

**ATTACHMENT A**  
**Proposed Renewal Major Facility Review Permit**  
**Valero Benicia Refinery – Plant No. B2626**  
**Public Comments - 6/30/2010**  
**BAAQMD Responses 8-16-2010**

Item	Location	Comment	Explanation	BAAQMD Response
<b>1. Permit Condition Language Corrections</b>				
1a	Table IV-E2 , Section VI Index, Section VI	Delete Condition 24297	Condition 24297 is for ATC and has been replaced with Condition 24298 for PTO	- Agreed. Condition 24297 was deleted
1b	Condition 24197, Part 19  Section VI	Replace “three” with “two” furnaces.	Editorial correction.	- Agreed. Three was replaced with two.
1c	Various Conditions (Correction of Source Test Submittal Dates)  Section VI	<p>Condition 19466, Parts 6, 7, 8, 9, 10, and 11: Revise language to require submittal of source test ‘no more than 60 days’ after test (instead of ‘no less than 45 days’).</p> <p>Condition 20666, Part 2: Revise language to require submittal of source test ‘60’ days after test (instead of ‘15’ days after test).</p> <p>Condition 21233, Parts 6A, 7, 7A1, 7A2: Revise language to require submittal of source test ‘60’ days after test (instead of ‘45’ days after test).</p> <p>Condition 24198, Parts 7, 8, 10, and 11: Revise language to require submittal of source test ‘no more than 60 days’ after test (instead of ‘no less than 45 days’).</p> <p>Condition 24298, Part 5: Revise language to require submittal of source test ‘60’ days after test (instead of ‘thirty’ days after test).</p>	<p>Corrections to make source test report submittal dates consistently 60 days after completion of source test. Source test contractors are unable to consistently provide written test results to allow Valero adequate time to review and submit reports to BAAQMD within 60 days of a source test.</p>	<p>- Agreed. Submittal of source test result was allowed up to 60 days in Condition 19466, Parts 6, 7, 8, 9, 10, and 11.</p> <p>- No. Condition 20666, Part 2 is a boilerplate condition for all gasoline dispensing facilities. To be consistent with all other facilities, no change is made.</p> <p>- No. Condition 21233, Parts 6A, 7, 7A1, 7A2 are boilerplate conditions for all facilities with the NOx boxes. To be consistent with all other facilities, no change is made at this time.</p> <p>- Agreed. Submittal of source test result was allowed up to 60 days in 24198, Parts 7, 8, 10, and 11.</p> <p>- No. Condition 24298, Part 2 is a boilerplate condition for all gasoline dispensing facilities. To be consistent with all other facilities, no change is made.</p>

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Item	Location	Comment	Explanation	BAAQMD Response
1d	Condition 20820 (VIP Amendments)  Tables IV-A3, A3.1, A4, A5, A6.1, A26, F1, J9  Section VI  Tables VII-A, A3.1, A4, A5, A6.1, A26, D2, D12, D13, F1 Statement of Basis	Part 3: Delete 'Part 60' from NSPS Subpart Ja  Parts 2, 8, 12, 21.c, 23, 29, 34, 63, 68, 70, and 72: Replace 'POC' with 'NMOC'  Part 21.b.iii: Remove space between '4' and '115.4'  Part 21.b.iv: Replace 'Part' with 'part'  Part 21.b.iv: Replace 'POC' with 'NMOC'  Part 21.b.v: Update CO limits  Part 22: Correct spelling of 'Prescrubber'  Part 30: Delete 'Part' from '40 CFR Part 60, Subpart Kb'  Part 33: For S-57 through S-62, correct Facility ID from 'Facility B2626' to Facility B5574'  Part 52: Replace "Permit Services Division' with 'Engineering Division'  Revise language for consistency with final Engineering Evaluation	Corrections to make Condition 20820 language consistent with the final engineering evaluation for AN 16937 (dated May 20, 2009).	-No. Keep 'Part 60' in condition language. Error in engineering evaluation.  - Agreed. POC was replaced with NMOC  - Agreed. Editorial corrections were made to all "1d" requests.

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Item	Location	Comment	Explanation	BAAQMD Response
		Part 65: Correct numbering for subparts a through d  Part 68: Add 'as determined by CEM' to 68a CO limit and replace		
1e	Condition 19466, Parts 5b and 5c  Table IV-A3 Section VI Table VII-A3	Delete Condition 19466, Parts 5a and 5b related to operation of 3 of 5 ESPs	Consistent with Valero letter requesting rescission of Condition 19466, Parts 5c and 5b dated July 19, 2010 for failure to meet standard for operation with less than 4 ESPs.	- Agreed. Valero is giving up the option of operating with only 3 ESPs.
<b>2. Regulatory Applicability Corrections</b>				
2a	S-157 (Sulfur Storage Pit)  Table IIC	Table IIC: Add rows for abatement of S-157 by A-56/A-62 as required by Condition 23446, Part 1.	As required by Condition 23446, Part 1, the S-157 sulfur storage pit must be abated the S-1 or S-2 sulfur recovery unit A or B (A-56/A-62) at all times.	- Agreed. Row for abatement was added.
2b	S-36 (SG-701)  Table IV-A13.1	Condition 19466, Header row: Add "(S-36 only). Condition 24198, Header row: Add "(S-36 only). Condition 24198, Part 12: Correct "S-159"	Corrected omission and error.	- Agreed. Clarifications were added.
2c	S-242, Diesel IC Engine (P-2607B)  Table IV-A21 Table VII-A21	Change Tag ID for S-242 from 'P-2608B' to 'P-2607B'	Source ID correction	- Agreed. Corrected source ID as requested.

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2c	S-251, Diesel IC Engine (DG-5301)  Table IV-A25	40 CFR 60, Subpart IIII – add effective date to title block  40 CFR 63, Subpart ZZZZ – add applicability for new emergency RICE ≤ 500 bhp	Update regulatory applicability for MACT RICE	- Agreed. Regulatory applicability was updated.
2d	S-159 (SG-701/GT-701)  Table IIC Table IV-C3 Table VII-C3	Table IIC: For A27, delete 1 <sup>st</sup> row for BAAQMD 6-1-301/SIP 6-301 abatement requirements. Table IV-C3: Delete BAAQMD Regulation 6, Rule 1 and SIP Regulation 6 citations. Table VII-C3: Delete rows for BAAQMD Regulation 6, Rule 1 and SIP Regulation 6.	As required by Condition 19466, Part 12, S-159 cannot operate unless abated for VOC emissions by the S-36 boiler for compliance with Reg 8-2-301. S-159 does not vent to atmosphere so is not subject to BAAQMD Reg 6, Rule 1 or SIP Reg 6 requirements.	- No. Need NSR permit application to remove Regulation 6’s applicability. Amend CAM analysis for renewal to show no PM control device for this source.
2e	S-160 (C-1031)  Table IIC Table IV-C4.1 Table VII-C4.1	Table IIC: For A13 and A26, delete S-160 from row for BAAQMD 6-1-301/SIP 6-301, add new rows for S-160 for A13 and A26 for Reg 8-2-301 VOC abatement requirements. Table IV-C4.1: Delete BAAQMD Regulation 6, Rule 1 and SIP Regulation 6 citations. Table VII-C4.1: Delete rows for BAAQMD Regulation 6, Rule 1 and SIP Regulation 6.	As stated in Engineering Evaluation for A/N 12588, S-160 was rerouted from atmosphere to the vapor recovery system for compliance with Reg 8-2-301. S-160 no longer vents to atmosphere so is not subject to BAAQMD Reg 6, Rule 1 or SIP Reg 6 requirements.	- No. Need permit application to remove Regulation 6’s applicability. Amend CAM analysis for renewal to show no PM control device for this source because abated by A13/A26 material recovery system.
2f	Source S-199  Table IV-H8	In Title, replace “Abated by A-36 Carbon Canisters and/or A-65 Thermal Oxidizer” with “Abated by A-37 Carbon Canisters and/or A-57 Thermal Oxidizer”	Corrected error	- Agreed. Error was corrected.

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2g	Source S-199  Table VII-H8	In Title, replace “with Closed Vent System & Two Control Devices – Benzene Wastewater” with “Abated by A-37 Carbon Canisters and/or A-57 Thermal Oxidizer” and/or A-57 Thermal Oxidizer”	Consistent with Section IV correction	- Agreed. Table VII, the title was corrected to be consistent with Table IV title.
2h	Source S-150, S-131, S-200  Table VII-H7	In Title, replace “with Closed Vent System & Two Control Devices – Benzene Wastewater” with “Abated by A-37 Carbon Canisters and/or A-57 Thermal Oxidizer”	Corrected inconsistency between Sections IV and VII	- Agreed. Table VII, the title was corrected to be consistent with Table IV title.
2i	Sources A-57 and A-65 (Wastewater thermal oxidizers) and sources abated by these oxidizers  For A-36 and A-37 (Wastewater carbon canisters) and sources abated by these canisters  Tables VII-H.4.2; H.5.2; H7; H8; J38; J40; K1; K2; K3; K4	For temperature monitoring at thermal oxidizers A-57 and A-65, revise monitoring type to indicate Temperature CPMS (continuous parametric monitoring system)  For flow monitoring and VOC monitoring at carbon canisters A-36 and A-37, revise monitoring type to indicate Flow CPMS and VOC CPMS.  For Method 21, revise monitoring type to add “portable hydrocarbon detector”	Consistent with Statement of Basis and with CPMS changes made throughout renewal markup and consistent with Method 21 monitoring type used throughout permit	- Agreed. The temperature monitor was clarified as a continuous parametric monitor.  - Agreed. The flow monitor and VOC monitor at carbon canisters were clarified as continuous parametric monitors.

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2j	Internal Floating Roof Tanks Table IV-J11 Table IV-J12 Table IV-J13 Table IV-J34 Table IV-J35	Add BAAQMD 8-5-320.3.2 Requirement for Internal Floating Roof Inaccessible Fittings	Correct omissions	- Agreed. Omissions were added to the appropriate tables IV.
<b>3. Editorial Corrections</b>				
3a	Section II	Table IIA, S-45: Add space between maximum hourly Table IIA, S-151: Add space between process water Table IIA, S-227: Correct ‘heartcut’ Table IIA, S-241: Correct “Cummins” Table IIA, S-243: Correct “Detroit” Table IIA, S-1061: Add space between Low NOx Table IIB, “None”: Correct “Reservoirs” Table IIC, A1047: Correct “monitor”		- Agreed. All editorial corrections were made as requested.
3b	Section IV	Table IV-Refinery, 61.357(d)(8): Correct citation number Table IV-A1, 9-1-313.2: Correct “Refineries” Section IV – in several cases: Correct “Condition” Table IV-A4, 63.1564(c)(1): Correct “averageat” to “average at”, Correct “on” to “one” Table IV-A10, Condition 10574, Part 21: Correct “Ringelmann” Table IV-A11, 40 CFR Subpart J, 60.107(fg): Correct to 60.107(g) Table IV-A15, 40 CFR Subpart J, 60.100(a): Add “, and” between DevicesClaus Table IV-A15: Correct “Appendix F” Section IV tables (throughout): Delete blank lines in tables Table IV-A16, 9-10-504.1: Add space between Recordsfor Table IV-A21, IV-A23, and IV-A25, 93115.5(b): Correct “use” Table IV-A22.1, 60.334(h)(1), 60.334(i), 60.335(b)(10): Correct misspelled words Table IV-A22.1, 60.334(i)(3): Correct citation number Table IV-A22.2, 9-3-303, Reg 9-10 header: Correct “operation” and “NOx”		- Agreed. All editorial corrections were made as requested.

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		acronym Table IV-A25, 6-1-601 and 6-601: Delete line break Table IV-A25, 60.4202: Correct “manufacturers” Table IV-A25, 60.4211(e): Delete “Operationg of”, Correct ‘maintenance’ Table IV-A25, 60.4214: Correct “Notification” Table IV-A25, 80.510(a)(2)(i): Correct “cetane” Table IV-A25: Delete duplicate rows in 80.510 Table IV-A26, Condition 20820, Part 17: Correct “POC, and” to “POC, and” Table IV-D8, Header: Correct “Alkylate” Table IV-D10, Table IV-D11, Condition 20820, Part 40: Correct “Throughput” Table IV-E2, Condition 24298, Part 12: Make header row bold, Correct “Requirement” Table IV-H3, 8-8-314 thru 8-8-402.5: Remove space before semicolons Table IV-H4.2, Table IV-H5.2, 61.347(a)(1)(i): Correct “Fixed” Table IV-H4.2, Table IV-H5.2, 61.354(d): Correct “Monitor” Table IV-H5.2, 61.349(a)(1)(ii): Correct “requirements” Table IV-H6, 8-8-113; SIP 8-8-113: Correct “Treatment” Table IV-H7, Condition 11879: Correct “Condition” Table IV-H9, Correct header row title Table IV-I1, 60.592(d) and (e), 60.592a(d) and (e): Delete redundant “with” Table IV-J3, 63.654(f)(1)(i)(A)(1): Correct “requirements” Table IV-J4, Table IV-J6, Table IV-J7, Table IV-J8, 63.646(f)(1): Correct “requirements” Table IV-various: Add spaces between words		
3c	Section VI	Various conditions: Add spaces between words, remove spaces in words, deleted extra spaces between words, removed redundant periods at end of condition Condition 10797, Part 3: Correct “maintenance” Condition 10797, Part 6: Correct “Owner/Operator” Condition 11030, Part 6: Correct “the” Condition 15512, Part 1: Correct “atmosphere” and “source” Condition 19329, List of sources S-41: Correct tag number from “SG-2301” to		- Agreed. All editorial corrections were made as requested.

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		<p>“SG-2302”            Condition 19329 List of sources (BAP): Remove underline            Condition 19466, Part 3, Condition 24198, Part 3: Correct “Ringelmann”            Condition 20820 – entire condition: Remove underline            Condition 20820, Part 21a and 21b, 22, 74, 75, 76: Increase font size for consistency            Condition 20820, Part 22: Correct “Prescrubber”            Condition 20820: Remove page break after Part 73            Condition 22949: Correct numbering to start at Part 1 instead of Part 1            Condition 22949: Remove “a” at beginning of introductory section of Part 1            Condition 22949, Part 22, Part 29, Part 33, Part 35: Remove underline            Condition 24198, Part 3: Correct “Ringelmann”            Condition 24239, Part 7a: Correct “achieved”</p>		
3d	Section VII	<p>Table VII-A1, A2 last row, Table VII-A2, last row: Correct “compounds”            Table VII-A8.1, header: Add space after “GAS”            Table VII-A14.1, 2<sup>nd</sup> row: Correct “more”            Table A21, row 5: Correct “Records”            Table VII-D1, 1<sup>st</sup> row: Correct “superseded”            Table VII-D1, next to last row: Correct “during”            Table VII-E2, next to last 2 rows: Correct “Drop” and “Triennial drop”            Table VII-J38: Correct “Temperature, Delete extraneous “Record”            Table VII-J40: Correct “Condition”            Table VII-various: Add spaces after Condition numbers and line breaks before “Part”</p>		- Agreed. All editorial corrections were made as requested.
3e	Section VIII	<p>Add spaces between words            Delete redundant words            Correct “Recovery”            Correct “light”</p>		- Agreed. All editorial corrections were made as requested.
3f	Section IX	<p>Delete blank rows            Change font size for consistency</p>		- Agreed. All editorial corrections were made as requested.
3g	Section X	<p>Correct miscellaneous typos</p>		- Agreed. All editorial corrections were made



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				as requested.
3h	Section XI	Correct miscellaneous typos Add units to Units of Measure		- Agreed. All editorial corrections were made as requested.
<b>4. Statement of Basis Comments</b>				
4a	AN 19637 VIP Amendments	Replace engineering evaluation with final version dated May 1, 2009 (on CD)		- Agreed. Application 15606 (POC baseline application) the engineering evaluation version dated May 1, 2009 was replaced with version dated May 20, 2009.
4b	Table VII-J38 Table VII-J40 Table VII-K1	Document Continuous Parametric Monitor System (CPMS) updates		- Agreed. Updated the continuous parametric monitor system.
4c	CAM Analysis	Replace CAM analysis with final updated version dated May 14, 2010 (on CD)		- Agreed. Updated the CAM analysis.