



BENICIA REFINERY • Valero Refining Company - California • 3400 E. Second Street • Benicia, CA 94510-1005 • Telephone (707) 745-7011

December 15, 2008

VIA HAND DELIVERY

Ms. Sylvia Zulawnick
Manager, Particulate Matter Analysis Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: California Air Resources Board's Draft Regional Haze Plan

Dear Ms. Zulawnick,

Valero Refining Company-California ("Valero") is providing to the California Air Resources Board ("CARB") its initial brief comments relative to CARB's Draft Regional Haze Plan ("Draft Plan"). Valero owns and operates the Benicia Refinery in Benicia, California. The Benicia Refinery produces approximately 25% of the compliant, clean-burning transportation fuels for the Bay Area market.

As Valero only became aware of the release the Draft Plan on Monday, December 8th, only a week before the December 15th public workshop, it has not had adequate time to thoroughly review and provide detail comments on the Draft Plan. Valero has concerns with the BART determination for the Benicia Refinery, including the cost-effective analysis and proposed limits.

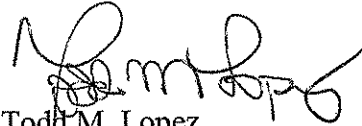
Because of these concerns Valero would like to set up a meeting with CARB staff to discuss these concerns. The Draft Plan in its current form if adopted, could jeopardize Valero's ability to produce compliant, clean-burning transportation fuels for the Bay Area market, and therefore, cause potential market constraints.

In conclusion, Valero would like to thank CARB for the opportunity to provide these initial comments and looks forward to working productively and cooperatively with CARB in developing a Final Plan.

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Please contact me at (707) 745-7203 if you should have any questions or need clarifications concerning Valero's initial comments. We look forward to meeting with you in the very near future to discuss our concerns with the Draft Plan.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Todd M. Lopez", written over a faint, illegible printed name.

Todd M. Lopez
Environmental Manager

DWS:tml

cc: Linda C. Murchinson, CARB
Karen Magliano, CARB
Tina Suarez-Murias, CARB