

Attachment E& F
Response to Comments on Permit for Facility B2626 – Section VIII

Line #	Date	4/14/0- Status	Permit Location	Sources	Applicable Requirements	Proposed Change	Rationale	District Response	9/22/03 Item & Respons	Appeal Item
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)	Change not made. Not in the scope of Revision 1.	N/A	N/A
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.	Change made.	N/A	11

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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.	Changes not made. Need citations for the procedures to add in the acceptable test method column.	N/A	N/A
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.	Changes made	N/A	N/A

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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.	Changes made	N/A	N/A
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.	Changes made	N/A	N/A
F1	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.	Change not made. This permit shield was added in response to an EPA Comment. Will consider for Rev 2 when there is more time to sort out the conflict between the two comments.	EPA#17	N/A
F2	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.	Changes made.	F5 District will review later	N/A