Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Jefferson Davis Parish Sanitary Landfill Commission	**AI #:**	12389	**TEMPO Activity No:**	
Facility Name:	Jefferson Davis Parish Sanitary Landfill	**Remarks Submitted by:**	BFI Waste Systems of Louisiana, LLC		
Permit Writer:		**Permit Writer Email address:**			

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)
Section I –Background - Air Permitting Briefing Sheet	The company name in this section is incorrect. Please update the name to "BFI Waste Systems of Louisiana, LLC.	The change will be made.
Section X (Table 1. Applicable Louisiana and Federal Air Quality Requirements – Background - Air Permitting Briefing Sheet	ID No. FUG1, Uncollected Landfill Gas – This emissions point is a minor source of HAP and therefore LAC 33:III.Chapter 51 does not apply. Please change the Key "1" to "3" to indicate this rule is not applicable.	ID NO. FUG01, Uncollected Landfill Gas was marked with a "1" under LAC 33:III.Chapter.51 to indicate applicability of LAC 33:III.5151 to this source. A separate column will be created for LAC 33:III.5151 and the applicability indicator moved to this column.
Section X (Table 1. Applicable Louisiana and Federal Air Quality Requirements – Background - Air Permitting Briefing Sheet	ID No. EQT 4 – Candlestick Flare – Please update this table to indicate that 40 CFR NSPS Subpart A and 40 CFR 63 NESHAP Subpart AAAA are applicable to this source.	The change will be made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Section VI. – Periodic Monitoring – Statement of Basis	This citation in this Section for the NSPS Subpart WWW is incorrect. Please update the citation to 40 CFR 60 Subpart WWW.	The change will be made.
General Information – Related People	Please change the Emissions Inventory contact to Oliver Ford. The mailing address is 918 Willow Springs Road, Sulphur, LA 70663. The contact phone number is (337) 527-9380 and contact e-mail is oliver.ford@awin.com	The change will be made.
Table – Emission Rates for TAP/HAP & Other Pollutants	Emission Point – FUG 0001 and UNF 0001 – Please remove the emission limits for Methyl Chloride. This pollutant is not listed in the application or the Emissions Inventory Questionnaire	The change will not be made. Methyl chloride is a synonym of Chloromethane. Based on the calculations provided in the November 2008 application, Chloromethane is emitted at a rate of 0.095 tons/yr. In accord with the current Louisiana Guidance for Air Permitting Actions, this pollutant is listed in the Title V permit.
Specific Requirements – FUG0001 2 – Uncollected Landfill Gas	The specific conditions 30 through 75, listed under this emission point apply to the entire facility. This Emission point represents the fugitive emissions not collected by the gas collection and control system. Therefore, it is requested that these specific conditions be moved under emission point UNF 0001.	The change will be made.
Specific Requirements – FUG0001 2 – Uncollected Landfill Gas, Specific Condition No. 54 [40CFR 60.757(f)]	The annual reports required under 40 CFR 60.757(f) are required to be submitted every 6 months in accordance with 40 CFR §63.1980 (a). It is requested that the specific condition No. 54 be revised accordingly.	The change will be made.
Specific Requirements – UNF 0001 – Entire Landfill, Specific Condition No. 101 [LAC 33:III.501.C6]	The particulate matter (2.5 microns or less) emissions limit indicated in this condition applies to FUG002 (Road Dust), and not the entire facility. Therefore, it is requested that this condition be removed.	The change will be made.

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