

Responses to Conoco/Phillips 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.

	Response
G1	The suggested change should be implemented at this time. The District agrees it is reasonable to provide a future effective date regarding monitoring newly imposed in the Title V permit. An effective date of April 1, 2004, has been added for all monitoring imposed under Title V authority. Monitoring explicitly required by existing regulations and permit conditions is effective as of the date of permit issuance.
G2	The conditions in the draft permit will be incorporated into the database, and become the only permit conditions, when the Title V permit is issued.
1.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
2.	The argument supporting a suggested change is factually incorrect. No change has been made to the permit. Condition 20786 will include the NOx monitoring conditions for Regulation 9, Rule 10. When the NOx monitoring permit conditions are approved and added to a future revision of the permit, they will appear in Condition 20786. The citation for this condition does not appear in Conditions 476 and 1694, but in the explanatory notes for those conditions. The notes were deleted after the public comment period, so these citations no longer exist.
3.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
4.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
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 corrects a mistake. The mistake has been corrected in the final permit.
8.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
9.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
10.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
11.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
12.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
13.	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
14.	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
15.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
16.	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 suggested change should be implemented at this time. The change has been made to the permit, based upon the rationale provided in the comment
18.	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
19.	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
20.	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
21.	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
22.	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
23.	The suggested change should be implemented at this time. The change has been made to the

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	Reference to tanks 115 through 773 is deleted and Tank F605 is corrected to F805 in Table II-C.
50.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
51.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
52.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
53.	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 requested change requires a permit application.
54.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
55.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
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61.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
62.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
63.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
64.	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 sulfur content sampling requirement has been changed in Condition 383 such that a sample is required for each new tanker or pipeline delivery, rather than daily.
65.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
66.	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 requested change requires a permit application.
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 suggested change corrects a mistake. The mistake has been corrected in the final permit.
73.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
74.	The suggested change corrects a mistake. The mistake has been corrected in the final permit.
75.	There are not modification records on file for the sulfur plant. Therefore, the 6 sources will be designated “grandfathered” sources with non-federally enforceable throughput limits (Table IV-U, VII-U and Section VI). The proposed Title V throughput limits will be combined as suggested for these 6 sources (Table IV-U, VII-U and Section VI). For clarity, changed references to “sulfur pits” to “molten sulfur pits”.
76.	There are not modification records on file for the sulfur plant. Therefore, the 6 sources will be designated “grandfathered” sources with non-federally enforceable throughput limits (Table IV-U, VII-U and Section VI). The proposed Title V throughput limits will be combined as suggested for these 6 sources (Table IV-U, VII-U and Section VI). For clarity, changed references to “sulfur pits” to “molten sulfur pits”.
77.	There are not modification records on file for the sulfur plant. Therefore, the 6 sources will be designated “grandfathered” sources with non-federally enforceable throughput limits (Table IV-U, VII-U and Section VI). The proposed Title V throughput limits will be combined as suggested for these 6 sources (Table IV-U, VII-U and Section VI). For clarity, changed references to “sulfur pits” to “molten sulfur pits”.