



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

June 8, 2018

Kimberly Ronan  
Manager, Environmental Engineering  
Valero Refining Company – California, Benicia Refinery  
3400 East Second Street  
Benicia, CA 94572

RE: Approval of Regulation 12, Rule 15 Air Monitoring Plan (AMP)

Dear Ms. Ronan:

The Bay Area Air Quality Management District has completed its review of the “Regulation 12, Rule 15 Air Monitoring Plan” and has determined that this AMP meets the requirements for approval under District Regulation 12, Rule 15: Petroleum Refining Emissions Tracking (Section 12-15-403). This letter confirms approval pursuant to Section 12-15-404.4 and notes two conditions not specified in the AMP itself that must be met so that approval can be maintained.

To maintain approval of the AMP, a Quality Assurance Project Plan (QAPP) must be submitted to the District within 6 months of the date of this letter. Because the QAPP is necessarily specific to equipment that has yet to be purchased and installed, submittal of the QAPP to the District is considered part of the AMP implementation. Failure to submit an adequate QAPP would be considered an implementation deficiency and would be a basis for withdrawal of approval. Valero may request addition time if more than 6 months is needed to submit the QAPP due to factors beyond Valero’s control.

Secondly, Valero must within 6 months of the date of this letter select an approach to monitoring H<sub>2</sub>S and inform the District in writing of that selection. The District anticipates that a method for open path monitoring of H<sub>2</sub>S will be validated in the next few months. To encourage the use of open path H<sub>2</sub>S monitoring, the District will allow up to 2 years from the date of this letter to begin operation of such monitoring. Valero may request a deadline beyond two years beyond the date of this letter if it can show that additional time is needed due to factors beyond its control. If Valero instead chooses to use fixed measurements for H<sub>2</sub>S monitoring using the EPA MACT siting procedures for benzene sampling at refineries, then such monitoring must be operational within one year of the date of this letter. Valero may request a deadline beyond one year if it can show that additional time is needed due to factors beyond its control. Valero’s selection and implementation of H<sub>2</sub>S monitoring will be reviewed as an element of AMP implementation. Failure to implement H<sub>2</sub>S monitoring in a timely and adequate manner would be basis for withdrawal of approval.

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If you have any questions regarding this determination, please contact Paul Grazzini at 415-749-4783 for compliance issues or Kate Hoag at 415-749-4619 for technical issues.

Sincerely,

*Richard Law for J. Gove*

Jeff Gove  
Director of Compliance and Enforcement

JG:pg