

**Response to Comments**  
**B2758/B2759 Title V Permit Proposed Renewal (5/24/2010)**  
**Tesoro Public Comments - July 14, 2010**

<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
1	Cover Page	Change Tesoro Facility Contact to “Matthew Marusich”	Administrative Change	Requested Change Completed
2	Throughout	Editorial corrections: <ul style="list-style-type: none"> <li>• typographical errors,</li> <li>• word, line, and paragraph spacing and justification inconsistencies,</li> <li>• incorrect use of underlining, italics, and bold face fonts,</li> <li>• font type and size</li> </ul>	Administrative Changes	Will complete in Final permit.
3	Document headers, Throughout	Correct document section headers – moved section titles into headers. Corrected styles assigned to headers for Table of Contents. Added/removed section breaks to correct section headers	Administrative Changes	Will complete in Final permit.
4	II-A1, Throughout	Delete blank rows and rows for sources removed from the permit or relocated from one table to another	Administrative Change	Will complete in Final permit.
5	II-A1, Header	Add “Golden Eagle Refinery”	Administrative Change	Requested Change Completed.
6	II-A1, S135	Reinstate S135. Remove “Out of Service”. Add source row from Revision 4	Reverse action taken in Application 17928/17458. This tank is currently out of service, but Tesoro wishes to retain its permit to allow it to be put back into permitted service in the future.	Requested Change Completed. S-135 was not deleted in Application 17928. Stating this was an error and was corrected in the Statement of Basis.

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7	II-A1, Several	Delete the following tanks that have been demolished in 2009/2010: S278 (Tank A-278) S313 (Tank A-313) S316 (Tank A-316) S403 (Tank A-403)	Administrative Change – remove demolished sources	Requested Change Completed.
8	II-A1, S612	Correct throughput from 243K bbl/yr to 1,200K bbl/12 consecutive months Correct Firm Limit Condition to #6740, Part 3	Application 11091 (increase from 243K to 400K bbl/12 consecutive months and correct part numbers for Condition 6740) Application 21023/21024 (increase from 400 to 1,200 K bbl/12 consecutive months)	Requested Change Completed.
9	II-A1, S656, S658	Delete “A12 Vapor Recovery” and “A14 Vapor Recovery”. Add “Flare Gas Recovery System Compressors CP-539 and CP-540 to 100 # Fuel Gas System at #5 Gas Plant (S1526)”	Corrections to reflect as built configuration. S656 and S658 do not vent to the NASH compressors located at the Foul Water Stripper (A12) as proposed in Application 12205. These tanks vent to the suction of the flare gas recovery system compressors (CP-539 and CP-540), which discharge to the 100# Fuel Gas System via the #5 Gas Plant Wet Gas system. A new permit application will be submitted to make the necessary corrections in Condition 10696.	Permit condition 10696 requires abatement with A-12. Changes will be incorporated after new application is submitted and approved.

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10	II-A1, S854, S992, S1517	Delete “Abates”	Administrative Change, consistent with S944, S945, and S1524 entries in Table II-A1. See Applicability Determination for Flares as Control Devices	Requested Change Not Completed. Consistency achieved by adding or returning “Abates:” to the S944, S945, and S1524 entries. The District considers flares to be both sources and abatement devices. Note 1 lists the equipment abated by these sources.
11	II-A1, S854, S944, S945, S992, S1517, S1524	Change “process gas” to “process upset gas”	Consistent with the definition of process upset gas in 40 CFR 60 Subpart J ((e) <i>Process upset gas means any gas generated by a petroleum refinery process unit as a result of start-up, shut-down, upset or malfunction</i> ). The change was made to clarify operation of the flares as backup abatement/safety devices that combust only process upset gas and not a control device for normal operation. Not all sources are currently subject to 40 CFR 60 Subpart J, but all will become subject to that regulation per the Consent Decree by 2011.	Requested Change Not Completed. Changed “Process Gas” to “Vent Gas”. Flaring combusts vent gas, according to Regulation 12-11-203. Regulation 12-11-210 defines Vent Gas as: Any gas directed to a flare excluding assisting air or steam, flare pilot gas, and any continuous purge gases. With these sources, natural gas is listed as the combusted pilot/purge gas, and vent gas is now listed. Flares also abate the vent gas called ‘process upset gas’ as defined in NSPS. [Flares do not abate ‘process upset gas’ exclusively since (at a minimum) pilot and purge gas is combusted routinely.]

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12	II-A1, S904, S908, S909, S912, S913, S915, S916, S917, S919, S920, S921, S922, S926, S927, S928, S929, S930, S931, S932, S933, S934, S935, S937, S950, S951, S971, S972, S973, S974	Delete Firm Limit Condition #18372, Part 27 Reinstate Firm Limit Condition 16685, Part 1	Application 21464/21465	Requested Change Completed.
13	II-A1, S943	Change Description from “Butane (Process Gas)” to “Process Upset Gas (Butane)”	Delete “Process Gas” consistent with comment in SB. Add “Process Upset Gas” consistent with definition of process upset gas in 40 CFR 60 Subpart J to clarify operation and functionality of S943 as a backup abatement/safety device and not a control device for S691 normal operation. Source is not yet subject to 40 CFR 60 Subpart J, but will become subject to that regulation per the Consent Decree in 2011.	Requested Change Not Completed. Flare S943 combusts both natural gas and butane. Process Gas is a generic term referring to any gas generated in the petroleum refinery process operation. Flare S943 also abates the process gas called ‘process upset gas’ as defined in NSPS. [Flares do not abate ‘process upset gas’ exclusively since (at a minimum) pilot and purge gas is combusted routinely.]

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14	II-A1, S943	Delete "Abates: S691". Add "See Note 2"	Administrative Change, consistent with S944, S945, and S1524 entries in Table II-A1. See Applicability Determination for Flares as Control Devices	Requested Change Partially Completed. Note 2 edited and added. The District considers flares to be both sources and abatement devices. It is understood that S943 is operated when A21 refrigeration system is unable to abate S691. However, when S943 combusts butane gas, S943 abates S691.
15	II-A1, S952, S953, S954	Change Make or Type from "Clark" to "Ingersoll-Rand spark ignition 4 stroke" Add "SVG-8" to Model column	Correction and Clarification	Requested Change Completed.
16	II-A1, S955, S956, S957, S958, S959, S960	Add "spark ignition 2 stroke" to Make or Type column	Clarification	Requested Change Completed.
17	II-A1, S990	Change Description of tank to "Rich DEA"	Clarification of tank contents	Requested Change Completed.
18	II-A1, S992	Correct error in capacity from "mmBTU/yr" to "mmBTU/day"	Correct error in units – Corrected daily rate (316,800 mmBTU/day) is 24 times the hourly rate shown (13,200 mmBTU/hr) and corrected daily rate is consistent in order of magnitude with values in Ultramar – Rev 8.	Requested Change Completed.

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19	II-A1, S1013	Delete "Abates: S1401, S1415" Add "See Note 3"	Administrative Change, consistent with S944, S945, and S1524 entries in Table II-A1. See Applicability Determination for Flares as Control Devices	Requested Change Partially Completed. Note 3 edited and added. The District considers flares to be both sources and abatement devices. It is understood that no routine emissions are routed to S1013. However, when S1013 combusts vent gas, S1013 abates S851, S1401 and/or A1402. Also added S825 and S856 per current permit.
20	II-A1, S1412	Add "Startup Use Only"	Clarification	Requested Change Completed.
21	II-A1, S1413, S1414	Delete S1413 and S1414 from Table II-A1 and add to Table IIC	Sources S1413 and S1414 are no longer in Oleum (regulated) service. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. Databank shows Oleum storage for this storage. Change of service to exempt service requires an application. Change will be incorporated after Application 22430 is completed and approved.

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#	Location	Comment	Rationale	BAAQMD Response
22	II-A1, S1421	Split entry for two operating scenarios – exempt with existing Grandfathered Limit and regulated with information from Condition 13282.	Corrections; Application 11395 (1995)	Requested Change Not Completed. Sources cannot be both Grandfathered and NSR. Added throughput limit. Application 11395 added throughput limit and Condition 13282 does not allow for an alternative operating scenario. Any permitted tank can operate in exempt service per 19528-12.
23	II-A1, S1473	Correct capacity period from “per year” to “rolling 12 months”	Consistent with Condition 19197, Part 2	Requested Change Completed.
24	II-A1, S1475, S1476	Correct Capacity from “34 hrs/yr” to “50 hrs’yr” Change Firm Limit Condition from 22851, Part 1 to 18947, Part 5	Reverse changes made in Application 19419/19418 for these portable IC engines: <ul style="list-style-type: none"> <li>• Delete the sources from Condition 22851</li> <li>• Reinstate the 50 hrs/yr limit that was removed from Condition 18947, Part 5.</li> </ul> Portable IC Engines should not be subject to permit condition 22851, which is for in-use stationary IC Engines subject to CCR Title 17, Section 93115 (ATCM). A new permit application will be submitted to make the necessary corrections in Conditions 18947 and 22851.	Requested Change will be incorporated after application is submitted and approved.

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25	II-A1, S1485	Delete "FCC Merox product" from Description	Application 21711/21712 FCC Merox (S848) no longer in operation.	Requested Change Completed.
26	II-A1, S1504	Correct throughput from 400K bbl/yr to 1200 Kbb/12 consecutive months	Application 21023/21024 with units consistent with Condition 21849, part 13	Requested Change Completed.
27	II-A.1, S1522	Delete entirely from Renewal markup (don't just show as added and crossed out)	Changes added and later removed should not be shown as redline strikeout. The renewal markup should only show the changes from Revision 4.	Requested Change Completed.
28	II-A1, S1524	Correct flare pilot throughput limit from "1.314 MMscf" to "3.942 MMscf". Add specific parts for Firm Limit Condition 24323	Application 18752/18753 Correct error in throughput limit and correct omission of specific Firm Limit Condition parts.	Requested Change Completed.
29	II-A1, S1526	Correct capacity from "TBD" to 3.46 MMscf/hr	Application 18949/18950 BAAQMD Form G for S1526	Requested Change Completed.
30	II-A1, S1549	Add Tank 890 (diesel additive).	Application 20968/20969 [Temporary Permit to Operate issued May 2010]	Requested Change Not Completed. Application 20968/20969 not included in the renewed permit. S1549 will be added to the permit as a minor revision after the renewed permit is finalized and approved.
31	II-A1, S1550, S1551	Add backup steam boilers S1550 and S1551	Application 20977/20995	Requested Change Completed.



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#	Location	Comment	Rationale	BAAQMD Response
32	II-A1, Note 1	Revise Note 1 to correct explanation of operation of Hydrocarbon Flares with Flare Gas Recovery System as part of the 100# Fuel Gas System. Include explanation of operation of 40# Fuel Gas System and its relationship to Flare Gas Recovery System.	See Applicability Determination for Flares as Control Devices	Requested Change Not Completed. Note 1 inconsistent with FMP, Application 18752 and information in Table II. The District considers flares to be both sources and abatement devices. It is understood that the vent gas routed to the flares only occurs when the capacity of the flare gas recovery system is exceeded. However, when the flares combusts vent gas, they abate one or more of the listed sources. The issues of comingled regulated and exempt gas and defining a flare as a control device in the context of NSPS and NESHAP are not pertinent to the abated devices listed in Note 1.
33	II-A1, Note 2	Add new note to explain operation of S691 – Refrigerated Butane Tank with A21 (Refrigeration System) and S943 (Safety Flare).	See Applicability Determination for Flares as Control Devices	Note 2 edited and added.
34	II-A1, Note 3	Add new note to explain operation of S1013 – Ammonia Plant Flare.	See Applicability Determination for Flares as Control Devices	Note 3 edited and added.

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35	II-B, throughout	Delete blank rows	Administrative Change	Requested change will be completed when permit is final.
36	IIB, A12 (BAAQMD 1-301)	Correct sources controlled by removing S529, S530, S656, S658. Clarify abatement of vacuum towers by adding “vacuum tower ejectors”	Correction to reflect as built configuration. S529 and S530 are permanently out of service and do not vent to vapor recovery. S656 and S658 do not vent to the NASH compressors located at the Foul Water Stripper (A12) as proposed in Application 12205. S656 and S658 vent to the suction of the flare gas recovery system compressors (CP-539 and CP-540), which discharge to the 100# Fuel Gas System via the #5 Gas Plant Wet Gas system. A new permit application will be submitted to make the necessary corrections in Condition 10696.	Requested Change Not Completed. Permit Condition 10696 part 1 requires abatement with A-12. Even though S529 and S530 are shown as out of service in Table II-A1, the Permits to Operate have not been relinquished, so they cannot be considered permanently out of service. The requirements of Condition 10696 are applicable. Any changes will be incorporated after an application is submitted and approved.
37	IIB, A12 (BAAQMD 8-5-306)	Delete entire row		
38	IIB, A12 (Condition 10696, Part 1)	Correct sources controlled by removing S529, S530, S656, S658. Clarify abatement of vacuum towers by adding “vacuum tower ejectors”		
39	IIB, A14 (all rows)	Change description of A14 to include “#1 Gas Plant”	Clarify where recovered vapors are routed	Requested Change Completed.

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40	IIB, A14 (Condition 20923, Part 3)	Change "VOC: 98% control" to "None"	The referenced permit condition (20923, Part 3) only requires that S134 be vented to A14 and does not specify an abatement efficiency	Requested Change Not Completed. Instead, 98% changed to 98.5%. It is true that Condition 20923 does not specify a control efficiency. However, this is because the abatement efficiency used in the engineering evaluation of Application 7768 was thought to be conservative and did not have to be specified. S134 triggered BACT in Application 7768. BACT required 98% control. Emission calculations and offsets in Application 7768 were based on 98.5% control. Other permit conditions require 99.5% control for A-14.
41	IIB, A14 (40 CFR 60.112b(a)(3)(ii))	Delete S318; S327; S367 as sources controlled	S318, S327, and S367 are grandfathered sources constructed prior to the effective date for NSPS Kb. They have not been modified per 60.14 and are not subject to NSPS Kb.	Requested Change Not Completed. Permit Condition 21053 requires 95% control for S318 and S367 with a NSPS Kb basis. Any changes in applicability for these sources must be incorporated through an application for a change in conditions.

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42	IIB, A14 (40 CFR 60.112b(a)(3)(ii))	Delete S656 and S658 as sources controlled	Correction to reflect as built configuration. S656 and S658 do not vent to the NASH compressors located at the Foul Water Stripper (A12) and to A14 as proposed in Application 12205. S656 and S658 vent to the suction of the flare gas recovery system compressors (CP-539 and CP-540), which discharge to the 100# Fuel Gas System via the #5 Gas Plant Wet Gas system. A new permit application will be submitted to make the necessary corrections in Condition 10696.	Changes will be incorporated when the application is submitted and approved.
43	IIB, A14 (S1025)	Correct Description of A14	Administrative Change. Consistent with other A14 entries in Table IIB	Requested Change Completed.
44	IIB, A30 (BAAQMD 6-1-305 & SIP 6-305)	Delete "Regulation"	Administrative Change. Consistent with other Table IIB entries	Requested Change Completed.
45	IIB, A1002	Delete "Regulation"	Administrative Change. Consistent with other Table IIB entries	Requested Change Completed.
46	IIB, A1404	Delete "Tanks and" from Description Delete S1413 and S1414 as sources controlled	Sources S1413 and S1414 are no longer in Oleum (regulated) service and are no longer abated by A1404. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. Databank shows Oleum storage for S1413 and S1414. Change of service to exempt service surrendering permits requires an application. Change will be incorporated after Application 22430 is completed and approved.

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47	IIB, A1418	Add "Lean DEA" to description of packed bed scrubber. Add "BAAQMD 1-301", "none", and "nuisance odors" to Applicable Requirement, Operating Parameters, and Limit or Efficiency, respectively	Clarification and correct omissions	Requested Change Completed.
48	IIB, A1423	Delete entirely from Renewal markup (don't just show as added and crossed out)	Changes added and later removed should not be shown as redline strikeout. The renewal markup should only show the changes from Revision 4.	Requested Change Completed.
49	IIB, A1524	Add "None" to Operating Parameters and to Limit or Efficiency	Correct omission	Corrected omission by adding 50 scfm capacity and BAAQMD Cond 24323 Part 1.
50	IIB, A1525 (S990, S1416, S1418) (BAAQMD 1-301)	Add row for BAAQMD 1-301 for S990, S1416, and S1418	See Applicability Determination for S990, S1416, and S1418	Requested Change Completed. Also added 57.3 MM Btu/hr capacity.
51	IIB, A1525 (S990, S1416, S1418) (BAAQMD 6-1)	Delete row – sources are not subject to Regulation 6, Rule 1 and SIP Regulation 6.		Requested Change Not Completed. Incinerator stack is subject to Regulation 6.

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52	IIB, A1525 (S990, S1416, S1418) (BAAQMD 8-5)	Delete row – sources are subject only to Regulation 8-5-117 and not to Regulation 8-5-306		Requested Change Not Completed. It is not possible to determine if this change is valid. Application required with supporting source test data to demonstrate organic layer is not Alkylate (or other hydrocarbon) subject to 8-5-306. Similar service at another refinery shows 8-5-306 applicable.
53	IIB, A1525 (S1401, A1402)	Add “None” to Operating Parameters	Correct omission	Corrected omission by adding 57.3 MM Btu/hr capacity
54	IIB, A1526	Add A1526, packed bed scrubber for S990. This scrubber has the same functionality for S990 as A1418 has for S1418.	Correct omission. Complete incorporation of Application 17913/17914	Requested Change Completed.
55	IIB, A1550 and A1551	Add new SCRs for backup boilers S1550 and S1551	Application 20977/20995	Requested Change Completed.
56	IIB, S943	Change description to “Tank A-691 Safety Flare”	Consistent with Table II-A1 name for S943	Requested Change Completed.
57	IIB, S943	Change Sources Controlled to “Backup abatement for A21, which abates S691”	See Applicability Determination for Flares as Control Devices.	Requested Change Completed.
58	IIB, S1013	Change Sources Controlled from “TBD” to “Backup abatement – combusts only process upset gas from S851 and A1402.”	See Applicability Determination for Flares as Control Devices.	Corrected omission by adding sources currently permitted: S825, S851, S856 A1401 and A1402.
59	IIC, Throughout	Delete blank rows and rows for sources removed from service	Administrative Change	Will complete in Final permit.

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60	IIC, Several	Delete the following sources that have been demolished in 2009/2010: S15; S28; S36; S44; S70; S209; S229; S230; S233; S235; S374; S405; S430; S489	Administrative Change – delete demolished sources	Requested Change Completed.
61	IIC, S467	Correct Capacity from 1000K bbl to 1000 bbl	Correct error in tank size.	Requested Change Completed.
62	IIC, S778 (Tank A-778)	Delete source number and move entry to end of Table IIC	Correct error. This tank is not permitted, so does not have source number. It was added in the renewal for completeness	Requested Change Completed.
63	IIC, S1413, S1414	Remove sources from Table II-A1 and add to Table IIC	Sources S1413 and S1414 are no longer in Oleum (regulated) service. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. Databank shows Oleum storage for this storage. Change of service to exempt service requires an application. Change will be incorporated after Application 22430 is completed and approved.
64	IIC, S1552	Add S1552	Application 20997	Requested Change Completed.
65	III, IV, VII Tables	Removed blank rows Corrected formatting issues – line spacing; table cell text moved to top of cell; text justification changed to left justified or centered as appropriate; font corrected; font size corrected; paragraph indentations corrected	Administrative Change	Will complete in Final permit.

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66	IV-A.1	Remove 40 CFR Subpart A; 63.11 Control Device Requirements	See Applicability Determination for Flares as Control Devices	Requested Change Completed.
67	IV-A.1	40 CFR 63 Subpart GGGGG header row, remove FE "Y" and "Upon start-up for new sources"	Administrative Change	Requested Change Completed.
68	IV-B.1 (S802)	Condition 8077, delete all parts. Conditions listed apply to S901 and not to S802.	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. S802 FCCU Regenerator discharges emissions that are emitted from S901 CO Boiler. It is appropriate to show Bubble Condition 8077 at both sources.
69	IV-B.1 (S802)	Condition 22150, Delete Part 3	Application 19874/19875	Requested Change Completed.
70	IV-B.2 (S815, S816, S817, S1001)	Delete Condition 8548.	Application 17928/17458 (Condition was superseded by Condition 10696 and was removed from Section VI in renewal. Should be removed for these sources.)	Requested Change Completed.
71	IV-B.8 (S1007, S1008)	Delete Condition 1910 header row	Condition has been deleted in Section VI (all parts completed or otherwise deleted). Consistent with changes for other conditions deleted in entirety.	Requested Change Completed.



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72	IV-C.1.1 (S901)	Condition 8077, delete sitewide parts. Add requirements for S901 (move from Table IV-B.1 for S802)	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Sources are subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
73	IV-C.1.1 (S901)	Condition 22150, Delete Part 3	Application 19874/19875	Requested Change Completed.

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74	IV-C.1.2 (S904)	Condition 8077, delete sitewide parts.	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Sources are subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with the changes made in Application 19300/19301 and with the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
75	IV-C.1.2 (S904)	Condition 18372, Part 27 – remove “Daily Firing Rate Limits” from description	Application 21464/21465	Requested Change Completed.
76	IV-C.1.3 (S1550, S1551)	Add new table for new backup boilers.	Application 20977/20995	Requested Change Completed.
77	IV-C.2.1 (Flares Subject to NSPS)	Add “[S1517, S1524]” to: 1-522; 1-522.10; and SIP 1-522	Clarification	Requested Change Not Completed. All flares in Table IV-C.2.1 have an H2S CEMS located on each of the 42”, 48” and 24” flare headers.

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78	IV-C.2.1 (Flares Subject to NSPS)	Delete 40 CFR 60 Subpart A and 60.18 citations	See Applicability Determination for Flares as Control Devices	Requested Change Completed.
79	IV-C.2.1 (Flares Subject to NSPS)	Delete 40 CFR 63 Subpart A and 63.11 citation	See Applicability Determination for Flares as Control Devices	Requested Change Completed.
80	IV-C.2.1 (Flares Subject to NSPS)	Condition 24324, Add “Applies only to S854, S992, S1012, S1517”	Clarification	Requested Change Completed.
81	IV-C.2.2 (S943)	Delete BAAQMD Regulation 10 row	Applicability correction – S943 not subject to NSPS Subpart J, so not subject to Regulation 10	Requested Change Not Completed. Instead, added future effective date of 12/31/2011 per consent decree. Also, S943 has been subject to Regulation 10 in previous Title V revisions. Justification provided not sufficient for requested change.
82	IV-C.2.3 (Flares not Subject to NSPS)	Delete BAAQMD Regulation 10 and 10-14, Subpart J rows	Applicability correction – S944 and S945 not subject to NSPS Subpart J, so not subject to Regulation 10	Requested Change Not Completed. Instead, added future effective date of 12/31/2011 per consent decree.
83	IV-C.2.4 (S1013)	Edit Title Block	Administrative Change. Consistent with title block format for other sources	Requested Change Completed.
84	IV-C.2.4 (S1013)	Delete 40 CFR 60 Subpart A header row and all rows for 60.18	See Applicability Determination for Flares as Control Devices	Requested Change Completed.

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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
85	IV-C.3.1 (B2759 S56, S57)	Delete 6-1-301 Add 6-1-303 and 6-1-303.1 Delete SIP 6-301 Add SIP 6-303 and SIP 6-303.1	Applicability correction. Emergency standby engines are subject to Ringelmann #2 rather than Ringelmann #1 requirements in Regulation 6-1 and associated SIP	Requested Change Completed.
86	IV-C.3.1 (B2759 S56, S57)	Add CARB ATCM 93115 and 40 CFR 63 Subpart ZZZZ applicability	Correct omissions	Requested Change Completed.
87	IV-C.3.1 (B2759 S56, S57)	Show corrections for basis of Condition 23811 requirements	Corrections to be consistent with current version of the CARB ATCM 93115. A new permit application will be submitted to make the necessary corrections in Condition 23811.	Requested Change Not Completed. Instead, bases edited to be consistent with existing condition. Requested change will be incorporated after application is submitted and approved.
88	IV-C.3.2 (S952, S953, S954)	Add "Spark Ignition, 4 Stroke" to title and correct "Burns" to "Burn"	Clarification	Requested Change Completed.
89	IV-C.3.2 (S952, S953, S954)	Delete 40 CFR 61 Subpart FF (61.349 requirements for Closed Vent Systems and Control Devices)	Correct applicability error. S952, S953, S954 are the natural-gas fired engines for the No. 1 Gas Plant 40# Fuel Gas System Compressors. As part of the fuel gas system, these engines are exempt from all requirements in 40 CFR 61 Subpart FF per the exemption for fuel gas systems found in 61.340(d).	Requested Change Completed.
90	IV-C.3.2 (S952, S953, S954)	Add 40 CFR 63 Subpart ZZZZ applicability	Correct omission	Requested Change Completed.

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#	Location	Comment	Rationale	BAAQMD Response
91	IV-C.3.2 (S952, S953, S954)	Condition 8077, delete sitewide parts. Modify description of Part B8A	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Sources are subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
92	IV-C.3.3 (S955 thru S960)	Add "Spark Ignition, 2 Stroke" to title	Clarification	Requested Change Completed.
93	IV-C.3.3 (S955 thru S960)	Add 40 CFR 63 Subpart ZZZZ applicability	Correct omission	Requested Change Completed.

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#	Location	Comment	Rationale	BAAQMD Response
94	IV-C.3.4 (Multiple IC Engines)	Delete S1475 and S1476 from table headers and move to new Table IV-C.3.7. Delete Condition 18947 for S1475 and S1476.	Administrative Reorganization – S1475 and S1476 are portable diesel powered fire-water pump engines. They are not subject to the same CARB ATCM or federal regulations as the other stationary diesel powered fire-water engines in Table IV-C.3.4	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
95	IV-C.3.4 (Multiple IC Engines)	Add S1487 to table headers (move from Table IV-C.3.5). Add Condition 20672 for S1487.	Administrative Reorganization – correct applicability for S1487	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
96	IV-C.3.4 (Multiple IC Engines)	<ul style="list-style-type: none"> <li>• SIP 6-303.1 – correct description</li> <li>• Regulation 9-8-330.3 – add Future Effective Date of 1/1/2012</li> </ul>	Clarification and correct omission	Requested Change Completed.

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#	Location	Comment	Rationale	BAAQMD Response
97	IV-C.3.4 (Multiple IC Engines)	<ul style="list-style-type: none"> <li>• CARB ATCM – Add explanation in header row. Add missing applicability citations</li> <li>• Add 40 CFR 63 Subpart ZZZZ applicability</li> <li>• Condition 22851, add explanation in header row and revise descriptions</li> </ul>	Clarifications, correct omissions, and incorporate newest version of CARB ATCM	Requested Change Completed.
98	IV-C.3.5	Remove S1487 from table headers (move to Table IV-C.3.4). Delete Condition 20672 parts for S1487.	Administrative Reorganization – correct applicability for S1487	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
99	IV-C.3.5 (S1488)	Delete 6-1-301 Revise description of 6-1-303.1 Delete SIP 6-301 Revise description of SIP 6-303.1	Applicability correction. Emergency standby engines are subject to Ringelmann #2 rather than Ringelmann #1 requirements in Regulation 6-1 and associated SIP.	Requested Change Completed.

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#	Location	Comment	Rationale	BAAQMD Response
100	IV-C.3.5 (S1488)	<ul style="list-style-type: none"> <li>• CARB ATCM - Revise header row and Correct applicability for S1488</li> <li>• 40 CFR 63 Subpart ZZZZ - Revise header row and Correct applicability for S1488</li> <li>• Condition 22851, add explanation in header row and revise descriptions</li> </ul>	Clarification and applicability corrections for CARB ATCM and 40 CFR 63 Subpart ZZZZ. S1488 is an in-use diesel-fueled CI emergency fire-water pump as defined in CARB ATCM. S1488 is a new emergency stationary RICE with > 500 bhp as defined in 40 CFR 63 Subpart ZZZZ.	Requested Change Completed.
101	IV-C.3.6 (S1518, S1519)	Delete 6-1-301 Revise description of 6-1-303.1 Delete SIP 6-301 Revise description of SIP 6-303.1	Applicability correction. Emergency standby engines are subject to Ringelmann #2 rather than Ringelmann #1 requirements in Regulation 6-1 and associated SIP.	Requested Change Completed.
102	IV-C.3.6 (S1518, S1519)	Add 9-8-502 and 9-8-502.1	Correct omissions	Requested Change Completed.
103	IV-C.3.6 (S1518, S1519)	<ul style="list-style-type: none"> <li>• CARB ATCM – Add explanation in header row. Add missing applicability citations. Delete incorrect citations</li> <li>• 40 CFR 63 Subpart ZZZZ - update effective date and correct applicability</li> <li>• Condition 23811 – correct basis of parts</li> </ul>	Clarification and applicability correction for S1518 and S1519. Sources are new diesel-fueled CI emergency fire-water pumps as defined in CARB ATCM. Sources are new emergency stationary RICE with <= 500 bhp as defined in 40 CFR 63 Subpart ZZZZ. Corrections to Condition 23811 be consistent with current version of the CARB ATCM 93115. A new permit application will be submitted to make the necessary corrections in Condition 23811.	Requested Change Completed, except kept Condition 23811 bases consistent with Databank version.



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#	Location	Comment	Rationale	BAAQMD Response
104	IV-C.3.7 (S1475, S1476)	Add new table for S1475 and S1476	Administrative Reorganization – correct applicability for S1475 and S1476. A new permit application will be submitted to make the changes in Condition 18947.	Requested Change Not Completed. Table IV-C.3.4 is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
105	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Condition 677 – correct basis for Parts 1 and 2 and delete Part 3	Application 19647/19632 (parts 1 and 2) Application 19874/19875 (part 3)	Requested Change Completed

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#	Location	Comment	Rationale	BAAQMD Response
106	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Condition 8077 – delete sitewide parts	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Sources are subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
107	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Condition 12016 – delete header row and Parts 9.2 and 9.11.3	Application 21711/21712	Requested Change Completed
108	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Condition 16685 - Reinstate header row and part 1 Condition 18372, Part 27 – revise description and basis	Application 21464/21465	Requested Change Completed
109	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Condition 18372, Part 29 – revise description	Clarification	Requested Change Completed

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#	Location	Comment	Rationale	BAAQMD Response
110	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Condition 18539, Parts 8, 18, 18A – add basis Condition 20099, Part 6 – add basis Condition 21100, Part 4 – add basis Condition 18539, Part 16 – revise basis	Correct omissions Application 19647/19632 (18539, part 16)	Requested Change Completed
111	IV-C.4.2 (Heaters subject to NSPS J by Consent Decree)	Delete S913 from header rows of Conditions 20099, 21053, 21100, 21849 Delete “(S-908, S-909, S-912, S-913 only)” from the applicable parts of Conditions 20099, 21053, 21100, 21849	S913 is no longer part of 40# FG system and is no longer included in the 40# FG source test requirements. Explanation is found in header row and does not also need to be on each part.	Requested Change Not Completed. Inclusion of S913 is consistent with the Databank version of the conditions. Change will be incorporated when Change of Conditions Application 19825/19946 is completed and approved.
112	IV-C.4.3 (Heaters subject to NSPS J by date)	40 CFR 60 Subpart J – move 60.105(a)(4)(i), (ii), and (iii) so they are in correct numerical order	Administrative change	Requested Change Completed

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#	Location	Comment	Rationale	BAAQMD Response
113	IV-C.4.3 (Heaters subject to NSPS J by date)	Condition 8077 – delete sitewide parts	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables.	Requested Change Not Completed. Sources are subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
114	IV-C.4.3 (Heaters subject to NSPS J by date)	Condition 16685 - Reinstate header row and part 1 Condition 18372, Part 27 – revise description and basis	Application 21464/21465	Requested Change Completed

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#	Location	Comment	Rationale	BAAQMD Response
115	IV-C.4.4 (S950)	Condition 8077 – delete condition in its entirety – no source-specific parts are shown.	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Source is subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
116	IV-C.4.4 (S950)	Condition 16685 - Reinstate header row and part 1 Condition 18372, Part 27 – revise description and basis	Application 21464/21465	Requested Change Completed
117	IV-C.4.5 (S1412)	Add “Sulfuric” to Title block	Clarification	Requested Change Completed
118	IV-C.4.5 (S1412)	BAAQMD Regulation 6, Rule 1 – correct Federal Enforceability for all citations to “N”	Correction	Requested Change Completed
119	IV-C.4.6 (S1106, S1470)	Add “Applicable only when sources are firing refinery fuel gas.” To header rows of BAAQMD Regulation 10; 40 CFR 60 Subpart J; 40 CFR 60 Appendix B; 40 CFR 60 Appendix F	Clarification	Requested Change Completed. Also removed “Natural Gas Fired” from title block.

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#	Location	Comment	Rationale	BAAQMD Response
120	IV-C.4.7 (S1511, S1512)	Add “Applicable only when sources are firing refinery fuel gas.” To header rows of BAAQMD Regulation 10; 40 CFR 60 Subpart J; 40 CFR 60 Appendix B; 40 CFR 60 Appendix F	Clarification	Requested Change Completed
121	IV-C.5.1 (S963)	Revise Title Block	Administrative Change – consistent with titles of other sources	Requested Change Completed
122	IV-C.5.1 (S963)	Delete past due future effective dates on 9-9-301.2; 9-9-301.4; 9-9-504; 9-9-605	Administrative Change	Requested Change Completed
123	IV-C.5.1 (S963)	Condition 8077 – delete condition in its entirety	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Source is subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with other sources in the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).

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#	Location	Comment	Rationale	BAAQMD Response
124	IV-D.1 (Amorco wharf S55)	40 CFR 63 Subpart Y: <ul style="list-style-type: none"> <li>• Add explanation of applicability to header row</li> <li>• Add 63.560 and revise descriptions for applicable citations</li> <li>• Delete 63.560(c) Table 1 row (40 CFR 63.11 General Control Device Requirements apply).</li> <li>• Add 63.560(d) Exemptions from MACT &amp; RACT Standards</li> <li>• Delete all applicability except exemptions at 63.560(d)(1) and 63.560(d)(7)</li> </ul>	<ul style="list-style-type: none"> <li>• Clarification – see Applicability Determination for Marine Tank Vessel Loading</li> <li>• Clarification</li> <li>• 40 CFR 63.11 General Control Device Requirements do not apply to the Amorco Wharf. There is no flare at this facility.</li> <li>• Correct omission</li> <li>• See Applicability Determination for Marine Tank Vessel Loading</li> </ul>	Requested Changes Partially Completed. Deleted 63.560(c) Table 1 63.11 row. The remaining changes may be valid, but need to be submitted in a new application for the following reasons: <ul style="list-style-type: none"> <li>• Table II says S100 Loading: Crude Oil, Gasoline, Diesel, Jet A, No. 6 Fuel Oil, Naphtha, Kerosene, Gas Oil</li> <li>• Table II says S108 Loading: Crude Oil, Gasoline, Diesel, Jet A, No. 6 Fuel Oil, Naphtha, Kerosene, Gas Oil</li> <li>• IV-D.1 says S55 Unloading Only</li> <li>• 22455-11 prohibits shipping any crude from S55</li> </ul>

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#	Location	Comment	Rationale	BAAQMD Response
125	IV-D.1 (Amorco wharf S55)	Condition 8077 – delete sitewide parts	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Source is subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with other sources in the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).



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#	Location	Comment	Rationale	BAAQMD Response
126	IV-D.2 (S100)	40 CFR 63 Subpart Y: <ul style="list-style-type: none"> <li>• Add explanation of applicability to header row</li> <li>• Add 63.560 and revise descriptions for applicable citations</li> <li>• Delete 63.560(c) Table 1 row (40 CFR 63.11 General Control Device Requirements apply).</li> <li>• Add 63.560(d) Exemptions from MACT &amp; RACT</li> <li>• Revise description of 63.560(d)(3)</li> <li>• Add missing applicability requirements and delete non-applicable requirements</li> <li>• Delete duplicate listings of 63.561 and 63.560(d)(7)</li> </ul>	<ul style="list-style-type: none"> <li>• Clarification – see Applicability Determination for Marine Tank Vessel Loading</li> <li>• Clarification</li> <li>• 40 CFR 63.11 General Control Device Requirements do not apply to S100. This source is vented to the 40# Fuel Gas system via the A14 vapor recovery system. S100 cannot be independently routed to the flares via any flare gas recovery system header. See Applicability Determination for Flares as Control Devices</li> <li>• See Applicability Determination for Marine Tank Vessel Loading</li> <li>• Correction</li> </ul>	Requested Changes Partially Completed. Deleted 63.560(c) Table 1 63.11 row. The remaining changes may be valid, but need to be submitted in a new application for the following reasons (inconsistent with proposed Applicability Determination): <ul style="list-style-type: none"> <li>• Table II says S100 Loading: Crude Oil, Gasoline, Diesel, Jet A, No. 6 Fuel Oil, Naphtha, Kerosene, Gas Oil</li> <li>• Table IV-D.2 says A-14 Vapor Recovery, not fuel gas</li> <li>• Table II says S108 Loading: Crude Oil, Gasoline, Diesel, Jet A, No. 6 Fuel Oil, Naphtha, Kerosene, Gas Oil</li> <li>• IV-D.1 says S55 Unloading Only</li> <li>• 22455-11 prohibits shipping any crude from S55</li> <li>• 63.640(d)(5) does not apply when regulated emissions do not go to fuel gas system</li> </ul>

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127	IV-D.2 (S100)	40 CFR 63 Subpart CC: <ul style="list-style-type: none"> <li>• Add 63.640(d)</li> <li>• Revise descriptions and add “as applicable to marine tank vessels only”</li> </ul>	<ul style="list-style-type: none"> <li>• Correct omission</li> <li>• Clarification of applicability – see Applicability Determination for Marine Tank Vessel Loading</li> </ul>	Requested Change Not Completed. Include in the new application referenced in #126.
128	IV-D.2 (S100)	Condition 8077 – delete sitewide parts	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Source is subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with other sources in the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
129	IV-D.4 (S108)	Add “Marine Bulk Plant” to Title Block	Clarification	Requested Change Completed.

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130	IV-D.4 (S108)	40 CFR 63 Subpart Y: <ul style="list-style-type: none"> <li>• Add explanation of applicability to header row</li> <li>• Add 63.560 and revise descriptions for applicable citations</li> <li>• Delete 63.560(c) Table 1 row (40 CFR 63.11 General Control Device Requirements apply).</li> <li>• Add 63.560(d) Exemptions from MACT &amp; RACT Standards</li> <li>• Delete all applicability except exemptions at 63.560(d)(1) and 63.560(d)(7)</li> </ul>	<ul style="list-style-type: none"> <li>• Clarification– see Applicability Determination for Marine Tank Vessel Loading</li> <li>• Clarification</li> <li>• 40 CFR 63.11 General Control Device Requirements do not apply to S108 because it has no marine vapor recovery system and its emissions cannot reach a flare.</li> <li>• Correct omission</li> <li>• See Applicability Determination for Marine Vessel Loading</li> </ul>	Requested Change Partially Completed. Deleted 63.560(c) Table 1 63.11 row. The remaining changes may be valid, but need to be submitted in a new application (See #124 and #126)

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#	Location	Comment	Rationale	BAAQMD Response
131	IV-D.4 (S108)	Condition 8077 – delete sitewide parts	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Source is subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with other sources in the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
132	IV-D.7 (S1025)	BAAQMD 8-33-403 – Revise description BAAQMD 8-33-403.3 – Delete	Clarification and S1025 is not subject to 40 CFR 63 Subpart BBBB (applies only to area sources)	Requested Change Completed.
133	IV-D.7 (S1025)	40 CFR 60 Subpart XX 40 CFR 63 Subpart R 40 CFR 63 Subpart CC <ul style="list-style-type: none"> <li>• Add explanations of applicability to header rows</li> <li>• Delete applicability for vapor collection system</li> <li>• Add applicability for cargo trucks and other missing citations</li> </ul>	See Applicability Determination for S1025	Requested Change Completed.

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134	IV-D.7 (S1025)	Add "Complete" to Condition 21849, Part 8	Consistent with Section VI mods	Requested Change Not Completed. Databank does not show 21849-8 as completed. Change will be incorporated once an application for an administrative change in conditions is submitted and approved.
135	IV-D.9 (S1525)	Revise Title Block	Consistent with source name in Table II-A1	Requested Change Completed.
136	IV-E.2 (S659, S60)	Condition 22150, Delete Part 3	Application 19874/19875	Requested Change Completed in Table IV-E.1 (not E.2).
137	IV-E.4 (Cooling Towers)	Delete Condition 22230	This condition requires monitoring for compliance with BAAQMD Regulation 6-1-311 and SIP Regulation 6-311 for cooling towers. This condition should be removed because this monitoring is not warranted for cooling towers based on findings documented in the Statement of Basis for Revision 3 of the Title V permit (December 2006; AN 12599).	Requested Change Completed. Condition 22230 was proposed but never approved. Including it in the draft permit was an error.
138	IV-Section F Tank Tables Throughout	Delete all blank rows	Changes not shown in markup – need to be made before permit is issued	Will complete when permit becomes final.
139	IV-F.1, S134	Change Group from 401C to 401D	Consistent with Table IV-F.2 group assignment	Requested Change Completed

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140	IV-F.1, S135	Add S135 and show revisions to Revision 4 permit conditions	Reverse action taken in Application 17928/17458. This tank is currently out of service, but Tesoro wishes to retain its permit to allow it to be put back into permitted service in the future. Application 17537/17538 (delete Condition 8636) Application 19874/19875 (delete Condition 19528-1)	Requested Change Completed
141	IV-F.1, S198	Change Group from 101D to 101C	Consistent with Changes made in Table IV-F.2	Requested Change Completed
142	IV-F.1, S278 IV-F.1, S313 IV-F.1, S316 IV-F.1, S403	Delete tanks that have been demolished	Administrative Change – remove demolished sources	Requested Change Completed. This leaves no sources in Group 302B, which is now “Reserved”.
143	IV-F.1, S318 IV-F.1, S367	Change group from 401C to 401A	S318 and S367 are grandfathered sources, constructed prior to the effective date of NSPS Kb and not modified per 60.14. These sources are not. subject to NSPS Kb (401C). The appropriate applicability is group 401A.	Requested Change Not Completed. It is inconsistent with the basis of 21053-6.
144	IV-F.1, S327, S529, S530	Change group from 101E to 101D	Consistent with Changes made in Table IV-F.2 [Old group 101D was deleted and Group 101E was renumbered to 101D]	Requested Change Completed
145	IV-F.1, S432	Delete “None” from Permit Condition	Correction	Requested Change Completed

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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
146	IV-F.1, S629	Delete from Table IV-F.1	S629 is aqueous ammonia – 12% solution. It must be permitted due to toxics regulations, but it has no applicable regulatory requirements and does not need to be included in Section IV.	Requested Change Completed.
147	IV-F.1, S656, S658	Condition 10696, Part 1 – Remove “by A-12” from description	Correction to reflect as built configuration. S656 and S658 do not vent to the NASH compressors located at the Foul Water Stripper (A12) as proposed in Application 12205. These tanks vent to the suction of the flare gas recovery system compressors (CP-539 and CP-540), which discharge to the 100# Fuel Gas System via the #5 Gas Plant Wet Gas system. A new permit application will be submitted to make the necessary corrections in Condition 10696.	Requested Change Not Completed. 10696-1 requires abatement by A-12. Changes will be incorporated after the new application is submitted and approved.
148	IV-F.1, S664	Add “None” to Permit Condition	Correct omission	Requested Change Completed
149	IV-F.1, S743, S746	Delete S743 and S746	Sources out of service and demolished. Consistent with changes made in Table II-A1 and Table IV-F.2.	Requested Change Completed

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#	Location	Comment	Rationale	BAAQMD Response
150	IV-F.1, S990, S1416, S1418	Change Group from 403 to 101B	See Applicability Determination for S990, S1416, and S1418	Requested Change Not Completed. There is no data demonstrating that organic layer is exempt material. Applicability consistent with similar tanks in the District. One similar tank burnt down. The change will be incorporated once a new application with supporting data is submitted and approved.
151	IV-F.1, S1421	Add S1421 with Condition 13282 and two tank groups (101B and 202). Add Footnote 9	S1421 is normally in exempt organic service (Group 101B) because of the diesel-like organic material in the top layer (added for odor control). Condition 13282 was imposed in 1995 by Application 11395 and applies only when tank is in regulated service (New Source Review). When in regulated service, S1421, which was constructed in 1982, is an NSPS Ka tank (Group 202).	Requested Change Not Completed. Added source to Group 202. See Comment # 22.



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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
152	IV-F.1, S1422	Add S1422	S1422 is in exempt organic service (Group 101B) because of the diesel-like organic material in the top layer (added for odor control)	Requested Change Not Completed. S1422 is permitted as shown in Table IIA. Added source to Group 202 since there is no evidence that the organic layer is exempt material.
153	IV-F.1, S1522	Delete entirely from Renewal markup (don't just show as added and crossed out)	Changes added and later removed should not be shown as redline strikeout. The renewal markup should only show the changes from Revision 4.	Requested Change Not Completed. True, S1522 was not in Rev 4, but it was granted an Authority to Construct and Minor Revision Application 17475 was submitted. Showing S1522 added and deleted conveys completeness.
154	IV-F.1, S1549	Add S1549	Application 20968/20969 [Temporary Permit to Operate issued May 2010]	Requested Change Not Completed. Application 20968/20969 not included in the renewed permit. S1549 will be added to the permit as a minor revision after the renewed permit is finalized and approved.
155	IV-F.2, Group 101B	Delete S403	Administrative Change – delete demolished source	Requested Change Completed

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#	Location	Comment	Rationale	BAAQMD Response
156	IV-F.2, Group 101B	Delete S629	S629 is aqueous ammonia – 12% solution. It must be permitted due to toxics regulations, but it has no applicable regulatory requirements and does not need to be included in Section IV.	Requested Change Not Completed. Revision 4 showed MACT CC Recordkeeping applicable. This change may be incorporated once a new application with supporting applicability determination is submitted and approved. See # 146
157	IV-F.2, Group 101B	Add S990, S1416, S1418	See Applicability Determination for S990, S1416, and S1418	Requested Change Not Completed. There is no data demonstrating that organic layer is exempt material. Applicability consistent with similar tanks in the District. One similar tank burnt down. The change will be incorporated once a new application with supporting data is submitted and approved. See # 150

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#	Location	Comment	Rationale	BAAQMD Response
158	IV-F.2, Group 101B IV-F.2, Group 202	Add S1421	S1421 is normally in exempt organic service (Group 101B) because of the diesel-like organic material in the top layer (added for odor control). Condition 13282 was imposed in 1995 by Application 11395 and applies only when tank is in regulated service (New Source Review). When in regulated service, S1421, which was constructed in 1982, is an NSPS Ka tank (Group 202).	Requested Change Not Completed. Added source to Group 202. See Comment # 22.
159	IV-F.2, Group 101B	Add S1422	S1422 is in exempt organic service (Group 101B) because of the diesel-like organic material in the top layer (added for odor control)	Requested Change Not Completed. S1422 is permitted as shown in Table IIA. Added source to Group 202 since there is no evidence that the organic layer is exempt material. See # 152.
160	IV-F.2, Group 101B	Add S1549	Application 20968/20969 [Temporary Permit to Operate issued May 2010]	Requested Change Not Completed. Application 20968/20969 not included in the renewed permit. S1549 will be added to the permit as a minor revision after the renewed permit is finalized and approved.

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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
161	IV-F.2, Group 201A	Add S135	Reverse action taken in Application 17928/17458. This tank is currently out of service, but Tesoro wishes to retain its permit to allow it to be put back into permitted service in the future.	Requested Change Completed. S-135 was not deleted in Application 17928. Stating this was an error and was corrected in the Statement of Basis. See # 6.
162	IV-F.2, Group 301B	Delete S313	Administrative Change – delete demolished source	Requested Change Completed.
163	IV-F.2, Group 302B	Delete S278 and S316 (all sources) Show group as “Not Used”	Administrative Change – delete demolished sources	Requested Change Completed by indicating "Reserved..." and "No Sources". See # 142.
164	IV-F.2, Group 401A	Add S318, S367	S318 and S367 are grandfathered sources, constructed prior to the effective date of NSPS Kb and not modified per 60.14. These sources are not. subject to NSPS Kb (401C). The appropriate applicability is group 401A.	Requested Change Not Completed. It is inconsistent with the basis of 21053-6. See # 143.
165	IV-F.2, Group 401C	Delete S318, S367	S318 and S367 are grandfathered sources, constructed prior to the effective date of NSPS Kb and not modified per 60.14. These sources are not. subject to NSPS Kb (401C). The appropriate applicability is group 401A.	Requested Change Not Completed. It is inconsistent with the basis of 21053-6. See # 143 and #164.

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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
166	IV-F.2, Group 403	Delete S990, S1416, and S1418 (all sources) Show group as "Not Used"	See Applicability Determination for S990, S1416, and S1418.	Requested Change Not Completed. There is no data demonstrating that organic layer is exempt material. Applicability consistent with similar tanks in the District. One similar tank burnt down. The change will be incorporated once a new application with supporting data is submitted and approved. See # 150.
167	IV-F.3	In BAAQMD Regulation 10: Correct description for 10-16; NSPS Kb In NSPS Ka, 60.110a row: Delete "X" for Group 401C	Correct omission and Clarification	Requested Change Completed.
168	IV-F.3	In 40 CFR 60 Subpart Kb: Add applicability for Group 401C (Same as Group 404)	Correct omission and Clarification	Requested Change Completed.
169	IV-F.3, Group 101	Delete "X" in BAAQMD 8-5-100, 8-5-101, 8-5-602, 8-5-604	Administrative Change – remove non-applicable citations.	Requested Change Completed.
170	IV-F.3, Group 302B	Delete "B" from Group 302 column heading to remove Group 302B Delete "B" from all cells in the column for Group 302 to remove Group 302B	Administrative Change – delete demolished sources (S278 and S316)	Requested Change Not Completed. 303B Reserved for Riveted, NSPS Kb, MACT Overlap 63.640(n)(1), (3), and (8) - Group 1

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#	Location	Comment	Rationale	BAAQMD Response
171	IV-F.3, Group 403	Delete column for Group 403 Delete citations used only for that Group: 60.112b(b); 60.112b(b)(1) 63.119(e); 63.120(d); 63.123(f); and 63.148 and all subparagraphs of those sections 63.646(i) 63.654(g)(5) and all subparagraphs 63.654(i)(2)	See Applicability Determination for S990, S1416, and S1418.	Requested Change Not Completed. There is no data demonstrating that organic layer is exempt material. Applicability consistent with similar tanks in the District. One similar tank burnt down. The change will be incorporated once a new application with supporting data is submitted and approved. See # 150.
172	IV-F3	Delete the following citations that contain requirements for flares as control devices: 60.113b(d) 61.349(a)(2)(iii) 61.356(c) for Group 401 only 61.356(c)(3) 61.357(j)(7) Revise the following descriptions to remove references to flares as control devices for: 60.112b(a)(3)(ii)	Tanks are controlled by venting to the refinery 40# Fuel Gas System via the A14 vapor recovery system. The sources cannot be independently routed to the flare gas recovery system headers. See Applicability Determination for Flares as Control Devices	Requested Change Partially Completed. 61.356(c) and 61.356(c)(3) not found.
173	IV-F.3	Add 63.640(d) Revise description of 63.640(d)(5)	Correct omission and Clarification	Requested Change Completed.
174	IV-G.2, Individual QQQ Drains	Add 63.640(o)(1) overlap for Group 2 WW streams.	Correct omission	Requested Change Completed.

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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
175	IV-G.3 (S513)	Remove 40 CFR 60 Subpart Kb requirements	Source is a grandfathered source. It has not been modified per 60.14 and is not subject to NSPS Kb	Requested Change Not Completed. It is inconsistent with the basis of 21053-6.
176	IV-G.3 (S513)	Add 63.640(d) Revise description of 63.640(d)(5)	Correct omission and Clarification	Requested Change Completed.
177	IV-G.3 (S513)	Delete Condition 21053, part 7	Source tests in Condition 21053 do not apply to S513	Requested Change Not Completed. 21053-7 source test is to demonstrate efficiency of S513 abatement requirement in 21053-6.
178	IV-G.4, S532 and S1484	Move 61.347(a)(1)(ii) to correct numerical order Correct citation from 61.347(a)(1)(i) to 61.347(c)	Corrections	Requested Change Completed.
179	IV-G.4, S532 and S1484	Delete requirements for flares as control devices: 61.349(a)(2) 61.349(a)(2)(ii)	Sources are controlled by venting to the refinery 40# Fuel Gas System via the A14 vapor recovery system. The sources cannot be independently routed to the flare gas recovery system headers. See Applicability Determination for Flares as Control Devices	Requested Change Completed by changing 61.349(a)(2)(ii) to 61.349(a)(2)(i).
180	IV-G.4, S532 and S1484	Add 63.640(d) Revise description of 63.640(d)(5)	Correct omission and Clarification	Requested Change Completed.
181	IV-G.4, S532 and S1484	Condition 20099 – Correct basis of Parts 4, 5, 6	Corrections	Requested Change Not Completed. Only Part 6 corrected.
182	IV-G.5, S606 and S607	Regulation 8, Rule 2 – Add: 8-2-101; 8-2-601	Correct omissions – consistent with other sources subject to Regulation 8, Rule 2	Requested Change Completed.

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#	Location	Comment	Rationale	BAAQMD Response
183	IV-G.6, S699	Revise Title Block from “Abated by A14” to “With A14”	Consistent with other title blocks for other source tables where sources are vented to A14	Requested Change Not Completed. Most title blocks are “Abated by A14”. The only “with A14” was in S1025 Table IV-D.7. This was revised to be consistent.
184	IV-G.6, S699	Delete requirements for closed vent systems and control devices (60.692-5 and all subparagraphs).	<p>Flare as control device requirements: Source is vented to the refinery 40# fuel gas system via the A14 vapor recovery system. The source cannot be independently routed to the flare gas recovery system. See Applicability Determination for Flares as Control Devices.</p> <p>Closed vent system requirements: In the definition of closed vent system in 40 CFR 60 Subpart QQQ (60.691), when emissions from a source are routed to a fuel gas system, the vapor recovery system is not subject to any of the closed vent system requirements in 60.692-5.</p>	Requested change Completed.



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185	IV-G.6, S699	Add 63.640(d) and 63.640(d)(5) exclusion for emission points vented to fuel gas.  Delete 63.640(o)(1).	S699 is vented to the 40# Fuel Gas system via the A14 vapor recovery system. In accordance with the exemption in 63.640(d)(5), this emission point is exempt from Subpart CC and is therefore exempt from the overlap with 40 CFR 60 Subpart QQQ in 63.640(o)(1).	Requested Change Completed.
186	IV-G.8, S819	Delete 60.692-5(c) Requirements for flare as control device	Source is vented to A14 vapor recovery system and cannot independently be routed to any flare or to the flare gas recovery system. See applicability determination for A14. Source can also be vented to A39 thermal oxidizer, which is not subject to requirements for flare as control device	Requested Change Completed.
187	IV-G.8, S819	Revise Title Block from “Abated by A14” to “With A14”	Consistent with other title blocks for other source tables where sources are vented to A14	Requested Change Not Completed. Most title blocks are “Abated by A14”. The only “with A14” was in S1025 Table IV-D.7. This was revised to be consistent.

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188	IV-G.8, S819	60.692-5 and all applicable closed vent system requirements in the subparagraphs of 60.692-5, add “[Applies only when source is vented to A39]”  Delete 60.692-5(b) Delete 60.692-5(c)	In the definition of closed vent system in 40 CFR 60 Subpart QQQ (60.691), when emissions from a source are routed to a fuel gas system, the vapor recovery system is not subject to any of the closed vent system requirements in 60.692-5. Therefore, the closed vent system requirements of 60.692-5 apply to S819 only when that source is vented to A39 and not when the source is vented to A14 and only the control device requirements of 60.692-5 that apply to the thermal oxidizer A39 apply to S819.	Requested Change Completed.
189	IV-G.10, S1026	Add “Abated by A39” to Title Block	Correct omission	Requested Change Completed.
190	IV-H.2, S1401	Delete area monitoring requirements: 1-510; 1-530; 1-540; 1-542; 1-543; 1-544	The area monitoring requirements are sitewide rather than site specific requirements and are found in Table IV-A.1.	Requested Change Completed.

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191	IV-H.2, S1401	Condition 8077 – delete sitewide parts	Only those parts of Condition 8077 that directly apply to the sources should be listed in the source-specific tables. Sitewide requirements should only be listed in the sitewide tables.	Requested Change Not Completed. Source is subject to Bubble Condition 8077 so it is appropriate to show all condition requirements in source table. Not all refinery sources are subject to Bubble Condition 8077 so it is not appropriate to move parts to the sitewide table. Also, keeping these parts is consistent with other sources in the Revision 4 Title V permit that showed all parts of Bubble Condition 4357 (prior to combining it with 8077 in Application 19647/19632).
192	IV-H.2, S1401	Condition 21053, Part 2 – add basis	Correct omission	Requested Change Completed.
193	IV-H.3, S1404	Add “Abated by A1422 Scrubber” to Title Block	Correct omission	Requested Change Completed.
194	IV-H.3, S1404	Condition 21053, Part 2 – add basis	Correct omission	Requested Change Completed.
195	IV-H.5, S1405	Condition 21053, Part 2 – add basis	Correct omission	Requested Change Completed.

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196	IV-H.6, S1413, S1414	Delete table in its entirety	Sources S1413 and S1414 are no longer in Oleum (regulated) service. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. Databank shows Oleum storage for S1413 and S1414. Change of service to exempt service surrendering permits requires an application. Change will be incorporated after Application 22430 is completed and approved.
197	IV-H.6 (S1415)	Re-number, was Table IV-H.7 Revise Title Block to correct source abatement consistent with Table II-A1 Regulation 8, Rule 2 header row – remove “District”	Corrections to abatement devices – review of P&IDs shows that the S1415 SAP Loading Rack is not abated by the A1525 SRU Stack Incinerators. S1415 is abated by the A1404 Mist Eliminator. Administrative changes	Requested Change to Abatement Completed.
198	IV-H.6 (S1415)	Remove Regulation 12, Rule 10 (Oleum Transfer Operation).	Loading rack will no longer be used in Oleum service since S1413 and S1414 will no longer be in that service. Sources S1413 and S1414 are no longer in Oleum (regulated) service. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. Databank shows Oleum storage for S1413 and S1414. Change of service for S1415 requires an application. Change will be incorporated after Application 22430 is completed and approved.
199	IV-H.8 (S1421, S1422)	Delete table in its entirety	Move S1421 and S1422 to the Tank Tables in Section IV-F.	Requested Change Completed.

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200	IV-J0	Change Title Block from “Fugitive” to “Equipment Leak”	Editorial	Requested Change Not Completed. “Fugitive” sources is consistent with other permits.
201	IV-J0	Spell out non-standard abbreviations in several places	Clarification	Requested Change Completed.
202	IV-J1	Add “Source-specific” to Title Block	Correct omission	Requested Change Completed.
203	IV-J.1	Delete requirements for flares as control devices: 60.482-10(d) 60.482-10a(d) 61.242-11(d)	See Applicability Determination for Flares as Control Devices	Requested Change Completed.
204	IV-J.1	Add Condition 11609, Part B6A 100 ppm fugitive emission limit for Alky pumps vented to A14 (previously vented to A41 Thermal Oxidizer)	Correct omission	Requested Change Completed.
205	IV-J.1	Add Condition 19199, Parts A5, B5, C5, and G5 100 ppm fugitive emission limits for various pumps installed as part of Application 2508.	Correct omission	Requested Change Completed.
206	IV-J.2	Add “Requirements” to Title Block	Correct omission	Requested Change Completed.

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207	IV-J.3 (S804, S807, S822, S834)	Delete empty table and renumber subsequent tables	Consistent with comment in Statement of Basis. The blowdown towers have been taken out of regulated service. They have been moved to the exempt source table in Section II. Their tables in Sections IV and VII contain no applicable requirements. Subsequent tables in Section J should be renumbered. Reference in SOB should be to table number from Revision 4, not IV-J3.	Requested Change Not Completed. Renumbering not done to prevent confusion of future references. For a permit revision or reopening, using Revision 4 as a starting point would be considered. However, since this is a permit renewal and there have been draft versions with Table IV-J.3, it is retained to prevent confusion.
208	IV-J.3 (S823, S824)	Renumber was IV-J.4	Administrative	Requested Change Not Completed. See Comment # 207.
209	IV-J.4 (S1543 thru S1548)	Renumber was IV-J.5	Administrative	Requested Change Not Completed. See Comment # 207.
210	IV-J.5 (S590)	Renumber was IV-J.6	Administrative	Requested Change Not Completed. See Comment # 207.
211	IV-J.5 (S590)	Condition 7405 – Delete rows for parts 2 and 3	Corrections – consistent with deleted condition parts throughout Section IV	Requested Change Not Completed. Retained with reason for deletion.
212	IV-J.6 (S825, S856)	Renumber was IV-J.7	Administrative	Requested Change Not Completed. See Comment # 207.

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213	IV-J.6 (S825, S856)	Regulation 8, Rule 2 – update effective date and add: 8-2-101; 8-2-601	Administrative change and Correct omissions – consistent with other sources subject to Regulation 8, Rule 2	Requested Change Completed.
214	IV-J.6 (S825, S856)	BAAQMD Condition 19528 – Delete header row and Part 1	Application 19874/19875	Requested Change Completed.
215	IV-K.1 (A39)	Add “Abates S819 and S1026” to Title Block	Correct omission	Requested Change Completed.
216	IV-K.1 (A39)	Regulation 6-1-401 – Correct federal enforceability	Correction	Requested Change Completed.
217	IV-K.1 (A39)	40 CFR 60 Subpart J – Add explanation of applicability to Title row	Clarification	Requested Change Not Completed. Clarification not needed since only fuel gas definition listed.
218	IV-K2 (A40, A42, A43)	Revise Title Block - Add “Pump Seal Thermal Oxidizers”	Clarification	Requested Change Completed.
219	IV-K2 (A40, A42, A43)	Delete 40 CFR 63 Subpart A header row and delete row for 63.11	Sources are thermal oxidizers and not flares. Not subject to requirements in 63.11 for flares as control devices	Requested Change Completed.
220	Section VI, throughout	Adjust spacing between conditions to 3 lines Make spacing between condition parts consistent and make paragraph indentations and formatting consistent within each condition. Verify that all Condition Names are Style “Heading 2” so they will appear correctly in the Table of Contents	Administrative	Will complete in Final permit.

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221	VI, 267, Part 4b	Delete Part 4b	Condition was for temporary operation. Temporary operation dates are past and condition is no longer effective.	Requested Change Not Completed. Inconsistent with databank. An application for an administrative change in conditions is required to delete 267-4b from databank.
222	VI, 677, Parts 1 & 2	Correct description of Application 19647 to remove reference to Condition 4357	Condition 4357 was removed by Application 19647 (consolidated with Condition 8077). It should not be referenced in basis of permit conditions.	Requested Change Not Completed. Inconsistent with databank. Reference to 4357 will be retained to avoid confusion when referencing bubble condition.
223	VI, 1910	Delete Condition from Section VI entirely	Consistent with other conditions that have been deleted. Condition 1910 was administratively deleted by Application 21711 (May 2010). All parts completed or redundant with District regulations.	Will complete in Final permit.
224	VI, 3996	Delete Condition from Section VI entirely	Consistent with other conditions that have been deleted. Condition 3996 was administratively deleted by Application 21711 (May 2010). All parts completed or redundant with District regulations.	Will complete in Final permit.
225	VI, 6740	<ul style="list-style-type: none"> <li>• Introduction – Add description of Application 21023</li> <li>• Part 3 - Correct throughput for S612 from 400,000 to 1,200,000 barrels</li> </ul>	Application 21023/21024	Requested Change Completed.



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#	Location	Comment	Rationale	BAAQMD Response
226	VI, 8077, Introduction	In Introduction, verify that Appendix A-D references are correct hyperlinks to locations for those pdf documents. If correct, change font type for Appendix A-D references to "Hyperlink". If incorrect, then insert correct hyperlink. Delete in four places "Hyperlink to Appendix X to go here."	Administrative	Appendix address is valid. May have to copy and paste into browser to follow link since hyperlink may not be retained when permit is converted to pdf format.
227	VI, 8077, Part B6D	Add "D. Deleted (S848 no longer in service)"	Add Condition part back as shown with documentation of deletion basis. Correct incorporation of Condition 21711 per Change of Conditions issued May 24, 2010 for Condition 8077.	Requested Change Completed.
228	VI, 8077, Part B8C	Add "A14"	Clarification	Requested Change Not Completed. Inconsistent with databank and Table IIB. An application for an administrative change in conditions is required to revise 8077-B8C.
229	VI, 14905	Delete condition in its entirety	Consistent with other conditions that have been deleted. Condition 14905 was administratively deleted by Application 21711 (May 2010). All parts completed or redundant with District regulations.	Will complete in Final permit.

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<b>#</b>	<b>Location</b>	<b>Comment</b>	<b>Rationale</b>	<b>BAAQMD Response</b>
230	VI, 16685	Change "Condition #1" to "Part 1" Delete S903; S924 Correct names of S908; S909; S937; S950; S951; S973; S974 Correct description of Application 19647 to remove reference to Condition 4357 from basis of Part 1	Make corrections to reinstated Condition 16685, Part 1 to incorporate other permit applications and other administrative corrections. Application 18738/18739 (S903, S924) Condition 4357 was removed by Application 19647 (consolidated with Condition 8077). It should not be referenced in basis of permit conditions.	Requested Change Completed except 4357 (see Comment # 222).
231	VI, 16729	Delete condition entirely	Consistent with other conditions where all parts have been deleted.	Will complete in Final permit.
232	VI, 17322 Part 9	Change Condition 18372, Part 27 to Condition 16685, Part 1	Additional corrections needed for Application 21464/21465	Requested Change Completed.
233	VI, 17477, Section B	Delete S1462 and Section B entirely	Consistent with other conditions where all parts have been deleted.	Requested Change Not Completed. All parts of Condition 17477 have not been deleted.
234	VI, 18372 Introduction	Correct NOx control descriptions for S912, S913, S916, S921, S922, and S926	Corrected to reflect current as-built configurations of low-NOx burners. Additional corrections needed for Application 21464/21465.	Requested Change Not Completed. Application 21464 did not change abatement devices.

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#	Location	Comment	Rationale	BAAQMD Response
235	VI, 18372 Part 3	Delete part 3 (annual firing rates)	Reverse change made in Application 21464/21465 and remove Condition 18372, Part 3. The annual firing rate limits in Condition 18372, Part 3 are not necessary. They are not required for regulatory compliance because Regulation 9-10 requires use of the operating day firing rates. The operating day firing rates are enforceable limits, and a complete list is provided in Condition 16685, Part 1. Condition 18372, part 3 does not contain annual firing rates for all of the sources listed in Condition 16685, Part 1. In addition, the annual rates in Condition 18372, Part 3 are redundant with the enforceable daily limits in Condition 16685, Part 1 because they are simply 365 times the daily limits.	Requested Change Not Completed. Part 3 was deleted by Application 19874 and reinstated by Application 21464. Deletion of Part 3 again requires an application. Change will be incorporated once the application is submitted and approved.
236	VI, 18372 Part 4	Delete "Basis: Regulation 9-10-301"	Application 19874/19875	Requested Change Completed.
237	VI, 18372 Part 27	Delete "Maximum Permitted Firing Rate" from Header of table	Complete incorporation of Application 21464/21465	Requested Change Completed.
238	VI, 18372 Part 31	Table of NOx Box Factors: <ul style="list-style-type: none"> <li>• Delete "933"</li> <li>• Correct decimal points</li> </ul>	Editorial	Requested Change Completed.

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239	VI, 18947, Part 5	Reinstate Part 5 hours of operation limit for portable IC engines S1475 and S1476	Reverse the changes made in Application 19419/19418 and reinstate Part 5 of Condition 18947. Portable IC engines S1475 and S1476 should not be subject to Condition 22851, which is based on CARB ATCM 93115 requirements for in-use stationary IC engines. A new permit application will be submitted to make the required changes to Conditions 18947 and 22851.	Requested Change Not Completed. Change will be incorporated once the application is submitted and approved.
240	VI, 19199, Section B	Add "Two New Flare Gas Recovery Compressors each with a Maximum Rates Capacity of 4 MMSCFD" between Parts A8 and B1.	Correct omission	Requested Change Completed.
241	VI, 19199, Section F	Delete S-1100 description and Section F in its entirety	Consistent with other conditions where all parts have been deleted.	Requested Change Not Completed. All parts of Condition 19199 have not been deleted.
242	VI, 19528, Part 2 and 2A	Change font color for Parts 2 and 2A from red to black	Format correction	Requested Change Completed.
243	VI, 19528, Part 4A	Delete "facility"	Administrative change	Requested Change Completed.
244	VI, 21053 Part 6	COMMENT: The list of sources vented to A14 is incomplete and the basis listed for the sources is incorrect in most cases.	A permit application will be submitted to make the required changes in Condition 21053.	Changes will be incorporated once the application is submitted and approved.
245	VI, 21751	Delete condition entirely	Consistent with other conditions that have been archived.	Will complete in Final permit.

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246	VI, 21849 Part 8	Add “[Completed]”	This requirement has been completed. Certification received from CARB.	Requested Change Not Completed. Inconsistent with databank. An application for an administrative change in conditions is required to revise 21849-8.
247	VI, 21849, Part 12d	Change “and” to “or”	Condition 21849, part 11a requires that S1025 be vented to S613 OR A14.	Requested Change Completed.
248	VI, 21849 Part 13	Correct throughput from 400 to 1,200 Kbbbl/12 consecutive months	Application 21023/21024	Requested Change Completed.
249	VI, Condition 22230	Delete entire condition	This condition requires monitoring for compliance with BAAQMD Regulation 6-1-311 and SIP Regulation 6-311 for cooling towers. This condition should be removed because this monitoring is not warranted for cooling towers based on findings documented in the Statement of Basis for Revision 3 of the Title V permit (December 2006; AN 12599).	Requested Change Completed. Condition 22230 was proposed but never approved. Including it in the draft permit was an error.

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250	VI, 22851	<ul style="list-style-type: none"> <li>• Remove S1475 and S1476 (portable diesel engines)</li> <li>• Correct basis for all parts</li> <li>• Delete Part 5</li> </ul>	<ul style="list-style-type: none"> <li>• Condition does not apply to portable diesel engines</li> <li>• Consistent with CARB ATCM current version and current district permit condition language in permit handbook</li> <li>• Sources are not located within 500 feet of any school grounds. Consistent with Condition 23811 for new stationary ICE</li> </ul> <p>A new permit application will be submitted to make the required changes to Condition 22851.</p>	Requested Changes Not Completed. Changes will be incorporated once the application is submitted and approved.
251	VI, 23811, Parts 1 and 2	Correct basis for Parts 1 and 2	Consistent with CARB ATCM current version and current district permit condition language in permit handbook	Requested Changes Not Completed. Inconsistent with databank. Include proposed changes in engine application referred to above. Changes will be incorporated once the application is submitted and approved.

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252	VI, 24131	Delete entirely from Renewal markup (don't just show as added and crossed out)	Changes added and later removed should not be shown as redline strikeout. The renewal markup should only show the changes from Revision 4.	Requested Change Not Completed. For a permit revision or reopening, using Revision 4 as a starting point would be considered. However, since this is a permit renewal and there have been draft versions with Condition 24131, it is retained to prevent confusion. It will not be shown in the final permit.
253	VI, 24491	Add new condition for S1550 and S1551 boilers	Application 20977/20995	Requested Change Completed.
254	VII-B.1	Revise Title Block	Consistent with Section IV, Table IV-B.1	Requested Change Completed.
255	VII-B.1, Opacity	Correct federal enforceability for 6-1-302	Correction	Requested Change Completed.
256	VII-B.2	Delete monitoring requirement for venting emissions to A12 vapor recovery (FWS NASH compressors that vent to 5GP & 100 # FG)	VOC destruction efficiency of the refinery fuel gas systems do not need to be specified. A permit application will be submitted to make the required changes to Condition 10696.	Requested Changes Not Completed. Inconsistent with current Permit Condition 10696. Changes will be incorporated once the application is submitted and approved.
257	VII-C.1.1 VII-C.1.2	Revise Title Block; Delete capacity and fuel source	Consistent with Section IV tables for sources. Capacity of sources listed in Section II.	Requested Change Completed.
258	VII-C.1.3	Add new table for S1550 and S1551, boilers	Application 20977/20995	Requested Change Completed.

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259	VII-C.2.1, Visible emissions	Delete visible emission monitoring requirements for 60.18 citations of limit	See Applicability Determination for Flares as Control Devices	Requested Change Completed.
260	VII-C.2.3 VII-C.2.4	Revised title block	Consistent with other Section VII table titles	Requested Change Completed.
261	VII-C.2.4	Remove underline – Monitoring Type column	Administrative change	Requested Change Completed.
262	VII-C.3.1	Revised Title Block	Consistent with other Section VII table titles	Requested Change Completed.
263	VII-C.3.1	Delete monitoring requirements for 6-1-301; SIP 6-301 Add monitoring requirements for 6-1-303.1; SIP 6-303.1	Consistent with corrections in Section IV. Emergency standby engines are subject to Ringelmann #2 rather than Ringelmann #1 requirements in Regulation 6-1 and associated SIP	Requested Change Completed.
264	VII-C.3.1	Add monitoring requirements for CARB ATCM: <ul style="list-style-type: none"> <li>• Diesel Particulate Matter</li> <li>• Hours of operation</li> </ul>	Consistent with corrections in Section IV.	Requested Change Completed.
265	VII-C.3.2	Add “Spark Ignition, 4 Stroke” to title	Clarification	Requested Change Completed.
266	VII-C.3.3	Add “Spark Ignition, 2 Stroke” to title	Clarification	Requested Change Completed.



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#	Location	Comment	Rationale	BAAQMD Response
267	VII-C.3.4	Revised Title Block: <ul style="list-style-type: none"> <li>• Remove “Source-specific Applicable Requirements</li> <li>• Add S1487</li> <li>• Delete S1475, S1476</li> </ul>	<ul style="list-style-type: none"> <li>• Correction</li> <li>• Consistent with changes in Section IV</li> <li>• Consistent with changes in Section IV</li> </ul>	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
268	VII-C.3.4	Add monitoring requirements for CARB ATCM and Condition 22851 hours of operation	Consistent with changes in Section IV	Requested Change Completed.
269	VII-C.3.4	Add monitoring requirements for 40 CFR 63 Subpart ZZZZ requirements	Consistent with changes in Section IV	Requested Change Completed.
270	VII-C.3.4	Add monitoring requirements for Condition 20672 for Source S1487 Delete monitoring requirements for Condition 18947 for Sources S1475 and S1476	Consistent with changes in Section IV	Requested Change Not Completed. See Comment # 267.

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271	VII-C.3.5	Revised Title Block – removed S1487	Consistent with changes in Section IV	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
272	VII-C.3.5, Throughout	Removed S1487 monitoring requirements and removed “S1488”	Consistent with changes in Section IV	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
273	VII-C.3.5	Add monitoring requirements for CARB ATCM and Condition 22851 hours of operation	Consistent with changes in Section IV	Requested Change Completed.

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274	VII-C.3.5	Delete monitoring requirements for Condition 20672 for Source S1487	Consistent with changes in Section IV	Requested Change Not Completed. Table is consistent with the applicability changes approved in Application 19419/19418. Any additional applicability changes require a new application. The requested changes will be incorporated once this new application is submitted and approved.
275	VII-C.3.6	Correct Citation of Limit for CARB ATCM hours of operation	Consistent with changes in Section IV	Requested Change Not Completed. No changes found in Comment mark-up.
276	VII-C.3.6	Delete rows for Unlimited hours for emergency operation and for fuel use	Consistent with Section VII tables of other ICE	Requested Change Completed.
277	VII-C.3.7	Add new table for S1475 and S1476	Administrative Reorganization; Consistent with changes in Section IV	Requested Change Not Completed. See Comment # 267.
278	VII-C.4.1	Revise Title Block; Delete capacity and fuel source	Consistent with Section IV tables for sources. Capacity of sources listed in Section II.	Requested Change Completed.

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#	Location	Comment	Rationale	BAAQMD Response
279	VII-C.4.2	Revise monitoring requirements for “Fuel Flow”: <ul style="list-style-type: none"> <li>• Change “Fuel flow” to “Firing Rate” (2 rows)</li> <li>• Change Citation of Limit from “18372, Part 27” to “16685, Part 1”</li> <li>• Change Limit from “MMBTU/yr” to “MMBTU/day” and change limit values to daily values</li> </ul>	Application 21464/21465	Requested Change Completed.
280	VII-C.4.2	Delete Fuel Flow (S916, S921) from Condition 17322, Part 9	Condition 17322, Part 9 was deleted as part of AN 19874/19875. The firing rates for S916 and S921 are included in the row above	Requested Change Completed.
281	VII-C.4.3	Revise monitoring requirements for “Fuel Flow”: <ul style="list-style-type: none"> <li>• Change “Fuel flow” to “Firing Rate” (2 rows)</li> <li>• Change Citation of Limit from “18372, Part 27” to “16685, Part 1”</li> <li>• Change Limit from “MMBTU/yr” to “MMBTU/day” and change limit values to daily values</li> </ul>	Application 21464/21465	Requested Change Completed.
282	VII-C.4.6	Revise Title Block; Delete capacity	Consistent with Section IV tables for sources. Capacity of sources listed in Section II.	Requested Change Completed.
283	VII-C.5.1	Revise Title Block; Delete capacity	Consistent with Section IV tables for sources.	Requested Change Completed.

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284	VII-D.1, HAPS VII-D.4, HAPS	Correct Monitoring Requirement Citation	Correction	Requested Change Completed.
285	VII-D.5 VII-D.6	Revise Title Block; Delete "Source-specific Application Requirements	Correction	Requested Change Completed.
286	VII-D.7, S1025	Revise Title Block; Add "Naphtha, Kerosene, Fuel Oil"	Consistent with Section IV tables for sources.	Requested Change Completed.
287	VII-D.7, S1025	Correct future effective date for BAAQMD 8-33-301.2 to 01/10/2011	Correct typo	Requested Change Completed.
288	VII-D.8, S1504	Correct throughput limit to 1,200K bbl/12 consecutive months	Application 21023/21024	Requested Change Completed.
289	VII, E.4	Delete underlining in table cells	Format correction	Requested Change Completed.
290	VII, E.4, Condition 22230	Delete all limits and monitoring requirements associated with Condition 22230	This condition requires monitoring for compliance with BAAQMD Regulation 6-1-311 and SIP Regulation 6-311 for cooling towers. This condition should be removed because this monitoring is not warranted for cooling towers based on findings documented in the Statement of Basis for Revision 3 of the Title V permit (December 2006; AN 12599).	Requested Change Completed. Condition 22230 was proposed but never approved. Including it in the draft permit was an error.
291	VII-F.3	Revised Title Block; Remove Source-specific Applicable Requirements and Add Applicable Limits and Compliance Monitoring Requirements	Correction for Section VII table	Requested Change Completed.
292	VII-F.3	In column heading for Group 101, Delete "E", making title 101ABCD		Requested Change Completed.

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293	VII-F.3	Delete entire column for Group 403	Group removed in Section IV table	Requested Change Not Completed. See Comment # 150, 166 and 171.
294	VII-F.3, S612	Correct throughput limit to 1,200K bbl/12 consecutive months	Application 21023/21024	Requested Change Completed.
295	VII-F.3, 1421	Add row for Throughput requirement of Condition 13282, Part 1	Consistent with changes in Section IV	Requested Change Completed.
296	VII-G.3 (S513)	Remove 40 CFR 60 Subpart Kb requirements	Source is a grandfathered source. It has not been modified per 60.14 and is not subject to NSPS Kb	Requested Change Not Completed. Inconsistent with Condition 21053-6 basis. NSPS Kb applicability consistent with Revision 4. Any proposed changes need and application. Changes may be made once application is submitted and approved.
297	VII-G.3 (S513)	Delete monitoring requirements for Condition 21053 Part 6.	Source test does not apply to S513	Requested Change Not Completed. Inconsistent with Condition 21053-6.
298	VII-G.4 (S532, S1484)	Revised Title Block; Changed "Abated by" to "With"	Consistent with other sources	Requested Change Not Completed. See Comment # 187.
299	VII-G.6 (S699)	Revised Title Block; Changed "Abated by" to "With"	Consistent with other sources	Requested Change Not Completed. See Comment # 187.
300	VII-G.7 (S700)	Revised Title Block; Added "Separator"	Consistent with Section IV tables for sources.	Requested Change Completed.
301	VII-G.8 (S819)	Revised Title Block; Changed "Abated by" to "With"	Consistent with other sources	Requested Change Not Completed. See Comment # 187.

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302	VII-G.10 (S1026)	Revised Title Block; Added "Abated by A39"	Correct omission	Requested Change Completed.
303	VII-H.2 (S1401)	Revised Title Block; Added "Tailgas"	Consistent with Section IV tables for sources.	Requested Change Completed.
304	VII-H.5 (S1411)	Revised Title Block; Added "(SAP)"	Consistent with Section IV tables for sources.	Requested Change Completed.
305	VII-H.6 (S1413, S1414)	Delete table in its entirety	Sources S1413 and S1414 are no longer in Oleum (regulated) service. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. See Comment # 21, 46, 63 & 196. Change will be incorporated after Application 22430 is completed and approved.
306	VII-H.6 (S1415)	Renumber, was Table VII-H.7 Revise Title Block to correct source abatement	Consistent with Section IV tables for sources.	Requested Change to Abatement Completed.
307	VII-H.6 (S1415)	Remove Regulation 12, Rule 10 (Oleum Transfer Operation).	Loading rack will no longer be used in Oleum service since S1413 and S1414 will no longer be in that service. Sources S1413 and S1414 are no longer in Oleum (regulated) service. Sources are in < 99% Sulfuric Acid (exempt service) and Tesoro wants to surrender their permits (see recent letter from Tesoro)	Requested Change Not Completed. See Comment # 21, 46, 63 & 196. Change will be incorporated after Application 22430 is completed and approved.
308	VII-H.8 (S1421, S1422)	Delete table in its entirety	S1421 and S1422 have been moved to the Tank Tables in Section IV-F.	Requested Change Completed.

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309	VII-J.1	Revise Title Block; Add "Equipment Leak"	Consistent with Section IV tables for sources.	Requested Change Completed, except using "Fugitive" consistent with Section IV. See Comment # 200.
310	VII-J.1	Add monitoring requirements for Condition 11609, Part B6A and Condition 19199, Parts A5, B5, C5, and G5 100 ppm fugitive emission limits for various pumps. .	Consistent with Section IV changes.	Requested Change Completed. Added quarterly inspection per 8-18-401.2.
311	VII-J.3 (S804, S807, S822, S834)	Delete empty table and renumber subsequent tables	Consistent with comment in Statement of Basis. The blowdown towers have been taken out of regulated service. They have been moved to the exempt source table in Section II. Their tables in Sections IV and VII contain no applicable requirements. Subsequent tables in Section J should be renumbered. Reference in SOB should be to table number from Revision 4, not VII-J3.	Requested Change Not Completed. See Comment # 207.
312	VII-J.3 (S823, S824)	Renumber was IV-J.4	Administrative	Requested Change Not Completed. See Comment # 207.
313	VII-J.4 (S1543 thru S1548)	Renumber was IV-J.5	Administrative	Requested Change Not Completed. See Comment # 207.
314	VII-J.5 (S590)	Renumber was IV-J.6	Administrative	Requested Change Not Completed. See Comment # 207.



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315	VII-J.5 (S590)	Delete monitoring requirements for BAAQMD Regulation 8, Rule 10	These sitewide requirements are found in Table VII-A.1. Consistent with Section IV.	Requested Change Completed.
316	VII-J.6 (S825, S856)	Delete monitoring requirements for BAAQMD Regulation 8, Rule 10	These sitewide requirements are found in Table VII-A.1. Consistent with Section IV.	Requested Change Completed.
317	VII-J.6 (S825, S856)	Add monitoring requirements for BAAQMD Regulation 8, Rule 2	Consistent with other sources subject to Regulation 8, Rule 2	Requested Change Completed.
318	VII-K.1 (A39)	Revised Title Block; Removed “and DNF Effluent Stripper”	Consistent with Section IV tables for sources.	Requested Change Completed.
319	VII-K.2 (A40, A42, A43)	Revised Title Block; Added “Pump Seal Thermal Oxidizers”	Correct omission	Requested Change Completed.
320	X – Revision History	Add Application 20968/20969 for S890	Application 20968/20969 [Temporary Permit to Operate issued May 2010]	Requested Change Not Completed. Application 20968/20969 not included in the renewed permit. S1549 will be added to the permit as a minor revision after the renewed permit is finalized and approved.
321	XI – Glossary	Added an corrected entries in Units of Measure	Administrative	Requested Change Completed.