

Responses to Valero Refinery Comments (9/22/03)

The District has prepared the following responses to the comments contained in this letter.

Each comment consists of 1) a suggestion for action or change, and 2) the argument, if any, supporting the suggestion.

The comments identified by the District have been numbered. Refer to the attached copy of the original comment letter for the comment numbers.

|    | <b>Response</b>   |
|----|---|
| 1  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| 2  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| 3  | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| 4  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| 5  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| 6  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| 7  | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| 8  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| 9  | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| 10 | The suggested change concerns an issue beyond the scope of Title V (e.g., NSR lookback, etc.) No change has been made to the permit. The District will review the issues raised by the comment, and will take appropriate steps at a later date.      |
| 11 | The suggested change concerns an issue beyond the scope of Title V (e.g., NSR lookback, etc.) No change has been made to the permit. The District will review the issues raised by the comment, and will take appropriate steps at a later date.      |
| 12 | The suggested change concerns an issue beyond the scope of Title V (e.g., NSR lookback, etc.) No change has been made to the permit. The District will review the issues raised by the comment, and will take appropriate steps at a later date.      |
| 13 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A1 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| A2 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| A3 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| A4 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| A5 | The suggested change should be implemented, but additional public review is required first. The   |

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|     | change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.   |
| A6  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| A7  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| A8  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A9  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A10 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A11 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A12 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| A13 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| A14 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| A15 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| A16 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A17 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A18 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A19 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A20 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A21 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| A22 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A23 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| A24 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A25 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A26 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A27 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A28 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| A29 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| A30 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| A31 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B1  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B2  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
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|     | time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B4  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B5  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B6  | The suggested change corrects a mistake. Condition 19466, Part 4 has been changed and is now the same as the text in Table IV.  |
| B7  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B8  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B9  | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-1 and S-2 compliance with Regulation 6-301.                |
| B10 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B11 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B12 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B13 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B14 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B15 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B16 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
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| B19 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B20 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date, after the "NOx-Box" conditions are finalized. |
| B21 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B22 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B23 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B24 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
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|     | change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.   |
| B28 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B29 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B30 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B31 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B32 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B33 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B34 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B35 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| B36 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. A parametric monitor has not been approved for NOx emissions monitoring. If a parametric monitor is approved then the District will reconsider this comment.  |
| B37 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B38 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| B39 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B40 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B41 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B42 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B43 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B44 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B45 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B46 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B47 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B48 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B49 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-237 compliance with Regulation 6-301.  |
| B50 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B51 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 7 is required to demonstrate S-237 compliance with Regulation 6-310.  |
| B52 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
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|     | suggestion at a later date.  |
| B54 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B55 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B56 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B57 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B58 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Only Phase I has been completed.   |
| B59 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B60 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B61 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B62 | The suggested change concerns an issue beyond the scope of Title V (e.g., NSR lookback, etc.) No change has been made to the permit. The District will review the issues raised by the comment, and will take appropriate steps at a later date.                                       |
| B63 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
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| B66 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| B67 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B68 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B69 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 7 is required to demonstrate S-8, S-10, S-11, S-12, S-176, S-232 and S-233 compliance with Regulation 6-310. |
| B70 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B71 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B72 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B73 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B74 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-160 compliance with Regulation 6-301.   |
| B75 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B76 | No change has been made to the permit. The District has reviewed the comment, and does not   |

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|     | consider it to be correct. The monitoring requirement of Condition 19466, Part 7 is required to demonstrate S-237 compliance with Regulation 6-310.   |
| B77 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B78 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B79 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B80 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B81 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B82 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B83 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| B84 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. S-129 Permit Condition 98 contains ramifications to POC credits that Valero received for early compliance with lightering standards.  |
| B85 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B86 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B87 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B88 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B89 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
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| B91 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B92 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B93 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| B94 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| B95 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 2a is required to demonstrate S-188 compliance with Regulation 8-8-302.3.   |
| B96 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B97 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B98 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this   |

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|      | time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B99  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B100 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 2b is required to demonstrate S-189 compliance with Regulation 8-8-307.2.   |
| B101 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B102 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| B103 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
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| B110 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
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| B118 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
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|      | permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B121 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
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| B123 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
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| B140 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B141 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| B142 | The suggested change should be implemented at this time. The change has been made to the  |

Responses to Valero Refinery Comments (9/22/03)

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|      | permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| B143 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| B144 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B145 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B146 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B147 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| B148 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B149 | The suggested change did not have sufficient argument as for why 40 CFR 63.654(i)(1)(iv) does not apply to S-230.   |
| B150 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B151 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| B152 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| B153 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B154 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| B155 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B156 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B157 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B158 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B159 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| B160 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B161 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B162 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B163 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B164 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B165 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B166 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| B167 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the                             |

Responses to Valero Refinery Comments (9/22/03)

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|      | suggestion at a later date.  |
| B168 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B169 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B170 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B171 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| B172 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| B173 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B174 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B175 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| B176 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B177 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B178 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. Subpart FF is already included in the permit in the Generally applicable Requirements. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| B179 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B180 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| B181 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| C1   | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. S-129 Permit Condition 98 contains ramifications to POC credits that Valero received for early compliance with lightering standards.   |
| C2   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C3   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C4   | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| C5   | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| C6   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C7   | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| C8   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C9   | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| C10  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided  |

Responses to Valero Refinery Comments (9/22/03)

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|     | by the District).   |
| C11 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C12 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C13 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C14 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| C15 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C16 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C17 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C18 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C19 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C20 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C21 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C22 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C23 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C24 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C25 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C26 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C27 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C28 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| C29 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C30 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |

Responses to Valero Refinery Comments (9/22/03)

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| C31 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C32 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C33 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| C34 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| C35 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. This S-243 Condition 18744 is the standard Back-up Generator conditions and was placed in the permit based on Valero comment #6 on Section VI. The District will consider incorporating the suggestion at a later date. |
| C36 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. This S-240, S-241 and S-242 Condition 18748 is the standard Back-up Generator condition. The District will consider incorporating the suggestion at a later date.   |
| C37 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C38 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C39 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C40 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C41 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C42 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C43 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C44 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C45 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C46 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C47 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.  |
| C48 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that  |

Responses to Valero Refinery Comments (9/22/03)

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|     | will be circulated for public comment within 30 days.   |
| C49 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.   |
| C50 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Condition 19466, Part 3 is required monitoring to verify compliance with Regulation 6-301. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments.  |
| C51 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Condition 19466, Part 3 is required monitoring to verify compliance with Regulation 6-301. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments.  |
| C52 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C53 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C54 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C55 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 7 is required to demonstrate S-8, S-10, S-11, S-12, S-176, S-232, S-233 and S-237 compliance with Regulation 6-310.   |
| C56 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C57 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C58 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| C59 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C60 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. A parametric monitor has not been approved for NOx emissions monitoring. If a parametric monitor is approved then the District will reconsider this comment.  |
| C61 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C62 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C63 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| C64 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days.   |
| D1  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D2  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D3  | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-1 and S-2 compliance with Regulation 6-301.  |
| D4  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D5  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D6  | No change has been made to the permit. The legal basis for the suggestion is incorrect. The District's authority for imposing additional monitoring or testing derives from 2-6-409.2.2, which pertains to all "applicable requirements." Applicable requirements include those enforceable by the District but not EPA. For applicable requirements that are District permit conditions, the District also has authority to impose the testing requirement pursuant to 2-1-403 and California Health & Safety Code § 42301(e). |
| D7  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D8  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |

Responses to Valero Refinery Comments (9/22/03)

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| D9  | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| D10 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D11 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| D12 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.  |
| D13 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D14 | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| D15 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| D16 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D17 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D18 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D19 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D20 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D21 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D22 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D23 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D24 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D25 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D26 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D27 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D28 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| D29 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D30 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| D31 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| D32 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D33 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D34 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D35 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-237 compliance with Regulation 6-301.        |
| D36 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |

Responses to Valero Refinery Comments (9/22/03)

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| D37 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 7 is required to demonstrate S-237 compliance with Regulation 6-310.   |
| D38 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.   |
| D39 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.   |
| D40 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.   |
| D41 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Only Phase I has been completed.   |
| D42 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Only Phase I has been completed  |
| D43 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Only Phase I has been completed  |
| D44 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Only Phase I has been completed  |
| D45 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| D46 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| D47 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| D48 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.   |
| D49 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.   |
| D50 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-8, S-10, S-11, S-12, S-176, S-232 and S-233 compliance with Regulation 6-301. |
| D51 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| D52 | The suggested change should be implemented at this time. The citation 6-310.3 has been changed to 6-310 in the permit, thereby covering all sources, based upon the rationale provided in the comment (and any additional analysis provided by the District).                          |
| D53 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| D54 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.   |
| D55 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| D56 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.  |
| D57 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 3 is required to demonstrate S-160 compliance with Regulation 6-301.   |
| D58 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| D59 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided  |

Responses to Valero Refinery Comments (9/22/03)

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|     | by the District).   |
| D60 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D61 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| D62 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| D63 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D64 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D65 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D66 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D67 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. S-129 Permit Condition 98 contains ramifications to POC credits that Valero received for early compliance with lightering standards.  |
| D68 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D69 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D70 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| D71 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 2a is required to demonstrate S-188 compliance with Regulation 8-8-302.3.   |
| D72 | The suggested change concerns an issue beyond the scope of the revisions made to the earlier draft, and is therefore untimely. No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. Detailed analysis has not, however, been prepared because the District has focused on responding to timely comments. |
| D73 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D74 | No change has been made to the permit. The District has reviewed the comment, and does not consider it to be correct. The monitoring requirement of Condition 19466, Part 2b is required to demonstrate S-189 compliance with Regulation 8-8-307.2.   |
| D75 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D76 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D77 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.   |
| D78 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| D79 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |

Responses to Valero Refinery Comments (9/22/03)

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| D80  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| D81  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| D82  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D83  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D84  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| D85  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| D86  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D87  | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.  |
| D88  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D89  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| D90  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| D91  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D92  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D93  | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.  |
| D94  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D95  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D96  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D97  | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.  |
| D98  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D99  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D100 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |

Responses to Valero Refinery Comments (9/22/03)

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|      | by the District).   |
| D101 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D102 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D103 | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.  |
| D104 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| D105 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| D106 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| E1   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E2   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E3   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E4   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E5   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E6   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E7   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E8   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E9   | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E10  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E11  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E12  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| E13  | The suggested change should be implemented at this time. The change has been made to the  |

Responses to Valero Refinery Comments (9/22/03)

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|     | permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).  |
| E14 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| E15 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| E16 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| E17 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| E18 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| E19 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| E20 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| F1  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| F2  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| F3  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| F4  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| F5  | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date.                                 |
| G1  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| G2  | The suggested change should be implemented, but additional public review is required first. The change has not been made in the permit, but will be included in a proposed permit revision that will be circulated for public comment within 30 days. |
| G3  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| G4  | The argument supporting a suggested change does not provide sufficient information or analysis to support the change. No change has been made to the permit.  |
| G5  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G6  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).   |
| G7  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided   |

Responses to Valero Refinery Comments (9/22/03)

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|     | by the District).   |
| G8  | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G9  | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G10 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G11 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G12 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| G13 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Source is subject to 8-2-301.   |
| G14 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G15 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G16 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G17 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G18 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G19 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G20 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G21 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G22 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G23 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G24 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G25 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G26 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G27 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G28 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G29 | The argument supporting a suggested change is factually incorrect. No change has been made to the permit. The throughput basis for S-202  |
| G30 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G31 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G32 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |
| G33 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District).             |
| G34 | The comment suggests a change that clarifies or improves the permit, but cannot be made at this time. No change has been made to the permit. The District will consider incorporating the suggestion at a later date. |
| G35 | The suggested change corrects a mistake. The mistake has been corrected in the final permit.  |

Responses to Valero Refinery Comments (9/22/03)

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| G36 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District). |
| G37 | The suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment (and any additional analysis provided by the District). |