved) (01/26/1999)	Y
BAAQMD · Regulation 2 · Rule 2	Permits, New Source Review (05/17/2000)	N
SIP Regulation 2 · Rule 2	Permits, New Source Review (01/26/1999)	Y
BAAQMD · Regulation 2 · Rule 3	Permits, Power Plants (12/19/1979)	Y
BAAQMD · Regulation 2 · Rule 4	Permits, Emissions Banking (05/17/2000)	N
SIP Regulation 2 · Rule 4	Permits, Emissions Banking (01/26/1999)	Y
BAAQMD · Regulation 2 · Rule 6	Permits, Major Facility Review (04/16/2003)	N
SIP Regulation 2 · Rule 6	Permits, Major Facility Review (11/03/1993 and 02/01/1995)	Y
BAAQMD · Regulation 2 · Rule 9	Permits, Interchangeable Emission Reduction Credits (04/07/1999)	N
BAAQMD · Regulation 3	Fees (07/02/2003)	N
SIP· Regulation 3	Fees (05/03/1984)	Y
BAAQMD · Regulation 4	Air Pollution Episode Plan (03/20/1991)	N
SIP Regulation 4	Air Pollution Episode Plan (08/-06/1990)	Y
BAAQMD · Regulation 5	Open Burning (03/06/2002)	N
SIP · Regulation 5	Open Burning (09/04/1998)	Y
BAAQMD · Regulation 6	Particulate Matter and Visible Emissions (12/19/1990)	Y
BAAQMD · Regulation 7	Odorous Substances (03/17/1982)	N
BAAQMD · Regulation 8 · Rule 1	Organic Compounds, General Provisions (06/15/1994)	Y
BAAQMD · Regulation 8 · Rule 2	Organic Compounds, Miscellaneous Operations (06/15/1994)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (11/21/2001)	Y
BAAQMD Regulation 8, Rule 4	Organic compounds - General Solvent and Surface Coating Operations (10/16/2002)	Y

Table III
Generally Applicable Requirements
(Not Requiring Routine Monitoring)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD · Regulation 8 · Rule 9	Organic Compounds, Vacuum Producing Systems (07/20/1983)	Y
BAAQMD · Regulation 8 · Rule 10	Organic Compounds, Process Vessel Depressurization (07/20/1983)	Y
BAAQMD · Regulation 8 · Rule 28-302	Pressure Relief Devices at New or Modified Sources at Petroleum Refineries (12/17/1997)	N
BAAQMD · Regulation 8 · Rule 40	Organic Compounds, Contaminated Soil and UST Removal (12/15/1999)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (03/22/1995)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/2002)	N
SIP - Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (02/26/2002)	Y
BAAQMD · Regulation 10 · Subpart A	NSPS Incorporation by Reference, General Provisions (02/16/2000)	N
BAAQMD · Regulation 11 · Rule 2	Hazardous Pollutants, Asbestos Demolition and Renovation. (10/07/1998)	N
BAAQMD · Regulation 11 · Rule 12	NESHAPS Incorporation by Reference, 40 CFR 61 Subpart FF Benzene Waste (01/05/1994)	N
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/1990)	N
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance – Sandblasting (09/02/1981)	Y
NESHAPS Title 40 Part 61 Subpart M	NESHAPS, Asbestos (06/19/1995)	Y
Title 40 Part 68	Chemical Accident Prevention Provisions (01/31/1994)	Y
Title 40 Part 82 Subpart F	CFC Recycling and Emissions Reduction (05/14/1993)	Y
Title 40 Part 82 Subpart F 82.156	Recycling and Emissions Reductions - Required Practices (08/08/1995)	Y
Title 40 Part 82 Subpart F 82.161	Recycling and Emissions Reductions - Technician Certification (08/19/1994)	Y
Title 40 Part 82 Subpart F 82.166	Recycling and Emissions Reductions - Reporting and Recordkeeping Provisions (08/08/1995)	Y
Title 40 Part 82 Subpart H 82.270(b)	Prohibitions, Halon (03/05/1998)	Y

Attachment B
Comments on Permit for Facility B2626 – Section IV

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
1.	4/14/04	NEW	IV-Refinery	Multiple	BAAQMD and SIP Reg 8, Rule 10	Add citations as shown in Attachment B.1.	BAAQMD Reg 8, Rule 10 was recently modified to include monitoring provisions. Therefore, BAAQMD Reg 8, Rule 10 and SIP Reg 8, Rule 10 should be moved from Table III to Table IV-Refinery with the detailed regulatory applicability shown in Attachment B.1.
2.	4/14/04 9/22/03	Partial. 40 CFR 63 Subpart UUU was added to Table IV-Refinery. The Subpart UUU applicability in Table IV-Refinery should be modified to only include the generally applicable citations. See comment #4 for detailed applicability.	IV-Refinery	Generally applicable	40 CFR 63 Subpart UUU	Add citations as shown in Attachment B.2.	Additional citations add clarity to the permit to document the applicability of Subpart UUU to the facility. Detailed applicable requirements for the affected process units should be added to the appropriate process unit tables in Section IV. A permit application further defining compliance and monitoring options must be submitted to the District by 10/11/04.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
3.	4/14/04	NEW	A1, A2	S1, S2	SIP 9-1-307	Delete SIP 9-1-307 and replace with BAAQMD 9-1-307.	Although the sulfur plants meet the 100 lb/day S02 exemption limit stated in 9-1-307, this citation should remain in Tables IV-A1 and A2 because it is the first portion of the citation that limits SO2 emissions to less than 250 ppmv, requiring continuous operation of the sulfur tail gas cleanup abatement units. Inclusion of 9-1-307 in Section IV is consistent with Table IIC which references 9-1-307 as the applicable requirement for the tail gas cleanup units. There is no SIP version of 9-1-307 because the language in the BAAQMD and SIP-approved versions of 9-1-307 is identical. Therefore, only the BAAQMD version should be referenced in the permit.
4.	4/14/04 9/22/03	No. Detailed applicability for Subpart UUU needs to be added for the sulfur plants, catalyst regenerator at the FCCU, and the catalytic reformer.	A1, A2, A4, D1	S1, S2, S5, S1004	40 CFR 63 Subpart UUU	1 Add applicability to 40 CFR 63, Subpart UUU, National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units. 2 Add 4/11/2005 for the Future Effective Date. See Attachment B.2 for 40 CFR 63, Subpart UUU applicability for the sulfur recovery, catalyst regenerator, and catalytic reformer units.	Consistent with Subpart UUU notification submitted 8/9/2004, the sulfur recovery units and the catalyst regenerator at the FCCU the Valero Benicia refinery are subject to Subpart UUU.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
5.	4/14/04	NEW	A1, A2, A20, B1,B2, B4, B7, C4.1	S1, S2, S237, S8, S10, S11, S12, S176, S233, S160	19466, Part 3	Delete S-232 from permit condition language.	S-232 was deleted from this permit condition in Section VI. Deletion of S-232 where Condition 19466, Part 3 appears in Section IV tables is necessary for consistency throughout the permit.
6.	4/14/04	NEW	A3, A6.1, A6.2, A10, A11, A12, A15, A16, A18, A19, F1, J36, J37, J38, J39, J40	S3, S4, S7, S20, S34, S24, S26, S35, S21, S22, S23, S25, S30, S31, S32, S33, S40, S41, S173, S220, S129, S131, S150, S193, S196, S199, S200, S205, S206	1-523 1-523.1 1-523.2 1-523.3 1-523.4 1-523.5 1-523 SIP 1-523.3 SIP	Add citations.	The sources (or their control devices in the case of tanks) have parametric monitors and therefore are subject to Reg 1-523 requirements.
7.	4/14/04	NEW	A6.1 A6.2 A10 A11 A12 A15 A16 A18 A19	S7 S20 S34 S21 S22 S23 S24 S26 S35 S25 S10 S31 S32 S33 S40 S41 S173 S220	19466, Part 10	Delete permit condition.	See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
8.	4/14/04	NEW	A8.1, A9	S16, S17, S18, S19	Reg 12 Rule 11	Change date for 12-11-501 from 12/4/04 to 12/4/03.	Provides consistency with BAAQMD Reg 12, Rule 11 future effective dates.
9.	4/14/04 12/01/03	Partial. Did not make the following changes: Did not add 12-11-601.1 or expand 12-11-502.3 to 12-11-502.3.1. Did not delete redundant 12-11-506.1.	A8.1, A9	S16, S18, S19	BAAQMD Reg 12, Rule 11	Add citations to Sections 12-11-502.1, 502.2, 601.1 and 602. Change citations from Section 12-11-502.3 to 12-11-502.3.1. Delete redundant citation to Section 12-11-506.1 (because citation to 12-11-506 encompasses this subsection). NEW COMMENTS Add 12-11-601.1 and expand 502.3 to 502.3.1. Delete redundant 12-11-506.1.	The Permit does not include the correct references to the applicable sections of Regulation 12-11. NEW COMMENTS Provides clarity in regulatory applicability and chosen compliance options in Title V permit.
10.	4/14/04	NEW	A8.1, A9	S16, S18, S19	BAAQMD Reg 12-11-502.3	Delete effective date.	The effective date of 3/4/04 has already passed.
11.	4/14/04	NEW	A13.1, A14.1, S14.2	S36, S48, S56, S43, S44, S46, S45	1-107	Add citations.	The Reg 1-107 requirements for combined emissions apply to these sources and applicability should be reflected in the Title V permit.
12.	4/14/04	NEW	A18	S173	40 CFR 60 Appendix F, Procedure 1	Add this NSPS Appendix procedure.	The Procedure 1 QA requirements for continuous emission monitoring systems apply to the Subpart J H2S monitor for this source. This procedure has been consistently included in the permit for all Subpart J units except S173.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
13.	4/14/04	NEW	A19	S220	NSPS Subpart Db 40 CFR 60.44b(l) 40 CFR 60.44b(l)(1) 40 CFR 60.49b(h)(4)	Delete citations.	The S220 (F-4460) steam generator is not subject to the 40 CFR 60.44b(l)(1) NOx limit because it was constructed prior to 7/9/1997. The S220 (F-4460) steam generator is not subject to the emission averaging period defined in 40 CFR 60.49b(h)(4) because it has a heat input capacity greater than 250 million Btu/hr (as referred to in 40 CFR 60.48b(g)(1)).
14.	4/14/04	NEW	A19, A20, A22.2	S220, S237, S1031, S1033	NSPS 40 CFR 60 Appendix B - Performance Specification 2	Add citation.	Sources subject to NSPS Db are required to install and operate NOx CEMs. Therefore, the NSPS Appendix B performance specification for NOx CEMs should be added to these sources.
15.	4/14/04	NEW	A19 D3 D6 H1.1 J18	Several	Permit Condition 10574, Part 12	Correct “S1025” to “S1026”	Correct error in source number. The C5/C6 Splitter is S-1026, not S-1025.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
16.	4/14/04	NEW	A20	S237	NSPS Subpart Db 40 CFR 60.44b(a) 40 CFR 60.44b(a)(1)(i) 40 CFR 60.44b(e) 40 CFR 60.49b(h)(4)	Delete citations.	The S237 (SG-1032) steam generator is not subject to the 40 CFR 60.44b(a) or 60.44b(e) NOx limits because it was constructed after 7/9/1997, and therefore, is subject to the 40 CFR 60.44b(l)(1) NOx limit of 0.20 lb/MM Btu. The S237 (SG-1032) steam generator is not subject to the emission averaging period defined in 40 CFR 60.49b(h)(4) because it has a heat input capacity greater than 250 million Btu/hr (as referred to in 40 CFR 60.48b(g)(1)).
17.	4/14/04	NEW	A21	S240, S241, S242	Condition 18748, Parts 2 and 3	Change Federal Enforceable Status from Y to N.	The basis of Condition 18747, Parts 2 and 3 cites BAAQMD 9-8-330 and 9-8-530 which are not federally enforceable.
18.	4/14/04	NEW	A21, A23	S240, S241, S242, S243	9-8-530	Add citation.	Citation includes requirement for hourly metering and therefore should be shown in the permit. Subsections of 9-8-530 relate to logging hourly usage.
19.	4/14/04	NEW	A22.1	S1030, S1032	40 CFR 60 Appendix B, Performance Specification 7 and Appendix F, Procedure 1	Add NSPS Appendix procedure and performance specification.	For consistency with other Subpart J sources the Performance Specification 7 and Procedure 1 are required for the Subpart J H2S monitors.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
20.	4/14/04	NEW	A22.1, A22.2	S1030, S1032, S1031, S1033	Condition 19177, Part 18(a)	Renumber condition to reflect 18(a)(1) and 18(a)(2) in the recently released ATC for the Phase II extension dated November 10, 2003. Add new language for 18(a)(2) for lower NOx limit based on reassessment of BACT for Phase II.	Provides consistency with modifications made to this condition in the November 10, 2003 Authority to Construct extension for Phase II construction and operation.
21.	4/14/04	NEW	A22.1, A22.2	S1030, S1032, S1031, S1033	Condition 19177, Part 18(d)	Delete language past first sentence. The operation of the gas turbine (S1030) alone on natural gas should be allowed.	Retesting of the gas turbine alone on natural gas in December 2003 demonstrated compliance with POC limits, therefore the prohibition of operating the gas turbine alone on natural gas should be deleted.
22.	4/14/04	NEW	A22.2	S1031, S1033	NSPS Subpart Db 40 CFR 60.44b(a) 60.44b(a)(4)	Add 60.44b(a)(4) and modify regulation title or description for 60.44b(a) and 60.44b(a)(4) to indicate that the NOx limit for duct burners applies only during natural gas-only firing conditions.	The S1031 and S1033 cogeneration heat recovery steam generators are subject to the 40 CFR 60.44b(a), (a)(4) NOx limit during natural gas-only firing conditions allowed by Condition 19177.
23.	4/14/04	NEW	A22.2	S1031, S1033	NSPS Subpart Db 40 CFR 60.48b(e)(2) 40 CFR 60.48b(e)(3)	Add citations.	The cogeneration heat recovery steam generators are subject to the 500 ppm span requirement for the NOx CEMs. These citations are shielded in Section IX, but should also be included in Section IV as applicable citations for completeness.

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
24.	4/14/04	NEW	A22.2	S1031, S1033	NSPS Subpart Db 40 CFR 60.44b(e) 40 CFR 60.46b(e) 40 CFR 60.46b(e)(1) 40 CFR 60.46b(e)(3) 40 CFR 60.46b(h) 40 CFR 60.46b(h)(1) 40 CFR 60.46b(h)(2) 40 CFR 60.49b(h)(4)	Delete citations.	The S1031 and S1033 cogeneration heat recovery steam generators are not subject to 60.44b(e) NOx limit because it was constructed after 7/9/1997, and therefore, is subject to the 40 CFR 60.44b(l)(1) NOx limit of 0.20 lb/MM Btu. The cogeneration heat recovery steam generators are subject to performance test methods for duct burners under 40 CFR 60.46b(f) instead of those specified under 40 CFR 60.46b(e). The cogeneration heat recovery steam generators are not subject to 40 CFR 60.44b(j) and therefore, are not subject to the 60.46b(h) performance testing requirements. The cogeneration heat recovery steam generators are not subject to the emission averaging period defined in 40 CFR 60.49b(h)(4) because they each have a heat input capacity greater than 250 million Btu/hr (as referred to in 40 CFR 60.48b(g)(1)).
25.	4/14/04	NEW	B5	S209	BAAQMD Condition 9296, Part B9	Replace 2 years record retention with 5 years.	For consistency with permit condition language in Section VI.

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
26.	4/14/04	NEW	B6	S233	19466, Part 3	Delete permit condition	S-232 was deleted from this permit condition in Section VI. Deletion of Condition 19466, Part 3 is necessary for consistency throughout the permit.
27.	4/14/04 9/22/03	Partial. Tables were renumbered, but resulted in two Table IV-D1's. Renumber to eliminate duplicate.	D1	S29	Entire Table	Renumber table from IV-D1 to IV-C5 and move cooling tower S-29 into the Miscellaneous Sources, Subsection C as IV-C5.	MOD 4/14/04: New section added for process units and new tables D1 through D8 added. Now have two tables D1, which leads to confusion.
28.	4/14/04	NEW	D3, D5, D6, D8	S1007, S1012, S1014, S211	18043, Part 2 18043, Part 3	Delete permit conditions 18043, Part 2 and Part 3	Similar permit conditions have consistently been deleted from this permit. These conditions require implementation of a fugitive monitoring program and specify fugitive emissions limits, all of which are already in place at the facility.
29.	4/14/04	NEW	E2	S165	8-7-605	Delete citation.	The method referenced by this citation does not apply to the Valero gasoline operation because it does not have a Vacuum-Assist Phase II vapor recovery system. The method specified in 8-7-605 refers to the testing requirements of 8-7-302.15 which apply only to Vacuum-Assist vapor recovery systems.
30.	4/14/04	NEW	G1	S177	Reg 8, Rule 16	Change effective date to 10/16/2002.	Revise regulation date consistency with BAAQMD approval of revised rule on 10/16/2002.

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Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
31.	4/14/04	NEW	G1	S177	BAAQMD 8-16-118.2	Delete citation and replace with SIP 8-16-118.2.	BAAQMD 8-16-118.2 only references applicability to 8-16-303.4. Since S177 is not subject to 8-16-303.4, the BAAQMD version of 8-118.2 does not apply. However, the version of SIP 8-118.2 references 8-16-501 in addition to 8-16-118.2 and since S177 is subject to 8-16-501, the SIP 8-16-118.2 version should be included in Table IV-G1.
32.	4/14/04	NEW	G1	S177	BAAQMD 8-16-303.1.6 and 303.5.	Add citations with Federal Enforceable status of N.	These two citations were added with the 10/16/2002 BAAQMD version of Reg 8, Rule 16 and should be added as applicable requirements.
33.	4/14/04	NEW	G1	S177	BAAQMD 8-16-501.6	Delete citation.	BAAQMD 8-16-501.6 requires recordkeeping to support the 8-16-121 exemption. Since Valero does not claim this exemption, BAAQMD 8-16-501.6 is not applicable and should be deleted.
34.	4/14/04	NEW	H1.1	S151	40 CFR 61 Subpart FF	Delete the line that says "40CFR61SubpartFF60.355(k)(1) Total Benzene Quantity (TBQ) Quantification" immediately following the citation for 8-8-501	The line that should be deleted is incorrect and has been replaced by a new header row for 40 CFR 61 Subpart FF and the correct citation, which have been added to the table following Permit Condition 10574 Part 12.
35.	4/14/04 9/22/03	No	H1.1, H1.2	S151, S156	BAAQMD Regulation 8, Rule 8	CORRECTED 4/14/04: Add 8-8-601, Wastewater Analysis for Critical OCs. FE = Y	This test method must be added to the applicability tables Table IV-H1.1 and IV-H1.2 because it is called out as a monitoring method in the associated Tables VII-H1.1 and VII-H1.2.
36.	4/14/04	NEW	H2.2, H4.1, H4.2, H5.1, H5.2	Several	40 CFR 61 Subpart FF	Change date to 11/12/2002	Update to current date for the regulation

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Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
37.	4/14/04	NEW	H4.2, H5.2, J36, J37, J39	S150, S194, S195, S199, S200, S131 S197, S198	11879, Parts 4 & 7 11882, Part 4 11888, Parts 4 & 7 13319, Part 4	Part 4: "The Owner/Operator shall maintain the oxidation temperature of A-57 Thermal Oxidizer at or above 1400 degrees Fahrenheit (minimum temperature) as averaged over any consecutive 3 hour period. ~~This minimum temperature may be adjusted by the District~~ If source test data demonstrate that an alternate temperature is necessary to maintain compliance with Part 3, the Owner/Operator shall maintain the oxidation temperature at or above the minimum temperature limit averaged over any consecutive 3 hour period, as determined by the source test." Part 7: Delete	A-57 abates organic emissions from wastewater equipment subject to 40 CFR 61 Subpart FF. Per 40 CFR 61.355(i)(3), an existing applicable requirement in the Title V permit, compliance of a control device and parameter to be monitored (i.e., temperature) is based on an averaging period determined by source test.

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
38.	4/14/04	NEW COMMENT	IV-I	Components	BAAQMD 8-18	Change effective date to January 21, 2004 Change FE of following citations to "N" 8-18-110 8-18-302 8-18-303 8-18-304 8-18-304.2 – also add "and leak discovered by APCO" to description 8-18-306 8-18-306.1 8-18-306.2 – also add future date of 7/1/2004 8-18-401 8-18-502 8-18-603 Add the following citations with FE "N" unless noted: 8-18-304.1 Connection leak discovered by Valero. FE "Y" 8-18-304.3 Connections subject to 8-18-306. 8-18-306.3 Non-repairable connections count as two valves 8-18-306.4 Requirements for valves with major leaks (>=10,000 ppm) Future date 7/1/2004 8-18-503 Reports 8-18-604 Determination of Mass Emissions	BAAQMD recently adopted new version of Regulation 8, Rule 18 Organic Compounds – Equipment Leaks

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
39.	4/14/04	NEW	IV-I	Components	NSPS Subpart VV	Add the following with FE = "Y": 40 CFR 60.487(a) Reporting 40 CFR 60.487(b) Reporting 40 CFR 60.487(c) Reporting Delete the following: 40 CFR 60.487(f)	The refinery submits semiannual reports that meet the requirements of 60.487(a), 60.487(b), and 60.487(c) and does not submit reports in an alternative format as allowed under 60.487(f).
40.	4/14/04	NEW	IV-I	Components	NSPS Title 40 Part 60 Subpart GGG	Add "Y" to Federally Enforceable (Y/N) column for the following: 40 CFR 60.592	Correct omission
41.	4/14/04	NEW	IV-I	Components	NESHAP Part 61 Subpart FF	Add "Y" to Federally Enforceable (Y/N) column for the following: 40 CFR 61.345(a)(1)(i)	Correct omission
42.	4/14/04	NEW	IV-I	Components	NESHAP Part 63 Subpart CC	Correct the description for 40 CFR 63.648(a) to read "Equipment Leak Standards—Existing sources comply with 40 CFR60 Subpart VV and 63.648(b). New sources comply with 40 CFR 63 Subpart H."	Correct omission

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Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
43.	4/14/04	NEW	IV-X	Fugitive Sources	BAAQMD Permit Conditions	Add or modify the following fugitive permit conditions in the Fugitive Sources table IV-X: Source Condition Part S-211 18043 1 NOTE: If Condition 18043, parts 2 and 3 are not deleted as requested in Attachment C, then make the following changes rather than the changes shown above: S-211 18043 1, 2, 3 S-211 10574 52 S-1007 18043 1, 2, 3 S-1012 18043 1, 2, 3 S-1014 18043 1, 2, 3	Add all applicable permit conditions related to fugitive components or fugitive monitoring to the Fugitive Sources table in Section IV of the permit.

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Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
44.	4/14/04	NEW	IV-X	S1006 S1010 S1027	BAAQMD Permit Conditions	Delete the following non-fugitive permit conditions from the Fugitive Sources table IV-X: Source Condition Part S-1006 815 1, 2 S-1010 15512 1 S-1027 17835 1, 2, 3	The listed permit conditions are now contained in the following Source-Specific Applicable Requirements Tables: Source Table IV S-1006 D2 S-1010 D4 S-1027 B8 The Permit did not originally contain Source-Specific Applicable Requirements Tables for all process units, therefore, all process unit permit conditions were listed in the Fugitive Sources table because that was the only place that the process unit sources appeared in Section IV of the Permit. Now that Source-Specific Applicable Requirements Tables have been added for the process units, all permit conditions are listed in those tables and only the conditions related to fugitive components and fugitive monitoring should be listed in the Fugitive Sources Table.

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Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
45.	4/14/04	NEW	IV-X	NA	Note 4	Change Note 4 to read, "This table lists only those permit conditions related to fugitive sources or fugitive monitoring. See source-specific Table IV's for all other permit conditions for each source."	Clarify contents of permit condition column.
46.	4/14/04	NEW	IV-X	S-211	NESHAPS, Part 63, Subpart CC	Delete "This SOCMI source is exempt from Subpart CC. It is subject to Subparts F and G." Add "X"	S-211 as the Alkylate Debutanizer is not a SOCMI source, but is a petroleum refining process unit as defined in 40 CFR 63.641 and is subject to the Refinery MACT (40 CFR 63 Subpart CC) in accordance with 63.640(a).
47.	4/14/04	NEW	IV-X	S-188 S-189	NESHAPS, Part 61, Subpart FF; BAAQMD Reg. 11-12	Add "Exempt"	Clarify applicability for these sources.
48.	4/14/04	NEW	J2	S58	BAAQMD 8-5	Add 8-5-604	Correct omission
49.	4/14/04	NEW	J9, J13, J18, J38, J40	S207, S210, S227, S193, S196, S205, S206	NSPS Kb 60.110b(a)	Change description from "…40 cu m…" to "… 75 cu m…" Change effective date of NSPS Kb to 10/15/2003	Change to agree with 10/15/2003 modifications to NSPS Kb (68 FR 59328)
50.	4/14/04	NEW	J10	S112	BAAQMD 8-5-321.4	DELETE: "8-5-321.4 Primary seal requirements; Metallic shoe type seals requirements"	The description for this citation is incorrect in this table. The correct description for this citation is "Primary seal requirements; Resilient toroid type seals requirements" and it is not applicable to this source which has metallic shoe primary seal
51.	4/14/04	NEW	J12	S87, 88, 90, 91	BAAQMD 8-5-320.5.3	Add 8-5-320.5.3	Correct omission

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
52.	4/14/04	NEW	J13 J34	S210, S101, S105	NSPS Kb citations	Delete 40 CFR 60.112b(a)(1)(ii)(A) 40 CFR 60.112b(a)(1)(ii)(C)	These optional paragraphs are not applicable for IFR tanks with double seals. 60.112b(a)(1)(ii) requires that IFR tanks have ONE of the three options. The correct option for IFRs with double seals is 60.112b(a)(1)(ii)(B).
53.	4/14/04	NEW	J29	S121, S142, S144, S185	BAAQMD 8-5-501	Add: 8-5-501.1	Make recordkeeping requirement consistent with other tables with 8-5-117 exemption.
54.	4/14/04	NEW	J35	S-103	NSPS Kb	Delete 60.112b(a)(1)(ii)(A)	This optional paragraph is not applicable for IFR tanks with a single mechanical shoe seal. 60.112b(a)(1)(ii) requires that IFR tanks have ONE of the three options. The correct option for S-103 is 60.112b(a)(1)(ii)(C) for a mechanical shoe seal.
55.	4/14/04	NEW	J35	S103	BAAQMD Regulation 8, Rule 5	Change Date for BAAQMD 8-5 to 11/27/2002	Editorial correction
56.	4/14/04	NEW	J41	S208	40 CFR 61 Subpart FF	Change effective date in header row of NESHAPS Title 40 Part 61 Subpart FF NESHAPS, Benzene Waste Operations from (1/7/93) to (11/12/2002)	Update to current date for the regulation
57.	12/01/03 9/22/03	No	A15	S40	BAAQMD Condition 9296, Part D8, D9, and D10	Delete permit conditions.	Conditions are redundant 1. Part D8 CEMS requirement is covered by 9-10-502.1. 2. Part D9 fuel flow meter requirement is covered by 9-10-502.2. 3. Part D10 recordkeeping requirements are covered by 9-10-504 and 40 CFR 60.7(a).

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
58.	12/01/03	No.	A19	S220	Condition 10574, Part H	Delete permit condition.	It is infeasible to comply with this condition because S220 operates with tubing normally filled with a heavy liquid material that would be drained during a shutdown, not a gaeous material that would be vented as when a vessel is depressurized. Furthermore, this furnace is not a "process vessel" as defined by Reg 8, Rule 10 (Process Vessel Depressurization).
59.	12/1/03 9/22/03	No	A23	S243	Condition 18744, Part 1	Delete "Emergency Conditions" definitions.	Definitions are redundant with Reg 9-8-231. Definitions are not consistently included in the Title V permit.
60.	12/1/03 9/22/03	No	A23	S243	Condition 18744, Parts 2 through 6	Delete Condition 18744, Parts 2 through 6	Permit conditions are redundant with Reg 9, Rule 8.
61.	12/01/03	No	J6		BAAQMD 8-5-320.4 8-5-320.4.1 8-5-320.4.2 8-5-320.4.3	Delete: 8-5-320.4 8-5-320.4.1 8-5-320.4.2 8-5-320.4.3 Add 8-5-320.5 8-5-320.5.1 8-5-320.5.2 8-5-320.5.3	Tanks have slotted sampling or gauging wells and are subject to 8-5-320.5 requirements rather than 8-5-320.4 requirements. Correct errors
62.	12/01/03	No	J12	S87, 88, 90, 91	Title of Table	Change title of table from "Internal Floating Roof Tanks with Secondary Seals; MACT Exempt" to "Internal Floating Roof Tanks with Secondary Seals and Slotted Guide Poles; MACT Exempt"	Change title to show distinction between Tables J11 and J12

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
63.	12/01/03	No	J14		BAAQMD 8-5	Delete the three rows of text between 8-5-328.2 and 8-5-403. The citation numbers were removed but the text was not deleted.	Correct errors and omissions.
64.	12/01/03	No	J27		BAAQMD 8-5-302.1 8-5-302.2	Delete 8-5-302.1 Add 8-5-302.2	Tank (S-158) has a side fill submerged fill pipe and is subject to 8-5-302.2 rather than 8-5-302.1, which is for a top fill submerged fill pipe.
65.	12/01/03	No	J30	S230	NA	Change title of table from "Exempt Fixed Roof Tank with NSPS Subpart Kb Recordkeeping" to "Exempt Fixed Roof Tank with MACT Recordkeeping"	Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68 FR 59328) . Source is now subject to MACT recordkeeping.
66.	12/01/03	No	J30	S230	40 CFR 63 Subpart CC	Delete NSPS Kb overlap applicability path: 40 CFR 63.640(n)(1) 40 CFR 63.640(n)(8) Add the following citations with descriptions from Table IV-J19 to complete the MACT recordkeeping applicability path: 40 CFR 63.646(b)(1) 40 CFR 63.646(b)(2) 40 CFR 63.654(h)(6) 40 CFR 63.654(h)(6)(ii) 40 CFR 63.654(i)(1) 40 CFR 63.654(i)(1)(i)	Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68 FR 59328) . Source is now subject to MACT recordkeeping. Make MACT recordkeeping applicability consistent with other MACT recordkeeping sources in Tables IV-J19, J21, and J22.

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
67.	12/01/03	No	J30	S230	NSPS Kb citations	Delete: 40 CFR 60.110b(c) 40 CFR 60.116b(a) 40 CFR 60.116b(b) 40 CFR 60.116b(e)(3)(i) 40 CFR 60.116b(e)(3)(ii) 40 CFR 60.116b(e)(3)(iii) 40 CFR 60.116b(e)(3)(iv) Change: 40 CFR 60.110b(a) description from "…40 cu m…" to "…75 cu m …" Change: Effective date from 08/11/1989 to 10/15/2003 Add: 40 CFR 60.110b(b) Applicability and Designation of Affected Facility; Exemptions for storage vessels >= 75 cu m FE="Y"	Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68 FR 59328).
68.	12/01/03	No	J41	S208	NSPS Kb	Delete: 40 CFR 60.110b(b) 40 CFR 60.116b(a) 40 CFR 60.116b(b) 40 CFR 60.116b(f) Change: 40 CFR 60.110b(a) description from "…40 cu m…" to "…75 cu m …" Change: Effective date from 08/11/1989 to 10/15/2003	Source is now exempt from NSPS Kb based on 10/15/2003 changes to NSPS Kb (68 FR 59328) that deleted recordkeeping requirements

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
69.	12/01/03	No	J41		BAAQMD 8-5	Delete 8-5-501.2	Correct error. Tank S-208 is not a floating roof tank and is therefore not subject to recordkeeping for seal replacements.
70.	9/22/03	No	All Tables			Modify Section IV of permit to Microsoft® Word table format	Change will make permit easier to read and easier to maintain in the future.
71.	9/22/03	No	IV-Refinery	Generally applicable	40 CFR 61 Subpart FF	Change date to 11/12/2002 Add and delete the citations as shown in Attachment B.1.	Update to current date Added 61.340(d) exemption for gaseous streams that route to a fuel gas system. Testing, monitoring, recordkeeping, or reporting not required when wastewater unit vents to fuel gas system. Note: Revision based on the addition of 61.340(d) to 40 CFR 61 Subpart FF as part of 11/12/2002 amendments. Add other generally applicable citations from 40 CFR 61 Subpart FF Benzene Waste Operations Delete non-applicable citations and delete citations that are included in the individual equipment tables from 40 CFR 61 Subpart FF Benzene Waste Operations
72.	9/22/03	No	IV-Refinery	Generally applicable	40 CFR 63 Subpart A	Make changes to 40 CFR 63 Subpart A citations as shown on Attachment B.1.	Incorporate recent revisions to 40 CFR 63 Subpart A as amended at 67 FR 16595, Apr. 5, 2002)
73.	9/22/03	No. Text should be added for consistency with Section VI.	A15	S40	Condition 19466, Part 14	Add “Steam Generators: S40, S41” as last sentence of condition.	Provides consistency in substantive condition language between Sections IV and VI.

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
74.	9/22/03	No. BAAQMD did not delete redundant permit conditions.	A19	S220	Condition 10574, Part 19	Delete permit condition.	Condition 10574, Part 19 is redundant with 9-10-502.2 and should be deleted from the Title V permit. Further, Condition 10574, Part 19 has been deleted from other applicable sources (see Table IV-A10 for S21 and S22). Requested deletion is consistent with change requested in Attachment C for Section VI.
75.	9/22/03	No. Permit condition not deleted.	A20	S237	Condition 19466, Part 3	Delete permit condition.	S237 is a refinery fuel gas fired boiler. CAPCOA periodic monitoring guidelines do not recommend visible emissions monitoring for gaseous-fueled combustion equipment. None of Valero's other fuel gas fired heaters and boilers require periodic monitoring for visible emissions in the Title V permit. Visible emissions from this source are unlikely, and have not been a problem in the past.
76.	9/22/03	No. Old effective date should be deleted to avoid confusion.	A20	S237	SIP Reg 1	Delete old effective date of 06/28/1999.	Correct error.
77.	9/22/03	No. BAAQMD did not delete redundant permit conditions.	A21	S240, S241, S242	Condition 18748, Part 1	Delete "Emergency Conditions" definitions.	Definitions are redundant with Reg 9-8-231. Definitions are not consistently included in the Title V permit.
78.	9/22/03	No. BAAQMD did not delete redundant permit conditions.	A21	S240, S241, S242	Condition 18748, Parts 2 through 4	Delete Conditions 18748, Parts 2 through 4.	Permit conditions are redundant with Reg 9, Rule 8.

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
79.	9/22/03	Yes, however, want to reverse this comment by deleting Part 18(c). Part 18(c) was added to the PTO after issuance of the ATC. The PTO, with the new ammonia injection monitoring requirement, was issued after initial source test was conducted and approved by BAAQMD, without determination of correlation for prediction of NH3 slip.	A22.1, A22.2	S1030, S1032, S1031, S1033	Condition 19177, Parts 18(c) and 18(d)	Incorporate recently updated permit conditions.	Substantive text modifications have been made to the condition language and requirements in the July 22, 2003 version of PTO No. 2488 for the Cogen turbine and heat recovery steam generator (S1030 and S1031), but the changes have not been consistently incorporated in Section IV.
80.	9/22/03	No. Without change, there are minor text differences between the Title V permit and PTO No. 2488 for this condition.	A22.1, A22.2	S1030, S1032, S1031, S1033	19177, Part 48	Add "date the" prior to "boiler" in the last sentence of the condition in the recently updated Cogen Unit PTO.	This correction has been made in the Title V permit, but has not been made in the recently updated PTO for the Cogen Unit. Correction will provide consistency between the Title V permit and the July 22, 2003 version of PTO No. 2488 for the Cogen turbine and heat recovery steam generator (S1030 and S1031).

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
81.	9/22/03	No. Date should be changed to reflect current rule effective date.	E2	S165	BAAQMD 8-7	Change date to 11/06/2002	Current version of BAAQMD 8-7 is fully SIP approved per 67 FR 14156.
82.	9/22/03	No. Citation should be deleted.	E2	S165	8-7-302.11	Delete citation.	Valero has a balance Phase II vapor recovery system. Therefore, this requirement for vacuum-assist vapor recovery systems does not apply.
83.	9/22/03	No. Note that the monitoring requirement citations (8-7-301.13 and 8-7-302.14) have been added to VII-E2. For consistency within the permit, these citations should be added to IV-E2.	E2	S165	8-7-301.13, 8-7-302.14, 8-7-407, 8-7-408	Add citations.	New citations added with BAAQMD 11/06/2002 updates to BAAQMD 8-7.
84.	9/22/03	No	F1	S129	Condition 98, All parts	Delete condition.	See Attachment C.1 for rationale for deletion of Condition 98.
85.	9/22/03	No. Date should be changed to reflect current rule effective date.	G1	S177	Reg 8, Rule 16	Change effective date to 10/16/2002.	Provides consistency with recent BAAQMD adoption of an updated version of Reg 8, Rule 16.
86.	9/22/03	No	H4.2, H5.2	S194, S195, S197, S198	BAAQMD Condition 13319, Part 1	Change the permit condition from: "The emissions of nitrogen oxides (NOx) shall not exceed…" to "The emissions of nitrogen oxides (NOx) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
87.	9/22/03	No	H4.2, H5.2	S194, S195, S197, S198	BAAQMD Condition 13319, Part 2	Change the permit condition from: "The emissions of carbon monoxide (CO) shall not exceed…" to "The emissions of carbon monoxide (CO) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions
88.	9/22/03	No	IV-I	Components	NESHAP Part 61 Subpart FF	Change date to 11/12/2002	Update to current date for the regulation
89.	9/22/03	No	IV-I	Components	NESHAP Part 61 Subpart FF	Add the following citations with FE="Y": 61.355(h) Test Methods, procedures, and compliance methods; no detectable emissions 61.356(h) Recordkeeping Requirements: No detectable emissions tests per 61.343 through 61.347, and 61.349	Add test methods and move recordkeeping from individual source tables to fugitive components table.
90.	9/22/03	No	J32, J33, J34, J35, J36, J37, J38, J39, J40	S67, S81, S85, S101, S103, S104, S105, S131, S150, S193, S196, S199, S200, S205, S206	40 CFR 61 Subpart FF	Change date to 11/12/2002	Update to current date for the regulation
91.	9/22/03	No	J36	S131	BAAQMD Condition 11888, Part 1	Change the permit condition from: "The emissions of nitrogen oxides (NOx) shall not exceed…" to "The emissions of nitrogen oxides (NOx) from the A-57 Thermal Oxidizer shall not exceed…" Change Basis from "9-10" to "2-2-112"	Clarify source of emissions Correct basis to NSR exemption for secondary emissions from abatement devices. Provide consistency in basis between conditions 11879, 11882, 11888, 13319. Abatement device is not subject to Regulation 9-10.

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Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
92.	9/22/03	No	J36	S131	BAAQMD Condition 11888, Part 2	Change the permit condition from: "The emissions of carbon monoxide (CO) shall not exceed…" to "The emissions of carbon monoxide (CO) from the A-57 Thermal Oxidizer shall not exceed…" Change Basis to "BAAQMD 2-2-112"	Clarify source of emissions Correct basis to NSR exemption for secondary emissions from abatement devices. Provide consistency in basis between conditions 11879, 11882, 11888, 13319.
93.	9/22/03	No	J36, J37, J38, J39, J40	S131, S150, S193, S196, S199, S200, S205, S206	40 CFR 61 Subpart FF	Delete 40 CFR 61.349(a)(1)(i) from these applicability tables.	The no detectable emissions standards, test methods, and recordkeeping requirements from 40 CFR 61 Subpart FF are already contained in the fugitive components table (Table IV-I) and these emission limits are monitored as part of the refinery's fugitive monitoring program. Consistency with rest of permit.
94.	9/22/03	No	J37	S150	BAAQMD Condition 11879, Part 1	Change the permit condition from: "The emissions of nitrogen oxides (NOx) shall not exceed…" to "The emissions of nitrogen oxides (NOx) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions
95.	9/22/03	No	J37	S150	BAAQMD Condition 11879, Part 2	Change the permit condition from: "The emissions of carbon monoxide (CO) shall not exceed…" to "The emissions of carbon monoxide (CO) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions
96.	9/22/03	No	J39	S199, S200	BAAQMD Condition 11882, Part 1	Change the permit condition from: "The emissions of nitrogen oxides (NOx) shall not exceed…" to "The emissions of nitrogen oxides (NOx) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions

Attachment B
Comments on Permit for Facility B2626 – Section IV (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
97.	9/22/03	No	J39	S199, S200	BAAQMD Condition 11882, Part 2	Change the permit condition from: "The emissions of carbon monoxide (CO) shall not exceed…" to "The emissions of carbon monoxide (CO) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions
98.	9/22/03	No	J42 (New table)	LPG Spheres	Several	Add new Table IV-J42 for the LPG Spheres (See Attachment B.3)	Add applicability for these tanks to account for new BAAQMD 8-5 requirements

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD · Regulation 1	**General Provisions and Definitions (05/02/2001)**		
1-510	Area Monitoring	Y	
1-530	Area Monitoring Downtime	Y	
1-540	Area Monitoring Data Examination	Y	
1-542	Area Concentration Excesses	Y	
1-543	Record Maintenance for Two Years	Y	
1-544	Monthly Summary	Y	
BAAQMD Regulation 2, Rule 1	**General Requirements (8/1/01)**		
2-1-429	Federal Emissions Statement	N	
BAAQMD Regulation 8, Rule 5	**Storage of Organic Liquids (11/27/2002)**		
8-5-328	Tank Degassing Requirements	Y	
8-5-328.1	Tank Degassing Requirements; Tanks > 75 cubic meters	Y	
8-5-328.1.2	Tank Degassing Requirements; Tanks > 75 cubic meters, Approved Emission Control System	Y	
8-5-328.2	Tank Degassing Requirements; Ozone Excess Day Prohibition	Y	
8-5-404	Certification	Y	
8-5-502	Tank degassing annual source test requirement	Y	
8-5-602	Analysis of Samples, True Vapor Pressure	Y	
8-5-603	Determination of emissions	Y	
8-5-603.2	Source tests for tank degassing equipment	Y	
8-5-604	Determination of applicability	Y	
BAAQMD Regulation 8, Rule 8	**Wastewater (Oil-Water) Separators (6/15/94)**		
8-8-308	Junction Box	Y	
BAAQMD Regulation 8, Rule 10	**Organic Compound – Process Vessel Depressurization (1/21/2004)**		
8-10-301	Process Vessel Depressurizing.	N	
8-10-302	Opening of Process Vessels	N	
8-10-302.1	organic compounds cannot exceed 10,000 ppm (methane) prior to	N	7/1/2004

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
	release to atmosphere		
8-10-302.2	Organic compound concentration of a refinery process vessel may exceed 10,000 ppm prior to release to atmosphere provided total number of such vessels during 5-year period does not exceed 10%	N	7/1/2004
8-10-401	Turnaround Records. Annual report due February 1 of each year with initial report of process vessels due 4/1/2004.	N	
8-10-501	Monitoring prior to and during process vessel opening	N	
8-10-502	Concentration measurement using EPA Method 21	N	
8-10-503	Recordkeeping	N	
8-10-601	Monitoring Procedures	N	
SIP Regulation 8, Rule 10	**Organic Compound – Process Vessel Depressurization (7/20/83)**		
8-10-301	Process Vessel Depressurizing.	Y	
8-10-301.1	recovery to the fuel gas system	Y	
8-10-301.2	combustion at a firebox or incinerator	Y	
8-10-301.3	combustion at a flare	Y	
8-10-301.4	containment such that emissions to atmosphere do not occur	Y	
8-10-401	Turnaround Records.	Y	
8-10-401.1	date of depressurization event	Y	
8-10-401.2	approximate vessel hydrocarbon concentration when emissions to atmosphere begin	Y	
8-10-401.3	approximate quantity of POC emissions to atmosphere	Y	
BAAQMD · Regulation 9, Rule 1	**Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (03/15/1995)**		
9-1-110	Conditional Exemption, Area Monitoring	Y	
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-313	Sulfur Removal Operations at Petroleum Refineries	N	
9-1-313.2	Sulfur Removal and Recovery System	N	
9-1-501	Area Monitoring Requirements	Y	
9-1-604	Ground Level Monitoring	Y	
SIP Regulation 9,	**Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (05/20/1992)**		

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
Rule 1			
9-1-313	Sulfur Removal Operations at Petroleum Refineries	Y[1]	
9-1-313.2	Sulfur Removal and Recovery System	Y[1]	
BAAQMD · Regulation 9, Rule 2	**Inorganic Gaseous Pollutants, Hydrogen Sulfide (10/06/1999)**		
9-2-110	Exemptions	N	
9-2-301	Limitations on Hydrogen Sulfide	N	
9-2-501	Area Monitoring Requirements	N	
9-2-601	Ground Level Monitoring	N	
NSPS Title 40 Part 60 Subpart A	**General Provisions (03/16/1994)**		
40 CFR 60.1	Applicability	Y	
40 CFR 60.2	Definitions	Y	
40 CFR 60.3	Units and Abbreviations	Y	
40 CFR 60.4	Address	Y	
40 CFR 60.5	Determination of Construction or Modification	Y	
40 CFR 60.6	Review of Plans	Y	
40 CFR 60.7(a)	Notification and Recordkeeping	Y	
40 CFR 60.7(b)	Maintain Records-CEMs	Y	
40 CFR 60.8	Performance Tests	Y	
40 CFR 60.9	Availability of Information	Y	
40 CFR 60.11	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 60.12	Circumvention	Y	
40 CFR 60.13	Monitoring Requirements	Y	
40 CFR 60.14	Modification	Y	
40 CFR 60.15	Reconstruction	Y	
40 CFR 60.17	Incorporated by Reference	Y	
40 CFR 60.19	General Notification and Reporting Requirements	Y	
NESHAPS Title 40 Part 61 Subpart A	**NESHAPS, General Provisions (03/16/1994)**		
40 CFR 61.01	Lists of Pollutants and Applicability of Part 61	Y	
40 CFR 61.02	Definitions	Y	
40 CFR 61.03	Units and abbreviations	Y	
40 CFR 61.04	Address	Y	
40 CFR 61.05	Prohibited Activities	Y	
40 CFR 61.06	Determination of Construction or Modification	Y	
40 CFR 61.07	Application for Approval of Construction or Modification	Y	
40 CFR 61.08	Approval of construction or modification	Y	

[1] This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved the District's revision of the regulation.

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
40 CFR 61.09	Notification of startup	Y	
40 CFR 61.10	Source reporting and waiver request	Y	
40 CFR 61.12	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 61.13	Emission Tests and Waiver of Emission Tests	Y	
40 CFR 61.14	Monitoring requirements	Y	
40 CFR 61.15	Modification	Y	
40 CFR 61.18	Incorporation by reference	Y	
40 CFR 61.19	Circumvention	Y	
NESHAPS Title 40 Part 61 Subpart FF	**NESHAPS, Benzene Waste Operations (01/07/1993)**		
40 CFR 61.340(a)	Applicability: Chemical Manufacturing, Coke by-product recovery, petroleum refineries	Y	
40 CFR 61.340(c)	Applicability: Exempt Waste	Y	
40 CFR 61.340(d)	Applicability: Exemption for Sources Routed to Fuel Gas	Y	
40 CFR 61.341	Definitions	Y	
40 CFR 61.342	Standards: General	Y	
40 CFR 61.342(a)	Standards: General: Total Annual Benzene Quantity (TAB)	Y	
40 CFR 61.342(b)	Standards: General; Facility with TAB > 10Mg/year in compliance by 4/7/93	Y	
40 CFR 61.342(c)(1)	Standards: General; Treat benzene-containing waste streams in accordance with 61.342(c)(1)(i), 61.342(c)(1)(ii) and 61.342(c)(1)(iii)	Y	
40 CFR 61.342(c)(1)(i)	Standards: General; Remove or destroy benzene in accordance with	Y	
40 CFR 61.342(c)(1)(ii)	Standards: General; Comply with 61.343 through 61.347 for treatment units operated in accordance with 61.342(c)(1)(i)	Y	
40 CFR 61.342(c)(1)(iii)	Standards: General; Comply with 61.343 through 61.347 for treatment units for recycled wastes. Recycled wastes subject to 61.342(c)	Y	
40 CFR 61.342(e)	Standards: General; Alternative to 61.342(c) and 61.342(d)	Y	
40 CFR 61.342(e)(1)	Standards: General; Treat waste with a flow-weighted annual average water content of less than 10% per 61.342(c)(1)	Y	
40 CFR 61.342(e)(2)	Standards: General; Treatment of waste with a flow-weighted annual average water content of 10% or more by volume.	Y	
40 CFR 61.342(e)(2)(i)	Standards: General; [Uncontrolled] 61.342(e)(2) Waste shall not contain more than 6.0 Mg/yr benzene.	Y	
40 CFR 61.342(e)(2)(ii)	Standards: General; Determine 61.342(e)(2) benzene quality per	Y	
40 CFR 61.342(g)	Standards: General; Compliance by record review and test results	Y	
40 CFR 61.345(a)	Standards: Containers	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
40 CFR 61.345(a)(1)	Standards: Containers--Covers	Y	
40 CFR 61.345(a)(1)(ii)	Standards: Containers--Openings	Y	
40 CFR 61.345(b)	Standards: Containers--Quarterly inspection	Y	
40 CFR 61.345(c)	Standards: Containers--Repairs	Y	
40 CFR 61.348(a)	Standards: Treatment Processes	Y	
40 CFR 61.348(a)(5)	Standards: Treatment Processes; Aggregated wastes	Y	
40 CFR 61.348(b)	Standards: Treatment Processes: Aggregated wastes	Y	
40 CFR 61.350(a)	Standards: Delay of Repair; If repair is technically impossible without shutdown	Y	
40 CFR 61. 350(b)	Standards: Delay of Repair; Exempt from 61.343 for delayed repairs	Y	
40 CFR 61.355	Test Methods, Procedures, and Compliance Provisions	Y	
40 CFR 61.355(a)	Test Methods, Procedures, and Compliance Provisions; Determine total annual benzene quantity	Y	
40 CFR 61.355(a)(1)	Test Methods, Procedures, and Compliance Provisions; Determine total annual benzene quantity	Y	
40 CFR 61.355(a)(2)	Test Methods, Procedures, and Compliance Provisions; Determine total annual benzene quantity	Y	
40 CFR 61.355(a)(3)	Test Methods, Procedures, and Compliance Provisions; Determine total annual benzene quantity	Y	
40 CFR 61.355(a)(6)	Test Methods, Procedures, and Compliance Provisions; Determine total annual benzene quantity	Y	
40 CFR 61.355(b)	Test Methods, Procedures, and Compliance Provisions; Determine annual waste quantity	Y	
40 CFR 61.355(b)(1)	Test Methods, Procedures, and Compliance Provisions; Determine annual waste quantity	Y	
40 CFR 61.355(b)(7)	Test Methods, Procedures, and Compliance Provisions; Determine annual waste quantity	Y	
40 CFR 61.355(c)(1)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(1)(i)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(1)(i)(A)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(1)(ii)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(1)(iii)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
40 CFR 61.355(c)(1)(iv)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(1)(v)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(2)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(c)(3)	Test Methods, Procedures, and Compliance Provisions; Determine flow-weighted annual average benzene concentration	Y	
40 CFR 61.355(k)(1)	Test Methods, Procedures, and Compliance Provisions; Determine Benzene Quantity for 61.342(e)(2) calculation	Y	
40 CFR 61.355(k)(2)	Test Methods, Procedures, and Compliance Provisions; Determine Benzene Quantity for 61.342(e)(2) calculation	Y	
40 CFR 61.355(k)(3)	Test Methods, Procedures, and Compliance Provisions; Determine Benzene Quantity for 61.342(e)(2) calculation	Y	
40 CFR 61.355(k)(5)	Test Methods, Procedures, and Compliance Provisions; Determine Benzene Quantity for 61.342(e)(2) calculation	Y	
40 CFR 61.355(k)(6)	Test Methods, Procedures, and Compliance Provisions; Determine Benzene Quantity for 61.342(e)(2) calculation	Y	
40 CFR 61.356	Recordkeeping Requirements	Y	
40 CFR 61.356(a)	Recordkeeping and retention requirements	Y	
40 CFR 61.356(b)	Waste stream records	Y	
40 CFR 61.356(b)(4)	Waste stream records	Y	
40 CFR 61.357	Reporting Requirements	Y	
40 CFR 61.357(a)(1)	Reporting Requirements; Total Annual benzene quantity	Y	
40 CFR 61.357(a)(2)	Reporting Requirements; Table of Waste Streams and Control Methods	Y	
40 CFR 61.357(a)(3)	Reporting Requirements; Data required for uncontrolled waste streams	Y	
40 CFR 61.357(d)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste	Y	
40 CFR 61.357(d)(2)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Annual report	Y	
40 CFR 61.357(d)(5)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Annual report contents required	Y	
40 CFR	Reporting Requirements: Facilities with 10 Mg/yr or more total	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
61.357(d)(6)	benzene in waste; Quarterly inspection certification		
40 CFR 61.357(d)(7)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Quarterly report	Y	
40 CFR 61.357(d)(7)(iv)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Quarterly report; Control device requirements	Y	
40 CFR 61.357(d)(7)(iv)(A)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Quarterly report; Control device requirements; Thermal Oxidizer	Y	
40 CFR 61.357(d)(7)(iv)(I)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Quarterly report; Control device requirements; Carbon Adsorption	Y	
40 CFR 61.357(d)(8)	Reporting Requirements: Facilities with 10 Mg/yr or more total benzene in waste; Annual Report Summarizing Inspection Findings	Y	
NESHAPS Title 40 Part 63 Subpart A	**General Provisions of MACT Standards (03/16/1994 as amended at 67FR16595, April 5, 2002)**		
40 CFR 63.1(a)(1)	Terms used throughout this part are defined in section 63.2	Y	
40 CFR 63.1(a)(2)	This part contains NESHAPS pursuant to Section 112 of Federal Clean Air Act. These NESHAPS are independent of NESHAPS in 40 CFR 61.	Y	
40 CFR 63.1(a)(3)	Emission standard in this part does not replace a more stringent standard in another rule.	Y	
40 CFR 63.1(a)(6)	Availability of information	Y	
40 CFR 63.1(a)(11)	Submittal postmarked within required timeframe is sufficient.	Y	
40 CFR 63.1(a)(12)	Time periods may be extended if mutually agreed upon, as allowed under 63.9(i)	Y	
40 CFR 63.2	Definitions	Y	
40 CFR 63.4(a)(1)	Sources may not operate in violation, unless an extension or exemption has been obtained	Y	
40 CFR 63.4(a)(2)	Recordkeeping and reporting requirements must be met	Y	
40 CFR 63.4(b)	Circumvention	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
40 CFR 63.4(c)	Severability	Y	
40 CFR 63.5(a)(1)	Construction and Reconstruction	Y	
40 CFR 63.5(a)(2)	Construction and Reconstruction	Y	
40 CFR 63.5(b)(1)	Upon construction or reconstruction, subject to standards for new sources	Y	
40 CFR 63.5(b)(3)	Prior written approval of administrator required before constructing or reconstructing	Y	
40 CFR 63.5(b)(4)	Construction and Reconstruction	Y	
40 CFR 63.5(b)(6)	Equipment added to affected source becomes part of affected source, and is subject to relevant standards for source	Y	
40 CFR 63.5(d)(1)(i)	Application for approval of Construction or Reconstruction	Y	
40 CFR 63.5(d)(1)(ii)	Separate applications for each construction or reconstruction	Y	
40 CFR 63.5(d)(3)	Application for approval of construction	Y	
40 CFR 63.5(d)(4)	Additional information	Y	
40 CFR 63.5(e)	Approval of construction or reconstruction	Y	
40 CFR 63.5(f)(1)	Approval of construction or reconstruction based on prior state pre-construction review	Y	
40 CFR 63.5(f)(2)	Construction and Reconstruction	Y	
40 CFR 63.6(a)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(b)(3)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(e)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(f)(1)	Compliance with non-opacity emission standards - applicability	Y	
40 CFR 63.6(f)(2)(i)	Determine compliance with non-opacity standard based on performance	Y	
40 CFR 63.6(f)(2)(ii)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(f)(2)(iii)(A)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(f)(2)(iii)(B)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(f)(2)(iii)(	Compliance with Standards and Maintenance Requirements	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
C)			
40 CFR 63.6(f)(2)(iv)	Determine compliance by reviewing records, inspections	Y	
40 CFR 63.6(f)(2)(v)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(f)(3)	Finding of compliance	Y	
40 CFR 63.6(g)	Use of alternative non-opacity emission standard	Y	
40 CFR 63.6(h)(1)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(h)(2)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(h)(6)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(i)	Compliance with Standards and Maintenance Requirements	Y	
40 CFR 63.6(j)	Exemption from compliance with emission standard	Y	
40 CFR 63.10(a)	Recordkeeping and reporting - applicability and general information.	Y	
40 CFR 63.10(b)(1)	Keep records for 5 years.	Y	
40 CFR 63.10(b)(2)(i)	Records of startup, shutdown, or malfunction of operation.	Y	
40 CFR 63.10(b)(2)(ii)	Records of malfunction of air pollution control equipment	Y	
40 CFR 63.10(b)(2)(iv)	Record of actions deviating from startup, shutdown, and malfunction plan.	Y	
40 CFR 63.10(b)(2)(v)	Records to determine conformance with startup, shutdown, and malfunction plan.	Y	
40 CFR 63.10(b)(2)(x)	Records of monitoring system calibration checks.	Y	
40 CFR 63.10(b)(2)(xi)	Records of monitoring system adjustments and maintenance.	Y	
40 CFR 63.10(d)(4)	Progress reports for extension of compliance	Y	
40 CFR 63.10(d)(5)(i)	Periodic startup, shutdown, and malfunction reports.	Y	
40 CFR 63.10(d)(5)(ii)	Immediate startup, shutdown, and malfunction reports.	Y	
40 CFR 63.10(f)	Waiver of recordkeeping and reporting requirements	Y	
40 CFR 63.11	Control Device Requirements	Y	
40 CFR 63.12	State Authority and Delegation	Y	
40 CFR 63.13	Addresses of EPA Regional Office	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
40 CFR 63.14	Incorporation by Reference	Y	
40 CFR 63.15	Availability of Information and Confidentiality	Y	
40 CFR 63.7(a)(3)	Administrator may require a performance test	Y	
40 CFR 63.7(d)	Performance testing facilities.	Y	
40 CFR 63.7(e)(1)	Performance Testing Requirements	Y	
40 CFR 63.7(e)(2)	Performance Testing Requirements	Y	
40 CFR 63.7(e)(4)	Performance Testing Requirements	Y	
40 CFR 63.7(h)(1)	Performance Testing Requirements	Y	
40 CFR 63.7(h)(2)	Performance Testing Requirements	Y	
40 CFR 63.7(h)(3)	Performance Testing Requirements	Y	
40 CFR 63.7(h)(5)	Performance Testing Requirements	Y	
40 CFR 63.8(b)(1)	Conducting monitoring	Y	
40 CFR 63.8(b)(3)	Using more than one monitoring system to measure emissions.	Y	
40 CFR 63.8(c)(1)	Monitoring Requirements	Y	
40 CFR 63.8(c)(1)(i)	Permit holder shall keep necessary parts to repair "routine" malfunctions, as identified in malfunction plan, per 63.6(e)(3)	Y	
40 CFR 63.8(c)(1)(iii)	Applicable operation and maintenance procedures	Y	
40 CFR 63.8(c)(2)	Monitoring systems shall measure representative emissions, parameters.	Y	
40 CFR 63.8(c)(3)	Monitors shall be installed prior to, or in conjunction with, performance tests under 63.7	Y	
40 CFR 63.8(f)(1)	Use of alternative monitoring method	Y	
40 CFR 63.8(f)(2)	Administrator may approve alternative monitoring upon written request	Y	
40 CFR 63.8(f)(3)	If administrator has reasonable grounds to dispute results of alternative monitoring, the administrator may require specific monitoring	Y	
40 CFR 63.8(f)(4)(ii)	Monitoring Requirements	Y	
40 CFR 63.8(f)(4)(iv)	Requirements for application for minor changes	Y	
40 CFR 63.8(f)(5)(i)	Monitoring Requirements	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
40 CFR 63.8(f)(5)(ii)	Monitoring Requirements	Y	
40 CFR 63.8(f)(5)(iii)	Monitoring Requirements	Y	
40 CFR 63.9(a)	Notification requirements – applicability and general information	Y	
40 CFR 63.9(b)(4)	Notification Requirements	Y	
40 CFR 63.9(b)(5)	Notification Requirements	Y	
40 CFR 63.9(c)	Notification Requirements	Y	
40 CFR 63.9(d)	Notification Requirements	Y	
40 CFR 63.9(i)	Adjustments to time periods or postmark deadlines for submittal and review of required communications	Y	
NESHAPS Title 40 Part 63 Subpart CC	**NESHAPS for Petroleum Refineries (06/12/1996)**		
40 CFR 63.640(a)	Applicability applies to petroleum refining process units and to related emission points.	Y	
40 CFR 63.640(c)	Applicability and Designation of Affected Source--Includes all emission points at Refinery	Y	
40 CFR 63.640(d)	Applicability and Designation of Affected Source--Exclusions	Y	
40 CFR 63.640(f)	Applicability and Designation of Affected Source	Y	
40 CFR 63.640(g)	Applicability and Designation of Affected Source--Exempt Processes	Y	
40 CFR 63.640(h)	Applicability and Designation of Affected Source--Compliance dates	Y	
40 CFR 63.640(i)	Applicability and Designation of Affected Source--New petroleum refining process unit requirements	Y	
40 CFR 63.640(j)	Applicability and Designation of Affected Source--Changes to existing petroleum refining process units	Y	
40 CFR 63.640(k)	Applicability and Designation of Affected Source--Additional requirements for new or changed sources	Y	
40 CFR 63.640(l)	Applicability and Designation of Affected Source--Additions of equipment (i.e. process vents, storage vessels, etc) in Group 1 sources not subject to 63.640(i) or (k).	Y	
40 CFR 63.640(m)	Applicability and Designation of Affected Source--Changes causing Group 2 emission points to become Group 1 points	Y	
40 CFR 63.640(q)	For overlap of subpart CC with local or State regulations, the permitting authority for the affected source may allow consolidation of the monitoring, recordkeeping, and reporting requirements under this subpart.	Y	
40 CFR 63.641	Definitions: (arranged alphabetically) Group 1 wastewater stream, Group 2 wastewater stream, miscellaneous process vents (specifically	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
	does not include emissions from wastewater collection and conveyance systems).		
40 CFR 63.642	General Standards	Y	
40 CFR 63.642(a)	Apply for a part 70 or part 71 operating permit	Y	
40 CFR 63.642(c)	Table 6 of this subpart specifies the subpart A provisions that apply.	Y	
40 CFR 63.642(d)	Initial performance tests and compliance determinations shall be required only as specified in this subpart	Y	
40 CFR 63.642(e)	Keep copies of all applicable reports and records for at least 5 years, except as otherwise specified in this subpart.	Y	
40 CFR 63.642(f)	All reports required by this subpart shall be sent to the Administrator	Y	
40 CFR 63.642(i)	Existing source owners/operators shall demonstrate compliance with (g) by following procedures in (k) or by following emission averaging compliance approach in (l) for specified emission points and the procedures in (k) for other emission points.	Y	
40 CFR 63.642(k)	Existing source owners/operators may comply, and new sources owners/operators shall comply with the wastewater provisions in 63.647 and comply with 63.654 and is exempt from (g)	Y	
40 CFR 63.647(a)	Wastewater Provisions	Y	
40 CFR 63.647(b)	Wastewater Provisions	Y	
40 CFR 63.647(c)	Wastewater Provisions	Y	
40 CFR 63.654(a)	Semi-Annual Reporting and Recordkeeping Requirements	Y	
40 CFR 63.654(e)	Semi-Annual Reporting and Recordkeeping Requirements	Y	
40 CFR 63.654(g)	Periodic Reporting and Recordkeeping Requirements	Y	
40 CFR 63.654(h)	Reporting and Recordkeeping Requirements--Other reports	Y	
40 CFR 63.654(i)	Reporting and Recordkeeping Requirements--Recordkeeping	Y	
Appendix Table 1	Hazardous Air Pollutants	Y	
Appendix Table 6	Hazardous Air Pollutants	Y	
NESHAPS Title 40 Part 63 Subpart UUU	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units**	**Y**	**4/11/2005**
63.1561(a)(1)	Applicable to petroleum refineries located at a major source of HAP emissions	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
63.1561(a)(2)	Applicable to a major source of HAPs with potential to emit 10 tpy any single HAP or 25 tpy of any combination of HAPs	Y	
61.1562(a)	Applicable to any new, reconstructed, or existing source at a petroleum refinery	Y	
61.1562(b)	Applicable affected sources include catalytic regenerators, catalytic reforming units, sulfur recovery units, and bypass lines serving affected units	Y	
61.1562(e)	An affected source is existing if it is not new or reconstructed.	Y	
61.1562(f)	Subpart UUU does not apply to:	Y	
61.1562(f)(4)	equipment associated with bypass lines including low leg drains, high point bleed, analyzer vents, open-ended valves or lines, or pressure relief valves needed for safety reasons.	Y	
61.1562(f)(5)	gaseous streams routed to a fuel gas system.	Y	
61.1563(b)	Comply with the emission limitations and work practice standards for existing sources by April 11, 2005.	Y	4/11/2005
61.1562(e)	Meet the notification requirements according to 63.1574 and 40 CFR 60 Part 63 Subpart A.		
BAAQMD Condition #20762			
Part 1	Verify true vapor pressure (8-5-117)	Y	
Part 2	Recordkeeping (8-5-117)	Y	

Table IV – Refinery
Generally Applicable Condition

Applicable Condition	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effecti ve Date
BAAQMD Condition # 19466-4	The owner/operator shall notify the District in writing by fax or email no less than three calendar days in advance of any scheduled startup or shutdown of any process unit and as soon as feasible for any unscheduled startup or shutdown of a process unit, but no later than 48 hours or within the next normal business day after the unscheduled startup/shutdown. The notification shall be sent in writing by fax or email to the Director of Enforcement and Compliance. The requirement is not federally enforceable. [Regulation 2-1-403]	N	
40 CFR 63 Subpart B	**National Emission Standards for Hazardous Air Pollutants for Source Categories: General Provisions; and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Section 112(g) and 112(j); Final Rule**		
63.52	Approved process for new and existing affected sources.	Y	
63.52(a)	Sources subject to section 112(j) as of the section 112(j) deadline	Y	
63.52(a)(1)	Submit an application for Title V permit revision	Y	

Attachment B.1
Section IV Modifications to Refinery-Wide Table – Facility B2626 (Continued)

Table IV – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Applicable Requirement	Regulation Title or Description of	Federally Enforceable (Y/N)	Future Effective Date
63.52(e)	Permit application review	Y	
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b) for Combustion Turbines	Y	12/29/03
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b) for Organic Liquids Distribution	Y	12/29/03
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b) for Site Remediation	Y	12/29/03
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b) for Process Heaters	Y	6/27/04
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b) for Reciprocating Internal Combustion Engines	Y	6/27/04
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b) for Process Heaters (that burn hazardous waste)	Y	11/12/05
63.52(h)	Enhanced monitoring	Y	
63.52(h)(i)	MACT emission limitations	Y	
63.52(h)(i)(1)	Compliance with all requirements applicable to affected sources, including compliance date for affected sources	Y	
63.53	Application content for case-by-case MACT determination	Y	
63.53(a)	Part 1 MACT application	Y	
63.53(b)	Part 2 MACT application	Y	
40 CFR 63 Subpart UUU	**National Emission Standards for Hazardous Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (4/11/02)**	**Y**	Notification by 8/9/02; compliance by 4/11/05
BAAQMD Condition #20620			
Part 1	Requirement to apply to incorporate 40 CFR 63, Subpart UUU (40 CFR 63, Subpart UUU)	N	10/11/04
Part 2	Requirement to submit startup, shutdown, and maintenance plan for catalytic cracking units, catalytic reforming units, and sulfur recovery plants (40 CFR 63.1574(f))	Y	4/11/05

Attachment B.2
Section IV Modifications to Tables A1, A2, A4, and D1 for MACT II, 40 CFR 63 Subpart UUU – Facility B2626

Table IV-A1 and A2
Source-Specific Applicable Requirements
S-1 AND S-2 SULFUR RECOVERY UNITS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
40 CFR Part 63 Subpart A	**MACT General Provisions**		
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional	Y	4/11/05
63.7	Performance Tests	Y	9/8/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications	Y	4/11/05
63.9(e)	Notification of Performance Test	Y	30 days before test
63.9(g)	Notification Requirements for sources with Continuous Monitoring Systems	Y	Simultaneous with notice of performance test
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05
63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
NESHAPS Title 40 Part 63 Subpart UUU	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.**	**Y**	**4/11/2005**
63.1568	Requirements for HAP Emissions from Sulfur Recovery Units	Y	4/11/05
63.1568(a)	Emission Limitations and Work Practice Standards	Y	4/11/05

Table IV-A1 and A2
Source-Specific Applicable Requirements
S-1 AND S-2 SULFUR RECOVERY UNITS

63.1568(a)(1)	Emission limitation options for Sulfur Recovery Units not already subject to NSPS for SO2: 1) Meet NSPS requirements (Option 1); or 2) meet total reduced sulfur emission limits (Option 2).	Y	4/11/05
63.1568(a)(1)(i)	Meet emission limitation of 300 ppmvd of reduced sulfur compounds calculated as SO2 at zero percent O2, for reduction control system without incineration (Option 1).	Y	4/11/05
63.1568(a)(2)	Meet operating limits for Option 1 (units not already subject to NSPS).	Y	4/11/05
63.1568(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate in compliance with the plan	Y	4/11/05
63.1568(b)	Initial Compliance Demonstration with Emission Limitations and Work Practice Standards	Y	4/11/05
63.1568(b)(1)	Install Continuous Monitoring System to measure and record hourly average concentration of reduced sulfur and O2 emissions. Calculate reduced sulfur emissions as SO2, dry basis, at 0% O2 (Option 1).	Y	4/11/05
63.1568(b)(2)	Performance Test: measure concentration of reduced sulfur for a reduction control system without incineration (Option 1), by collecting monitoring data every 15 minutes for 24 consecutive hours.	Y	9/8/05
63.1568(b)(3)	Establish Site Specific Operating Limits.	Y	9/8/05
63.1568(b)(4)	Correct reduced sulfur samples to zero percent O2 with specified equation.	Y	4/11/05
63.1568(b)(5)	Demonstrate Initial Compliance with the 300 ppmvd reduced sulfur limit calculated as SO2 at zero percent O2 by monitoring the hourly average total reduced sulfur emissions over a 24-hour period (Option 1).	Y	9/8/05
63.1568(b)(6)	Demonstrate Initial Compliance with Work Practice Standard by submitting Operation, Maintenance, and Monitoring Plan as part of the Notification of Compliance Status report.	Y	5/11/05
63.1568(b)(7)	Submit Notice of Initial Compliance Status cotaiing the results of the initial compliance demonstration.	Y	5/11/05
63.1568(c)	Continuous Compliance Demonstration with emission limitation and work practice standards	Y	
63.1568(c)(1)	Demonstrate Continuous Compliance with Emission Limitation: maintain 300 ppmvd reduced sulfur emissions calculated as SO2 at zero percent O2 (Option 1) and collect hourly average TRS monitoring data.	Y	4/11/05
63.1568(c)(2)	Demonstrate Continuous Compliance with Work Practice Standard through maintaining records to document conformance with the Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1569	Requirements for HAP Emissions from Bypass Lines	Y	4/11/05

Table IV-A1 and A2
Source-Specific Applicable Requirements
S-1 AND S-2 SULFUR RECOVERY UNITS

63.1569(a)(1)	Meet work practice standards for bypass lines by selecting one of four options.	Y	4/11/05
63.1569(a)(1)(i)	Install an automated system in the bypass line (Option 1)	Y	4/11/05
63.1569(a)(2)	EPA may grant permission to use alternate bypass lines to those specified.		
63.1569(a)(3)	Prepare an Operations, Maintenance, and Operating Plan, and operate at all times in accordance with the Plan.	Y	4/11/05
63.1569(b)	Initial Compliance Demonstration with work practice standards	Y	4/11/05
63.1569(b)(1)	Conduct performance test for automated bypass line (Option 1)	Y	5/11/05
63.1569(b)(2)	Demonstrate initial compliance with work practice standard for bypass line with automated system (Option 1).	Y	4/11/05
63.1569(b)(3)	Demonstrate initial compliance with the work practice standard for automated bypass lines (Option 1) by submitting an Operations, Maintenance, and Monitoring Plan as part of the Notification of Compliance Status report.	Y	5/11/05
63.1569(b)(4)	Submit the Notification of Compliance Status containing the results of the initial compliance demonstration.	Y	5/11/05
63.1569(c)	Demonstrate continuous compliance with the work practice standards for bypass lines.	Y	4/11/05
63.1569(c)(1)	Demonstrate continuous compliance with the work practice standards for automated bypass lines by continuously monitoring and recording whether flow is present in the bypass line, and recording whether the device is operating properly.	Y	4/11/05
63.1569(c)(2)	Demonstrate continuous compliance with the work practice standard for automated bypass lines by complying with the Operation, Maintenance, and Monitoring Plan.	Y	4/11/05
63.1570	General Compliance Requirements	Y	4/11/05
63.1570(a)	Operate in compliance with non-opacity standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05
63.1570(e)	Operate in accordance with SSMP during periods of startup, shutdown, and malfunction	Y	4/11/05

Table IV-A1 and A2
Source-Specific Applicable Requirements
S-1 AND S-2 SULFUR RECOVERY UNITS

63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1571	Performance Tests	Y	4/11/05
63.1571(a)	Conduct Performance Test and submit results no later than 150 days after compliance date	Y	9/8/05
63.1571(a)(1)	For emission limitation or work practice standard where compliance is not demonstrated using performance test, opacity observation, or visible emission observation, conduct initial compliance demonstration within 30 days after compliance date	Y	5/11/05
63.1571(b)	Requirements for Performance Tests	Y	
63.1571(b)(1)	Conduct performance tests in accordance with the requirements of 63.7(e)(1)	Y	9/8/05
63.1571(b)(2)	Except for opacity and visual emissions observations, conduct three separate test runs of at least an hour for each performance test	Y	9/8/05
63.1571(b)(3)	Conduct each performance evaluation in accordance with the requirements of 63.8(e)	Y	9/8/05
63.1571(b)(4)	Do not conduct performance tests during periods of startup, shutdown, or malfunction	Y	9/8/05
63.1571(b)(5)	Arithmetic average of emission rates	Y	9/8/05
63.1571(d)(4)	Adjust process or control device measured values when establishing operating limits for continuous parametric monitoring systems (optional).	Y	9/8/05
63.1571(e)	Changes to Operating limits for continuous parametric monitoring systems (optional)	Y	9/8/05
63.1572	Monitoring installation, operation, and maintenance requirements	Y	4/11/05
63.1572(a)	Monitoring installation, operation, and maintenance requirements for continuous emission monitoring systems.	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05
63.1572(d)(1)	Conduct monitoring at all times source is operating except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1572(d)(2)	Not use data recorded during monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1573	Monitoring Alternatives	Y	4/11/05
63.1573(c)	Automated data compression system (optional)	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	4/11/05

Table IV-A1 and A2
Source-Specific Applicable Requirements
S-1 AND S-2 SULFUR RECOVERY UNITS

63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(2)	Submit notification of intent to conduct performance test 30 days before scheduled (instead of 60 days)	Y	30 days before test
63.1574(a)(3)	Notification of Compliance Status	Y	
63.1574(a)(3)(i)	Submit Notification of Compliance Status for initial compliance demonstration that does not include a performance test, no later than 30 days following completion of initial compliance demonstration	Y	5/11/05
63.1574(a)(3)(ii)	Submit Notification of Compliance Status for initial compliance demonstration that includes a performance test, no later than 150 days after source compliance date	Y	9/8/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Plan	Y	
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	7/31/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05
63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS **is not** used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(1)	Requirement to submit performance test reports	Y	1/31/06
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	7/31/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	7/31/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(b)	Records for continuous emission monitoring systems	Y	4/11/05
63.1576(d)	Records required by Tables 34 and 35 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05

Table IV-A1 and A2
Source-Specific Applicable Requirements
S-1 AND S-2 SULFUR RECOVERY UNITS

63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05
63.1577	Parts of Subpart A General Provisions which apply to this Subpart.	Y	4/11/05

Table IV - A4
Source-Specific Applicable Requirements
FLUID CATALYTIC CRACKING UNIT, CATALYST REGENERATOR
S-5 (R-702)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
40 CFR Part 63 Subpart A	**MACT General Provisions**		
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional	Y	4/11/05
63.7	Performance Tests	Y	9/8/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications	Y	4/11/05
63.9(e)	Notification of Performance Test	Y	30 days before test
63.9(g)	Notification Requirements for sources with Continuous Monitoring Systems	Y	Simultaneous with notice of performance test
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05

Table IV - A4
Source-Specific Applicable Requirements
FLUID CATALYTIC CRACKING UNIT, CATALYST REGENERATOR
S-5 (R-702)

63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
NESHAPS Title 40 Part 63 Subpart UUU	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.**	**Y**	**4/11/2005**
63.1564(a)	Emission Limitations and Work Practice Standards	Y	4/11/05
63.1564(a)(1)	Emission limitation options for Catalytic Cracking Units not already subject to NSPS for PM: 1) Meet NSPS requirements (Option 1); meet PM emission limit (Option 2); meet Nickel lb/hr emission limit (Option 3); or meet Nickel coke burn-off limit (Option 4).	Y	4/11/05
63.1564(a)(1)(ii)	Meet PM emission limit (Option 2)	Y	4/11/05
63.1564(a)(2)	Comply with operating limits to meet emission limitation of 1.0 lb PM/1,000 lbs of coke burn-off in the catalyst regenerator (Option 2)	Y	4/11/05
63.1564(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate in compliance with the plan	Y	4/11/05
63.1564(a)(4)	Emission limitation and operating limits for metal HAP emissions do not apply during periods of planned maintenance preapproved by applicable permitting authority.	Y	4/11/05
63.1564(b)	Initial Compliance Demonstration with Emission Limitations and Work Practice Standards	Y	4/11/05
63.1564(b)(1)	Install Continuous Monitoring System to measure and record the opacity of emissions from each catalyst regenerator vent.	Y	4/11/05
63.1564(b)(2)	Performance Test: measure PM emissions for a unit without a wet scrubber (Option 2). Calculate coke burn-off rate and PM emission rate.	Y	9/8/05
63.1564(b)(3)	Establish Site Specific Operating Limits	Y	9/8/05
63.1564(b)(4)(ii)	Compute PM emission rate (1.0 lb/1,000 lbs) of coke burn-off using Equations 1 and 2 of 63.1564; Compute site-specific opacity operating limit (for units with continuous opacity monitoring systems) using Equation 4 of 63.1564.	Y	9/8/05
63.1564(b)(5)	Demonstrate Initial Compliance with the 1.0 lb PM/1,000 lbs coke burn-off limit (Option 2)	Y	9/8/05

Table IV - A4
Source-Specific Applicable Requirements
FLUID CATALYTIC CRACKING UNIT, CATALYST REGENERATOR
S-5 (R-702)

63.1564(b)(6)	Demonstrate Initial Compliance with Work Practice Standard by submitting Operation, Maintenance, and Monitoring Plan as part of the Notification of Compliance Status report.	Y	5/11/05
63.1564(b)(7)	Submit Notice of Initial Compliance Status containing the results of the initial compliance demonstration.	Y	5/11/05
63.1564(c)	Continuous Compliance Demonstration with emission limitation and work practice standards	Y	
63.1564(c)(1)	Demonstration Continuous Compliance with Emission Limitation: For PM emission limit determine and record daily average coke burn-off rate and hours of operation for catalyst regenerator; use process data to determine the volumetric flow rate; and maintain PM emission rate below 1.0 lb/1,000 lbs of coke burn-off. For site-specific opacity limit collect hourly average continuous opacity monitoring system data and maintain each 6-minute average per 1-hour period below the site-specific limit. For continuous parametric monitoring of electrostatic precipitator, collect hourly and daily average gas flow rate monitoring data and maintain daily average flow rate at or below limit established during performance test. For continuous parametric monitoring of electrostatic precipitator, collect hourly and daily average voltage and secondary current (or total power input) monitoring data and maintain daily average voltage and secondary current at or above the limit established during performance test.	Y	9/8/05
63.1564(c)(2)	Demonstrate Continuous Compliance with Work Practice Standard through maintaining records to document conformance with the Operation, Maintenance, and Monitoring Plan.	Y	4/11/05
63.1565	Requirements for Organic HAP Emissions from Catalytic Cracking Units	Y	4/11/05
63.1565(a)	Emission Limitations and Work Practice Standards	Y	4/11/05
63.1565(a)(1)	Emission limitation options for Catalytic Cracking Units not already subject to NSPS for CO: 1) Meet NSPS requirements (Option 1); or 2) meet CO emission limit (Option 2).	Y	4/11/05
63.1565(a)(1)(i)	Meet CO emission limit (Option 1).	Y	4/11/05
63.1565(a)(2)	Meet operating limits for Option 1 (units not already subject to NSPS).	Y	4/11/05
63.1565(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate in compliance with the plan.	Y	4/11/05
63.1565(a)(4)	Emission limitation and operating limits for organic HAP emissions do not apply during periods of planned maintenance preapproved by applicable permitting authority.	Y	4/11/05

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63.1565(b)	Initial Compliance Demonstration with Emission Limitations and Work Practice Standards	Y	4/11/05
63.1565(b)(1)	Install Continuous Monitoring System	Y	4/11/05
63.1565(b)(1)(ii)	For catalytic cracking units not already subject to the CO NSPS: continuous monitoring emission monitoring or continuous parameter monitoring is not required if emissions are vented to a boiler or process heater with a design heat input capacity of at least 44 MW.	Y	4/11/05
63.1565(b)(1)(iii)	For catalytic cracking units not already subject to the CO NSPS: continuous monitoring emission monitoring or continuous parameter monitoring is not required if emissions are vented to a boiler or process heater in which all emissions are introduced into the flame zone.	Y	4/11/05
63.1565(b)(2)	Performance Test not required because emissions vented (into flame zone) of a boiler or process heater with a design heat input capacity of at least 44 MW.	Y	9/8/05
63.1565(b)(3)	Establish Site Specific Operating Limits.	Y	9/8/05
63.1565(b)(4)	Demonstrate Initial Compliance with the hourly average CO emissions over the 24-hour period for the initial performance not more than 500 ppmv (dry) for units with continuous CO emission monitoring systems.	Y	9/8/05
63.1565(b)(5)	Demonstrate Initial Compliance with Work Practice Standard by submitting Operation, Maintenance, and Monitoring Plan as part of the Notification of Compliance Status report.	Y	5/11/05
63.1565(b)(6)	Submit Notice of Initial Compliance Status containing the results of the initial compliance demonstration.	Y	5/11/05
63.1565(c)	Continuous Compliance Demonstration with emission limitation and work practice standards		
63.1565(c)(1)	Demonstrate Continuous Compliance with Emission Limitation: collect hour average CO monitoring data and hourly average CO concentration at or below 500 ppmv (dry basis)	Y	4/11/05
63.1565(c)(2)	Demonstrate Continuous Compliance with Work Practice Standard through maintaining records to document conformance with the Operation, Maintenance, and Monitoring Plan.	Y	4/11/05
63.1569	Requirements for HAP Emissions from Bypass Lines	Y	4/11/05
63.1569(a)(1)	Meet work practice standards for bypass lines by selecting one of four options.	Y	4/11/05
63.1569(a)(1)(i)	Install an automated system in the bypass line (Option 1)	Y	4/11/05

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63.1569(a)(2)	EPA may grant permission to use alternate bypass lines to those specified.		
63.1569(a)(3)	Prepare an Operations, Maintenance, and Operating Plan, and operate at all times in accordance with the Plan.	Y	4/11/05
63.1569(b)	Initial Compliance Demonstration with work practice standards	Y	4/11/05
63.1569(b)(1)	Conduct performance test for automated bypass line (Option 1)	Y	5/11/05
63.1569(b)(2)	Demonstrate initial compliance with work practice standard for bypass line with automated system (Option 1).	Y	4/11/05
63.1569(b)(3)	Demonstrate initial compliance with the work practice standard for automated bypass lines (Option 1) by submitting an Operations, Maintenance, and Monitoring Plan as part of the Notification of Compliance Status report.	Y	5/11/05
63.1569(b)(4)	Submit the Notification of Compliance Status containing the results of the initial compliance demonstration.	Y	5/11/05
63.1569(c)	Demonstrate continuous compliance with the work practice standards for bypass lines.	Y	4/11/05
63.1569(c)(1)	Demonstrate continuous compliance with the work practice standards for automated bypass lines by continuously monitoring and recording whether flow is present in the bypass line, and recording whether the device is operating properly.	Y	4/11/05
63.1569(c)(2)	Demonstrate continuous compliance with the work practice standard for automated bypass lines by complying with the Operation, Maintenance, and Monitoring Plan.	Y	4/11/05
63.1570	General Compliance Requirements	Y	4/11/05
63.1570(a)	Operate in compliance with non-opacity standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)	Y	4/11/05
63.1570(b)	Operate in compliance with the opacity limits at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(h)(1).	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05

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63.1570(e)	Operate in accordance with SSMP during periods of startup, shutdown, and malfunction	Y	4/11/05
63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1571	Performance Tests	Y	
63.1571(a)	Conduct Performance Test and submit results no later than 150 days after compliance date	Y	9/8/05
63.1571(a)(1)	For emission limitation or work practice standard where compliance is not demonstrated using performance test, opacity observation, or visible emission observation, conduct initial compliance demonstration within 30 days after compliance date	Y	5/11/05
63.1571(b)	Requirements for Performance Tests	Y	
63.1571(b)(1)	Conduct performance tests in accordance with the requirements of 63.7(e)(1)	Y	9/8/05
63.1571(b)(2)	Except for opacity and visual emissions observations, conduct three separate test runs of at least an hour for each performance test	Y	9/8/05
63.1571(b)(3)	Conduct each performance evaluation in accordance with the requirements of 63.8(e)	Y	9/8/05
63.1571(b)(4)	Do not conduct performance tests during periods of startup, shutdown, or malfunction	Y	9/8/05
63.1571(b)(5)	Arithmetic average of emission rates	Y	9/8/05
63.1565(d)	Adjustment of process or control device measured values when establishing an operating limit.		
63.1571(d)(4)	Adjust process or control device measured values when establishing operating limits for continuous parametric monitoring systems (optional).	Y	9/8/05
63.1571(e)	Changes to Operating limits for continuous parametric monitoring systems (optional)	Y	9/8/05
63.1572	Monitoring installation, operation, and maintenance requirements	Y	
63.1572(a)	Monitoring installation, operation, and maintenance requirements for continuous emission monitoring systems.	Y	4/11/05
63.1572(b)	Monitoring installation, operation, and maintenance requirements for continuous opacity monitoring systems.	Y	4/11/05
63.1572(c)	Monitoring installation, operation, and maintenance requirements for continuous parameter monitoring systems.	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05

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63.1572(d)(1)	Conduct monitoring at all times source is operating except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1572(d)(2)	Not use data recorded during monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1573	Monitoring Alternatives	Y	
63.1573(c)	Automated data compression system (optional)	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	4/11/05
63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(2)	Submit notification of intent to conduct performance test 30 days before scheduled (instead of 60 days)	Y	30 days before test
63.1574(a)(3)	Notification of Compliance Status	Y	
63.1574(a)(3)(i)	Submit Notification of Compliance Status for initial compliance demonstration that does not include a performance test, no later than 30 days following completion of initial compliance demonstration	Y	5/11/05
63.1574(a)(3)(ii)	Submit Notification of Compliance Status for initial compliance demonstration that includes a performance test, no later than 150 days after source compliance date	Y	9/8/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Plan	Y	
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	7/31/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05
63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS **is not** used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(e)	Where CEM or COMS is used	Y	7/31/05

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63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(1)	Requirement to submit performance test reports	Y	1/31/06
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	7/31/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	7/31/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(b)	Records for continuous emission monitoring systems	Y	4/11/05
63.1576(d)	Records required by Tables 6, 7, 13, and 14 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05
63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05
63.1577	Parts of Subpart A General Provisions which apply to this Subpart.	Y	4/11/05

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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
40 CFR Part 63 Subpart A	**MACT General Provisions**		
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional	Y	4/11/05
63.7	Performance Tests	Y	9/8/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications	Y	4/11/05
63.9(e)	Notification of Performance Test	Y	30 days before test
63.9(g)	Notification Requirements for sources with Continuous Monitoring Systems	Y	Simultaneous with notice of performance test
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05
63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
NESHAPS Title 40 Part 63 Subpart UUU	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.**	**Y**	**4/11/2005**

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63.1566	Requirements for Organic HAP Emissions from Catalytic Reforming Units	Y	4/11/05
63.1566(a)	Emission Limitations and Work Practice Standards	Y	4/11/05
63.1566(a)(1)	Meet organic HAP emission limitation, by either venting to a flare (Option 1), or to a control device to meet a 98% TOC percent reduction standard or 20 ppmvd concentration limit at 3% O2 (Option 2).	Y	4/11/05
63.1566(a)(1)(i)	Vent emissions to a flare meeting the control device requirements in 63.11(b) (Option 1)	Y	4/11/05
63.1566(a)(2)	Ensure flare pilot light is lit at all times and flare operated at all times that emissions are vented to it.	Y	4/11/05
63.1566(a)(3)	Emission limitations apply to emissions that occur during depressuring and purging operations, when reactor vent pressure is greater than 5 psig.	Y	4/11/05
63.1566(a)(4)	Emission limitations do not apply to emissions that occur during depressuring and purging operations when reactor pressure is 5 psig or less.	Y	4/11/05
63.1566(a)(5)	Prepare Operation, Maintenance, and Monitoring Plan and operate in compliance with the plan	Y	4/11/05
63.1566(b)	Initial Compliance Demonstration	Y	4/11/05
63.1566(b)(1)	Install, operate, and maintain a monitoring device to continuously detect the presence of a pilot flame.	Y	4/11/05
63.1566(b)(2)	Conduct performance test for venting to a flare.	Y	9/8/05
63.1566(b)(3)	Establish operating limits for flares based on procedures in Table 18.	Y	9/8/05
63.1566(b)(6)	TOC performance test is not required if emissions are vented to a flare, vented to combustion device greater than 44MW, or emissions vented into the flame zone.	Y	4/11/05
63.1566(b)(7)	Demonstrate initial compliance by ensuring visible emissions from flares do not exceed a total of 5 minutes during any consecutive 2 hour period.	Y	9/8/05
63.1566(b)(8)	Demonstrate initial compliance with work practice standards.	Y	9/8/05
63.1566(b)(9)	Submit Notification of Compliance Status with results of the intial compliance demonstration.	Y	5/11/05
63.1566(c)(1)	Demonstrate continuous compliance with each emission limit	Y	4/11/05
63.1566(c)(2)	Demonstrate continuous compliance with work practice standards	Y	4/11/05
63.1567	Requirements for Inorganic HAP Emissions from Catalytic Reforming Units	Y	4/11/05
63.1567(a)	Emission Limitations and Work Practice Standards	Y	4/11/05

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63.1567(a)(1)	Emission Limitations for Hydrogen Chloride (HCl) during coke burn-off and catalyst rejuvenation using wet scrubber: Reduce uncontrolled HCl emissions by 97% or to a concentration of 10 ppmvd corrected to 3%O_2 (Table 22 Item 2)	Y	4/11/05
63.1567(a)(2)	Operating limits for daily average pH of water and average liquid-to-gas ratio exiting wet scrubber during coke burn-off and catalyst rejuvenation: daily average pH of scrubbing liquid not fall below the limit established during performance test; daily average liquid-to-gas ratio not to fall below the limit established during performance test (Table 23 Item 1.a)	Y	9/8/05
63.1567(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate in compliance with the plan	Y	5/11/05
63.1567(b)	Initial Compliance Demonstration	Y	
63.1567(b)(1)	Install Continuous Parameter Monitoring System to record pH of water and liquid and gas flow rate to scrubber (Table 24, Item 1)	Y	4/11/05
63.1567(b)(2)	Performance Test: measure HCl concentration at the outlet (for the concentration standard) or at the inlet and outlet (for the percent reduction standard) of the scrubber (Table 25, Item 1.a)	Y	9/8/05
63.1567(b)(3)	Establish Operating Limit: measure and record pH of scrubbing liquid and gas and liquid flow rate every 15 minutes during the performance test. Determine hourly average. (Table 25, Items 1.b and 1.c)	Y	9/8/05
63.1567(b)(4)	Demonstrate Initial Compliance with Emission Limitations: reduce HCl concentration by 97% or to 10 ppmv (Table 26, Item 2)	Y	9/8/05
63.1567(b)(5)	Demonstrate Initial Compliance with Work Practice Standard by submitting Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1567(b)(6)	Submit Notice of Initial Compliance Status	Y	5/11/05
63.1567(c)	Continuous Compliance Demonstration	Y	
63.1567(c)(1)	Demonstrate Continuous Compliance with Emission Limitation: maintain 97% control efficiency or 10 ppmv HCl concentration (Table 27, Item 2) and collect hourly and daily pH monitoring data and hourly average liquid-to-gas ratio, and maintain both above the operating limit established during performance test (Table 28, Items 1.a and 1.b)	Y	9/8/05
63.1567(c)(2)	Demonstrate Continuous Compliance with Work Practice Standard through maintaining records to document conformance with the Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1570	General Compliance Requirements	Y	4/11/05

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63.1570(a)	Operate in compliance with non-opacity standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05
63.1570(e)	Operate in accordance with SSMP during periods of startup, shutdown, and malfunction	Y	4/11/05
63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1571	Performance Tests	Y	4/11/05
63.1571(a)	Conduct Performance Test and submit results no later than 150 days after compliance date	Y	9/8/05
63.1571(a)(1)	For emission limitation or work practice standard where compliance not demonstrated using performance test, opacity observation, or visible emission observation, conduct initial compliance demonstration within 30 days after compliance date	Y	5/11/05
63.1571(b)	Requirements for Performance Tests	Y	
63.1571(b)(1)	Conduct performance tests in accordance with the requirements of 63.7(e)(1)	Y	9/8/05
63.1571(b)(2)	Except for opacity and visual emissions observations, conduct three separate test runs of at least an hour for each performance test	Y	9/8/05
63.1571(b)(3	Conduct each performance evaluation in accordance with the requirements of 63.8(e)	Y	9/8/05
63.1571(b)(4)	Performance tests not conducted during periods of startup, shutdown, or malfunction	Y	9/8/05
63.1571(b)(5)	Arithmetic average of emission rates	Y	9/8/05
63.1571(c)	Procedures for an Engineering Assessment (optional in lieu of performance test)	Y	5/11/05
63.1571(d)(4)	Adjust process or control device measured values when establishing operating limit (optional)	Y	9/8/05
63.1571(e)	Changes to Operating limits (optional)	Y	9/8/05

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63.1572	Monitoring installation, operation, and maintenance requirements	Y	4/11/05
63.1572(c)	Continuous parameter monitoring requirements	Y	4/11/05
63.1572(c)(1)	Locate the air flow and liquid flow sensors and other necessary equipment that provides representative flow; use flow rate sensor with ±5% accuracy; reduce abnormal conditions due to up/down stream disturbances; conduct semiannual calibration (Table 41, Item 3); and locate pH sensor in a position that provides a representative measurement; ensure the sample is properly mixed and representative; check calibration every 8 hours; inspect all components; record inspection results (Table 41, Item 5)	Y	4/11/05
63.1572(c)(2)	Complete a minimum of one cycle for each 15-minute period; four cycles of operation for a valid hour of data	Y	4/11/05
63.1572(c)(3)	Valid hourly data at least 75% of process operating hours	Y	4/11/05
63.1572(c)(4)	Determine and record hourly and daily average of all recorded readings	Y	4/11/05
63.1572(c)(5)	Record results of inspection, calibration, and validation check	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05
63.1572(d)(1)	Conduct monitoring at all times source is operating except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1572(d)(2)	Not use data recorded during monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1573	Monitoring Alternatives	Y	4/11/05
63.1573(b)	Alternatives for monitoring for pH (Table 41, Item 5) (optional)	Y	4/11/05
63.1573(c)	Automated data compression system (optional)	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	4/11/05
63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(2)	Submit notification of intent to conduct performance test 30 days before scheduled (instead of 60 days)	Y	30 days before test
63.1574(a)(3)	Notification of Compliance Status	Y	
63.1574(a)(3)(i)	Submit Notification of Compliance Status for initial compliance demonstration that does not include a performance test, no later than 30 days following completion of initial compliance demonstration	Y	5/11/05

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63.1574(a)(3)(ii)	Submit Notification of Compliance Status for initial compliance demonstration that includes a performance test, no later than 150 days after source compliance date	Y	9/8/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	7/31/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05
63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS **is not** used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(1)	Requirement to submit performance test reports	Y	1/31/06
63.1575(f)(2)	Submittal of requested change in the applicability of an emission standard	Y	7/31/05
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	7/31/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	7/31/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(c)	Record of visible emissions observations	Y	4/11/05
63.1576(d)	Records required by Tables 20, 21, 27, and 28 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05
63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05
63.1577	Parts of Subpart A General Provisions which apply to this Subpart.	Y	4/11/05

Attachment B.2
Section IV Modifications to Tables A1, A2, A4, and D1 for
MACT II, 40 CFR 63 Subpart UUU – Facility B2626 (continued)

Attachment B.3
Section IV New Table J42 for Exempt Spheres – Facility B2626

Table IV – J42
Source-Specific Applicable Requirements
EXEMPT LPG SPHERES VENTED TO FUEL GAS SYSTEM
TK-1721, TK-1722, TK-1723, TK-1724, TK-1725, TK-1726

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD · Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (11/27/02) REQUIREMENTS FOR PRESSURE TANKS**		
8-5-111	Limited Exemption, Tank Removal From and Return to Service	Y	
8-5-111.1	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO	Y	
8-5-111.1.1	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO; 3 day prior notification	Y	
8-5-111.1.2	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO; Telephone notification	Y	
8-5-111.2	Limited Exemption, Tank Removal From and Return to Service; Compliance before notification	Y	
8-5-111.4	Limited Exemption, Tank Removal From and Return to Service; Use of vapor recovery	Y	
8-5-111.5	Limited Exemption, Tank Removal From and Return to Service; Minimization of emissions	Y	
8-5-111.6	Limited Exemption, Tank Removal From and Return to Service; Written notice of completion not required	Y	
8-5-111.7	Limited Exemption, Tank Removal From and Return to Service; Compliance with Section 8-5-328	Y	
8-5-112	Limited Exemption, Tanks in Operation	Y	
8-5-112.1	Limited Exemption, Tanks in Operation; Notice to the APCO	Y	
8-5-112.1.1	Limited Exemption, Tanks in Operation; Notice to the APCO; 3 day prior notification	Y	
8-5-112.1.2	Limited Exemption, Tanks in Operation; Notice to the APCO; Telephone notification	Y	
8-5-112.2	Limited Exemption, Tanks in Operation; Compliance and certification before commencement of work	Y	
8-5-112.3	Limited Exemption, Tanks in Operation; No product movement; minimization of emissions	Y	
8-5-112.4	Limited Exemption, Tanks in Operation; Exemption does not exceed 7 days	Y	
8-5-301	Storage Tank Control Requirements (internal floating roof, external floating roof, or approved emission control system)	Y	
8-5-303	Requirements for Pressure Vacuum Valves	Y	
8-5-303.1	Requirements for Pressure Vacuum Valves; Set pressure	Y	
8-5-303.2	Requirements for Pressure Vacuum Valves; Installation, maintenance, operation	Y	
8-5-307	Requirements for Pressure Tanks and Blanketed Tanks	Y	
8-5-328	Tank Degassing Requirements	Y	
8-5-328.1	Tank Degassing Requirements; Tanks > 75 cubic meters	Y	

Attachment B.2
Section IV New Table J42 for Exempt Spheres – Facility B2626 (Continued)

Table IV – J42
Source-Specific Applicable Requirements
EXEMPT LPG SPHERES VENTED TO FUEL GAS SYSTEM
TK-1721, TK-1722, TK-1723, TK-1724, TK-1725, TK-1726

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-5-328.1.2	Tank Degassing Requirements; Tanks > 75 cubic meters; Concentration of <10,000 ppm as methane after degassing	Y	
8-5-328.2	Tank degassing requirements; Ozone excess day prohibition	Y	
8-5-403	Inspection Requirements for Pressure Vacuum Valves	Y	
8-5-404	Certification	Y	
8-5-501	Records	Y	
8-5-501.1	Records; Type and amounts of liquid; blanket gas; true vapor pressure; Retain 24 months	Y	
8-5-503	Portable hydrocarbon detector	Y	
8-5-602	Analysis of Samples, True Vapor Pressure	Y	
8-5-604	Determination of Applicability	Y	
8-5-605	Pressure Vacuum Valve Gas Tight Determination	Y	
NESHAPS Title 40 Part 63 Subpart CC	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refining (8/18/95) EXEMPTION FOR TANKS VENTED TO FUEL GAS SYSTEM**		
40 CFR 63.640(c)(2)	Applicability and Designation of Storage Vessels	Y	
40 CFR 63.640(d)(5)	Exemption for emission points routed to fuel gas system	Y	

Attachment C
Comments on Permit for Facility B2626 – Section VI

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale
1.	4/14/04	NEW	VI	S1026	10574, Part 12 and FUGITIVES introduction	Correct "S1025" to "S1026"	Correct error in source number. The C5/C6 Splitter is S-1026, not S-1025.
2.	4/14/04	NEW	VI	S150, S194, S195, S199, S200, S131 S197, S198	11879, Parts 4 & 7 11882, Part 4 11888, Parts 4 & 7 13319, Part 4	Part 4: "The Owner/Operator shall maintain the oxidation temperature of A-57 Thermal Oxidizer at or above 1400 degrees Fahrenheit (minimum temperature) as averaged over any consecutive 3 hour period. ~~This minimum temperature may be adjusted by the District~~ If source test data demonstrate that an alternate temperature is necessary to maintain compliance with Part 3, the Owner/Operator shall maintain the oxidation temperature at or above the minimum temperature limit averaged over any consecutive 3 hour period, as determined by the source test." Part 7: Delete	A-57 abates organic emissions from wastewater equipment subject to 40 CFR 61 Subpart FF. Per 40 CFR 61.355(i)(3), an existing applicable requirement in the Title V permit, compliance of a control device and parameter to be monitored (i.e., temperature) is based on an averaging period determined by source test.
3.	4/14/04	NEW	VI	S1007, S1014, S1012	18043, Parts 2 and 3	Delete permit condition 18043, parts 2 and 3 with the following explanations: Part 2 Deleted. [Basis: Inspection and Maintenance program is covered by Regulation 8, Rule 18.] Part 3: Deleted. [Basis: Maximum leak concentrations are covered by Regulation 8, Rule 18.]	Similar permit conditions have consistently been deleted from this permit for the reasons stated. For example, 9296, parts A2, A3, B7, B8, C3, and C4. These conditions require implementation of a fugitive monitoring program and specify fugitive emissions limits, which are covered by Regulation 8, Rule 18. If they are not deleted, delete "no later than 7 days" in Part 3 to allow for Reg 8-18 alternatives.

Attachment C
Comments on Permit for Facility B2626 – Section VI (Continued)

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale
4.	4/14/04	NEW	VI	S1030, S1031, S1032, S1033	19177, Part 18(a)	Renumber condition to reflect 18(a)(1) and 18(a)(2) in the recently released ATC for the Phase II extension dated November 10, 2003. Add new language for 18(a)(2) for lower NOx limit based on reassessment of BACT for Phase II.	Provides consistency with modifications made to this condition in the November 10, 2003 Authority to Construct extension for Phase II construction and operation.
5.	4/14/04	NEW	VI	S1030, S1031, S1032, S1033	19177, Part 18(d)	Delete language past first sentence. The operation of the gas turbine (S1030) alone on natural gas should be allowed.	Retesting of the gas turbine alone on natural gas in December 2003 demonstrated compliance with POC limits, therefore the prohibition of operating the gas turbine alone on natural gas should be deleted.
6.	4/14/04	NEW	VI	Multiple	19466, Parts 1, 2c, 6, 8, 9, 10, and 11	Change the requirement for submittal of source test results to BAAQMD from 30 days to 45 days.	Consistent with similar change made to Condition 19466, Part 7 and NOx Box Condition 21233. A full 45-day submittal period is necessary to allow the source test contractor 30 days to prepare the report followed by a two week allowance for Valero review and submittal.
7.	4/14/04	NEW	VI	S237	19466, Part 3	Delete S-237 from permit condition, consistent with Part 7.	S-237 is a refinery fuel gas fired boiler. CAPCOA periodic monitoring guidelines do not recommend visible emissions monitoring for gaseous-fueled combustion equipment. None of Valero's other fuel gas fired heaters and boilers require periodic monitoring for visible emissions in the draft Title V permit. Visible emissions from this source are unlikely, and have not been a problem in the past.
8.	4/14/04 12/1/03	NEW	VI	S11, S160, S233	19466, Part 7	Delete sources from permit condition	S11 vents very infrequently and the designs of the three emission points do not allow for PM source testing per approved methods. A more frequent, monthly visible emissions check (as required by 19466 Part 3) is more practical and cost effective.

Attachment C
Comments on Permit for Facility B2626 – Section VI (Continued)

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale
9.	4/14/04	NEW	VI	S7 S20 S21 S22 S23 S24 S25 S26 S30 S31 S32 S33 S34 S40 S41 S220 S35 S173	19466, Part 10	Delete entire permit condition.	The effective date of April 1, 2004 for Condition 19466, Part 10 conflicts with the effective date of June 1, 2004 for Condition 21233, Parts 7A and 8 which require CO source testing to demonstrate compliance with 9-10-305. Further, the Condition 19466, Part 10 CO source testing requirements are redundant with those in Condition 21233, Part 7A and 8.
10.	12/1/03 9/22/03	No	VI	S40	9296, Parts D8, D9, and D10	Delete conditions.	Conditions are redundant 1. Part D8 CEMS requirement is covered by 9-10-502.1. 2. Part D9 fuel flow meter requirement is covered by 9-10-502.2. 3. Part D10 recordkeeping requirements are covered by 9-10-504 and 40 CFR 60.7(a).

Attachment C
Comments on Permit for Facility B2626 – Section VI (Continued)

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale
11.	12/01/03	No	VI	S220	10574, Part H	Specify that Part H does not apply to S220.	The District's comments on this condition indicate that the requirement to vent process vessels to a control device when depressurizing applies to venting of the furnace tubing. However, it is infeasible to comply with this condition because S220 operates with tubing normally filled with a heavy liquid material that would be drained during a shutdown, not a gaseous material that would be vented as when a vessel is depressurized. Furthermore, this furnace is not a "process vessel" as defined by Regulation 8-10 (Process Vessel Depressurization).
12.	12/1/03 9/22/03	No	VI	S243	18744, Parts 2 through 6	Delete Condition 18744, Parts 2 through 6.	Conditions are redundant with Reg 9-8 requirements.
13.	9/22/03	No	VI	S129	98, All Parts	Delete permit condition.	See Attachment C1 for the rationale for deletion of Condition 98.
14.	9/22/03	No	VI	S21, S22, S220	10574, Part 19	Delete permit condition	Condition 10574, Part 19 is redundant with 9-10-502.2 and should be deleted from the Title V permit. Further, this permit condition has been deleted from applicability Table IV-A10 for S21 and S22 and Attachment B requests its deletion from Table IV-A19 for S220.
15.	9/22/03	No	VI	S150, S199, S200, S131, S194, S195, S197, S198	11879, Part 1 11882, Part 1 11888, Part 1 13319, Part 1	Change the permit condition from: "The emissions of nitrogen oxides (NOx) shall not exceed…" to "The emissions of nitrogen oxides (NOx) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions

Attachment C
Comments on Permit for Facility B2626 – Section VI (Continued)

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale
16.	9/22/03	No	VI	S150, S199, S200, S131, S194, S195, S197, S198	11879, Part 2 11882, Part 2 11888, Part 2 13319, Part 2	Change the permit condition from: "The emissions of carbon monoxide (CO) shall not exceed…" to "The emissions of carbon monoxide (CO) from the A-57 Thermal Oxidizer shall not exceed…"	Clarify source of emissions
17.	9/22/03	No	VI	S240, S241, S242	18748, Parts 2 through 4	Delete Condition 18748, Parts 2 through 4.	Conditions are redundant with Reg 9-8 requirements.
18.	9/22/03	Yes, however, want to reverse this comment by deleting Part 18(c). Part 18(c) was added to the PTO after issuance of the ATC. The PTO, with the new ammonia injection monitoring requirement, was issued after initial source test was conducted and approved by BAAQMD, without determination of correlation for prediction of NH3 slip.	VI	S1030, S1031, S1032, S1033	19177, Part 18(c)	Add new ammonia injection monitoring requirements.	Provides consistency with modifications made to this condition in the July 22, 2003 version of PTO No. 2488 for the Cogen turbine and heat recovery steam generator (S1030 and S1031).

Attachment C
Comments on Permit for Facility B2626 – Section VI (Continued)

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale
19.	9/22/03	Partial Made all requested revisions with the exception of the typographical correction for the addition of CO before S3/S4 furnaces. This change was made correctly in the Section IV tables for these sources and should be corrected in Section VI for consistency.	VI	S3, S4, S21, S22, S23, S25, S30, S31, S32, S33, S220, S40, S41	19466, Part 14	Make the following changes to the permit condition language: 1 Delete "and CO" after NOx. 2 Add "CO" before "Furnaces". 3 Delete S173 and add S33 to the list of Furnaces. 4 Switch "S-40, S-41" with "Steam Generators" for consistency with other source groupings.	Provides consistency between Sections IV and VI of the Title V permit.

Attachment C.1
Permit Condition No. 98 for Crude/Product Dock (S-129)
Proposed Deletion of Permit Conditions for Crude Lightering – Facility B2626

Background:

The BAAQMD granted VOC Emission Reduction Credits (ERC's) to the Exxon Benicia Refinery in 1987, when Exxon Shipping voluntarily controlled VOC emissions from crude lightering operations in SFB, prior to development of a District regulation.

Exxon Shipping generated VOC credits by installing emission controls on board its parent and lighter vessels, with credits to be used for future projects at the Exxon Benicia Refinery. The joint project between the two Exxon affiliates was done in the general interest of Exxon Corporation.

The banked VOC credits were based on lightering ANS crude from an Exxon parent vessel to an Exxon lighter vessel (such as the Galveston and Baytown), in which crude subsequently was delivered to the Exxon Benicia Refinery.

In 1989, the BAAQMD adopted Regulation 8 Rule 46 (Marine Tank Vessel to Marine Tank Vessel Loading), which was modeled after the Exxon permit conditions for crude lightering controls.

ExxonMobil sold the Benicia Refinery to Valero on May 15, 2000, as part of the FTC agreement when Exxon purchased Mobil Oil Corporation and became ExxonMobil. However, the Valero Refinery continued to receive lightered crude from SeaRiver for about one year.

Valero terminated its agreement with SeaRiver (ExxonMobil) to receive lightered crude on June 1, 2001.

SeaRiver and Valero representatives met with BAAQMD Enforcement staff on April 5, 2002 to request elimination of the permit conditions for crude lightering.

The crude lightering permit conditions, which previously had not been linked to any Refinery source, has now been included as Permit Condition No. 98 for the Refinery's Crude/Product Dock (S-129) in the draft Title V permit.

Rationale for Deleting Permit Conditions:

- Permit conditions are only valid when SeaRiver vessels lighter crude to SeaRiver vessels, and deliver that crude to the ExxonMobil Benicia Refinery
- ExxonMobil sold the Benicia Refinery to Valero on May 15, 2000.
- SeaRiver and the Valero Benicia Refinery are now independently owned and operated, with no mutual or joint operating agreements.
- The Valero Benicia Refinery terminated its agreement to receive lightered crude from SeaRiver in June, 2001. The Refinery now receives only unlightered crude in SeaRiver parent vessels.
- Since the Valero Benicia Refinery no longer receives lightered crude from SeaRiver, the lightering permit conditions are no longer relevant, and can be eliminated from the Title V permit.
- BAAQMD Regulation 8 Rule 46, which was patterned after the Exxon permit conditions for crude lightering, provides comparable emission controls, in the event lightered crude is again delivered to the Benicia Refinery.

Attachment D
Comments on Permit for Facility B2626 – Section VII

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
1.	4/14/04	NEW	Refinery	All	VOC	SIP 8-10-301 and BAAQMD 8-10-302	Add rows for SIP and BAAQMD Regulation 8, Rule 10 as shown in Attachment D.1.	BAAQMD Reg 8, Rule 10 was recently modified to include monitoring provisions. Therefore, detailed applicability should be added to Table VII-Refinery wide applicability.
2.	4/14/04	NEW	A6.1	S7 S20 S34	CO	BAAQMD Condition 21233, Part 9	Change Monitoring Frequency from P/A to P/SA.	These sources are subject to semi-annual, not annual CO source testing per Condition 21233 Part 7A.2 (>25 MM Btu/hr).
3.	4/14/04	NEW	A6.1 A6.2	S7 S20 S34 S24 S26 S35	CO	BAAQMD 9-10-305	Delete BAAQMD Condition 19466, Part 10 shown as the second Monitoring Requirement Citation. On the Future Effective Date, delete "for 21233 Part 7A" since it is not necessary to differentiate between two Monitoring Requirement Citations.	See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8.
4.	4/14/04	NEW	A6.1 A6.2 A18	S7 S20 S34 S24 S26 S35 S173	O2	None	In the Monitoring Type description, delete "semiannual" (Table VII-A6.1), "semiannual or annual" (Table VII-A6.2), or "annual" (Table VII-A18).	The monitoring frequencies are already noted in the previous column.
5.	4/14/04	NEW	A6.2	S24 S26 S35	CO	Condition 21233, Part 9	Change the Monitoring Requirement Citation from "P/A" to "P/SA (Note: Part 9 is N/A for S35)".	Corrections provide the correct source testing frequencies for the different duty ratings of these sources.
6.	4/14/04	NEW	A6.2	S35	O2	None	Make a note that Part 4B in the Future Effective Date and Monitoring Requirement Citation columns applies only to S24 and S26 and not to S35.	S35 (F-2906) is a small unit (<25 MM Btu/hr) and is not subject to the O2 limit requirement per Condition 21233, Part 3B or the O2 CEM requirement per revised Condition 21233, Part 2. Therefore it is not necessary to show the NOx Box O2 requirements for this source.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
7.	4/14/04	NEW	A8.1, A9	S16, S18, S19	Opacity	6-301	Add future effective date of June 1, 2004.	For consistency with Section VI future effective date for Condition 19466.
8.	4/14/04	NEW	A8.1, A9	S16, S18, S19	VOC, HAP	None	Delete line beginning with Future Effective Date "12/4/03 (if any >1E6 scf/24hr vent gas flared)".	Flares are already subject to video recording because monitors were installed by January 1, 2003, as documented in line above.
9.	4/14/04	NEW	A8.2	S17	Opacity	BAAQMD 6-301	Replace Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type with None, N, and N/A, respectively.	The S17 Butane Flare is not subject to Permit Condition 20806.
10.	4/14/04	NEW	A10	S21 S22	CO	BAAQMD Condition 10574, Part 32	Replace Condition 19466, Part 10 as the Monitoring Requirement Citation with Condition 21233, Part 8.	See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8.
11.	4/14/04	NEW	A10 A11 A12 A15 A16 A19	S21 S22 S23 S25 S30 S31 S33 S40 S41 S220	CO	BAAQMD 9-10-305	Delete entire row for deletion of BAAQMD Condition 19466, Part 10.	See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8.
12.	4/14/04	NEW	A10 A11 A12 A15 A16 A19	S21 S22 S23 S25 S30 S31 S32 S33 S40 S41 S220	CO	BAAQMD Condition 21233, Part 9	Change Monitoring Requirement Citation from Condition 21233, Part 7A to Part 8. Change Monitoring Frequency from P/A to P/SA.	These sources are subject to semi-annual, not annual CO source testing per Condition 21233 Part 8 (>25 MM Btu/hr with NOx CEMS),

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
13.	4/14/04	NEW	A10, A11, A15	S21 S22 S23 S40	NOx	9-10-301	Delete future effective date of 7/1/02.	Future effective date has passed.
14.	4/14/04	NEW	A15	S40	CO	BAAQMD Condition 9296, Part D3	Replace BAAQMD Condition 19466, Part 10 with Condition 21233, Part 8.	See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8.
15.	4/14/04	NEW	A18	S173	CO	BAAQMD 9-10-305	Delete BAAQMD Condition 19466, Part 10 as one of the Monitoring Requirement Citations.	See Attachment C for discussion regarding deletion of Condition 19466, Part 10 due to redundancy and conflicting effective dates with Condition 21233, Parts 7A and 8.
16.	4/14/04	NEW	A18	S173	O2	None	In the Monitoring Requirement Citation column, delete Part 4B from the Future Effective Date and Monitoring Requirement Citation columns.	S173 (F-902) is a small unit (<25 MM Btu/hr) and is not subject to an O2 limit per Condition 21233, Part 3B. Therefore it is not necessary to show the NOx Box O2 requirements for this source.
17.	4/14/04	NEW	A22.1, A22.2	S1030 S1031 S1032 S1033	NOx	BAAQMD Condition 19177, Part 18(a)	Modify existing row for 18(a) to cite revised numbering to Part 18(a)(1) and add notation that 2.5 ppmv natural gas firing NOx limit applies only to Phase I. Add new row for new Phase II NOx limit of 2.0 ppmv for natural gas firing and 2.5 ppmv for 3-hour transition period from refinery gas to natural gas as defined in Part 18(a)(2).	Provides consistency with modifications made to this condition in the November 10, 2003 Authority to Construct extension for Phase II construction and operation.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
18.	4/14/04 9/22/03	Complete, but reverse the comment to delete Part 18(c). The Part 18(c) ammonia injection monitoring requirement was added to the PTO after issuance of the ATC. The PTO, with the new monitoring requirement, was issued after initial source test was conducted and approved by BAAQMD, without determination of correlation for prediction of NH3 slip. Reverse the requested changes to show Condition 19177, Part 21 initial source as the monitoring method.	A22.1, A22.2	S1030, S1032, S1031, S1033	NH3	Condition 19177, Part 18(c) and 19(e)	1. Change the Monitoring Requirement Citation from Condition 19177, Part 21 to Part 18(c) 2. Change the Monitoring Frequency from P/E to C. 3. Change the Monitoring Type from "Initial source test" to "Ammonia injection rate recording and emission calculations".	Condition 19177, Part 21 initial source testing has been completed. New language added to Condition 19177, 18(c) requires ammonia injection monitoring correlated with source test data as the method to demonstrate ongoing compliance with the NH3 emission limits. Proposed changes provide consistency with modifications to the July 22, 2003 version of PTO No. 2488 for the Cogen turbine and heat recovery steam generator (S1030 and S1031).

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
19.	4/14/04	NEW	A22.2	S1030, S1032, S1031, S1033	NOx	40 CFR 60 Subpart Db 60.44b(e), 60.44b(l)(1)	Delete 60.44b(e) as one of the Citation of Limit references. Delete 60.46b(h)(1) as one of the Monitoring Requirement Citations requiring initial performance testing. Delete 60.46b(h)(2) as the Monitoring Requirement Citation for annual source testing. Delete the annual source testing requirement.	The S1031 and S1033 cogeneration heat recovery steam generators are not subject to the 40 CFR 60.44b(a) or 60.44b(e) NOx limits because they were constructed after 7/9/1997, and therefore, are subject to the 40 CFR 60.44b(l)(1) NOx limit of 0.20 lb/MM Btu. The cogeneration heat recovery steam generators are not subject to 40 CFR 60.44b(j) and therefore, are not subject to the 60.46b(h) performance testing requirements. The cogeneration heat recovery steam generators are not subject to the emission averaging period defined in 40 CFR 60.49b(h)(4) because they each have a heat input capacity greater than 250 million Btu/hr (as referred to in 40 CFR 60.48b(g)(1)).
20.	4/14/04	NEW	B1	S8 S10 S12	Opacity	BAAQMD 6-301	In the Monitoring Frequency column, after "P/M" add the following: "(for S-10 and S-12, when returned to service).	Modify table to reflect the different monitoring frequencies and conditions noted in BAAQMD Condition 19466, Part 3.
21.	4/14/04	NEW	B2	S11	FP	BAAQMD 6-310	In the Monitoring Frequency column, after "P/A" add the following: "starting after ST Plan approved)".	Modify table to reflect the source test plan noted in BAAQMD Condition 19466, Part 7.
22.	4/14/04	NEW	B4	S176	Opacity	BAAQMD 6-301	In the Monitoring Frequency column, change P/M to "P/E when dry salt is added to the tank".	Modify table to reflect the conditions that trigger event-driven source testing as noted in BAAQMD Condition 19466, Part 3.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
23.	4/14/04	NEW	B4	S176	FP	BAAQMD 6-310	In the Monitoring Frequency column, change P/A to P/E.	Modify table to reflect the conditions that trigger event-driven source testing as noted in BAAQMD Condition 19466, Part 7.
24.	4/14/04	NEW	B6	S232	Opacity	BAAQMD 6-301	Replace the Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type with None, N, and N/A, respectively.	This source has been deleted from BAAQMD Condition 19466, Part 3.
25.	4/14/04	NEW	C4	S160	Opacity	BAAQMD 6-301	Change Monitoring Requirement Citation from Condition 19466, part 2c to Condition 19466, Part 3.	Condition Part 2c requires monitoring for 8-2-301. The correct monitoring requirement for 6-301 is Condition 19466, Part 3.
26.	4/14/04 9/22/03	No	D1	S29	All	Entire table	Renumber table from VII-D1 to VII-C5 and move cooling tower S-29 into the Miscellaneous Sources Subsection C.	MOD 4/14/04 New tables VII-D1 through D8 have been added to the permit for process units with permit conditions. There are not two Tables IV-D1 and the table numbers in Section IV and VII do not match (S-29 is IV is D1 but in VII is D). Tables VII-D for S-29 (and IV-D1 for S-29) should be renumbered to avoid confusion in the permit.
27.	4/14/04	NEW	D3, D5, D6, D8	S1007 S1012 S1014 S211	POC	BAAQMD Condition 18043, Part 1	Make the following changes Monitoring Requirement Citation: BAAQMD Regulation 8, Rule 18 Monitoring Frequency: As required Monitoring Type: Method 21 portable hydrocarbon detector	Make the monitoring requirements consistent with other permit conditions that require fugitive emission monitoring per BAAQMD Reg 8, Rule 18.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
28.	4/14/04	NEW	H4.2, H5.2, J36, J37, J39	S150 S194 S195 S199 S200 S131 S197 S198	Outlet Temperature (H4.2 and H5.2) and VOC (J36, J37, J39)	11879, Parts 4 11882, Part 4 11888, Parts 4 13319, Part 4	To the Citation of Limit add the following averaging period language: "averaged over 3-consecutive hours".	A-57 abates organic emissions from wastewater equipment subject to 40 CFR 61 Subpart FF. Per 40 CFR 61.355(i)(3), an existing applicable requirement in the Title V permit, compliance of a control device and parameter to be monitored (i.e., temperature) is based on an averaging period determined by source test.
29.	4/14/04	NEW	I	Components	VOC	BAAQMD Regulation 8, Rule 18 and SIP Regulation 8, Rule 18	Modify monitoring requirements for BAAQMD Reg 8, Rule 18 and add monitoring requirements for new SIP 8-18 as shown in Attachment D.4.	BAAQMD recently adopted new version of Regulation 8, Rule 18 Organic Compounds – Equipment Leaks with new monitoring requirements. SIP version of 8-18 is now different than BAAQMD version, therefore both should be incorporated into permit.
30.	4/14/04 9/22/03	Partial. Did not change for S-207, but made most changes for S-210. Corresponding changes were made in Section IV and VI for S-207. Therefore, the permit is not inconsistent.	J9	S207	Several	Several	Change monitoring requirements for BAAQMD Permit Conditions for S207 as shown in Attachment D.2.	Refinery transitioning from methanol to ethanol for MTBE Phaseout. It is necessary to incorporate these changes to permit conditions at this time to allow operation of the MTBE phaseout project shortly after the planned Title V Permit issue date of 12/1/2003. NEW COMMENT: The changes for the MTBE phaseout project have been made inconsistently in the Title V permit. These changes are necessary for consistency.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
31.	4/14/04 9/22/03	No in Section VII. (NOTE: Corresponding changes have been made in Section IV, therefore, permit is inconsistent)	J11, J12	S87, S88, S89, S91	NA	NA	Change titles of tables as listed below and regroup tanks in Table VII-J11 and J12. New title for J11: Internal Floating Roof Tank with Secondary Seal and Solid Guide Poles; MACT Exempt S-89 (TK-1761) New Title for J12: Internal Floating Roof Tanks with Secondary Seals and Slotted Guidepoles; MACT Exempt S-87, S-88, S90, S-91 (TK-1760, TK-1759, TK-1762, TK-1763)	Tanks in tables VII-J11 and VII-J12 need to be regrouped. S87, S88, S89, S90, S91 are all Internal Floating Roof Tanks with resilient-toroid primary seals and zero-gap secondary seals. Seals in all tanks were installed after 2/1/1993. S87, S88, S90, and S91 have slotted guide poles (table J12) and S89 has solid guide poles (table J11). NEW COMMENT: Changes have been made in Section IV but need to be made in Section VII for consistency.
32.	4/14/04	NEW	J13	S210	POC	BAAQMD Condition 9296, Part 2	Change Monitoring Requirement Citation for BAAQMD Condition 9296 Part 3 from the detailed 8-18 citations to a single reference to 8-18, rolled up.	Listed 8-18 citations are not complete and approach is not consistent with other similar references to BAAQMD 8-18 as the monitoring requirement citation.
33.	4/14/04	NEW	J18	S227	VOC	8-5-306	Change monitoring frequency from "P/A" to "N"	Correct error. Source is not subject to monitoring for 8-5-306 because it is vented to fuel gas recovery system (per SOB).

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
34.	12/01/03	No	A1, A2, A3, A4, A5, A6.1, A6.2, A8.1, A8.2, A9, A10, A11, A12, A13.2, A15, A16, A18, A19, A20, B1, B2, B4, B6, B7, C4	S1, S2, S3, S4, S5, S6, S7, S8, S10, S11, S12, S16, S17, S18, S19, S20, S21, S22, S23, S24, S25, S26, S30, S31, S32, S33, S34, S35, S40, S41, S43, S44, S46, S160, S173, S176, S220, S232, S233, S237	Multiple	BAAQMD Conditions 19466 and 20806	Modify the Permit to include the future effective dates (April 1, 2004 for Condition No. 19466 and June 1, 2004 for Condition No. 20806) in the relevant tables in Section VII.	The future effective dates for Conditions Nos. 19466 and 20806 were not incorporated into the relevant tables in Section VII.
35.	12/01/03	No	A15	S40	O2	None	Change FE to "N"	In the absence of a reference to a specific regulatory limit, there is no federally enforceable O_2 limit provision in this table
36.	12/1/03 9/22/03	No	A23	S243	Hours of Operation	Condition 18744, Part 2	Delete entire row.	Condition 18744, Parts 2 through 6 are redundant with Reg 9, Rule 8.
37.	12/01/03	No	J30	S230	Vapor Pressure	40 CFR 60 NSPS Kb 60.110b(c)	Delete monitoring requirement row	Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68FR59328).

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
38.	12/01/03	No	J30	S230	NA	Title row for 40 CFR 60 NSPS Kb	Change "NSPS Kb" to "NONE" Change "40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels at Petroleum Refineries RECORDKEEPING ONLY" to "40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels (10/15/2003 Exempt per 60.110b(b) [low vapor pressure]."	Source is now exempt from NSPS Kb based on 10/15/2003 changes in applicability and exemptions made to NSPS Kb (68FR59328).
39.	12/01/03	No	J41	S208	NA	NA	Add row: NONE 40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels (10/15/2003). Exempt per 60.110b(a)(1) [capacity < 75 cu m]	Source is no longer subject to NSPS Kb based on 10/15/2003 changes to NSPS Kb (68FR59328) that deleted recordkeeping requirements
40.	9/22/03	No	A8.2	S17	None	None	Change table title from "Flares" to "Butane Flare"	Editorial correction.
41.	9/22/03	No. Changed the FE to "Y". Should be changed because there is no O2 limit.	A15	S40	O2	None	Delete "N" as FE status.	Editorial correction.
42.	9/22/03	No. This change should be made because S173 is not included in 19466, Part 14 because it does not have a NOx CEM.	A18	S173	NOx	9-10-303	Delete Condition 19466, Part 14 from Monitoring Requirement Citation.	Consistent with deletion of Condition 19466, Part 14 from Section IV for this source.
43.	9/22/03	No	A18, A19	S173, S220	CO	9-10-305	Delete BAAQMD Regulation 9-10-502 from Monitoring Requirement Citation.	Consistent with similar change made throughout Section VII of the BAAQMD draft permit for sources subject to Condition 19466, Part 10.

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
44.	9/22/03	No.	A20	S237	Opacity, PM	6-301, Condition 16027, Part 10	1. Delete "Condition 19466, Part 3" as the Monitoring Requirement Citation and replace with "None". 2. Delete "P/M" as the Monitoring Frequency and replace with "N". 3. Delete "Visible Inspections" as the Monitoring Type and replace with "N/A". 4. Delete entire row for PM with Condition 19466, Part 10 as the Limit and Condition 19466, Part 3 as the Monitoring Requirement Citation.	S237 is a refinery fuel gas fired boiler. CAPCOA periodic monitoring guidelines do not recommend visible emissions monitoring for gaseous-fueled combustion equipment. None of Valero's other fuel gas fired heaters and boilers require periodic monitoring for visible emissions in the Title V permit. Visible emissions from this source are unlikely, and have not been a problem in the past.
45.	9/22/03	No	A21	S240, S241, S242	Hours of Operation	Condition 18748, Part 2	Delete entire row.	Condition 18748, Parts 2 through 4 are redundant with Reg 9, Rule 8.
46.	9/22/03	No	A21	S240, S241, S242	Hours of Operation	9-8-330.2	Delete entire row.	Condition 18748, Parts 2 through 4 are redundant with Reg 9, Rule 8.
47.	9/22/03	No. Added the shield, but did not make these changes in Section VII	A22.1	S1030, S1032	Sulfur	40 CFR 60, Subpart GG 60.333(b)	1. Change Monitoring Requirement Citation back from 60.334(b)(2) to 60.335(d) because the latter contains the use of the daily grab sample as ASTM Method to determine fuel sulfur content. 2. Add ASTM Method D 3246 81 back as the Monitoring Type with "Initial" to indicate that this is the method that was used for initial compliance demonstration. 3. Add "and Condition 19177, Part 35" after 60.335(d) as the Monitoring Requirement Citation.	See Table IX-B-10.1 comments for shielding the Subpart GG initial compliance method with Condition 19177, Part 35 which requires a TRS CEM on fuel gas.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
48.	9/22/03	No	A23	S243	Hours of Operation	9-8-330.2	Delete entire row.	Condition 18744, Parts 2 through 6 are redundant with Reg 9, Rule 8.
49.	9/22/03	No. There are still two Table IV-C4's for different sources.	C4.1, C4.2	S160, S167, S168	Multiple	Entire table	1. Number Table VII-C4.1 for S160 Seal Oil Sparger. 2. Number Table VII-C4.2 for S167 and S168 Seal Oil Spargers.	Provides consistency with table numbering in Section IV of the Title V permit.
50.	9/22/03	No	F	S129	Multiple	Condition 98	Delete rows with Condition 98 limits and monitoring requirements.	See Attachment C.1 for rationale for deletion of Condition 98.
51.	9/22/03	No. This was an editorial change	J1, J2, J3, J4, J5, J6, J7, J8, J9, J10, J11, J12, J13, J32, J33, J34, J35	S57, S58-64, S66-68, S72-S80, S81-85, S86-92, S97, S101, S103-S105, S112, S163, S207, S210	VOC	None (Limit: Certification reports)	1. Change Limit to "Certification reports on tank inspections" 2. Change Monitoring Frequency to "P/E within 60 days after tank inspection"	1. Delete reference to "source test" because floating roof tanks are not subject to any source tests that require reporting under 8-5-404. 2. Clarify required frequency for floating roof tank inspection reports.
52.	9/22/03	No	J7	S97		New	Add header row for BAAQMD Permit Conditions and add the following: Type of Limit: LEAVE BLANK FE Y/N: Y Citation of Limit: LEAVE BLANK Monitoring Requirement Citation: BAAQMD Condition 10633, Part 1 Monitoring Frequency: P/D Monitoring Type: Record	Add monitoring requirement for permit condition 10633, Part 1, but do not cite the throughput in Table IIA as the limit because under Reg 2, Rule 6, the BAAQMD does not provide authority for applying fuel flow monitoring requirements on the Table IIA annual throughput limits for these grandfathered sources.

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
53.	9/22/03	Partial. Change made only in Tables J14, J38, J41 Change still needs to be made in J40 (S205, S206)	J14, J21, J22, J23, J25, J26, J38, J40, J41	S55, S108, S110, S113-115, S117, S120, S122, S123, S170, S171, S180, S193, S196, S205, S206, S208, S234, S235, S239	VOC	BAAQMD Regulation 8-5-117	Delete this monitoring requirement (BAAQMD 8-5-117)	Tank is not subject to the low vapor pressure exemption of 8-5-117

Attachment D
Comments on Permit for Facility B2626 – Section VII (Continued)

Line	Date	4/14/04 Status	Permit Location	Sources	Limit Type	Limit Citation	Proposed Change	Rationale
54.	9/22/03	No. Result is that some tanks have 8-5-604 monitoring requirement and some tanks do not. Therefore the permit is inconsistent	J17, J21, J22, J23, J24, J25, J26, J27, J28, J36, J37, J39	S108, S110, S113-115, S117, S120, S122, S123, S131, S133, S143, S150, S158, S170, S171, S180, S199, S200, S234, S235, S239, S1013	VOC	BAAQMD 8-5	Add the following monitoring requirement for determination of applicability.: Type of Limit: VOC Citation of Limit: [None] FE Y/N: Y Limit: Determination of applicability Monitoring Requirement Citation: BAAQMD 8-5-604 Monitoring Frequency: P/E Monitoring Type: Look-up table or sample analysis	Correct omissions
55.	9/22/03	No.	J36, J37, J38, J39, J40	S131, S150, S193, S196, S199, S200, S205, S206	VOC	63.647(a) 61.343(a)(1)(i)(B) or 61.343(a)(1)(i)(A) 63.647(a) 61.349(a)(1)(i)	Delete rows.	Delete duplicate requirements. These requirements are included in the fugitive component table and are monitored under the Fugitives Monitoring Program.
56.	9/22/03	No	J41	S208	VOC	BAAQMD Condition 8771 Part 2	Delete row.	Condition 8771 parts 1 and 2 have been deleted from the permit conditions in Section VI and replaced with Regulation 8, Rule 18.
57.	9/22/03	No	new table J42	LPG Spheres	Several		Add new Table VII-J42 for the LPG Spheres (See Attachment D.3)	Add applicability for these tanks to account for new BAAQMD 8-5 requirements

Attachment D.1
Table VII-Refinery Modifications for Regulation 8, Rule 10 Revisions – Facility B2626

Table VII – Refinery
Generally Applicable Requirements
which Require Routine Monitoring

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	SIP 8-10-301	Y		Abatement of emissions from process vessel depressurization is required until pressure is reduced to less than 1000 mm Hg	SIP 8-10-401	P/E	Records of hydrocarbon concentration emissions
VOC	BAAQMD 8-10-302	N	7/1/2004	No process vessel may be opened to atmosphere unless organic compounds have been reduced to less than 10,000 ppm (methane). A refinery vessel may exceed this limit provided total number of such vessels does not exceed 10% of total vessel population over 5-consecutive year period and total mass organic compound emissions are less than 15 lb/day.	BAAQMD 8-10-501 and 8-10-503	P/E (prior to opening vessel and daily during time vessel is open to atmosphere)	Method 21 and records of measured hydrocarbon concentration emissions and mass emission calculations.

Attachment D.2
Section VII MTBE Phaseout Changes to S-207 – Facility B2626

Table VII – J9
Applicable Limits and Compliance Monitoring Requirements
S-207 (TK-1740) – NSPS SUBPART KB EXTERNAL FLOATING ROOF TANK

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
BAAQMD Permit	**PERMIT CONDITIONS**						
POC	BAAQMD Condition #BAAQMD Condition # 10797 Part 1	Y		Total POC emissions shall not exceed 4.62 tons in any rolling 365 consecutive day period	None	N/A	None
Material Stored	BAAQMD Condition # 10797 Part 4	Y		The S-207 External roof storage tank shall store mogas/components only.	BAAQMD Condition # 10797 Part 7	P/D	Record
Throughput	BAAQMD Condition # 10797 Part 6	Y		The total throughput of mogas/components at S-207 shall not exceed 16,936,400 barrels in any rolling 365 consecutive day period.	BAAQMD Condition # 10797 Part 7	P/D	Record

Attachment D.3
Section VII New Table J42 for Exempt Spheres – Facility B2626

Table VII – J42
Applicable Limits and Compliance Monitoring Requirements
EXEMPT LPG SPHERES VENTED TO FUEL GAS SYSTEM
TK-1721, TK-1722, TK-1723, TK-1724, TK-1725, TK-1726

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
BAAQMD 8-5	**Organic Compounds - STORAGE OF ORGANIC LIQUIDS LIMITS AND MONITORING FOR PRESSURE TANKS**						
VOC	BAAQMD 8-5-301	Y		Record of liquids stored and true vapor pressure	BAAQMD 8-5-501.1	P/E	records
VOC	BAAQMD 8-5-303.1	Y		Pressure vacuum valve set pressure within 10% of maximum allowable working pressure of the tank, or at least 0.5 psig	BAAQMD 8-5-403	P/SA	visual inspection
VOC	BAAQMD 8-5-303.2	Y		Pressure vacuum valve must be gas-tight: < 500 ppm (as methane) above background	BAAQMD 8-5-403 8-5-503 8-5-605	P/SA	Method 21 portable hydrocarbon detector
VOC	BAAQMD 8-5-307	Y		Pressure tank must be gas tight: < 100 ppm (as methane) above background	BAAQMD 8-5-503 8-5-605	not specified	Method 21 portable hydrocarbon detector
VOC	BAAQMD 8-5-328.1.2	Y		Organic concentration in tank <10,000 ppm as methane after degassing	BAAQMD 8-5-503	P/E	portable hydrocarbon detector
VOC		Y		Determination of applicability	BAAQMD 8-5-604	P/E	look-up table or sample analysis
NONE	**40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries Exempt per 63.640(d)(5). Emission point routed to fuel gas system**						

Attachment D.4
Table VII-I Fugitives – Regulation 8, Rule 18 Revisions – Facility B2626

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	BAAQMD Regulation 8-18-301	Y		General equipment leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	None	P/E	Method 21 Inspection
POC	BAAQMD Regulation 8-18-300	Y		Valves, Pumps, Compressors, Connectors, PRDs, and General Equipment	BAAQMD Regulation 8-18-401.5	P/E (24 hrs after repair/mini-mization)	Method 21 Inspection
POC	BAAQMD Regulation 8-18-302.1 8-18-302.2	N		Valve leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	BAAQMD Regulation 8-18-401.2 or 8-18-404	P/Q (footnote a)	Method 21 Inspection
POC	BAAQMD Regulation 8-18-302.1 8-18-302.2	N		Inaccessible Valve leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	BAAQMD Regulation 8-18-401.3	P/A	Method 21 Inspection
VOC	BAAQMD 8-18-302.3 8-18-306.2 8-18-306.3 8-18-306.4	N	7/1/04	Inspect non-repairable valves	BAAQMD 8-18-401.9	P/Q	Method 21 inspection
VOC	BAAQMD 8-18-302.3 8-18-306.4	N	7/1/04	Mass emission rate </= 15 lb/day for valve with major leak (>/= 10,000 ppm)	BAAQMD 8-18-306.4 8-18-604	P/E within 45 days of leak discovery	Mass Emission Sampling
VOC	BAAQMD 8-18-302.3 8-18-306.4	N	7/1/04	Mass emission rate </= 15 lb/day for valve with major leak (>/= 10,000 ppm)	BAAQMD 8-18-401.10 8-18-604	P/A	Mass Emission Sampling
POC	BAAQMD Regulation 8-18-303.1 8-18-303.2	N		Pump and compressor leak ≤ 500 ppm or minimize in 24 hours, repair in 7 days	BAAQMD Regulation 8-18-401.2	P/Q	Method 21 Inspection

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	BAAQMD Regulation 8-18-304.1 8-18-304.2	N		Connection leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	BAAQMD Regulation 8-18-401.6	Every 5 years (footnote b)	Method 21 Inspection
POC	BAAQMD Regulation 8-18-304.1 8-18-304.2	N		Connection leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	BAAQMD Regulation 8-18-401.1	P/E (90 days after turnaround startup)	Method 21 Inspection
POC	BAAQMD Regulation 8-18-305	Y		Pressure relief valve leak ≤ 500 ppm or minimize in 24 hours, repair in 15 days	BAAQMD Regulations 8-18-401.2 & 8-18-401.7	P/Q	Method 21 Inspection
POC	BAAQMD Regulation 8-18-305	Y		Inaccessible PRDs leak < 500 ppm or minimize in 24 hours, repair in 15 days	BAAQMD Regulation 8-18-401.3	P/A	Method 21 Inspection
POC	BAAQMD Regulation 8-18-305	Y		Pressure relief valve leak ≤ 500 ppm or minimize in 24 hours, repair in 15 days	BAAQMD Regulation 8-18-401.8	P/E (5 working days after release)	Method 21 Inspection
POC	BAAQMD Regulation 8-18-306.1	N		Valve, connector, pressure relief, pump or compressor must be repaired within 5 years or at the next scheduled turnaround	BAAQMD Regulation 8-18-502.4	P/Q	Report

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	BAAQMD Regulation 8-18-306.2 8-18-306.3 8-18-306.4	N	7/1/04	Maximum percentage awaiting repair **Components** **%** Valves (including with major leaks) and connectors per 8-18-306.3 0.30 Valves with major leaks per 8-18-306.4 0.025 Pressure Reliefs 1.0 Pumps and Compressors 1.0	BAAQMD Regulation 8-18-502.4	P/Q	Report
POC	BAAQMD Regulation 8-18-307	Y		Equipment liquid leaks minimize in 24 hours, repair in 7 days	None	P/E	Records
POC		Y		Pumps and Compressors Evidence of Leak	BAAQMD Regulation 8-18-403	P/D	Visual Inspection
POC	SIP Regulation 8-18-302	Y		Valve leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	SIP Regulation 8-18-401.2 or 8-18-404	P/Q (footnote a)	Method 21 Inspection
POC	SIP Regulation 8-18-302	Y		Inaccessible Valve leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	SIP Regulation 8-18-401.3	P/A	Method 21 Inspection
POC	SIP Regulation 8-18-303	Y		Pump and compressor leak ≤ 500 ppm or minimize in 24 hours, repair in 7 days	SIP Regulation 8-18-401.2	P/Q	Method 21 Inspection

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	SIP Regulation 8-18-304.2	Y		Connection leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	SIP Regulation 8-18-401.6	Every 5 years (footnote b)	Method 21 Inspection
POC	SIP Regulation 8-18-304.2	Y		Connection leak ≤ 100 ppm or minimize in 24 hours, repair in 7 days	SIP Regulation 8-18-401.1	P/E (90 days after turnaround startup)	Method 21 Inspection
POC	SIP Regulation 8-18-306.1	Y		Valve, pressure relief, pump or compressor must be repaired within 5 years or at the next scheduled turnaround	SIP Regulation 8-18-502.4	P/Q	Report
POC	SIP Regulation 8-18-306.2	Y		Awaiting repair Valves ≤ 0.5% Pressure Relief ≤ 1% Pumps and Compressors ≤ 1%	SIP Regulation 8-18-502.4	P/Q	Report
POC	BAAQMD Regulation 8-28-303	N		Pressure Relief Devices to Meet Prevention Measures Procedures of BAAQMD 8-28-405.	None	N (one-time, completed)	N/A
POC	BAAQMD Regulation 8-28-304.1	N		Pressure Relief Device with reportable releases in 5-year period.	BAAQMD Regulations 8-28-304.1 & 8-28-405	P/E (90 day after release) P/E (120 day after release)	PHA & PMP Report Install tamper-proof indicators

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	BAAQMD Regulation 8-28-304.2	N		After 2nd release in 5 years; Vent Pressure Relief Devices to an Abatement Device	BAAQMD Regulation 8-28-304.2	P/E (1 year after release)	
POC		N		Pressure Relief Device Release Event Reporting	BAAQMD Regulation 8-28-401	P/E (1 working day and 30 days after release)	Report
POC	BAAQMD Regulation 8-18-305	Y		Pressure Relief Device with reportable releases ≤ 500 ppm	BAAQMD Regulations 8-28-402 & 8-18-401.8	P/E (5 working days after release)	Method 21 Inspection w/Report
POC	BAAQMD Regulation 11-7-213	N		Pumps leak ≤ 10,000; or 1st repair attempt 5 day, repaired 15 days	BAAQMD Regulation 11-7-501	P/M	Method 21 Inspection
POC	BAAQMD Regulation 11-7-213	N		Pump Leak Indicated by Dripping Liquid	BAAQMD Regulation 11-7-401	P/W	Visual Inspection
POC	BAAQMD Regulation 11-7-310.4	N		Pumps under "Delay of Repair" repaired within 6 months.	None	P/E	Records
POC	BAAQMD Regulations 11-7-213 and 11-7-307	N		Valves leak ≤ 10,000; or 1st repair attempt 5 day, repaired 15 days	BAAQMD Regulation 11-7-501	P/M	Method 21 Inspection
POC	BAAQMD Regulation 11-7-213	N		Valves leak < 10,000 ppm 2 successive months w/o leaking.	BAAQMD Regulation 11-7-307.1	P/Q (if criteria met)	Method 21 Inspection

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	BAAQMD Regulation 11-7-213	N		Valves leak < 10,000 ppm 2 successive quarters w/< 2% leaking	BAAQMD Regulation 8-18-302	P/SA (if criteria met) (note c)	Method 21 Inspection
POC	BAAQMD Regulation 11-7-213	N		Valves leak < 10,000 ppm 5 successive quarters w/< 2% leaking.	BAAQMD Regulation 11-7-313.3	P/A (if criteria met) (note c)	Method 21 Inspection
POC	BAAQMD Regulation 11-7-213	N		Pressure Relief Valves (liquid), flanges, connectors; leak $\leq$ 10,000; or 1st repair attempt 5 day, repaired 15 days	BAAQMD Regulation 8-18-304	P/E (5 days after leak noted by visual, audible, or olfactory inspection)	Method 21 Inspection
POC		N		Monitoring and Repair Reporting	BAAQMD Regulation 11-7-403	P/SA	Report
40 CFR 60; Subpart VV (SOCMI Equipment Leaks of VOC)							
POC	40 CFR 60.482-2 (b)(1)	Y		LL Pump leak < 10,000 ppm or 1st repair attempt 5dy, repaired 15 days, or put on delay of repair list	40 CFR 60.482-2 (a)(1)	P/M	Method 21 Inspection
POC	40 CFR 60.482-2 (b)(2)	Y		LL Pump leak Indicated by dripping liquid	40 CFR 60.482-2 (a)(2)	P/W	Visual Inspection
POC	40 CFR 60.482-2(e)	Y		Pump designated for "No detectable emissions" pursuant to 60.486(e), < 500 ppm	40 CFR 60.482-2(e)(3)	P/A	Method 21 Inspection

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	40 CFR 60.482-3(d)	Y		Compressor shall have a sensor to detect failure of seal system, barrier fluid system, or both	40 CFR 60.482-3 (e)(1)	C or P/D	Sensor with audible alarm or checked daily
POC	40 CFR 60.482-3(i)	Y		Compressor designated for "No detectable emissions" pursuant to 60.486(e), < 500 ppm	40 CFR 60.482-3(i)(2)	P/A	Method 21 Inspection
POC	40 CFR 60.482-4(a)	Y		Pressure relief valve (gas/vapor) not vented to abatement ≤ 500 ppm	None	P/E	Method 21 Inspection
POC	40 CFR 60.482-4(b)(1)	Y		Pressure relief valve (gas/vapor) not vented to abatement < 500 ppm after a pressure release event	40 CFR 60.482-4(b)(2)	P/E (5 days)	Method 21 Inspection
POC	40 CFR 60.482-7(b) 60.482-7(d)(1)	Y		Valve leak < 10,000 ppm or 1st repair attempt 5 day, repaired 15 days	40 CFR 60.482-7(a)	P/M	Method 21 Inspection
POC	40 CFR 60.482-7(b)	Y		Valve leak < 10,000 ppm; 2 successive months	40 CFR 60.482-7(c)(1)	P/Q	Method 21 Inspection
POC	40 CFR 60.482-7(f)	Y		Valve designated "No detectable emissions" leak < 500 ppm	40 CFR 60.482-7 (f)(3)	P/A	Method 21 Inspection
POC	40 CFR 60.482-7(h)	Y		Valve designated "Difficult to monitor (up to 3% of total valves)" leak < 500 ppm	40 CFR 60.482-7 (h)(3)	P/A	Method 21 Inspection

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	40 CFR 60.482-8(b)	Y		Pumps and Valves (heavy liquid), Pressure Relief Devices (liquid), Flanges, Connectors leak < 10,000 ppm	40 CFR 60.482.8(a)	P/E (5 days after leak noted by visual, audible, or olfactory inspection)	Method 21 Inspection to confirm leak
POC	40 CFR 60.482-10 (g)	Y		Closed-vent systems leak ≤ 500 ppm or visible leak indication, or 1st repair attempt 5 day, repaired 15 days, or turnaround list	40 CFR 60.482-10 (f)(1)(ii)	P/A	Visual Inspection (hard-pipe systems)
POC	40 CFR 60.483-2	Y		Individual valve that measures <10,000 ppm for 2 consecutive quarters may be monitored semiannually, if in a process unit with 2 consecutive quarters <2% valves leaking ≥10,000 ppm.[c]	40 CFR 60.483-2(b)(2) (footnote c)	P/SA (if criteria are met)	Method 21 Inspection
POC	40 CFR 60.483-2	Y		Individual valve that measures <10,000 ppm for 5 consecutive quarters may be monitored annually, if in a process unit with 5 consecutive quarters <2% valves leaking ≥10,000 ppm.[c]	40 CFR 60.483-2(b)(3) (footnote c)	P/A (if criteria are met)	Method 21 Inspection
		Y		SOCMI NSPS Fugitives I/M Program	40 CFR 60.487(d) and 60.487(f)	P/SA	Report
40 CFR 61; Subpart FF (Benzene Waste NESHAPS)							
POC	40 CFR 61.343 (a)(1)(i)(A)	Y		Tanks fittings leak ≤ 500 ppm	40 CFR 61.343 (a)(1)(i)(A)	P/A	Method 21 Inspection

Table VII – I Fugitives
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type
POC	40 CFR 63.345 (a)(1)(i)	Y		Container fittings leak ≤ to 500 ppm	40 CFR 63.345 (a)(1)(i)	P/A	Method 21 Inspection
POC	40 CFR 61.347 (a)(1)(i)(A)	Y		O/W Separator fittings leak ≤ 500 ppm	40 CFR 61.347 (a)(1)(i)(A)	P/A	Method 21 Inspection
POC	40 CFR 61.349 (a)(1)(i)	Y		Closed-vent systems <500 ppm above background	40 CFR 61.349 (a)(1)(i)	P/A	Method 21 Inspection

Footnotes to Table VII-I

[a] Valves are inspected pursuant to BAAQMD-approved Alternative Inspection Schedule that satisfies the requirements of BAAQMD Regulation 8-18-404. Valves that have not been found to be leaking for the five prior quarters are placed on the annual inspection schedule.

[b] Connectors are inspected pursuant to a BAAQMD-approved Connector Inspection Program that satisfies the requirements of BAAQMD Regulation 8-18-401.6. Under this program, 20% of all of the refinery's connectors are inspected each year.

[c] 40 CFR 60.483-2 (Subpart VV) and BAAQMD Regulation 11-7-313 alternative screening schedules for valves are analogous to the Valero Alternative Inspection Schedule (see footnote "a") with two exceptions: 40 CFR 60.483-2 uses a leak definition of 10,000 ppm VOC rather than 100 ppm TOC, and 40 CFR 60.483-2 requires that the percentage of valves leaking facility-wide (at 10,000 ppm) must have been less than 2% for the five-quarter time period. For process units covered by refinery MACT, 40 CFR 63.648(a)(2) allow the percentage leaking to be determined on a refinery-wide basis. This applies to all process units except NSPS process units except Dimersol, which is not subject to MACT. Finally, any valve subject to Subpart VV or to BAAQMD Regulation 11-7 must *individually* comply with BAAQMD Regulation 8-18-404 (5 quarters with no leaks at 100 ppm) in order to be allowed to be screened less frequently than quarterly. As a practical matter, Subpart VV and BAAQMD Regulation 11-7 are effectively less stringent than the Valero Alternative Inspection Schedule.

Attachment E
Comments on Permit for Facility B2626 – Section VIII

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
1.	4/14/04	NEW	VIII		BAAQMD Regulation 8-5-306	Add the following note to BAAQMD Regulation 8-5-306: "* NOTE: This source test has been deleted without replacement in the MOP, but is still called out in the regulation. " OR BAAQMD should modify either the MOP to add an applicable source test as Volume IV, ST-4 or should modify 8-5-603.1 to call for an applicable and available source test.	Test Method listed calls for a source test that is not available in the MOP (Volume IV, ST-4)
2.	4/14/04	NEW	VIII		40 CFR 60 Subpart A 60.18(c)(1)	Delete this test method.	This test method was added by BAAQMD when they added 60.18 to the flare tables. Now that 60.18 has been deleted from the flare tables, this test method should be removed from Section VIII. Test method is not applicable to this permit. 40 CFR 60.18 is not included in this permit.
3.	4/14/04	NEW	VIII	S1,S2, S4, S1004	40 CFR 63 Subpart UUU	Add new header row: Applicable Requirement: 40 CFR 63 Subpart UUU Description of Requirement: National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (4/11/02)	40 CFR 63 Subpart UUU requirements have been added to Section IV of the permit. Test methods for performance testing need to be added to Section VIII for consistency.

Attachment E
Comments on Permit for Facility B2626 – Section VIII (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
4.	4/14/04	NEW	VIII	S1004 Catalytic Reformer	40 CFR 63.1567(b)(3)	Add the following row: Applicable Requirement: 40 CFR 63.1567(b)(3) Description of Requirement: Performance Test for Inorganic HAP (HCl) Emissions From Catalytic Reforming Units Acceptable Test Methods: Method 26A (40 CFR 60, Appendix A)	Test Method is required for 40 CFR 63 Subpart UUU performance testing.
5.	4/14/04	NEW	VIII	S5 Catalytic Cracking Unit	40 CFR 63.1564(b)(2)	Add the following row: Applicable Requirement: 40 CFR 63.1564(b)(2) Description of Requirement: Performance Test for PM Emissions from Catalytic Cracking Units Acceptable Test Methods: Method 5B of 5F (40 CFR 60, Appendix A)	Test Method is required for 40 CFR 63 Subpart UUU performance testing.
6.	4/14/04	NEW	VIII	S5 Catalytic Cracking Unit	40 CFR 63.1564(b)(2)	Add the following row: Applicable Requirement: 40 CFR 63.1564(b)(2) Description of Requirement: Compute PM Emission Rate of Coke Burn-Off Acceptable Test Methods: Equations 1 and 2 of 63.1564	Test Method is required for 40 CFR 63 Subpart UUU performance testing.

Attachment F
Comments on Permit for Facility B2626 – Section IX

Line	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
1.	4/14/04	NEW	IX-A5	Multiple	40 CFR 60 VV and GGG	Delete permit shield.	The regulations shown in this permit shield are applicable and should not be shielded.
2.	9/22/03	No	B-9, B-10.1, 10.2, 23, 24, 25	Multiple	Multiple	Renumber tables.	Provides correct number sequencing. It appears that permit shield tables have been deleted but the remaining tables have not been renumbered to fill the gaps created by the deletions.

Attachment G
Comments on NOx Box Permit Condition 21233 for Sections IV and VI - Facility B2626
(Note: Section VII comments on NOx Box located in Attachment D)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
1.	4/14/04	NEW COMMENT	VI		Condition 21233	Make the text of NOx Box Conditions 20617 and 21233 consistent so they are the same in the Valero Title V permits for the refinery and the asphalt plant.	Make the NOx Box permit conditions in the Valero refinery and asphalt plant Title V permits the same number, Condition 21233. Consistent with the numbering approach used for the ACP permit condition, which is Condition 19329 in both facility permits.
2.	4/14/04	NEW COMMENT	VI		Condition 21233	Add "Effective June 1, 2004". See Attachment G.1 for proposed revisions to Condition 21233.	Add the future effective date in the introductory language of Condition 21233. The effective date of June 1, 2004 was referenced in Sections IV and VII of the permit, but was not included in the condition language in Section VI.
3.	4/14/04	NEW COMMENT	VI		Condition 21233, Part 1	Change Facility number for the Refinery from 12626 to B2626 and for the Asphalt Plant from 13193 to A0901. See Attachment G.1 for proposed revisions to Condition 21233.	Make the NOx Box Conditions in the Valero refinery and asphalt plant Title V permits consistent. Consistent with the approach used for the ACP permit condition, Condition 19239, which is the same in both facility permits.
4.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 4, Part 5, Part 5C, Part 6, Part 10	Place the statement of basis at the end of the numbered paragraph rather than in a subparagraph and use the format "(Basis: Regulation X-X-XXX)" for the statement of basis.	Editorial comments
5.	4/14/04	NEW COMMENT	VI		Condition 21233, Part 1.A	Add "daily" before the "refinery wide average NOx emission limit". See Attachment G.1 for proposed revisions to Condition 21233.	Clarifies emission limit period.

Attachment G
Comments on NOx Box Permit Condition 21233 for Sections IV and VI - Facility B2626 (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
6.	4/14/04	NEW COMMENT	VI IV – A6.2 and A18	S35 S173	Condition 21233, Part 2	Modify condition language to require O2 monitors only on sources with maximum firing rate greater than 25 MM Btu/hr. Modify description in Table IV-A6.2 to indicate that Part 2 applies only to S24 and S26 and not S35 because S35 is < 25 MM Btu/hr. Delete Part 2 from Table IV-A18 for S173 because it is < 25 MM Btu/hr. See Attachment G.1 for proposed revisions to Condition 21233.	The requirement to install O2 monitors on small (<25 MM Btu/hr) sources is not necessary since there is no minimum or maximum O2 requirement for these sources per Condition 21233, Part 3.b.
7.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 3.B	Delete language that specifies low fire is as 20% of the maximum rated capacity. See Attachment G.1 for proposed revisions to Condition 21233.	Emissions from small sources are insignificant. This requirement is not discussed in the Statement of Basis.
8.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 5	Delete “at all times of operation.” and replace with “This operational range shall be maintained within a tolerance of equal to or less than 10% for measurement uncertainty.” See Attachment G.1 for proposed revisions to Condition 21233.	An allowable tolerance should be established to account for natural source testing variability. See Attachment G.2 for supporting rationale.

Attachment G
Comments on NOx Box Permit Condition 21233 for Sections IV and VI - Facility B2626 (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
9.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 5.A	Move the sentence "The limits listed below are based on a calendar day averaging period for both firing rate and O2%" to below the table of limits and change "below" to "above". See Attachment G.1 for proposed revisions to Condition 21233.	Provides consistency with the Valero asphalt plant NOx Box Condition 20617.
10.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 5.B	Modify the condition language by adding two commas as shown. See Attachment G.1 for proposed revisions to Condition 21233.	Editorial comments clarify condition language, based on discussions with District staff.
11.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 6.A	Add a statement clarifying that source testing required after a NOx Box deviation shall reasonably represent the deviation conditions. Modify the sentence specifying the time frame for the source test to delete "no later than the next regularly scheduled source test period, or within 8 months, whichever is sooner." and replace it with "within 8 months of the event." Add "application" after "permit amendment". See Attachment G.1 for proposed revisions to Condition 21233.	To exactly replicate an "out of the box" condition over three runs can take a significant amount of time without actually obtaining a more accurate test result. See Attachment G.2 for supporting rationale for proposed tolerance level. While it is advantageous to conduct "out of the box" testing as soon as possible, there may be operational reasons to test at a later date For more details see WSPA comments submitted to the District on 4/9/04.

Attachment G
Comments on NOx Box Permit Condition 21233 for Sections IV and VI - Facility B2626 (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
12.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Parts 6.A.1	Add "Case 1:" to the title. Modify the condition language to specify "by more than 5%" as the maximum allowable exceedance of the higher NOx emission factor or the CO limit. Modify the last sentence from the negative "will not be considered to be in violation" to the positive "will be considered to be in compliance" See Attachment G.1 for proposed revisions to Condition 21233.	Provides consistency with the Valero asphalt plant NOx Box Condition 20617. Semi-annual source tests should have a tolerance of 5% because the emissions involved are miniscule in relation to the calculations involved, the paperwork for both the District and facility is extensive and provides no environmental benefit. This provision will operate in both directions, since the facility would not be submitting for REDUCTIONS if a single source test result showed it 5%, or even 10% lower.
13.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Parts 6.A.2 and 7.B	Add "Case 2:" to the title for Part 6.A.2. Modify the condition language to specify "Part 5A" as the source of permitted emission concentrations or emission rates. Modify the condition language to specify "by more than 5%" exceedances as the trigger point for further action. See Attachment G.1 for proposed revisions to Condition 21233.	Provides consistency with the Valero asphalt plant NOx Box Condition 20617. Clarifies Condition 21233, Part 5.A as the source of the permitted emission concentrations or emission rates. Semi-annual source tests should have a tolerance of 5% because the emissions involved are miniscule in relation to the calculations involved, the paperwork for both the District and facility is extensive and provides no environmental benefit. This provision will operate in both directions, since the facility would not be submitting for REDUCTIONS if a single source test result showed it 5%, or even 10% lower.

Attachment G
Comments on NOx Box Permit Condition 21233 for Sections IV and VI - Facility B2626 (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
14.	4/14/04	NEW COMMENT	VI	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Parts 6.A.2.a.1 and 6.A.2.a.2	Modify the condition language to clarify the basis for determining the period that NOx IERCs need to be retroactively applied to maintain compliance with the refinery-wide NOx limit for the two different conditions that can occur. See Attachment G.1 for proposed revisions to Condition 21233.	Part 1 allows NOX IERC usage. However, additional language is proposed in Part 6.A.2.a to clarify that the facility will be in compliance with 9-10-301 unless there are insufficient NOX IERCs provided.
15.	4/14/04	NEW COMMENT	VI IV – A6.1, A6.2, A18	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 7.C	Add new Part 7.C to Condition 21233. See Attachment G.1 for proposed revisions to Condition 21233. Add new Part 7.C to Tables IV-A6.1, A6.2, and A18	Addition of new Part 7.C provides an allowance for rescheduling a source test to accommodate downtimes.
16.	4/14/04	NEW COMMENT	IV – A6.1, A6.2, A18	S7 S20 S34 S24 S26 S35 S173	Condition 21233, Part 8	Delete non applicable permit condition listed in Section IV tables.	Condition 21233, Part 8 does not apply to these sources since they do not have NOx CEMS. Part 8 requires CO source testing only on units with NOx CEMS.

Attachment G
Comments on NOx Box Permit Condition 21233 for Sections IV and VI - Facility B2626 (Continued)

Line #	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale
17.	4/14/04	NEW COMMENT	VI IV – A6.2 and A18	S35 S173	Condition 21233, Part 9	Modify condition language to require a CEM on sources greater than 25 MM Btu/hr if source test results show CO > 200 ppm more than two times in a 5-year period. Modify description in Table IV-A6.2 to indicate that Part 2 applies only to S24 and S26 and not S35 because it is < 25 MM Btu/hr. Delete Part 9 from 2 from Table A-18 for S173 because is < 25 MM Btu/hr. See Attachment G.1 for proposed revisions to Condition 21233.	CO emissions from small sources are insignificant and do not warrant CO CEMS. This is consistent with previous NOx Box guidance.

Attachment G.1
Proposed Revisions to NOx Box Permit Condition 21233 - Facility B2626

Condition 21233

Valero Refining Company – California
3400 E. Second Street
Benicia, Ca 94510
Application 8028
Plant B2626
Regulation 9-10 Refinery-Wide Compliance
Effective June 1, 2004

*1. The following sources are subject to the refinery-wide NOx emission rate and CO concentration limits in Regulation 9-10: (Basis: Regulation 9-10-301 & 305)

Facility No. B2626, Valero Refining Company

S#	Description	CEM (Y/N)
7	F-103 Jet Fuel HF, 53 MMBtu/hr	No
20	F-104 Naphtha HF, 62 MMBtu/hr	No
21	F-301 Hydrogen, 614 MMBtu/hr	Yes
22	F-351 Hydrogen, 614 MMBtu/hr	Yes
23	F-401 Gas Oil HC, 200 MMBtu/hr	Yes
24	F-601 Cat Feed HF, 33 MMBtu/hr	No
25	F-701 Cat Feed, 230 MMBtu/hr	Yes
26	F-801 HCN HF, 33 MMBtu/hr	No
30	F-2901 PFR Preheat, 463 MMBtu/hr total	Yes
31	F-2902 PFR Preheat, 463 MMBtu/hr total	Yes
32	F-2903 PFR Preheat, 463 MMBtu/hr total	Yes
33	F-2904 PFR Preheat, 463 MMBtu/hr total	Yes
34	F-2905 PFR Regen Gas, 74 MMBtu/hr	No
35	F-2906 PFR React Gas, 14 MMBtu/hr	No
40	SG-2301 Steam Gen, 218 MMBtu/hr	Yes
41	SG-2302 Steam Gen, 218 MMBtu/hr	Yes
173	F-902 Coker Steam Superheat, 20 MMBtu/hr	No
220	F-4460 MRU Hot Oil, 351 MMBtu/hr	Yes

Facility No. A0901, Valero Benicia Asphalt Plant

S#	Description	CEM (Y/N)
19	Vacuum Heater, 40 MMBtu/hr	No
20	Steam Boiler, 14.7 MMBtu/hr	No
21	Steam Boiler H-2B, 14.7 MMBtu/hr	No

A. Compliance with the daily refinery wide average NOx emission limit, 0.033 lb NOx/MMBtu fired duty is achieved through the use of an approved Alternate Compliance Plan using NOx IERCs in accordance with the provisions in Regulation 2-9-303.

B. The owner/operator of each source listed in Part 1 above shall determine compliance with Regulation 9-10 as follows:

1) Calculate NOx emissions from each furnace using measured fuel gas rates, and either:

a. CEM data or

b. NOx emission factors from Part 5A

2) The daily refinery wide average emission rate shall be determined by dividing the combined total emissions from sources listed in Part 1 above and those sources listed in the Valero Benicia Asphalt Plant (Plant # A0901) Regulation 9-10 permit conditions by the

combined total heat input.

3) Sufficient NOx IERC's will be provided in accordance with the provisions of Regulation 2-9-303 to ensure compliance with the refinery wide average NOx emission limit of 0.033 lb NOx/MMBtu fired duty.

*2. The Owner/Operator of each source with a maximum firing rate greater than 25 MMBtu/hr listed in Part 1 shall properly install, properly maintain, and properly operate an O2 monitor and recorder. This Part shall be effective September 1, 2004. (Basis: Regulation 9-10-502)

*3. The Owner/Operator shall operate each source listed in Part 1 that does not have a NOx CEM within specified ranges of operating conditions (firing rate and oxygen content) as detailed in Part 5. The ranges shall be established by utilizing data from District-approved source tests. (Basis: Regulation 9-10-502)

A. The NOx Box for units with a maximum firing rate of 25 MMBtu/hr or more shall be established using the procedures in Part 4.

B. The NOx Box for units with a maximum firing rate less than 25MMBtu/hr shall be established as follows: High-fire shall be the maximum rated capacity. There shall be no maximum or minimum O2.

*4. The Owner/Operator shall establish the initial NOx box for each source subject to Part 3 by June 1, 2004. The NOx Box may consist of two operating ranges in order to allow for operating flexibility and to encourage emission minimization during standard operation. (Basis: Regulation 9-10-502) The procedure for establishing the NOx box is:

A. Conduct District approved source tests for NOx and CO, while varying the oxygen concentration and firing rate over the desired operating ranges for the furnace;

B. Determine the minimum and maximum oxygen concentrations and firing rates for the desired operating ranges (Note that the minimum O_2 at low-fire may be different than the minimum O_2 at high-fire. The same is true for the maximum O_2). The Owner/Operator shall also verify the accuracy of the O2 monitor on an annual basis.

C. Determine the highest NOx emission factor (lb/MMBtu) over the preferred operating ranges while maintaining CO concentration below 200 ppm; the Owner/Operator may choose to use a higher NOx emission factor than tested.

D. Plot the points representing the desired operating ranges on a graph. The resulting polygon(s) are the NOx Box, which represents the allowable operating range(s) for the furnace under which the NOx emission factor from part 5a is deemed to be valid.

1). The NOx Box can represent/utilize either one or two emission factors.

2) The NOx Box for each emission factor can be represented either as a 4- or 5-sided polygon. The NOx box is the area within the 4- or 5-sided polygon formed by connecting the source test parameters that lie about the perimeter of successful approved source tests. The source test parameters forming the corners of the NOx box are listed in Part 5.

Attachment G.1
Proposed Revisions to NOx Box Permit Condition 21233 - Facility B2626 (continued)

E. Upon establishment of each NOx Box, the Owner/Operator shall prepare a graphical representation of the box. The representation shall be made available on-site for APCO review upon request. The box shall also be submitted to the BAAQMD with permit amendments.

*5. Except as provided in part 5B & C, the Owner/Operator shall operate each source within the NOx Box ranges listed below. This operational range shall be maintained within a tolerance of equal to or less than 10% for measurement uncertainty. This part shall not apply to any source that has a properly operated and properly installed NOx CEM. (Basis: Regulation 9-10-502)

A. NOx Box ranges.

Source No.	Emission Factor (lb/MMBtu)	Min O_2 at Low Firing (O2% , MMBtu/hr)	Max O_2 at Low Firing (O2% , MMBtu/hr)	Min O_2 at High Firing (O2% , MMBtu/hr)	Mid O_2 at Mid/High Firing (polygon) (O2% , MMBtu/hr)	Max O_2 at High Firing (O2% , MMBtu/hr)
Plant B2626						
7	0.35	3, 16	17, 10	6, 30	N/A	11, 38
20	0.23	2, 19	7, 13	2, 37	N/A	6, 41
24	TBD					
26	TBD					
34	0.25	17, 2	20,2	4, 26	N/A	7, 38
35	TBD					
173	TBD					
Plant A0901						
S-19	TBD					
S-20	TBD					
S-21	TBD					

The limits listed above - are based on a calendar day averaging period for both firing rate and O2%.

B. Part 5A does not apply to low firing rate conditions (i.e., firing rate less than or equal to 20% of the unit's rated capacity), during startup or shutdown periods, or periods of curtailed operation (ex. during heater idling, refractory dry out, etc.) lasting 5 days or less. During these conditions the means for determining compliance with the refinery wide limit shall be accomplished using the method described in 9-10-301.2 (i.e. units out of service & 30-day averaging data).

C. Part 5A does not apply during any source test required or permitted by this condition. See Part 7 for the consequences of source test results that exceed the emission factors in Part 5.

*6. NOx Box Deviations (Basis: Regulation 9-10-502).

A. The Owner/Operator may deviate from the NOx Box (either the firing rate or oxygen limit) provided that the Owner/Operator conducts a District approved source test that reasonably represents the past operation outside of the established ranges. The source test representing the new conditions shall be conducted within eight months of the event. The source test results will establish whether the source was operating outside of the emission factor utilized for the source.

The source test results shall be submitted to the District Source Test Manager within 45 days of the test. As necessary, a permit amendment application shall be submitted.

1) Case 1: Source Test ≤ Emission Factor

   If the results of this source test do not exceed the higher NOx emission factor in Part 5 by more than 5%, or the CO limit in Part 9, the unit will be considered to be in compliance during this period for operating out of the "box."

   The facility may submit an accelerated permit program permit application to request an administrative change of the permit condition to adjust the NOx Box operating range(s), based on the new test data.

2) Case 2: Source Test > Emission Factor

   If the results of this source test exceed the permitted emission concentrations or emission rates in Part 5A by more than 5% then the actions described below must be followed:

   a. Utilizing the measurement, the Owner/Operator shall perform an assessment of compliance with Regulation 9-10-301 as described below:
      1. "Out of Box" Condition – for the day(s) in which the "out of box " condition(s) occurred ensure sufficient NOx IERCs will be provided that day (or those days) to ensure the facility is in compliance with the refinery wide limit.

      2. Within the Box but Higher Emission Factor Only – The higher emission factor must be retroactively applied back to the date of the previous source test and sufficient NOx IERCs provided for that time period to ensure the facility is in compliance with the refinery wide limit specified in 9-10-301. The unit will be considered in violation of Regulation 9-10-301 for each day there are insufficient NOx IERCs provided to bring the refinery wide average into compliance with 9-10-301.

   b. The facility may submit a permit application to request an alteration of the permit condition to change the NOx emission factor and/or adjust the operating range, based on the new test data.

B. Reporting. The Owner/Operator must report conditions outside of box within 96 hours of occurrence.

*7. For each source subject to Part 3, the Owner/Operator shall conduct source tests at the schedule listed below. The source tests are performed in order to measure NOx, CO, and O2 at the as-found firing rate, or at conditions reasonably specified by the APCO. The source test results shall be submitted to the District Source Test Manager within 45 days of the test. (Basis: Regulation 9-10-502)

A. Source Testing Schedule

1) Heater < 25 MMBtu/hr

   One source test per consecutive 12 month period. The time interval between source tests shall not exceed 16 months.

2) Heaters ≥ 25 MMBtu/hr

Two source tests per consecutive 12 month period. The time interval between source tests shall not exceed 8 months and not be less than 5 months apart. The source test results shall be submitted to the District Source Test Manager within 45 days of the test.

B. Source Test Results > NOx Box Emission Factor

If the results of any source test under this part exceed the permitted concentrations or emission rates in Part 5A by more than 5%, the Owner/Operator shall follow the requirements of Part 6A2. If the Owner/Operator chooses not to submit an application to revise the emission factor, the Owner/Operator shall conduct another Part 7 source test, at the same conditions, within 90 days of the initial test.

C. If a source is shutdown during the period when a source test is scheduled (i.e., outside of normal routine maintenance turnaround schedule), then the owner/operator shall conduct the source test within 30 days of start up of the source.

*8. For each source listed in Part 1 with a NOx CEM installed, the Owner/Operator shall conduct semi-annual District approved CO source tests at as-found conditions. The time interval between source tests shall not exceed 8 months. District-conducted CO emission tests associated with District-conducted NOx CEM field accuracy tests may be substituted for the CO semi-annual source tests. (Basis: Regulation 9-10-502)

*9. For any source with a maximum firing rate greater than 25 MMBtu/hr listed in Part 1 for which any two source test results over any consecutive five year period are greater than or equal to 200 ppmv CO at 3% O2, the Owner/Operator shall properly install, properly maintain, and properly operate a CEM to continuously measure CO and O2. The Owner/Operator shall install the CEM within the time period allowed in the District's Manual of Procedures. (Basis: Regulation 9-10-502, 1-522)

*10. In addition to records required by Regulation 9-10-504, the Owner/Operator must maintain records of all source tests conducted to demonstrate compliance with Parts 1 and 5. These records shall be kept on site for at least five years from the date of entry in a District approved log and be made available to District staff upon request. (Basis: Regulation 9-10-504)

Reg 9 Rule 10 Alternative Compliance Monitoring

Demonstration of NOx Box Tolerance(s) Equivalence to CEMS

Continuous Emissions Monitoring Systems	Mean Difference	**Source Testing**	Mean Difference
Sampling location and stratification	1%	Sampling location and stratification, 12 traverses	1%
extractive/in-situ sampling		extractive/in-situ sampling	
probe, type and location	3-6%	probe, type and location	2-10%
calibration drift	<2.5%	calibration drift	<2.5%
Interference	2%	Interference	2%
calibration gases	<5%	calibration gases	<5%
CO_2 or O_2 diluent correction monitor	<1%	CO_2 or O_2 diluent correction monitor	<1%
Flow monitor	2-15%	Flow monitor	2-15%
Water Correction	3-5%	Water Correction	3-5%
Pressure Measurements	5%	Pressure Measurements	5%
Temperature Measurements	1.5%	Temperature Measurements	1.5%
Data acquisition and handling system		Data acquisition and handling system	
Rounding errors, equation errors, linearity		Rounding errors, equation errors, linearity	
Bias Adjustment Factor correct for systematic error			
Relative Accuracy of CEMS	<20%	Source Test Accuracy	<20%
		Address systematic error	
		Address random error	

"Accuracy of a measurement refers to the degree of agreement between the measured value and a true value.
In source measurements, the true value of a physical parameter is rarely known.
In source testing, the "true" value is assumed to be that value determined by the EPA Reference Method."
Reference 6

Sources:
1. BAAQMD Manual of Procedures
2. Cal EPA ARB Method 7 Determination of Nitrogen Oxide Emissions from Stationary Sources
3. EPA 40 CFR 60 Appendices A, B
4. SCAQMD Protocol for the Measurement of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Sources Subject to SCAQMD Rule 1146
5. "Techniques to Improve Measurement Accuracy in Power Plant Reported Emissions", All contents copyright © 2002 ISA The Instrumentation, Systems, and Automation Society. All rights reserved.
6. EPA's Operator's Guide to Eliminating Bias in CEMS Systems http://www.epa.gov/airmarkets/monitoring/bias/

WSPA Rationale for Tolerance Levels for NOx Box Testing

Attachment G.2
Rationale for Proposed NOx Box Source Testing Tolerance - Permit Condition 21233, Part 5 - Facility B2626

The permit conditions in question establish equivalency for those heaters and boilers regulated by Regulation 9-10 using an Alternative Compliance Plan (ACP) under the provisions of that rule. Based on a direct equivalency, the District previously allowed a tolerance of 20% for source testing in its "District guidance on Equivalent Verification" issued June 2000 for the ACP.

There is inherent variability in all test methods and this is well documented in scientific and regulatory literature. This is the basis for tolerances established in regulations and regulatory reference test methods. Tolerances for systemic and random errors of 20% have been established for CEMs. EPA and CARB Reference Test Methods verify CEMs results based on source testing results. An analysis of measurement uncertainty in source testing can be verified by a review of the various measurements required for source testing, the potential for random error, and the potential for systemic errors such as occur in data handling and collection. Based on a review of scientific literature and various federal, state, and local reference test methods, this measurement uncertainty is between 10 to 20% based on the specific source testing configuration, measurement devices, the data collection protocol, and the data handling techniques.

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In addition, calculation of emissions using the method specified in the June 2000 guidance result in extremely conservative estimates. WSPA members report that emissions calculated according to the ACP may be overstated by as much as 30%. This finding is intuitive because all operating conditions are calculated at the highest emission factor (worst operating case scenario), when most operating conditions are lower than the highest firing and O_2 rates.

Therefore, there is a large margin for error introduced in the ACP calculation requirements themselves which directionally increases the likelihood of exceeding the emissions estimates that would have been yielded had CEMs been installed.

Thus, this requested amendment does nothing to harm the demonstration of alternative compliance assurance. Source tests are logistically and operationally burdensome, and returning to identical and previous operating conditions is even more costly, with the potential to increase emissions of NOx and other pollutants.

WSPA believes it to be within the District's authority to continue a 10 to 20% tolerance for measurement uncertainty.