



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

August 18, 2003

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*SAB*  
*DWB*  
*BFC*

William deBoisblanc  
Director of Permit Services  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, California 94109

Subject: Proposed Title V Major Facility Review permit for Valero's Benicia asphalt plant (source B3193)

Dear Mr. deBoisblanc:

EPA appreciates the opportunity to comment on the proposed Title V permit for Valero's Benicia asphalt plant, which we received on July 3, 2003. We have enclosed our comments on this proposed Title V permit. We understand that the plant is grouped with the Valero refinery for Title V applicability purposes and the District is proposing to issue separate permits to the asphalt plant and the rest of the refinery for convenience.

We appreciate the District's cooperation and intend to work closely with the District through our review of all of the Bay Area's proposed refinery Title V Major Facility Review permits. Please contact me at (415) 972-3974 or have your staff contact Ed Pike of my staff at (415) 972-3970 or [pike.ed@epa.gov](mailto:pike.ed@epa.gov) if you have any questions regarding our comments.

Sincerely,

*Mark A. Senti*

*for* Gerardo C. Rios  
Chief, Air Permits Office

Enclosure

cc: Mike Tollstrup, ARB  
W. H. Buckalew, Jr., Valero Refinery

**U.S. EPA Region IX Comments**  
**Proposed Title V Major Facility Review Permit**  
**Valero Benicia Asphalt Plant, Facility #B3913**

MACT Applicability

The Statement of Basis states that the facility will be subject to MACT, although it does not specifically list which pieces of equipment are subject to MACT. We understand from a call between Steve Hill of your staff and Ed Pike of my staff last Friday that the District will revise the Statement of Basis to explain what MACT requirements apply to each unit, and add the requirements that apply to the permit for each unit (such as combustion sources A4 and A31) if necessary.

The Refinery MACT standard subpart CC section 63.644 (a)(1) requires temperature monitoring for incinerators and section 63.644 (e) states that “Each owner or operator of a control device subject to the monitoring provisions of this section shall operate the control device in a manner consistent with the minimum and/or maximum operating parameter value or procedures required to be monitored under paragraphs (a) and (b) of this section.” Section 63.654(f)(3) explains how that range would be established, and section 63.654(g)(5) requires notification when parameters (in this case the temperature) are outside of the established range.

Temperature Ranges and Monitoring

The proposed permit allows variations in the temperatures for combustion devices A4 and A31 (pages 148 and 160), which are described as oxidizers and therefore should fall under the incinerator monitoring requirements of the MACT standard. The first option allows small variations in temperature, and the second option appears to allow up to 15 minutes of deviation each hour without limiting the amount of the deviation (condition 19(a)(b) on page 148 and condition 58(c)(b) on page 160). We do not believe that this second condition would assure compliance with the temperature limits and applicable requirements in the permit because the control efficiency could be substantially reduced during those time periods. Instead, we recommend requiring that the source meet both conditions (for example 19(a)(a) and 19(a)(b)) or deleting the second option. While our concerns are not limited to MACT because the units are subject to a separate 98.5% control requirement, any temperature variations authorized in the permit must fall within the MACT compliance range established for units subject to that standard.

Page 147 of the permit allows the source 90-180 days to install temperature monitors and determine the appropriate temperature range. If the facility must already meet the MACT requirements, then the permit must simply require that the facility comply with the temperature monitoring requirements (if the facility is not in compliance, a separate compliance schedule will also be necessary). Page 160 states that the permit holder shall install temperature monitoring devices, without the dates specified in the draft permit. We would agree that compliance dates that have already passed need not be specified in the permit. Instead, the permit must require that the source operate the control device and parameter monitoring. We also recommend that the District include procedures to make sure that the source testing occurs at maximum load (i.e.

emissions (we understand that the District does not presume that emissions caps set on allowable emissions can be used as NSR baselines).

Permit Conditions 25-29 for S9 Internal Floating Roof Tank, TK-7:

Permit condition 26 states that the true vapor pressure of materials stored in Tank S9 shall not exceed 11 psia. Further, Regulation 8, Rule 5 (Storage of Organic Liquids) requires true vapor pressure monitoring and records (under 501.1) although the period of record retention is two years. Since the Part 70 requires 5 year record retention, we suggest clarifying on page 45 of the permit that these records must be retained for five years rather than referring to the two-year requirement in Reg 8 Rule 5 section 501.1. Similarly, we recommend specifying the 5 year record retention period for Tank S3 in the permit.

Marine Vessel Compliance Requirements

We encourage the District to review the compliance requirements in the permit for the marine vessel loading operation, such as sampling the vapor pressure of organic liquids loaded into vessels at the facility and examining whether compliance monitoring can be included to verify that past cargos did not include organic liquids. (p167)

S-19 opacity limit

The permit contains an opacity limit of Ringleman #1 as specified in the District rule (<http://www.baaqmd.gov/regs/rg0600.pdf>) except for narrow exceptions. We believe that the application review for S-19 contains a typo stating that the opacity limit has been changed to Ringleman #2 instead of #1 (p 24).