

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.

As a preliminary note regarding the September 26, 2003, comment letter from EPA, there are numerous instances in which the letter purports to represent a position of or an anticipated future action by the District. In a letter to EPA dated, September 25, 2003, the District agreed to certain actions related to some of the issues addressed below. The District's position on additional issues is represented in this document, the final statement of basis documents, and the final refinery Title V permits. However, EPA's September 26, 2003, letter is not necessarily representative of the District's views or its anticipated future actions.

	Response
1.	(Chevron) The requested change has been made. (Phillips) All references to 9-1-313.2 already flagged as federally enforceable. (Shell) The requested change has been made. (Valero) All references to 9-1-313.2 already flagged as federally enforceable. (Tesoro) The requested change has been made.
2.	The District has incorporated in the permit requirements applicable to flares to the extent supported by available information and analysis. The District agrees with the comment that further analysis would be useful, and plans to conduct that analysis in connection with a proposed permit revision that will be circulated for public comment within 30 days. To the extent that determinations made at initial issuance can be supported with further documentation and analysis, the District will do so.
3.	The District has not committed to include fuel H2S monitors for flares subject to the NSPS limit. The District has committed to including the monitoring explicitly required by NSPS Subpart J.
4.	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.
5.	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.
5a.	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.
6.	The District is gathering information from the refineries on flare design and use. That information will be used to revise the flare applicability and monitoring determinations. These will be included in a proposed permit revision that will be circulated for public comment within 30 days.
7.	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.
8.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date. It is uncertain whether and to what extent monitoring flow rate would be help assure compliance with residence time requirements. The District will consider incorporating the suggestion at a later date.
9.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
10.	Refinery comments will be included in the final District response to comments.
11.	No change to the permit has been suggested.
12.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date. If and when new MACT determinations occur as a result of CAA section 112(j), those requirements will be incorporated on a source-specific basis for each

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	subject source.
13.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
14.	(Phillips) The requested language is already in the proposed permit. (Shell) The requested language is already in the proposed permit. (Tesoro) The requested change has been made in the permit, based on the rationale provided in the comment. (Valero) The requested language is already in the proposed permit.
15.	No change has been made to the permit. The basis for the permit shield is explicitly included in the shield. Operation outside of the shield's valid range voids the shield.
16.	The firing rate of the No. 6 Boiler, S-904, has not been modified. The firing rate was changed from 775 MM Btu/hour to 848 MM Btu/hour to show the boiler's design heat input rate. An application (#19418) was submitted to the District in January 1999 to retrofit the boiler with a Selective Catalytic Reduction (SCR) system to comply with the facilitywide NOx averaging requirement of Regulation 9-10-302. A condition was imposed at that time to limit the maximum firing rate to design heat input rate of 848 MM Btu/hour (Condition # 17322, Part 1). Therefore, the permit shield for No. 6 Boiler is appropriate since it has not been modified since its inception in 1956. Appropriate language has been added to the preamble of the Permit Shield to stipulate that the shields for the affected sources are only valid as long as the conditions for the shields are met.
16a.	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.
17.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
17a.	The District committed to performing the analysis of these issues, using EPA guidance as appropriate, and sharing the results with EPA. Of course, since EPA's guidance is not binding on EPA, it follows that it is not binding on the District. A determination that an associated operation is subject to Title V is not necessarily indicative of a deficiency in the permit for the rest of the refinery. Therefore, the District does not interpret this comment as indicating a problem with any of the refinery Title V permits.
18.	The District committed to performing the analysis of these issues, using EPA guidance as appropriate, and sharing the results with EPA. Of course, since EPA's guidance is not binding on EPA, it follows that it is not binding on the District. A determination that an associated operation is subject to Title V is not necessarily indicative of a deficiency in the permit for the rest of the refinery. Therefore, the District does not interpret this comment as indicating a problem with any of the refinery Title V permits.
19.	(Chevron) Chevron's truck rack receives material from both on site (Plant #72) storage and from refinery tanks (Plant #10). The two facilities share a piping network. (Phillips) Product shipping occurs at S-339 (Unit 80.) Essentially all of the product shipped through ConocoPhillips (Plant 15693) originates at the refinery. (Shell) The adjacent Distribution Terminal to the Shell Martinez Refinery is located at 1801 Marina Vista, Martinez. The Plant # is 11956. The SIC Code for the plant is 5171. This Terminal serves to load Gasoline, Jet, and Diesel products to Tanker Trucks. Approx. 20% of the product slate of the Martinez Refinery is loaded to tanker trucks using this terminal. The remainder of the refinery products is shipped via pipeline or ship. (Tesoro) The loading racks at Tesoro rely on storage tanks situated at the Tesoro refinery (Valero) Refinery tanks are used to supply gasoline to loading racks.
20.	There is some confusion in the District's records concerning these permit conditions. The District will review the permitting history, and clarify the conditions at a later date. In the interim, both caps apply.
21.	See prior response.
22.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
23.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.

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24.	The condition language in each of these two paragraphs has been amended to clarify that it is not federally enforceable.
25.	The condition text has been amended in condition #4357 and #8077 to clarify that the cap may be used as an emissions baseline only if allowed under the SIP adopted version of Regulation 2, Rule 2, Section 604.2.
26.	The condition text has been amended in condition #4357 and #8077 to clarify that CO increases must comply with the SIP adopted version of Regulation 2, Rule 2 and applicable provisions of the federal Code of Regulations.
27.	The condition text has been amended in condition #4357 and #8077 to clarify that the generation of offsets must comply with applicable requirements of the SIP adopted version of Regulation 2, Rule 2.
28.	This change has been made to the permit.
29.	Clarification that CEM data must be used is covered in Table A, B, C and D in the Appendix now added to the SOB.
30.	This change has been made to the permit.
31.	Emission calculation procedure for SO2 emissions is covered in Table C of the Appendix. The Appendix has now been added to the SOB.
32.	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.
33.	No revision is needed to the cap to include appropriate monitoring for the S-802 FCCU since this information is contained in the Appendix attached to the permit.
34.	No revision is needed to the cap to include appropriate monitoring for the S-806 Coker since this information is contained in the Appendix attached to the permit.
35.	No revision is needed to the cap to include appropriate monitoring for the S-904 Boiler#6 since this information is contained in the Appendix attached to the permit.
36.	No revision is needed to the cap to include appropriate monitoring for the Claus 3-stage sulfur recovery plant (S-1401) since this information is contained in the Appendix attached to the permit.
37.	No revision is needed to the cap to include appropriate monitoring for the sulfur acid plant since this information is contained in the Appendix attached to the permit.
38.	The cap will be revisited in the first revision to determine if any additional monitoring is needed to quantify SO2 emissions from non-combustion sources.
39.	The compliance method for PM and VOC is included in the Appendix for the cap.
40.	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. Condition 5379 Parts 11 and 12 have been amended to include District approved emissions monitoring for Part 11 and District approved source testing for part 12.
41.	The suggested change corrects a mistake. The mistake has been corrected in the final permit. 1-522 and 1-522.7 are federally enforceable.
42.	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. The requirements of 60.482-2(c) (NSPS Subpart VV) have been added to the permit.
43.	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.
44.	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.
45.	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.
46.	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.
47.	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.
48.	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.
49.	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.

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50.	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.
51.	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.
52.	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.
53.	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.
54.	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.
55.	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.
56.	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.
57.	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. This is now Table VII-CF. 60.695 monitoring will be added.
58.	The comments do not appear to apply to Tesoro. No change was made to the permit.
59.	The suggested change corrects a mistake. 40CFR61, Subpart FF has been added to Table IV-A (bookmarked EPA 59)
60.	The suggested change corrects a mistake. Table IX-B8 has been deleted.
61.	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. This monitoring will be added in a new condition. S-1405 is already in 19528-15
62.	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.
63.	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. This monitoring is in Condition 19528 part 9.
64.	The suggested change corrects a mistake. Condition 8077-B9 in Section VI now states the requirement is effective 48 months after AC.
65.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
66.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
67.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
68.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
69.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
70.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
71.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
72.	The argument supporting a suggested change is incorrect as a matter of law. No change has been made to the permit. The annual source test requirement of Regulation 8-5-502 applies to tanks degassed to an approved abatement device. This does not apply to external floating roof tanks.
73.	The argument supporting a suggested change is incorrect as a matter of law. No change has been made to the permit. External floating roof tanks do not have vacuum pressure relief devices.
74.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
75.	The suggested change corrects a mistake. The mistake has been corrected in the final permit. The 60.113b(a)(2) annual inspections are included in Table VII for the tanks subject to Subpart Kb. The 8-5-402.1 10-year inspections are in addition to and more thorough than these annual inspections. In addition, the Tables have the 60.113b(a)(4) 10-year inspection.
76.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
77.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
78.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
79.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
80.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
81.	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.

82.	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.
83.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
84.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
85.	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.
86.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
87.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
88.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
89.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
90.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
91.	The District concurs that there are drain systems at the refinery that are subject to the Standards of Performance for New Sources, 40 CFR 60, Subpart QQQ, Section 60.692-2. Since there are no Group II wastewater streams as defined by the NESHAPS, 40 CFR 63.641, the NSPS is not superseded. The citations have been added to the Section IV and VII tables for "Components."
92.	<p>There are several sources that have citations of BAAQMD Regulation 8-8-112: S819, API Oil Water Separator (Section IV table); sources S1101-S1104, Subsurface Aerators, (Section VII table).</p> <p>There are several errors in the citations for S819. The exemption in BAAQMD Regulation 8-8-112 does not apply to S819. It cannot simultaneously be subject to 8-8-112 and either 8-8-301 or 8-8-302. Therefore, BAAQMD Regulation 8-8-112 has been deleted.</p> <p>Moreover, the sources cannot simultaneously be subject to 8-8-301 and 8-8-302. The data in the District's database indicates that the maximum flow is about 1340 liters/second. Therefore, the source is subject only to BAAQMD 8-8-302, Wastewater Separators Larger than or Equal to 18.9 Liters per Second.</p> <p>The facility has clarified that S819 is using the compliance option in BAAQMD Regulation 8-8-302.3. BAAQMD Regulations 8-8-302.1, 302.2, and 302.4 have been deleted.</p> <p>Sources S1101-S1104, Subsurface Aerators, are not Oil-Water Separators. Therefore, the citation for BAAQMD Regulation 8-8-112 has been deleted. The exemption for these sources is actually BAAQMD Regulation 8-8-113, Exemption, Secondary Wastewater Treatment Processes And Stormwater Sewer Systems.</p>
93.	The District has added BAAQMD Regulation 8-8-303 to S819, Oil Water Separator, since the District concurs that it applies
94.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
95.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
96.	The refinery has verified that they do have Group 1 wastewater streams. Therefore, some wastewater streams are subject to 40 CFR 63, Subpart CC. 40 CFR 63.640(o) states that Group 1 wastewater streams that are subject to 40 CFR 60, Subpart QQQ are only required to comply with 40 CFR 63, Subpart CC. 40 CFR 63.647 states that Group 1 sources shall comply with the requirements of 40 CFR 61, Subpart FF, sections 340 through 355. The 40 CFR 61, Subpart FF requirements have been inserted in the "Facility" table of the permit at the section level. More detail will be added in the first or second revisions of the permit
97.	The refinery has verified that they do have Group 1 wastewater streams. Therefore, some wastewater streams are subject to 40 CFR 63, Subpart CC. 40 CFR 63.640(o) states that Group 1 wastewater streams that are subject to 40 CFR 60, Subpart QQQ are only required to comply with 40 CFR 63, Subpart CC. 40 CFR 63.647 states that Group 1 sources shall comply with the requirements of 40 CFR 61, Subpart FF, sections 340 through 355. The 40 CFR 61, Subpart FF

	requirements have been inserted in the "Facility" table of the permit at the section level. More detail will be added in the first or second revisions of the permit.
98.	The refinery has verified that they do have Group 1 wastewater streams. Therefore, some wastewater streams are subject to 40 CFR 63, Subpart CC. 40 CFR 63.640(o) states that Group 1 wastewater streams that are subject to 40 CFR 60, Subpart QQQ are only required to comply with 40 CFR 63, Subpart CC. 40 CFR 63.647 states that Group 1 sources shall comply with the requirements of 40 CFR 61, Subpart FF, sections 340 through 355. The 40 CFR 61, Subpart FF requirements have been inserted in the "Facility" table of the permit at the section level. More detail will be added in the first or second revisions of the permit.
99.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
100.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
101.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
102.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
103.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
104.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
105.	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 Appendix G has been amended to include calculations for all operating cooling water towers. Monitoring requirements for these sources have been added to the permit. S-6054 and S-6055 are out of service. S-4078 (Wax Rerun cooling tower) is no longer in operation.
106.	The change has been made to the permit, based upon the argument made in the comment.
107.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
108.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
109.	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. Condition #469 part 9D requires that equivalent reductions in 9E satisfy the district's SIP approved NSR rule to qualify as offsets.
110.	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. The term "refinery" as referenced in Condition #469 represents only the sources covered by Condition #469. At a later date, the district will clarify the term "refinery" in Condition #469. The cogeneration units were permitted after condition #469 was in place and are permitted to use fuel oil.
111.	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. Condition #469 part 9D requires compliance with all current district, state and federal regulations. Section 9K, which provides for variance relief from district regulations only and the facility would still be subject to any applicable federal requirements. These conditions were never intended to exempt the facility from federal requirements.
112.	No change has been made to the permit. The permit already states that all sources equipped with SCR will have CEMs. All new RLOP furnaces were equipped with SCR.
113.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
114.	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. Both the facility and the district are aware that the conditions became effective in accordance with condition #469 part 9I. The permit to operate the light neutral hydrocracker was issued on 8/30/85. Per condition #469 part 9I, which states that the terms and conditions become effective upon the first day of the month following the month when feed is first introduced to the light neutral hydrocracker. This date occurred over 18 years ago.

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115.	The argument supporting a suggested change is incorrect as a matter of law. The comment misstates the requirements of Regulation 8-1. Any stream that is vented to a flare or thermal oxidizer that meets the requirements of 8-1-110.3 is exempt from Regulation 8, including 8-2. No change has been made to the permit.
116.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
117.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
118.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
119.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
120.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
121.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
122.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
123.	The suggested change corrects a mistake. The mistake has been corrected in the final permit. Monitoring only added to Table VII Monitoring Tables.
124.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
125.	The change has been made to the permit, based upon the argument made in the comment.
126.	The argument supporting a suggested change is incorrect as a matter of law. No change has been made to the permit. Permit conditions are not automatically federally enforceable simply because they are contained in permits issued pursuant to a federally-approved NSR permit program. The District imposes permit conditions to enforce both federal and state-only requirements. Each of the permit conditions mentioned in the comment was imposed to address non-federal applicable requirements, and each is therefore correctly labeled non-federally-enforceable. The comment does not assert that these particular permit conditions implement federal requirements.
127.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
128.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
129.	This comment did not apply to the Chevron permit. No change has been made to the permit.
130.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
131.	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. The requirements are currently listed in the Refinery-Wide requirements tables.
132.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
133.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
134.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
135.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
136.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
137.	The facility has the right to use either limit. Both options are therefore listed.
138.	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
139.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
140.	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
141.	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
142.	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.
143.	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
144.	The cited section is not applicable. S-9034 is a two-nozzle gasoline dispenser used to fuel refinery vehicles. It is not a gasoline loading rack, nor is it situated in a bulk gasoline terminal.
145.	The sources are exempt from subpart Y per section 63.560(d)(6). The sources are exempt from subpart CC per 63.640(c)(6). Subpart A does not apply because neither Subpart Y nor subpart CC apply.
146.	The suggested change should be implemented at this time. The change has been made to the permit,

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	based upon the rationale provided in the comment
147.	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
148.	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
149.	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
150.	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. The thermal oxidizers are equipped with temperature monitors and the furnaces are required to be in service at all times that the vapor collection system is in service. The 95% standard is a design criteria that was reviewed upon installation. The district will request further information from the facility to demonstrate compliance.
151.	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
152.	No change has been made to the permit. 40 CFR 60 subpart A and 40 CFR 63 subpart A are both listed in Section IV, but do not contain any applicable limits for these sources requiring monitoring.
153.	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
154.	This comment repeats issues raised in Comment 133.
155.	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
156.	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
157.	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
158.	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. The thermal oxidizers are equipped with temperature monitors and the furnaces are required to be in service at all times that the vapor collection system is in service. The 95% standard is a design criteria that was reviewed upon installation. The district will request further information from the facility to demonstrate compliance.
159.	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. The thermal oxidizers are equipped with temperature monitors and the furnaces are required to be in service at all times that the vapor collection system is in service. The 95% standard is a design criteria, which was reviewed upon installation. The district will request further information from the facility to demonstrate compliance.
160.	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
161.	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
162.	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
163.	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
164.	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
165.	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
166.	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
167.	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
168.	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.
169.	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
170.	The argument supporting a suggested change does not provide sufficient information or analysis to

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	support the change. No change has been made to the permit.
171.	See condition 19177, part 22a.
172.	Tests are conducted under “as-found” conditions. The refinery does not vary fuel gas sulfur content at will, and could not comply with a requirement to conduct tests at a particular concentration.
173.	The argument supporting a suggested change is incorrect as a matter of law. No change has been made to the permit. 40 CFR 60.104(a) does not contain a ppm H ₂ S limitation applicable to this source.
174.	The argument supporting a suggested change is incorrect as a matter of law. No change has been made to the permit. The Alternative Compliance Plan is not federally enforceable.
175.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
176.	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
177.	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.
178.	
179.	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. Condition 19466-15 requires a Continuous Opacity Monitor for S-5 & 6.
180.	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. Subpart J does not apply per 60.100(d).
181.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
182.	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. Subpart J does not apply per 60.100(d). Added 6-401 to S-5 and S-6, 6-305 does not apply.
183.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
184.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
185.	The suggested change concerns an issue beyond the scope of Title V (i.e., it suggests changes to an applicable requirement, specifically, a District permit) 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.
186.	The 60.113b(a)(2) annual inspections are included in Table VII for the tanks subject to Subpart Kb (S-210 is the only source directly subjected to Subpart Kb; S-101, 103 & 105 have the annual 60.113b(a)(2) inspections indirectly as an alternative to Subpart FF, Benzene Waste NESHA). The 8-5-402.1 10-year inspections are in addition to and more thorough than these annual inspections. In addition, the Tables have the 60.113b(a)(4) 10-year inspection.
187.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
188.	This comment applies to the Chevron permit, not the Valero permit (see comment 125). No change has been made.
189.	This comment applies to the Chevron permit, not the Valero permit (see comment 125). No change has been made.
190.	No argument supporting a suggested change is made. No change has been made to the permit.
191.	This comment applies to the Chevron permit, not the Valero permit (see comment 128). No change has been made.
192.	This comment applies to the Chevron permit, not the Valero permit (see comment 129). No change has been made.
193.	9-1-301 is in the general applicable Table IV - Refinery. 9-1-305 was deleted from the SIP 20May92. 9-1-502 is not applicable since the Claus units do not emit more than the 100 lb/day limit of 9-1-307.
194.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
195.	The lab methods referred to in 9-1-606 and 607 are now included in Table VIII for 9-1-313.2.
196.	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.
197.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
198.	The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Monitoring requirements are already contained in Table VII-I
199.	The permit has been modified to cite the requirements. The requirement that the reports are to be

	sent to the Administrator is contained in the cited requirement, and is not repeated in the permit.
200.	No change to the permit was suggested; no change to the permit was made.
201.	The permit includes 61.342(c)(1) as an applicable requirement in Table IV-Refinery and cross-referenced in 61.342(e)(1) for the 6.0 Mg/Yr compliance option as set forth in 61.342(e)(2)(i). There are no specific generally applicable monitoring requirements in 61.342(c)(1) or its subparagraphs that should be included in Table VII-Refinery. The appropriate monitoring requirements created by compliance with 61.342(c)(1)(ii) are included in the permit in the applicable Table VII's for the affected sources.
202.	Valero's wastewater treatment system is a totally enclosed and abated facility that complies with 61.342(e). Valero is not subject to the requirements of 61.348(b) because it complies with 61.342(e). However, Valero complies with all of the applicable requirements set forth in 61.348(b) for the biotreaters listed in the permit in Table IV-H2.1 and IV-H2.2. The biotreaters comprise an enhanced biodegradation unit, which is the first exempt waste management unit in which waste is managed or treated. The enhanced biodegradation unit meets the definition set forth in 61.348(b)(ii)(2)(B).
203.	See previous response.
204.	S-161 (Sewer Pipeline) and S-32105 (process drains) are not subject to 40 CFR 63 Subpart CC because they are not subject to specific requirements in 40 CFR 61 Subpart FF. Valero is complying with the 6.0 Mg/Yr benzene quantity (BQ) compliance option set forth in 61.342(e)(2)(i). As an alternative to controlling emissions from individual drain systems in accordance with 61.346, Valero instead elected to remove the major benzene-containing waste streams (such as crude desalter water) from the sewer system, consider any remaining benzene-containing waste streams in the sewer as uncontrolled, and count these uncontrolled streams toward the 6.0 Mg/Yr compliance option.
205.	61.347(a)(1)(I)(B) is already shown in Tables IV-H4.1, H4.2, H5.1, and H5.2.
206.	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.
207.	S-192 wastewater sludge thickener is an open-top tank that contains spent aqueous sludge ("bugs") from the enhanced biodegradation units. Except for sludge content, the quality of wastewater in this tank is similar to the effluent from the enhanced biodegradation unit, and contains no benzene. Therefore, the tank is not subject to Subpart FF.
208.	The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Subpart FF is already listed in Tables IV and VII.
209.	Please see the response to Comment No.204 regarding Valero's uncontrolled sewer system, as allowed under the 6.0 Mg/Yr compliance option set forth in 61.342(e)(2)(i).
210.	Valero's tanks, including slop oil tanks, are all subject to Regulation 8 Rule 5, which is more stringent than the slop oil vessel requirements set forth in Regulation 8-8-305. Slop oil tanks are subject to the wastewater provisions of Part 63 Subpart CC (Part 61 Subpart FF), and not subject to any NSPS Subpart QQQ provisions, in accordance with 63.640(o)(1).
211.	Valero does not own or operate any sludge dewatering equipment at the wastewater treatment plant. Therefore, Regulation 8-8-304 is not an applicable requirement for Valero's permit.
212.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
213.	The suggested change concerns an issue beyond the scope of Title V (i.e., change to an applicable requirement, specifically, a District permit) 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.
214.	The argument supporting a suggested change is factually incorrect. No change has been made to the permit. A source test requirement is already present in Condition 19466 part 2a.
215.	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
216.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
217.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date.
218.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
219.	775 MMbtu/hr was a mistake, 848 MMbtu/hr is the correct capacity. S-906 was changed to 848 MMbtu/hr in SOB to be consistent.
220.	Tesoro has indicated that liquid fuel will not be used in boiler #5 and 6. Condition #573, Part 14,

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	Condition #17322, Part 1a, for boiler #6 has been added prohibiting use of liquid and solid fuels.
221.	The comment incorrectly states the District's commitment. The permit has been corrected to reflect the fact that the permit shield is a determination that NSPS is not applicable to the source. The NSPS requirements have not been subsumed.
222.	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 has investigated, and determined that no modification was made to S-903 that resulted in emission increases.
223.	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. Condition #573, Part 9a has been added to require continuous opacity monitor for boiler #5. Condition #17322, Part 4a has been added to required continuous opacity monitor for boiler #6.
224.	Boiler #5 and #6 will not use non-gaseous fuel, so CEM is not required.
225.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
226.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
227.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
228.	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. ESP monitoring has been added to Condition 11433, Part 4a.
229.	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. Daily visual opacity check has been added.
230.	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. Daily visual opacity check has been added.
231.	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. Daily visual opacity check has been added.
232.	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. The frequency of source testing has been changed from biannual to semiannual.
233.	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. The frequency of source testing has been changed from biannual to semiannual.
234.	The contribution that VOC emissions from these engines make to the VOC cap is trivial, and does not justify imposition of a monitoring requirement.
235.	Rich Burn engines are S-952, S-953, S-954. The rest are Lean-Burn engines
236.	New cooling will not be subject to 8-2-301, because they use best modern practices. The rest of the cooling towers will be subject to 8-2-301. Regulation 8-2-301 has been added to the appropriate Tables.
237.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
238.	See response number 178
239.	Monitoring is not required for cooling towers since the POC emissions are much less than 300 ppmv. See appendix D for details. Condition # 19199 requires adequate source tests demonstration.
240.	Regulation 6-301 and 8-2-301 have been added to the appropriate cooling towers.
241.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
242.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
243.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
244.	The comment merits consideration as a future revision to the permit. However, the District believes the proposed permit conditions are appropriate at least for the time being. The District will consider incorporating the suggestion at a later date. The permit will be amended to include the limits once the appropriate values have been established.