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Connect with the  
Bay Area Air District:



September 21, 2020

Kimberly Ronan  
Manager, Environmental Engineering  
Valero Refining Company – California, Benicia Refinery  
3400 East Second Street  
Benicia, CA 94510

RE: Air Monitoring Plan – Notification of Extension for H<sub>2</sub>S Monitoring  
Selection Submittal

Dear Ms. Ronan:

On December 6, 2018 the Bay Area Air Quality Management District (Air District) sent an Air Monitoring Plan (AMP) – Notification of Extension for H<sub>2</sub>S Monitoring Selection Submittal. The letter extended the deadline and revised the timeline to allow an additional 3 months for the selection of an H<sub>2</sub>S monitoring method. Subsequent extension letters were sent on March 6, 2019, September 17, 2019, December 19, 2019, March 20, 2020, and June 19, 2020.

This letter serves to further extend the deadline and revise the timeline to allow an additional 3 months from the date of this letter for Valero to select an approach to monitoring H<sub>2</sub>S and inform the District in writing of that selection. The Air District anticipates that a method for open path monitoring of H<sub>2</sub>S will be validated in the next few months pending the completion of a vendor sponsored open path tunable diode laser field validation and method detection limit study scheduled to be commenced at a Bay Area refinery. To encourage the use of open path H<sub>2</sub>S monitoring, the Air District will allow up to 15 months from the date of this letter to begin operation of such monitoring. Valero may request a deadline beyond 15 months after the date of this letter if it can show that additional time is needed due to factors beyond its control.

If Valero instead chooses to use fixed measurements for H<sub>2</sub>S monitoring using the EPA MACT siting procedures for benzene sampling at refineries, then such monitoring must be operational within 6 months of the date of this letter. Valero may request a deadline beyond 6 months if it can show that additional time is needed due to factors beyond its control. Valero's selection and implementation of H<sub>2</sub>S monitoring will be reviewed as an element of the AMP implementation. Failure to implement H<sub>2</sub>S monitoring in a timely and adequate manner would be basis for withdrawal of approval.

If you have any questions regarding this notification, please contact me for compliance issues or Jerry Bovee at 415-749-4601 for technical issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Crowley", with a long horizontal line extending to the right.

Chris Crowley  
Air Quality Specialist  
Compliance and Enforcement Division  
(415) 749-5118