Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Air Products and Chemicals, Inc.	**AI #:**	31512	**TEMPO Activity No:**	PER20060001
Facility Name:	Geismar 2 Syngas Separation Unit	**Remarks Submitted by:**	Kyle Lawrence		
Permit Writer:	Rusty J. Jack	**Permit Writer Email Address:**	rusty.jack@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permit Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	**Remarks**	**Air Permits Division Response** (for official use only)
Statement of Basis – Section III Proposed Project/Permit Information, Permitted Air Emissions Table Draft Title V Permit -- Air Permit Briefing Sheet, Section III Description, Estimated emissions table	Current NO_x emissions are listed as 2.86 ton/yr. Please revise the noted permit references to reflect NO_x emissions of 2.850 ton/yr as indicated in the October 12, 2007 application.	Change has been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Draft Title V Permit -- Emission Rates for Criteria Pollutants Table	EQT 0005 (Source ID 102-97) lists average CO emissions of 2.67 lb/hr. Please revise the noted permit reference to reflect average CO emissions of 2.369 lb/hr as indicated in the October 12, 2007 application.	Change has been made.
Draft Title V Permit -- Inventories Table, Subject Item Groups and Group Membership	Source ID 103-97-A (Warm Flare Startup/Shutdown) is listed as a new group (SCN 0001) with Source ID 103-97 as part of that Group. Air Products requests that SCN 0001 be removed and that Source ID 103-97-A is listed in the Subject Item Inventory as an individual emission unit.	The SCN 0001 is not a "group" by definition; it is an operating condition. Since the 103-97 Warm Flare is already a point source and it is not always in startup/shutdown mode, it is best to create an alternate operating scenario for the flare during times of startup/shutdown. As such, SCN 0001 will remain. Also, an operating scenario, SCN 0002, has been created for the normal operation of the flare.
Draft Title V Permit -- Inventories Table, Stack Information	EQT 0004 (Source ID 101-97) lists a flow rate of 100 cubic ft/min-actual. Please revise the noted permit reference to reflect a flow rate of 1,000 cubic ft/min-actual as indicated in the October 12, 2007 application.	Change has been made.
Draft Title V Permit -- Specific Requirements 4 and 7	Specific requirements 4 and 7 for EQT 0005 (Source ID 102-97) include a BTU limit of 300 BTU/scf. The Cold Flare is used solely to control startup and shutdown activities at the facility and thus operation is limited. LDEQ indicated verbally that due to the nature of operation of the Cold Flare an annual BTU/scf test is not required. Thus, Air Products requests a discussion to formally remove the Btu testing requirements.	Change has been made.
Draft Title V Permit -- Specific Requirements 14 and 16	Specific requirements 14 and 16 for EQT 0006 (Source ID 103-97) include a BTU limit of 300 BTU/scf "to ensure destruction of emissions to the flare stack." The Warm flare is not steam assisted, thus Air Products requests that the limit be changed from 300 BTU/scf to 200 BTU/scf. Although the Warm flare is not subject to NSPS requirements, 200 BTU/scf is an allowable net heating	Change has been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
	value of the gas being combusted for a non-assisted flare (40 CFR 60.18(c)(1)(B)(ii)). Air Products hereby makes this request under this basis and as described in Section 2.1.6 of the October 12, 2007 application.	
Draft Title V Permit -- Section X, Table 1, Applicable Louisiana and Federal Air Quality Requirements	EQT 04 (Source ID 101-97) is identified in the Description column as 107-97. Please revise the description to reflect the correct Source ID number of 101-97.	Change has been made.
Draft Title V Permit and Statement of Basis – All Sections	Throughout the draft permit and statement of basis, the facility is referred to as "No. 2 Syngas Separation Unit". The APCI Geismar facility located at 36637 Hyighway 30, Geismar, Louisiana is referred to as the "Geismar 2" location. Please revise all references to "No. 2 Syngas Separation Unit" to indicate "Syngas Separation Unit", since there is only one SSU present at the Geismar 2 location.	Change has been made.

LDEQ-EDMS Document 39171260, Page 39 of 156