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From May 9, 2017 the Texas Commission on Environmental Quality (TCEQ) Houston Regional Office received a Request for Comments (RFC) from the TCEQ Air Permits Division (APD) for Permit # 2501A for Valero Refining Texas LP — Valero Refining Houston Refinery (APD Project No. 205855).
Narrative
On May 11, 2017, Ms. Dominique Henson of the TCEQ conducted an in-house review of the draft permit amendment for Permit # 2501A.

A response was sent to the permit writer via e-mail on May 12, 2017. A copy of the response can be found in Attachment 1. The response included the following regional comments:

1. Operational Limitations: The proposed HCN allowables appear high; based on the new stack test will the HCN lbs./hour and tons/year allowables decrease?
2. General Comments: Please clarify the addition to special condition 55; subparagraph I is not represented in the permit as specified in your comments.

Exit Interview
An exit interview with Valero Refining Houston Refinery was not conducted during this permit review process.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description
Valero is a petroleum refinery. Details pertaining to specific processes can be found in the Houston Region files.

BACKGROUND

Current Enforcement Actions
Comments from regional staff regarding current enforcement actions are included in Attachment 1, if applicable.

Agreed Orders, Court Orders, and Other Compliance Agreements
Comments from regional staff regarding Agreed Orders, Court Orders, and other Compliance Agreements are included in Attachment 1, if applicable.

Complaints
Comments from regional staff regarding any complaints are included in Attachment 1, if applicable.

Prior Enforcement Issues
Comments from regional staff regarding any prior enforcement issues are included in Attachment 1, if applicable.

ADDITIONAL INFORMATION / RECOMMENDATIONS

Conclusions and Recommendations
Comments from regional staff regarding applicability and enforceability are included in Attachment 1.

Additional Issues
Additional issues are included in Attachment 1, if applicable.

List of Report Attachments
1. Request for Comments Form
2. Permit Special Conditions
3. MAER table sent from APD

No Violations Associated to this Investigation
Signed [Signature]
Environmental Investigator

Date [May 12, 2017]

Signed [Signature]
Supervisor

Date [May 19, 2017]

Attachments: (in order of final report submittal)

- Enforcement Action Request (EAR)
- Letter to Facility (specify type): __________
- Investigation Report
- Sample Analysis Results
- Manifests
- Notice of Registration

- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify):
  - Request for Comments - Draft
  - MAERT from APD
  - Permit Special Condition SS
ATTACHMENT 1

REQUEST FOR COMMENTS – DRAFT CONDITIONS

RN: 100-219-310
CN: 600-127-468

Valero Refining Texas LP – Valero Refining Houston Refinery
Houston, Harris

Investigation # 1411010

May 12, 2017
TO: Region: 12  City: Houston  County: Harris  Account No.: HG-0130-C
Submitted by: Mr. Tony Ionescu, P.E.  E-Mail ID: Tony.Ionescu  Phone: (512) 239-1277
Date Request Submitted: May 9, 2017
Comments Deadline: May 30, 2017

For deadlines less than 21 days Section Manager approval is required.

Date Application Received by TCEQ in Austin: February 10, 2014

REGIONAL OFFICES: Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has passed.

LOCAL PROGRAMS: The company below has submitted an application for the project referenced below in accordance with regulations of the TCEQ. Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has passed. Permit Reviewer may request faster response if needed. If no comments are received within this timeframe, we will assume you have no comments or objections to the project as proposed. Please return a complete copy of the form (both sides) with your comments.

PROJECT TYPE: Amendment  NEWLY AUTHORIZED MSS? _____YES _____NO
PROJECT NO.: 205855  REGULATED ENTITY NO.: RN100219310
PERMIT NO.: 2501A
COMPANY NAME: Valero Refining Texas LP  CUSTOMER REFERENCE NO.: CN600127468
PLANT NAME: Valero Refining Houston Refinery
LOCATION: 9701 Manchester St
UNIT NAME: Houston Refinery  COUNTY: Harris
TECHNICAL CONTACT: Matthew Lindquist  PHONE: (713) 923-3300
OPERATING SCHEDULE: Continuous? x

Engineer's Comments: Valero Refining which operates the Houston Refinery has submitted an amendment to permit 2501A to authorize emissions of hydrogen cyanide (HCN) from the FCCUs. The estimated emissions are based on a limited amount of stack test data available from FCCUs of other similar Valero refineries. Special Condition No. 55 was modified with the addition of subparagraph 1, requiring stack testing within 180 days of the approval of this amendment. Emissions are being added to the permit based on current representation with the understanding that stack testing is performed and that an amendment to readress the emissions will be filed subsequent to the stack test.

Attachments: MAERT, Draft Conditions

Investigation Type: RFC Draft Conditions
Air Account No: HG-0130-C
Attachment: RFC Comments

Page: 1 of 2
TO: Mr. Tony Ionescu, P.E., Austin
FROM: Region: 12  City: Houston  County: Harris  Account No.: HG-0130-C
Copy of Application Received by your Office:  YES  X  NO  Date Received: N/A

COMPANY NAME: Valero Refining Texas LP

PERMIT NO.: 2501A

REGULATED ENTITY NO: RN100219310  PROJECT NO.: 205855

Investigator's/Compliance Officer's Name (Please Print): Dominique Henson
Phone: 713-422-8909
Comments Deadline (from pg. 1): May 30, 2017
Date of Last Site Visit: November 28, 2016

COMMENTS ON CONDITIONS: (Please mark up draft special conditions with your comments. Please address applicability and enforceability. List any additional conditions below):

Please note that the scope of the review is typically limited to the affected sources within the project, although suggestions to improve the enforceability of conditions not related to the specific permit action may be provided with justification. Please also note that changes in permit stringency during a renewal process must meet the criteria of Texas Health and Safety Code 382.055(e) and should be submitted with justification.

Compliance Determination Conditions: __________________________________________

________________________________________

________________________________________

________________________________________

Operational Limitations: The proposed HCN allowables appear high; based on the new stack test will the HCN lbs./hour and tons/year allowables decrease?

________________________________________

________________________________________

________________________________________

GENERAL COMMENTS: Please clarify the addition to special condition 55; subparagraph I is not represented in the permit as specified in your comments.

________________________________________

________________________________________

________________________________________

PERMIT ISSUANCE:

If you have any objections to issuance, please note them here:

________________________________________

________________________________________

________________________________________
ATTACHMENT 2

PERMIT SPECIAL CONDITIONS

RN: 100-219-310
CN: 600-127-468

Valero Refining Texas LP — Valero Refining Houston Refinery
Houston, Harris

Investigation # 1411010

May 12, 2017
Special Conditions
Permit Numbers 2501A and PSDTX767M2
Page 30

(4) Type of sampling equipment to be used.

(5) Method or procedure to be used in sampling.

The purpose of the pretest is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposal description of any deviation from the sampling procedures specified in a permit condition or TCEQ or the U.S. Environmental Protection Agency (EPA) sampling procedures shall be made available to the TCEQ and any local air program having jurisdiction, at or prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedure. Requests to waive testing for any pollutant specified in subparagraph B of this permit condition shall be submitted to the TCEQ Regional Director. If the waiver is approved by the TCEQ, a copy of the approval document and supporting data shall be mailed to local air programs having jurisdiction by the regulatory entity within 30 days after approval.

B. Air contaminants emitted from the TGIs to be tested may include (but are not limited to) CO, H₂S, NH₃, NOₓ, and SOₓ, to ensure compliance with Special Condition Nos. 20, 21, and 22.

C. Sampling shall occur within 180 days after the startup of the modified Unit 46 SRU and within 180 days after the startup of the Unit 39 SRU, and at such other times as may be required by the Executive Director of the TCEQ, requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. If request for additional time to perform sampling is approved by the TCEQ, a copy of the approval document and supporting data shall be mailed to local air programs having jurisdiction by the regulatory entity within 30 days after approval. Additional time to comply with the requirements of 40 CFR Part 60 and 40 CFR Part 66 cannot be granted. In the event the stack testing is conducted on September 21-22, 2011.

D. Copies of the final test report shall be forwarded to the TCEQ within 60 days after testing is completed. Sampling reports shall comply with the attached provisions and Chapter 9 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

   One copy to the appropriate TCEQ Regional Office.
   One copy to the appropriate local air pollution control program.

E. Sampling ports and platforms shall be incorporated into the design of the TGI stack according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director or the TCEQ Director of the Compliance Support Division in Austin.

55. The holder of this permit shall perform stack sampling and other testing as required by the TCEQ Executive Director or his representative to establish the actual pattern and quantities of air contaminants being emitted from the FCC Unit Stack (EPN 42CB2201). Sampling shall be conducted in accordance the appropriate procedures of the TCEQ Sampling Procedure Manual and in accordance with the appropriate EPA Reference
Special Conditions
Permit Numbers 2501A and PS8767M2
Page 31

Methods. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.

A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled but not less than 30 days prior to sampling to schedule a pretest meeting. The notice shall include:
   (1) Date for pre-test meeting.
   (2) Date sampling will occur.
   (3) Name of firm conducting sampling.
   (4) Type of sampling equipment to be used.
   (5) Method or procedure to be used in sampling.

   The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

   A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation in specified sampling procedures. Requests to waive testing for any pollutant specified in paragraph B of this condition shall be submitted to the TCEQ Air Permits Division in Austin.

B. Air constituents emitted from the M. C. Hunt Stack (N 42CB2201) to be tested for include (but are not limited to) sulfur dioxide, particulate matter, suspended particulate, oxides of nitrogen, and carbon monoxide.

C. The last scheduled stack test was conducted on December 19, 2008. Sampling shall also occur in such number of times as may be required by the Executive Director of the TCEQ.

D. The FCCU's flue gas and desulfurization systems shall operate at maximum coke burn rate during stack emission testing. Secondary operating parameters that enable determination of coke burn rate shall be maintained and recorded during the stack test. These parameters shall be determined at the pretest meeting and shall be stated in the sampling report. The FCCU is unable to operate at maximum rates during testing, therefore production rates may be limited to the rates established during testing. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Director. Permit allowable emissions and emission control requirements are not waived and shall apply during stack testing periods.

E. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the conditions of Chapter 14 of the TCEQ. The reports shall be distributed as follows:

One copy to the appropriate TCEQ Regional Office;

One copy to each appropriate local air pollution control program.
ATTACHMENT 3

MAER TABLE SENT FROM APD
RN: 100-219-310
CN: 600-127-468

Valero Refining Texas LP — Valero Refining Houston Refinery
Houston, Harris

Investigation # 1411010

May 12, 2017
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Investigation Type: RFC Draft Conditions
Air Account NO: HG 0130 C
Attachment: MAERT
Page: 1 of 1