

Attachment B
Response to Comments on Permit for Facility B2626 – Section IV

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made.	N/A	N/A
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.	Changes made.	B5 Corrects a mistake.	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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 SO₂ 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.	Corrects a mistake.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made.	N/A	N/A
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.	Changes made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Corrects a mistake	N/A	N/A
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.	Changes not made. The two “conflicts” are related, but not the same. 19466, Part 10 demonstrates compliance with 9-10-305 CO not to exceed 400 ppm @ 3% O ₂ , operating day average. NO _x Box Condition 21233 Part 7 is an “as found” Source test to verify operation within the “Box”; Part 8 is a CO Source Test for sources with NO _x CEMs; and Part 9 requires the installation of a CO CEM if 2 5-year tests show CO > 200 ppm. Moreover, all of Condition 21233 is for NO _x CEM equivalency, which is a different purpose than Condition 19466, Part 10.	N/A	N/A
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.	Corrects a mistake. Also, since the effective date is in the past, it will be deleted.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
9.	4/14/04 12/1/03	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.	Changes not made. 12-11-601 covers 12-11-601.1. It also covers 12-11-601.2 and 601.3 in the event monitoring is achieved using continuous analyzers. 12-11-502.3 requires one of four methods of monitoring vent gas composition, including 12-11-502.3.1. 12-11-506.1 is listed separately, even though it is covered by 12-11-506, because it has a unique future effective date.	B28, Corrects a mistake	
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.	Change made.	N/A	N/A
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.	Changes made.	N/A	N/A
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.	Change made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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)).	Changes made. Correct NOx limit is 60.44b(a) which is already in the table. Applicable citation is 60.48b(b)(1) requiring a CEM and is already in the table.	N/A	N/A
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.	Change made.	N/A	N/A
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.	Change made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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)).	Changes made. 60.44b(l)(1) is already in the table. Applicable citation is 60.48b(b)(1) requiring a CEM and is already in the table.	N/A	N/A
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.	Changes made.	N/A	N/A
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.	Changes made.	N/A	N/A
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.	Changes made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made. The change makes the condition consistent with the latest condition issued November 2003.	N/A	N/A
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.	Change made with minor revision proposed October 25, 2004.	N/A	N/A
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.	Change made.	N/A	N/A
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.	Changes made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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)).	Changes made. 40 CFR 60.44b(l)(1) is already in the table. 40 CFR 60.46b(f), 60.46b(f)(1) and 60.46b(f)(2) are already in the table. 60.44b(j) is not applicable because the natural gas contains nitrogen in quantities greater than 0.3 wt%. Applicable citation is 60.48b(b)(1) requiring a CEM and is already in the table.	N/A	N/A
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.	Change made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Change made.	N/A	N/A
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.	Change made.	B78, District will review later	N/A
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.	Changes made. This will make the Tables consistent with Table IV-X, Fugitive Sources.	N/A	N/A
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.	Change not made. Beyond the scope of this revision.	N/A	N/A
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.	Change made.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Change not made. Beyond the scope of this revision. Insufficient argument – reason or citation(s) demonstrating that source is not subject to 8-16-303.4 is not provided.	N/A	N/A
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.	Change made.	N/A	N/A
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.	Change made.	N/A	N/A
34.	4/14/04	NEW	H1.1	S151	40 CFR 61 Subpart FF	Delete the line that says “40CFR61SubpartFF60.3 55(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.	Change made.	B91 Corrects a mistake	N/A
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.	Changes made	B89 Changes made.	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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	Changes made	N/A	N/A
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) <u>as averaged over any consecutive 3 hour period.</u> 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, <u>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.</u> ” 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.	Changes made. Part 7 of Condition 11882 and 13319 was first deleted in response to original EPA comment # 185 and 213 that stated temperature excursions are not allowed under 40CFR 61 Subpart FF. Clarification of this comment determined that only a portion of Part 7 was at issue, not the entire part. Follow-up review concluded that the temperature limitation could be stated as an average over a 3-hour period without any allowable excursions.	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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 ($\geq 10,000$ 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	Changes made	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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).	Changes made	N/A	N/A
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	Changes made	N/A	N/A
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	Changes made	N/A	N/A
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	Changes made	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made	N/A	N/A
46.	4/14/04	NEW	IV-X	S-211	NESHAPS, Part 63, Subpart CC	Delete "This SOCM I 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 SOCM I 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).	Changes made	N/A	N/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.	Changes made.	N/A	N/A
48.	4/14/04	NEW	J2	S58	BAAQMD 8-5	Add 8-5-604	Correct omission	Changes made	N/A	N/A
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)	Changes made	N/A	N/A
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	Changes made	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
51.	4/14/04	NEW	J12	S87, 88, 90, 91	BAAQMD 8-5-320.5.3	Add 8-5-320.5.3	Correct omission	Changes made	N/A	N/A
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).	Changes made	N/A	N/A
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.	Changes made	N/A	N/A
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.	Changes made	N/A	N/A
55.	4/14/04	NEW	J35	S103	BAAQMD Regulation 8, Rule 5	Change Date for BAAQMD 8-5 to 11/27/2002	Editorial correction	Changes made	N/A	N/A
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	Changes made	N/A	N/A

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
57.	12/1/03 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).	Changes made to correct the errors. It is unclear where these Parts originated, but these 3 conditions were in Databank and this was the basis for the first response for this comment. Recent review of Application 2035 confirms that none of the 3 conditions were included in the NSR Authority to Construct issued May 24, 2001. Databank was not used for the AC condition (a separate Word® document was used). However, the Title V permit was not properly corrected. Databank was updated after the AC was issued, but when the District automatically copied the Title V conditions into the Databank, the error was reproduced.	B38 Beyond scope, incorrect	A16
58.	12/1/03	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 gaseous 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).	Change made. Condition 10574, Part H was revised to make it clear that depressurization gas is to be vented to a control device. For normal liquid draining from S-220, 10574, Part H would not apply unless an exchanger leak caused process gas to migrate into the hot oil system.	B35 Out of scope, incorrect.	A15
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.	Changes not made. Will consider later. The condition language is consistent with the District's standard condition for Backup Generators.		17

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes not made. Will consider later. The condition language is consistent with the District's standard condition for Backup Generators.		17
61.	12/1/03	No	J6		BAAQMD 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	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	Changes made.		19
62.	12/1/03	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	Changes made.	B132 Good improvement, will review later.	
63.	12/1/03	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.	Changes made.		21
64.	12/1/03	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.	Changes made.		22
65.	12/1/03	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.	Changes Made		23

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
66.	12/1/03	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.	Changes Made		23
67.	12/1/03	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).	Changes Made		23

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
68.	12/1/03	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	Change Made		
69.	12/1/03	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.	Change made.		21
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B1 Good improvement, will review later	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B3 Good improvement, will review later	
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)	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B4 Good improvement, will review later	
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.	Change not made, but should have been. Will be completed in Revision 2.	B39 Mistake corrected	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B45 Good improvement, will review later	
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.	Change not made. Unlike 19466 Part 7, S-237 was not deleted from Part 3 since there is a SCR Unit on the source. Consistent with the CAPCOA guidelines, the combustion of gaseous fuel is not the concern. Testing to comply with 6-301 will verify that ammonia injection will not cause visible emissions.	B49 Not in the scope of this revision	
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B46 Good improvement, will review later	
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.	Changes not made. The definitions are part of a standard District Backup Generator condition.	B52 Good improvement, will review later	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes not made. These are parts of a standard District Backup Generator condition.	B53 Good improvement, will review later	
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.	Changes made.	B56 Change made	
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).	Change not made. Will make the correction in Revision 2.	B62 Beyond the scope of Title V.	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B81 Good improvement, will review later	
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision.	B83 Not in the scope of this revision.	
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B82 Good improvement, will review later	
84.	9/22/03	No	F1	S129	Condition 98, All parts	Delete condition.	See Attachment C.1 for rationale for deletion of Condition 98.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision.	B84 Not in the scope of this revision	
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B85 Good improvement, will review later.	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B103 Good improvement, will review later	
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B104 Good improvement, will review later	
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	Change made.	B107 Good improvement, will review later	
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B108 Good improvement, will review later	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B153 Good improvement, will review later	
91.	9/22/03	No	J36	S131	BAAQMD Condition 11888, Part 1	Change the permit condition from: “The emissions of nitrogen oxides (NO _x) shall not exceed...” to “The emissions of nitrogen oxides (NO _x) 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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B155 Good improvement, will review later	
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B156 Good improvement, will review later	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B162 Good improvement, will review later	
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B163 Good improvement, will review later	
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B164 Good improvement, will review later	
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B171 Good improvement, will review later	

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

	Date	4/14/04 Status	Permit Location	Sources	Applicable Requirement	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B172 Good improvement, will review later	
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	Changes not made. This comment was made on a previous revision and does not address a change made to this revision. As responded previously, the proposed improvement will be addressed in a future revision.	B181 Good improvement, will review later	