

Attachment C
Response to Comments on Permit for Facility B2626 – Section VI

Line #	Date of Comment	4/14/04 Status	Permit Section	Sources	Permit Condition	Proposed Change	Rationale	District Response	9/22/03 Item & Response	Appeal Item
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.	Changes made.	N/A	N/A
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) <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

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3.	4/14/04	NEW	VI	S1007, S1014, S1012	18043, Parts 2 and 3	<p>Delete permit condition 18043, parts 2 and 3 with the following explanations:</p> <p>Part 2 Deleted. [Basis: Inspection and Maintenance program is covered by Regulation 8, Rule 18.]</p> <p>Part 3: Deleted. [Basis: Maximum leak concentrations are covered by Regulation 8, Rule 18.]</p>	<p>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.</p> <p>If they are not deleted, delete “no later than 7 days” in Part 3 to allow for Reg 8-18 alternatives.</p>	Changes made.	N/A	N/A
4.	4/14/04	NEW	VI	S1030, S1031, S1032, S1033	19177, Part 18(a)	<p>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.</p> <p>Add new language for 18(a)(2) for lower NOx limit based on reassessment of BACT for Phase II.</p>	Provides consistency with modifications made to this condition in the November 10, 2003 Authority to Construct extension for Phase II construction and operation.	Change made. The latest version of Condition 19177 was issued 10Nov03. The Title V permit was not appropriately updated, and the District’s automatic transfer of the Title V version of the condition to Databank overwrote the correct condition.	N/A	N/A
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.	Change not made. Waiting on District review and approval of the Source Test. Probably will make change in Revision 2. The condition allows firing on natural gas if a source test demonstrates compliance. Therefore, Part 18(d) as worded does not prevent natural gas operation.	N/A	N/A

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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.	Changes made. 45 days is consistent with the duration in 19466, Part 7.	N/A	N/A
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.	Change not made. Unlike 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.	C51 Out of scope, incorrect	N/A

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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.	Changes not made. Changes will be proposed in Revision 2 of the Permit to allow the appropriate Public Comment period. This item was also in the Variance request based on the sources being impossible to test. A detailed review of the sources with Valero concluded that testing was not impossible and it was agreed to revise the language of Part 7 as written in the Draft Revision 1 permit. When Valero submitted the test protocol for S-11, S-160 and S-233, the District's Source Test group questioned the tests. A 20Apr04 review of all of the sources with Valero and the District's Source Test group concluded that all sources in Part 7, except S-8, are best tested for compliance with 6-301 (which is in Part 3). These conclusions were based on one or more of the following: The emission flowrate was low, the exhaust configuration was unsuitable for the Standard EPA Method 5 test, or the source was either out-of-service or in an alternative service that would not cause particulate emissions.	C55 Incorrect	N/A

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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.	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% O2, operating day average. NOx 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 NOx 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 NOx CEM equivalency, which is a different purpose than Condition 19466, Part 10.	N/A	N/A

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10.	12/1/03 9/22/03	No	VI	S40	9296, Parts D8, D9, and D10	Delete conditions.	<p>Conditions are redundant</p> <ol style="list-style-type: none"> 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). 	<p>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.</p>	B38 Beyond scope, incorrect	A16

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11.	12/1/03	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).	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
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.	Changes not made. Will consider later. The condition language is consistent with the District's standard condition for standby engines..	C35 District will review later	17
13.	9/22/03	No	VI	S129	98, All Parts	Delete permit condition.	See Attachment C1 for the 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.	C1 Incorrect	

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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.	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.	C9 Good improvement, will review later.	
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	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.	C20 Good improvement, will review later	
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	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.	C22 Good improvement, will review later	

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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.	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. The condition language is consistent with the District's standard condition for standby engines..	C36 Good improvement, will review later	
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).	Changes made. The ammonia injection monitoring requirements were from an early version of the Authority to Construct conditions. The requirement was removed prior to the formal transmittal of the Authority to Construct, but the databank version of the condition was not updated.	C40 Need Public Review	A8

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19.	9/22/03	Partial	VI	S3, S4, S21, S22, S23, S25, S30, S31, S32, S33, S220, S40, S41	19466, Part 14	<p>Make the following changes to the permit condition language:</p> <ol style="list-style-type: none"> 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.	Changes made	C62 Corrects a mistake	N/A