Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Bollinger Shipyards, Inc.	**AI #:**	130128	**TEMPO Activity No:**	PER20080003
Facility Name:	Amelia Operations	**Remarks Submitted by:**			
Permit Writer:	Dustin Duhon	**Permit Writer Email address:**	dustin.duhon@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)
Statement of Basis page 1, Heading	Change the Proposed Permit Number to 2660-00105-V1.	**This change was made.**
Statement of Basis, II. Facility and Current Permit Status	Include the following as the first paragraph: "Bollinger Amelia Operations, L.L.C. operates a marine vessel construction and repair operation located in Amelia, Louisiana. This operation consists of three facilities: Bollinger Amelia Repair (BAR), Bollinger Morgan City, L.L.C. (BMC), and Bollinger Marine Fabricators, L.L.C (BMF)."	The first paragraph was changed to read as follows: The Bollinger - Amelia Operations, located in Amelia, Louisiana, consist of marine vessel, boat, and barge repair and fabrication. This operation consists of three facilities: Bollinger Amelia Repair (BAR), Bollinger Morgan City, LLC (BMC), and Bollinger Marine Fabricators, LLC (BMF). The main activities include welding, cutting, abrasive blasting, panel line

		shot blasting, and painting of vessels. Peripheral operations include diesel, gasoline, solvent, and oil tanks; storage tanks for barge/marine vessel cargos, tanker/truck loading, barge/marine vessel venting, diesel and gasoline combustion sources, traffic on unpaved roads, and fugitives.
Statement of Basis, II. Facility and Current Permit Status, 1st paragraph, 1st sentence	In the 1st sentence, change the word ship to marine vessel. The sentence should read "…Amelia Operations consist of marine vessel, boat, and barge repair…."	This change was made.
Statement of Basis, II. Facility and Current Permit Status, 2nd paragraph	Replace 2nd paragraph with the following: "New construction and repair includes work on hulls, decks, cabins, structural supports, and compartments. The facility also fabricates components for marine boats and barges."	This paragraph was changed to read as follows: New construction and repair operations include work on hulls, decks, cabins, structural supports, and compartments. The facility also fabricates components for marine boats and barges.
Statement of Basis, III. Proposed Project/Permit Information, Project	Revise the second bullet to state "Increase throughput **and/or capacities** of various gasoline and diesel tanks."	This change was made.
Statement of Basis, III. Proposed Project/Permit Information, Project	In the 3rd bullet, revise the name of the BMC Dry Dock Generator (EQT31) to BMC-Ms. Brooke Generator (EQT 31).	This change was made.
Statement of Basis, III. Proposed Project/Permit Information, Project	Add the following bullets: • Increase welding rod usage, metal cutting fuel usage, truck loading throughput, and shot blasting fuel usage. • Remove BAR 058, BAR Portable Welder (EQT 013) • Incorporate BAO Air Compressor (BAO-008) • Incorporate the following Insignificant Activity fuel tanks: Big Bo fuel tank, BMC-Ms. Brooke Generator Fuel Tank, BAO Compressor Tank, BMF Diesel Heater for Pressure Washer, and BAR Rental Compressor Fuel Tank. • Increase the fugitive equipment count. • Change the service of BMF-004 from solvent to heavy fuels, change the name of BMF-004 to	This change was made.

	BMF-004 Heavy Oil Tank T-106, and incorporate this tank into the Insignificant Activity list. • Change the name of BMC Winch Engine No. 1 and BMC Winch Engine No. 1 Fuel Tank to BMF Winch Engine No. 2 and BMF Winch Engine No. 2 Fuel Tank.	
Statement of Basis, III. Proposed Project/Permit Information, Proposed Permit	In 1st sentence, change permit number to 2660-00105-V1.	This change was made.
Statement of Basis, III. Proposed Project/Permit Information, Permitted Air Emissions	Please revise the facility total emissions. Several source's emissions (EQT 26 and 27) were not included in the draft permit emission total, several sources are being modified as reflected in the attached calculations and EIQs, and some sources are being deleted. The estimated After emissions in tons per year are as follows: PM10 = 100.81 TPY that results in a change of 23.20 TPY SO2 = 1.62 TPY that results in a change of 1.05 TPY NOx = 43.95 TPY that results in a change of 34.01 TPY CO = 12.23 TPY that results in a change of 9.16 TPY VOC = 222.92 TPY that results in a change of 72.85 TPY	The emission rate totals were changed as follows: PM10 = 100.80 TPY that results in a change of 23.19 TPY SO2 = 1.63 TPY that results in a change of 1.06 TPY NOx = 43.96 TPY that results in a change of 34.02 TPY CO = 12.23 TPY that results in a change of 9.16 TPY VOC = 216.38 TPY that results in a change of 66.36 TPY
Statement of Basis, IV. Regulatory Analysis	Please remove EQT 003 from the table. EQT 3 Solvent Tank T-106 (BMF-004) is requesting a tank change of service from solvent to heavy oil/diesel. As a result of this change of service, this tank (3288 gal) will be an Insignificant Activity A.3. Please refer to the attached tank calculation which shows the emissions estimate from diesel stored in this tank.	This change was made.
Statement of Basis, IV. Regulatory Analysis	Please remove EQT 1. This tank was deleted with an EIQ requesting deletion in the May 2008 Application.	This change was made.
Statement of Basis, IV. Regulatory Analysis	Incorporate EQT 20 with EQT 2 in the table. These tanks are not applicable to K, Ka, and Kb for the same reasons.	This change was made.
Statement of Basis, IV. Regulatory Analysis	Please remove EQT 17 and EQT 18. These sources were deleted with an EIQ requesting deletion in the May 2008 Application.	This change was made.
Statement of Basis, IV.	The rows currently with ID Nos. EQT 19-25, EQT 33	This change was made.

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Regulatory Analysis	should be revised to read EQT 19, EQT 21-25 and remove EQT 33. Please refer to regulatory table 3-5 in the additional information submittal on 10/15/08.	
Statement of Basis, IV. Regulatory Analysis	Please remove ARE 4 from the table. LAC Chapter 51 does apply to ARE 4. Please refer to page 2-8 in the additional information submittal on 10/15/08.	This change was made.
Statement of Basis, IV. Regulatory Analysis	The rows currently with ID Nos. EQT 5-13, 26-32 should be revised to read EQT 5, 6, 27, 31, and 32. Also, the Note stating the EXEMPT from NESHAP ZZZZ should be changed to DOES NOT APPLY for the same reason that NSPS IIII does not apply. These are non-road engines. Please refer to page 3-3 and 3-4 in the additional information submittal on 10/15/08.	In order to address the concerns expressed by the commenter, EQT 7, 10, and 28-30 were separated out and given their own exemption descriptions. For NSPS IIII, the explanation reads as follows: DOES NOT APPLY - Engines commenced construction before July 11, 2005, and were manufactured prior to April 1, 2006. [40 CFR 60.4200(a)(2)]. The nonapplicability statement regarding NESHAP ZZZZ was changed to read as follows: EXEMPT - All engines below 500 brake horsepower.
Statement of Basis, IV. Regulatory Analysis	Please incorporate BAO-008, BAO Air Compressor, into regulatory analysis. This engine will have the same regulatory applicability as EQT 5 and 6.	This change was made.
Statement of Basis, IV. Regulatory Analysis	Please remove EQT013, BAR Portable Welder, from the Regulatory Analysis as this engine is no longer in service.	This change was made.
Statement of Basis, IV. Regulatory Analysis	Please list EQT 26 separately showing that this source Does Not Apply to LAC Chap 15 because it emits <5 TPY, it Does Not Apply to NSPS JJJJ and NESHAP ZZZZ because the source is a non-road engine, and it Does Not Apply to LAC Chap 5109 because it combusts Group 1 fossil fuel.	In order to address the concerns expressed by the commenter, the nonapplicability statement regarding NESHAP ZZZZ was changed to read as follows: EXEMPT - All engines below 500 brake horsepower. In addition, engines are Non-road Engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than

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		12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function at the engine replaced will be included in calculating the consecutive time period. No other changes were made.
Statement of Basis, IV. Regulatory Analysis	Remove LAC Chap. 2111 from FUG 1 in the table. There are no pump or compressor pieces of equipment in the count that could potentially release fugitives. If anything needs to be listed for FUG 1, it should be LAC Chap. 2121. Please refer to page 3-3 in the additional information submittal on 10/15/08.	This change was not made. This regulation is applicable since the pump associated with the gasoline tank handles gasoline, which has a vapor pressure of > 1.5 psia. This provides conformity between the Bollinger Larose and Bollinger Amelia permits.
Statement of Basis, IV. Regulatory Analysis	Please include EQT 33 and list as exempt from LAC Chap 2103 and 2131 because the tank is <250 gal. It also does not apply to K, Ka, or Kb because of its capacity.	This change was made.
Statement of Basis, IV. Regulatory Analysis	Please include EQT 7, 10, 28-30 and list LAC Chap 1511 as Does Not Apply because source emits < 5 TPY of SO2. Also, NSPS IIII does not apply because these engines were constructed prior to 7/11/05. Refer to page 3-5 in the additional information submittal on 10/15/08.	This change was made.
Statement of Basis, IV. MACT Analysis	Please remove Hydroquinone and Methyl tert Butyl Ether from the third sentence. These are Supplemental TAPs and do not have MERs. Please add Manganese, Toluene 2-4 Diisocyanate, and Toluene 2-6 Diisocyanate into the third sentence as they are emitted at levels higher than the MER.	This change was made.
Statement of Basis, IV. MACT Analysis	Please revise the second paragraph to read: "MACT for painting has been determined to be in compliance with 40 CFR 63 Subpart II – Shipbuilding and Ship Repair. MACT for welding has been determined as use of flux core arc welding and submerged arc welding where possible. Best management practices including the use of screens and operating/engineering controls when practical is determined to be MACT for abrasive blasting. Good operating practices are determined to be MACT for metal cutting operations. MACT for tanks is determined to be compliance with LAC 33:III.2103. MACT for truck loading is determined to be compliance with LAC	This paragraph as been changed to read as follows: MACT for painting operations has been determined to be compliance with 40 CFR 63 Subpart II – Shipbuilding and Ship Repair. MACT for welding operations has been determined to be use of flux core arc welding and submerged arc welding where possible. Best management practices are determined to be MACT for abrasive blasting operations. Good operating practices are determined to be

	33:III.2107. MACT for tank venting is determined to be compliance with LAC 33:III.2108.	MACT for metal cutting operations, MACT for truck loading, tank venting, diesel tanks, and the Miscellaneous Gasoline Tanks source (EQT 33) is determined to be no additional controls. MACT for gasoline tanks (EQT 2 and EQT 20) is determined to be the use of a submerged fill pipe.
Cover Letter	Please update the date in the 3rd paragraph.	This change was not made. It is assumed that this comment requests that the expiration date be reset to expire 5 years from the issuance of this permit. LAC 33:III.507.E.2 states, in pertinent part, "Reopenings or revisions which require DEQ and EPA review as well as affected state and public notice of an entire permit shall establish the start of a new five-year permit duration, except in the case of acid rain permits." When a permit is renewed, LDEQ reviews the entire permit and makes this review available for further review by the public. In the case of Bollinger Amelia, the draft permit does not require EPA review.
Air Permit Briefing Sheet, I. Background	Please revise the Permit No. to 2660-00105-V0.	This change was not made. This permit is the modification of Permit No. 2660-00105-V0.
Air Permit Briefing Sheet, III. Description	In the 1st sentence, change the word ship to marine vessel. The sentence should read "…Amelia Operations consist of marine vessel, boat, and barge repair…."	This change was made.
Air Permit Briefing Sheet, III. Description	Replace 2nd paragraph with the following: "New construction and repair includes work on hulls, decks, cabins, structural supports, and compartments. The facility also fabricates components for marine boats and barges."	This paragraph was changed to read as follows: New construction and repair operations include work on hulls, decks, cabins, structural supports, and compartments. The facility also fabricates components for marine boats and barges.
Air Permit Briefing Sheet, III. Description	Revise the second bullet to state "Increase throughput **and/or capacities** of various gasoline and diesel tanks."	This change was made.
Air Permit Briefing Sheet, III. Description	Add the following bullets: • Increase welding rod usage, metal cutting fuel usage, truck loading throughput, and shot	This change was made.

	blasting fuel usage. • Remove BAR 058, BAR Portable Welder (EQT 013) • Incorporate BAO Air Compressor (BAO-008) • Incorporate the following Insignificant Activity fuel tanks: Big Bo fuel tank, BMC-Ms. Brooke Generator Fuel Tank, BAO Compressor Tank, BMF Diesel Heater for Pressure Washer, and BAR Rental Compressor Fuel Tank. • Increase the fugitive equipment count. • Change the service of BMF-004 from solvent to heavy fuels, change the name of BMF-004 to BMF-004 Heavy Oil Tank T-106, and incorporate this tank into the Insignificant Activity list. • Change the name of BMC Winch Engine No. 1 and BMC Winch Engine No. 1 Fuel Tank to BMF Winch Engine No. 2 and BMF Winch Engine No. 2 Fuel Tank.	
Air Permit Briefing Sheet, III. Description, Criteria Pollutant Facility Totals	Please revise the facility total emissions. Several source's emissions (EQT 26 and 27) were not included in the draft permit emission total, several sources are being modified as reflected in the attached calculations and EIQs, and some sources are being deleted. The estimated After emissions in tons per year are as follows: PM10 = 100.81 TPY that results in a change of 23.20 TPY SO2 = 1.62 TPY that results in a change of 1.05 TPY NOx = 43.95 TPY that results in a change of 34.01 TPY CO = 12.23 TPY that results in a change of 9.16 TPY VOC = 222.92 TPY that results in a change of 72.85 TPY	The emission rate totals were changed as follows: PM10 = 100.80 TPY that results in a change of 23.19 TPY SO2 = 1.63 TPY that results in a change of 1.06 TPY NOx = 43.96 TPY that results in a change of 34.02 TPY CO = 12.23 TPY that results in a change of 9.16 TPY VOC = 216.38 TPY that results in a change of 66.36 TPY
Air Permit Briefing Sheet, III. Description, TAP Facility Totals	Please remove Hydroquinone and Methyl tert Butyl Ether since these are supplemental TAPs and do not have MERs.	This change was made.
Air Permit Briefing Sheet, III. Description, TAP Facility Totals	Please revise the Emissions Total for Toluene -2,4-diisocyanate and Toluene-2,6-Diisocyanate to 0.024 TPY.	This change was made.

Air Permit Briefing Sheet, IV. Type of Review	Please remove Hydroquinone and Methyl tert Butyl Ether from the third sentence. These are Supplemental TAPs and do not have MERs. Please add Manganese, Toluene 2-4 Diisocyanate, and Toluene 2-6 Diisocyanate into the third sentence as they are emitted at levels higher than the MER.	This change was made.
Air Permit Briefing Sheet, IV. Type of Review	Please revise the second paragraph to read: "MACT for painting has been determined to be in compliance with 40 CFR 63 Subpart II – Shipbuilding and Ship Repair. MACT for welding has been determined as use of flux core arc welding and submerged arc welding where possible. Best management practices including the use of screens and operating/engineering controls when practical is determined to be MACT for abrasive blasting. Good operating practices is determined to be MACT for metal cutting operations. MACT for tanks is determined to be compliance with LAC 33:III.2103. MACT for truck loading is determined to be compliance with LAC 33:III.2107. MACT for tank venting is determined to be compliance with LAC 33:III.2108.	This paragraph as been changed to read as follows: MACT for painting operations has been determined to be compliance with 40 CFR 63 Subpart II – Shipbuilding and Ship Repair. MACT for welding operations has been determined to be use of flux core arc welding and submerged arc welding where possible. Best management practices are determined to be MACT for abrasive blasting operations. Good operating practices are determined to be MACT for metal cutting operations. MACT for truck loading, tank venting, diesel tanks, and the Miscellaneous Gasoline Tanks source (EQT 33) is determined to be no additional controls. MACT for gasoline tanks (EQT 2 and EQT 20) is determined to be the use of a submerged fill pipe.
Air Permit Briefing Sheet, IX. Insignificant Activities	Please remove BMC-090 and BAR-003 from the insignificant activity. list. These tanks are no longer at the facility	This change was made.
Air Permit Briefing Sheet, IX. Insignificant Activities	Please add BAO-007, BAO Air Compressor Fuel Tank to the Insignificant Activity list. It is 240 gal and is an I.A. A.2. Please refer to the attached for the calculation.	This change was made.
Air Permit Briefing Sheet, IX. Insignificant Activities	Please add BAO-008, BMF Diesel Heater to the Insignificant Activity list. It is 0.385 MMBtu/hr heater and is an I.A. A.5. Please refer to the attached for the calculation.	This change was made. It should be noted that the additional information submitted by Bollinger Amelia indicated that the Source ID Number for this source is BMF-076 and the source was listed in the Insignificant Activity list as BMF-076.
Air Permit Briefing Sheet, IX. Insignificant Activities	Please change the name of BMF-092, BMF Winch No.1 Fuel Tank to BMF Winch No.2 Fuel Tank.	This change was made.

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Air Permit Briefing Sheet, IX. Insignificant Activities	Please change the name of BMC-096, BMC Dry Dock Generator Fuel Tank to BMC-Ms. Brooke Generator Fuel Tank.	This change was made.
Air Permit Briefing Sheet, IX. Insignificant Activities	Please add BMF-004, BMF Diesel Tank T-106 to the I.A. list. Bollinger is requesting a tank change of service from solvent to heavy oil/diesel and name change to BMF Diesel Tank T-106. As a result of this change of service, this tank (3288 gal) will be an Insignificant Activity A.3.	This change was made.
Air Permit Briefing Sheet, X. Table 1	ARE 1, please put a 3 (Does Not Apply) for LAC Chap. 15 and a 1 (Applicable) for LAC Chap 51.	The requested reference was made for Chapter 15, but not for Chapter 51. This source does not emit any Toxic Air Pollutants.
Air Permit Briefing Sheet, X. Table 1	ARE 2, please put a 1 (Applicable) for LAC Chap 13.	This change was made.
Air Permit Briefing Sheet, X. Table 1	ARE 4. Please remove the 1 from LAC Chap. 11 and change the 2 to a 1 for LAC Chap. 51.	The requested reference was made for Chapter 51, but not for Chapter 11. This source emits smoke and, therefore, Chapter 11 applies.
Air Permit Briefing Sheet, X. Table 1	EQT 2, please put a 1 (Applicable) for LAC Chap 51.	This change was made.
Air Permit Briefing Sheet, X. Table 1	Please remove EQT 3 from the table since it is an I.A. A.3. Refer to the attached calculation.	This change was made.
Air Permit Briefing Sheet, X. Table 1	Please remove EQT 13 from the table. This point is no longer in service.	This change was made.
Air Permit Briefing Sheet, X. Table 1	Please change the description of EQT 15 to BAO-090 Truck Loading.	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 19, 20, 21, 22, 23, 24, 25; please put a 1 (Applicable) for LAC Chap 51.	This change was made.
Air Permit Briefing Sheet, X. Table 1	Please change the Description of EQTs 21-25 from BAO-061, BAO-062, BAO-063, BAO-064, and BAO-065 to BMC-061, BMC-062, BMC-063, BMC-064, and BMC-065, respectively.	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 26, 27, 28, 29, 30, 31, 32 please put a 2 (Exempt) for LAC Chap 51.	This change was made.
Air Permit Briefing Sheet, X. Table 1	Please change name of EQT 31 to BMC-Ms. Brooke Generator	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 33, please replace the 3 (Not applicable) for LAC Chap 2103 to a 2 (Exempt). Please place a 2 (Exempt) for LAC Chap 2131 and a 1 (Applicable) for LAC Chap 51.	This change was made.
Air Permit Briefing Sheet, X.	BAO-060 and BAO-080, Please place a 3 (Not Applicable)	This change was not made. Chapter 51 clearly

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Table 1	for LAC Chap 51.	does not apply
Air Permit Briefing Sheet, X. Table 1	EQT 2, Please change the 2 to a 3 for NSPS K, Ka, and Kb.	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 7 and EQT 10, Please change the 3 to a 1 for NESHAP ZZZZ. These engines are applicable to ZZZZ, however, they are existing and do not have to meet the requirements of the subpart.	This change was not made. NESHAP ZZZZ does not apply to these sources because they have a brake horsepower of less than 500 hp. See 40 CFR 63.6590(a)(1).
Air Permit Briefing Sheet, X. Table 1	EQT 10, Please change the name from BMC 055, BMC Winch No. 1 to BMF 055, BMF Winch No.2.	This change was made.
Air Permit Briefing Sheet, X. Table 1	Incorporate BAO-008, BAO Air Compressor into the table.	This change was made.
Air Permit Briefing Sheet, X. Table 1 p.9	Please remove EQT 3 from the table since it is an I.A. A.3. Refer to the attached calculation.	This change was made.
Air Permit Briefing Sheet, X. Table 1, p. 9	Please remove EQT 13 from the table. This point is no longer in service.	This change was made.
Air Permit Briefing Sheet, X. Table 1 p. 9	Please change the description of EQT 15 to BAO-090 Truck Loading.	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 19 thru EQT 25, Please change the 2 to a 3 for NSPS K, Ka, and Kb.	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 26, Please remove the 3 under NSPS and place a 3 under NSPS JJJJ. This source is for gasoline engines.	This change was made.
Air Permit Briefing Sheet, X. Table 1	EQT 28, EQT 29, and EQT 30, please change the 3 for NESHAP ZZZZ to a 1. These engines are applicable to ZZZZ, however, they are existing and do not have to meet the requirements of the subpart.	This change was not made for EQT 30. NESHAP ZZZZ does not apply to EQT 30 because it has a brake horsepower of less than 500 hp. See 40 CFR 63.6590(a)(1). This change was made for EQT 28 and EQT 29.
Air Permit Briefing Sheet, X. Table 1	EQT 33, Please change the 2 to a 3 for NSPS K, Ka, and Kb	This change was made.
Air Permit Briefing Sheet, XI. Table 2	Please remove EQT 003 from the table. EQT 3 Solvent Tank T-106 (BMF-004) is requesting a tank change of service from solvent to heavy oil/diesel. As a result of this change of service, this tank (3288 gal) will be an Insignificant Activity A.3. Please refer to the attached tank calculation which shows the emissions estimate from diesel stored in this tank.	All of the comments below that refer to Table 2 of the Air Permit Briefing Sheet are identical to those made for the Regulatory Analysis for the Statement of Basis. Please see the responses to the appropriate comment above.
Air Permit Briefing Sheet, XI. Table 2	Please remove EQT 1. This tank was deleted with an EIQ requesting deletion in the May 2008 Application.	See comment above.
Air Permit Briefing Sheet, XI.	Incorporate EQT 20 with EQT 2 in the table. These tanks	See comment above.

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Table 2	are not applicable to K, Ka, and Kb for the same reasons.	
Air Permit Briefing Sheet, XI. Table 2	Please remove EQT 17 and EQT 18. These sources were deleted with an EIQ requesting deletion in the May 2008 Application.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	The rows currently with ID Nos. EQT 19-25, EQT 33 should be revised to read EQT 19, EQT 21-25 and remove EQT 33. Please refer to regulatory table 3-5 in the additional information submittal on 10/15/08.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	Please remove ARE 4 from the table. LAC Chapter 51 does apply to ARE 4. Please refer to page 2-8 in the additional information submittal on 10/15/08.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	Please remove EQT 13 from the table. This point is no longer in service.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	The rows currently with ID Nos. EQT 5-13, 26-32 should be revised to read EQT 5, 6, 27, 31, and 32. Also, the Note stating the EXEMPT from NESHAP ZZZZ should be changed to DOES NOT APPLY for the same reason that NSPS IIII does not apply. These are non-road engines. Please refer to page 3-3 and 3-4 in the additional information submittal on 10/15/08.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	Please incorporate BAO-008, BAO Air Compressor, into regulatory analysis. This engine will have the same regulatory applicability as EQT 5 and 6.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	Please list EQT 26 separately showing that this source Does Not Apply to LAC Chap 15 because it emits <5 TPY, it Does Not Apply to NSPS JJJJ and NESHAP ZZZZ because the source is a non-road engine, and it Does Not Apply LAC Chap 5109 because it combusts Group 1 fossil fuel.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	Remove LAC Chap. 2111 from FUG 1 in the table. There are no pump or compressor pieces of equipment in the count that could potentially release fugitives. If anything needs to be listed for FUG 1, it should be LAC Chap. 2121. Please refer to page 3-3 in the additional information submittal on 10/15/08.	See comment above.
Air Permit Briefing Sheet, XI. Table 2	Please include EQT 33 and list as exempt from LAC Chap 2103 and 2131 because the tank is <250 gal. It also does not apply to K, Ka, or Kb because of its capacity.	See comment above.

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Air Permit Briefing Sheet, XI. Table 2	Please include EQT 7, 10, 28-30 and list LAC Chap 1511 as Does Not Apply because source emits < 5 TPY of SO2. Also, NSPS IIII does not apply because these engines were constructed prior to 7/11/05. Refer to page 3-5 in the additional information submittal on 10/15/08.	See comment above.
General Information – Also Known As	Please change the start date for Bollinger Amelia Operations to 4/16/07. The previous permit was issued on this date.	This change was not made. The information on the General Information Sheet is not considered a part of the permit. This date does not reflect the issuance date of the previous permit.
General Information – Physical Location	Please change the contact number to 985-631-3600.	This change was made.
General Information – Related Organizations	Please change Bollinger Amelia Operations LLC to Bollinger Shipyards Lockport, LLC as the facility that owns Bollinger Amelia Operations.	This change was made.
Inventories	Please change the normal and maximum operating rate of ARE 0001 to 9.61 MM sq ft/yr.	This change was made.
Inventories	Please list Gasoline under "Contents" for EQT 0002	This change was made.
Inventories	EQT 0010, Please change the Description to BMF-055 – BMF Winch No. 2	This change was made.
Inventories	EQT 0015, please change the Max Operating Rate to 5040 gal/hr and the Normal Operating Rate to 3.809 MM gallons/yr	This change was made.
Inventories	EQT 0019, Please change the Normal Operating Rate and the Max Operating Rate to 253,591 gal/yr. Please list Diesel under Contents	This change was made.
Inventories	EQT 0020, Please change the Normal Operating Rate and the Max Operating Rate to 7,120 gal/yr. Please list Gasoline under Contents	This change was made.
Inventories	EQT 0023, Please change the Max Operating Rate to 300,000 gal/yr instead of gal/dy.	This change was made.
Inventories	Please change the Description of EQTs 21-25 from BAO-061, BAO-062, BAO-063, BAO-064, and BAO-065 to BMC-061, BMC-062, BMC-063, BMC-064, and BMC-065, respectively.	This change was made.
Inventories	EQT 0032, Please change the Max Operating Rate and the Normal Operating Rate to 1200 HP.	This change was made.
Inventories	EQT 0031, Please change the name of this source to BMC-Ms. Brooke Generator.	This change was made.

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Inventories	Please remove EQT 0013. This engine is no longer in service.	This change was made.
Inventories	Incorporate BAO-008, BAO Air Compressor into the Inventory page.	This change was made.
Inventories	Please remove EQT 0003. This tank has changed service from solvent to diesel and its name is now BMF-004 Diesel Tank T-106. Since it is < 10,000 gal, it is a I.A. A.3.	This change was made.
Emission Rates for Criteria Pollutants	Please delete EQT 0013. This source is no longer in service.	This change was made.
Emission Rates for Criteria Pollutants	Please remove EQT 003. This tank has changed service from solvent to diesel and its name is now BMF-004 Diesel Tank T-106. Since it is < 10,000 gal, it is a I.A. A.3. Please refer to the attached tank calculation which shows the emissions estimate from diesel stored in this tank.	This change was made.
Emission Rates for Criteria Pollutants	EQT 0010, please change BMC-055 in the Subject Item column to BMF-055.	This change was made.
Emission Rates for Criteria Pollutants	EQT 0021 thru EQT 0025, please change Avg lb/hr of VOC from 0.002 to <0.01. Criteria pollutants should be rounded to 2 digits. Change Subject Item to BMC 061 thru BMC-065 respectively.	This change was not made. Emissions are listed in the draft permit in accordance with the guidance in the *Louisiana Guidance for Air Permitting Actions*, Section 1.2.4.
Emission Rates for Criteria Pollutants	Please incorporate BAO Air Compressor, BAO-008, in this table.	This change was made.
Emission Rates for Criteria Pollutants	Please incorporate EQT 026 and EQT 027 in this table.	This change was made.
Emission Rates for TAP/HAP & Other Pollutants	Please delete EQT 0013. This source is no longer in service.	This change was made.
Emission Rates for TAP/HAP & Other Pollutants	Please remove EQT 003. This tank has changed service from solvent to diesel and its name is now BMF-004 Diesel Tank T-106. Since it is < 10,000 gal, it is a I.A. A.3. Please refer to the attached tank calculation which shows the emissions estimate from diesel stored in this tank.	This change was made.
Emission Rates for TAP/HAP & Other Pollutants	EQT 0002, please change Avg lb/hr of Benzene from <0.001 to 0.001. Toluene avg lb/hr should be 0.002 and n-Hexane avg lb/hr should be 0.004 lb/hr	This change was made.
Emission Rates for TAP/HAP	EQT 0019, please change Tons/Yr of benzene, biphenyl,	This change was made.

& Other Pollutants	ethyl benzene, naphthalene, toluene, and xylene to <0.01. Unless the MER is <50 lb, the TPY should be listed as <0.01.	
Emission Rates for TAP/HAP & Other Pollutants	EQT 0021 thru 0025, please change Tons/Yr of benzene, biphenyl, ethyl benzene, naphthalene, toluene, and xylene to <0.01. Unless the MER is <50 lb, the TPY should be listed as <0.01.	This change was made.
Emission Rates for TAP/HAP & Other Pollutants	EQT 0021, please change Avg lb/hr of Toluene from 0.002 to <0.001.	This change was not made. Emissions are listed in the draft permit in accordance with the guidance in the *Louisiana Guidance for Air Permitting Actions*, Section 1.2.4.
Emission Rates for TAP/HAP & Other Pollutants	EQT 0022, please change Avg lb/hr of Toluene from 0.001 to <0.001.	This change was not made. Emissions are listed in the draft permit in accordance with the guidance in the *Louisiana Guidance for Air Permitting Actions*, Section 1.2.4.
Emission Rates for TAP/HAP & Other Pollutants	EQT 0023, please change Avg lb/hr of Toluene from 0.001 to <0.001.	This change was not made. Emissions are listed in the draft permit in accordance with the guidance in the *Louisiana Guidance for Air Permitting Actions*, Section 1.2.4.
Emission Rates for TAP/HAP & Other Pollutants	EQT 0024, please change Avg lb/hr of Toluene from 0.001 to <0.001.	This change was not made. Emissions are listed in the draft permit in accordance with the guidance in the *Louisiana Guidance for Air Permitting Actions*, Section 1.2.4.
Emission Rates for TAP/HAP & Other Pollutants	EQT 0025, please change Avg lb/hr of Toluene from 0.001 to <0.001.	This change was not made. Emissions are listed in the draft permit in accordance with the guidance in the *Louisiana Guidance for Air Permitting Actions*, Section 1.2.4.
Emission Rates for TAP/HAP & Other Pollutants	UNF 0001, please remove Methyl Tert Butyl Ether since this TAP does not have a MER.	This change was not made. Its lack of an MER does not affect its status as a TAP.
Emission Rates for TAP/HAP & Other Pollutants	UNF 0001, please change Phenol TPY to <0.70 TPY	This change was not made. No supporting information was submitted to justify this change.
Emission Rates for TAP/HAP & Other Pollutants	UNF 0001, please change Toluene-2,4-diisocyanate and Toluene-2,6-diiscocyanate TPY to 0.024 TPY	This change was made.
Specific Requirement	Please include new BAO air compressor, BAO 008. See attached regulatory table for applicable regulations.	This change was made.
Specific Requirement # 116 thru 118, ARE 005 LAC	Please add the phrase "if tarps are used" to each of these specific conditions.	This change was made.

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33:III.1329.C.1-3		
Specific Requirement # 119 ARE 005 LAC 33:III.1329.D	Please add the phrase "if blasting is performed in a permanent building with a particulate matter collection system" to this specific conditions.	This change was made.
Specific Requirement # 120 ARE 005 LAC 33:III.1329.E	Please add the phrase "when blasting is performed over waters of the state" to this specific conditions.	This change was made.
Specific Requirement # 141 thru 144, EQT 0003 Solvent Tank T-106	Please remove all specific requirements. This tank has changed service from solvent to diesel and its name is now BMF-004 Diesel Tank T-106. Since it is <10,000 gal, it is a I.A. A.3. Please refer to the attached tank calculation which shows the emissions estimate from diesel stored in this tank.	This change was made.
Specific Requirement # 153 thru 154, EQT 0013 BAR Portable Welder	Please remove all specific requirements. This source is no longer in service.	This change was made.
Specific Requirement EQT 0031	Please change the name of this source to BMC-074 – BMC Ms. Brooke Generator.	This change was made.
Specific Requirement EQT 0010	Please change the name of this source to BMF-055 – BMF Winch No. 2.	This change was made.
Specific Requirement, EQT 0007, EQT 0010, EQT 028, EQT 029, EQT 030	Add 40 CFR 63.6590(b)(3) to these sources. These engines are affected sources and are applicable to Subpart ZZZZ; however, they are existing compression ignition stationary RICE and do not have to meet the requirements of this subpart and of Subpart A. No initial notification is required.	This change was not made. NESHAP ZZZZ does not apply to these sources because they have a brake horsepower of less than 500 hp. See 40 CFR 63.6590(a)(1).
Specific Requirement # 172 UNF 0001 40 CFR 63	Please remove "...and Table 12 of 40 CFR 63 Subpart EEEE." The solvent tank that was applicable to EEEE has changed service from solvent to diesel and its name is now BMF-004 Diesel Tank T-106. Since it is < 10,000 gal, it is a I.A. A.3. NESHAP EEEE does not apply.	This change was made.
Specific Requirement # 181 UNF 0001	Please remove specific requirement #181. Many of the sources that have opacity limits are not operated on a daily basis. This requirement is not included in other Bollinger Title V permits (refer to Bollinger Shipyards Lockport, LLC, Permit No. 1560-00051-V0	This change was not made. This requirement is found in the permit for Bollinger Larose (Permit No. 1560-00049-V.1) and provides conformity between these permits.
Specific Requirement # 184 UNF 0001	Please revise the total TAP amount to 129.22 TPY.	This change was made.
Specific Requirement # 187	Please revise "66.56 TPY" to "129.22 TPY".	This change was made.

UNF 0001		
Specific Requirement # 188 UNF 0001	Please remove this specific requirement. Good housekeeping is addressed under specific condition No.179 addressing LAC Chap 2113. This requirement is not in any Title V for any Lockport facility.	This change was made.
Specific Requirement # 199 UNF 0001	Please change capitalized statement "IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANITIFIED USING GOOD ENGINEERING PRACTICIES" to lower case.	This change was made.
Specific Requirement # 200 and #201, UNF 0001	Please revise the statement to read "…initial start-up of a stationary source subject to MACT."	This change was not made. The conditions are sufficiently clear as to indicate that they apply to initial startup. Further, it is clear that the facility as well as a number of sources within the facility are stationary sources subject to MACT. The requested revision would not add any additional clarity.

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