# Worksheet for Technical Review of Working Draft of Proposed Permit

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| **Company Name:** | **Bengal Pipeline Company LLC** | **AI #:** | **588** | **TEMPO Activity No:** | **PER20070002** |
| **Facility Name:** | **Baton Rouge Tank Farm** | **Remarks Submitted by:** | **January 8, 2008** | | |
| **Permit Writer:** | **Jada Lewis** | **Permit Writer Email address:** | **Jada.Lewis@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 Permits 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 any required 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.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
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| Emission Rates for Criteria Pollutants Page 1 of 2; EQT0026 (0005), EQT0027 (0006); VOC | Draft permit limits average lb/hr and maximum lb/hr emissions of VOC to <0.001; however, these emission rates are calculated to be 0.002 lb/hr. Please change permitted limits to match calculated emissions. | Updated. |
| Emission Rates for Criteria Pollutants Page 1 of 2; EQT0026 (0005), EQT0027 (0006); VOC | Draft permit limits VOC emissions at <0.01 tpy. Emissions are calculated to be 0.007 tpy, which is rounded to 0.01 tpy. Please remove the "<" symbol from permitted emission limit. | Updated. |
| Emission Rates for Criteria Pollutants Page 1 of 2; EQT0025 (0004); VOC | Draft permit limits average lb/hr and maximum lb/hr emissions of VOC to <0.001; however, these emission rates are calculated to be 0.003 lb/hr. Please change permitted limits to match calculated emissions. | Updated. |

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| Emission Rates for Criteria Pollutants Page 2 of 2; EQT0028 (0007); VOC | Average lb/hr, Maximum lb/hr, and tons per year should be permitted at 0.001, 0.001 and 0.01, respectively, in order to match the calculated emissions. Please remove the "<" symbol from permitted emission limits. | Updated. |
| Emission Rates for Criteria Pollutants Page 2 of 2; EQT0029 (0008); VOC | Draft permit limits average lb/hr and maximum lb/hr emissions of VOC to <0.001; however, these emission rates are calculated to be 0.003 lb/hr. Please change permitted limits to match calculated emissions. | Updated. |
| Inventories; Page 3 of 4; EQT 0015 (1486) | Draft permit shows height to be 56 feet. The height is 66 feet. Please change height to 66 feet. | Updated. |
| Inventories; Page 3 of 4; EQT0016 (1518), EQT0017 (1519) | The draft permit shows that Tanks 1518 and 1518 have a diameter of 1 foot. This should be changed to show that these tanks have a discharge area of 1 square foot. Please move the "1" over one column to the right. | Updated. |
| Inventories; Page 3 of 4; EQT0027 (0006), EQT0028 (0007) | Draft permit reflects temperature of 75 degrees; please change temperature to 76 degrees F to match EIQ pages within permit application. | Updated. |
| Specific Requirements 2, 13, 22, 40, 58, 76, 94, 112, 128, 133, 143, 181, 188, 195, 202, 209, 217, 234, 241, 249 | No loading occurs at this facility; therefore, 40 CFR 63.425(h), which applies to gas cargo tanks (delivery tank trucks or railcars), does not apply to this facility. Please remove these specific requirements from the permit. | Specific Requirement removed. |
| Specific Requirements 8, 128 | These tanks are internal floating roof tanks and 40 CFR 60.112b(a)(1)(iv)-(ix) does not apply to internal floating roof tanks. Please remove these specific requirements. | Specific Requirement removed. |
| Specific Requirements 11, 131 | 40 CFR 63.423(b) applies to external floating roof tanks. These tanks are internal floating roof tanks; therefore, this regulation does not apply. Please remove these specific requirements. | Specific Requirement removed. |
| Specific Requirements; EQT0019 (TMW-2) | Please add the recordkeeping requirements of LAC 33:III.2103.I.1-7 to TMW-2. | Specific Requirement added. |
| Specific Requirement 177 | Draft permit references LAC 33:III.2103.G.5, which does not apply to this particular emission source because the sump will operate for more than two weeks. This sump has a capacity less than 250 gallons, which is why it is exempt from LAC 33:III.2103. Please change this specific requirement to reflect the recordkeeping requirements of LAC 33:III.2103.I.1-7. | Specific Requirement updated. |
| NA (not in draft permit) | Draft permit does not include applicable recordkeeping requirements of LAC 33:III.2103.I.1-7. Please add these specific requirements for Tanks 134, 135, 136, 151, 152, 171, 172, and 173. | Specific Requirement added. |
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