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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Bollinger Calcasieu, L.L.C.**	**AI #:**	**2164**	**TEMPO Activity No:**	**PER2005003**
Facility Name:	**Bollinger Calcasieu**	**Remarks Submitted by:**	**Jodi Satches , VP - HSE**		
Permit Writer:	**Christopher Smith**	**Permit Writer Email address:**	**Christopher.smith@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Requirement 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 Requirements 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)
Section III Description	**Please modify Page 3 of the draft permit second paragraph concerning the flaring of barges. The first sentence should be changed to "Vessel containing liquified petroleum gases..." instead of "Vessels containing gaseous materials..."**	The text was revised as requested.
Section III Description	**Please modify Page 3 of the draft permit list of changes from State Permit to include –** **1. Increase throughput and material composition for truck loading.** **2. Remove Oily Water Tank 7-64.** **3. Add emission source 7-07 Misc. Gas Tanks** **4. Add Insignificant Emission source 8-07 Miscellaneous Diesel Tanks**	The text was revised as appropriate.

Air Permit Briefing Sheet Page 5, Statement of Basis Page 5.	The facility wide criteria pollutant totals should equal: PM10 = 21.15, SO2 = 10.56, NOx = 52.68, CO = 66.04, VOC = 131.00. Please update the Air Briefing Sheet on Page 5 of the draft permit and Page 5 of the Statement of Basis.	This change was made as requested.
Emission Rates for Criteria Pollutants Table	The following changes should be made to the Emission Rates for Criteria Pollutants Table to be consistent with the emission rates requested in the February 2009 submittal: EQT0023–VOC Max lb/hr should be 4.69 lb/hr not 4.72 lb/hr, EQT0031–VOC Max lb/hr should be < 0.01 lb/hr not 7.53 lb/hr, EQT0057–CO Avg = 1.04 lb/hr, Max = 2.00lb /hr, Tons/Yr 0.76 EQT0057–NOx Avg = 4.83 lb/hr, Max = 9.26 lb /hr, 3.53 Tons/Yr EQT0057–PM10 Avg = 0.34 lb/hr, Max = 0.65 lb /hr, 0.25Tons/Yr EQT0057–SO2 Avg = 0.32 lb/hr, Max = 0.61 lb /hr, 0.23Tons/Yr EQT0057–VOC Avg = 0.39 lb/hr, Max = 0.76 lb /hr, 0.29 Tons/Yr	The changes were made as requested.
Air Permit Briefing Sheet Page 5 & 6, Statement of Basis Page 4 & 6 and Emission Rates for TAP/HAP & other Pollutants Table	The facility wide totals for individual Toxic Air Pollutants should be amended to the following to: 1,2 Dichloroethane = 1.091, Ethylene Glycol = 0.17, Glycol Ethers 0.20, Hexane = 0.89, Methanol = 0.57, Methyl Isobutyl Ketone = 0.32, PAH = 0.04, 1,1,2,2 – Tetrachloroethane = 0.002, Toluene = 2.06, Chromium = 0.009, Copper = 0.258, Manganese = 0.06. These amended numbers were calculated by summing each emission point using additional significant digits than required to be reported in the permit. Bollinger requests that these provided facility wide totals are used to ensure that there is no potential for actual facility emissions to exceed permitted facility wide total emissions while all the individual sources are below their respective emission limits.	The changes were made as requested.
Air Permit Briefing Sheet Page 5, & 6 Statement of Basis Page 5 & 6 and Emission Rates for TAP/HAP & other Pollutants Table	The facility wide total for the Toxic Air Pollutant 1,1,1 – Trichloroethane should be changed from 0.66 TPY to 1.08 TPY as requested in the permit application submitted in February 2008. The Facility wide Total TAPs, Total VOC TAPs, Total Non-VOC TAPs and the Total Supplemental TAPs should be updated to reflect the changes from this comment and the previous comment.	The changes were made as requested.
TAP/HAP & other Pollutants Table	The facility wide total for the Toxic Air Pollutant Ethyl Benzene should be changed from 0.54 TPY to 1.75 TPY as requested in the permit application submitted in February 2008.	The changes were made as requested.

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Air Permit Briefing Sheet Page 6, Statement of Basis Page 6 and Emission Rates for TAP/HAP & other Pollutants Table	4,4 Methylene Dianiline (CAS No. 101-77-9) should be added to the facility wide total list for supplemental Toxic Air Pollutants with an estimate annual total of 0.01 TPY.	The changes were made as requested.
Emission Rates for TAP/HAP & other Pollutants Table	Please add to Emission Pt. UNF 0001 the following Pollutants and emission rates : Hydroquinone = 0.004 TPY, Bis (2-ethyl hexyl) phthalate = 0.05 TPY as requested in the permit application submitted in February 2008.	The changes were made as requested.
Emission Rates for TAP/HAP & other Pollutants Table	The following changes should be made to the Emission Rates for TAP/HAP & other pollutant Table to be consistent with the emission rates requested in the March 2009 submittal: EQT0009 - 1,3 Butadiene Avg lb/hr should be 0.001 not < 0.001, EQT0061 - Toluene Max lb/hr should be 0.06 not < 0.01, EQT 0031 should have Ethyl Benzene and Naphthalane added at the emission rates of Avg and Max lb/hr = < 0.01 and Tons/Yr = < 0.01, GRP0003 1,1,1 Trichloroethane Tons/yr should be 0.90 TPY not 0.32 TPY. GRP0003 Cumene Avg. lb/hr should 0.20 lb/hr not 0.02 lb/hr	The changes were made as requested to EQT031, 01-04 – Midstream Fueler 5, and EQT061, 7-07 – Miscellaneous Gasoline Fuel Tanks. The individual limits on TAPs/HAPs for EQT009, 5-93 – Truck Loading, and GRP003, 2-64 – Marine Vessel and Tank Venting were removed from the permit because GRP004, BCO - Barge Cleaning Operations, includes a CAP on annual VOC emissions and also allows Bollinger to vary the use of individual TAPs from these sources.
Air Permit Briefing Sheet Page 8 - 9,	"Table 1. Product Minimum Condenser Concentration (PPMV)" and the preceding paragraph should be removed from the air permit briefing sheet. Bollinger Calcasieu is no longer planning to use a condenser as a emissions control device for barge cleaning activities and this table is no longer applicable to Bollinger Calcasieu operations. The facility will use a Thermal oxidizer to control emissions from barge cleaning operations.	This change was made as requested.
Air Permit Briefing Sheet Section VII; Page 10	Section VII of the draft permit, "Effects on Ambient Air" states that LDEQ did not require the applicant to model emissions. Air dispersion Modeling for Air Toxics was requested by the agency and completed and submitted to the Agency by Bollinger. This section should include summary information showing that Bollinger emissions were modeled and show compliance with the Ambient Air Standard.	This change was made as requested.
Air Permit Briefing Sheet Section IX; Page 10& 11	Section IX of the draft permit, "Insignificant Activities" Insignificant Activity ID No. 8-07 for Miscellaneous Diesel Tanks should be added to this list as requested in the February 2008 permit application update.	This change was made as requested.
Air Permit Briefing Sheet Section X Table 1.	Air Permit Briefing Sheet Section X Table 1. Applicable Louisiana And Federal Air Quality Requirements for Source ID No. EQT. 031 – Midstream Fueler 5 has a "3" under requirements of Chapter 15. This source is a diesel storage barge and has no SO2 emissions which would be subject to LAC 33 III Chapter 15 regulations, nor is an exemption status provided in Table 2. The "3" should be deleted. A copy of this table is also included in the Statement of Basis which should	This change was made as requested.

	also be modified.	
Air Permit Briefing Sheet Section X Table 1.	Air Permit Briefing Sheet Section X Table 1. Applicable Louisiana And Federal Air Quality Requirements for Source IDs No. 1- EQT. 012, 013, 019 and 020 should have a 3 for NESHAP EEEE 2- EQT 027,032 and 033 should have a 3 for NESHAP EEEE 3- ARE006, EQT027, 032, 033, 058, 060 should have a 3 for NESHAP ZZZZ not a 2. (Not Applicable to Non Road Engines) 4- FUG001 has a 1 corresponding to applicable requirements for LAC 33:III Chapter 21, but Table 2 has an exemption criteria. Also FUG001 has a Specific Requirement (417) with Chapter 21 as the citation. Please clarify applicability.	1. This change was made as requested. 2. This change was made as requested. 3. This change was made as requested. 4. 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.
Air Permit Briefing Sheet Section X Table 2 & Statement of Basis Section IV Table 2	Air Permit Briefing Sheet Section X Table 2 and Statement of Basis Section IV Table 2 "Explanation for Exemption Status or Non-Applicability" for Source ID Nos. ARE 006, EQT 026, 027, 032, 033, 058, 059 and 060 state that these engines are exempt from Part 63 NESHAP ZZZZ because they have a maximum power output less than 500 HP. Since the submittal of the 2005 application, NESHAP ZZZZ has been revised and the exemption for engines less than 500 HP no longer exists. However, this regulation does not apply to these engines due to the fact that they are non road engines. The Notes section should be changed to read the same as that for NSPS IIII or NSPS JJJJ for each source.	These changes were made as requested.
Draft Permit Inventories Section Page 1	Please remove max and normal operating rate values for ARE 002 thru ARE 005. The emissions for each source are not dependant on a single operating parameter. The facility could exceed these parameters without exceeding their emission limits and should not be included as a limit. Each source has sufficient monitoring requirements in the specific conditions to ensure compliance with all emission limits and regulatory requirements. This will be consistent with other Bollinger permits at similar facilities. Please refer to Bollinger Amelia Operations, LLC permit, Bollinger Lockport, L.L.C. and Bollinger Larose, L.L.C. permits.	This change was made as requested.
Draft Permit Inventories Section Page 1	The Stack Information – Velocities for ARE002, EQTs 009 -25 GRP002 and GRP003 should be removed. These sources are area sources or storage tanks and do not have exhaust stacks. The listed values were used in the Air Toxic modeling in accordance with standard modeling procedures but do represent actual exhaust stacks with a steady exhaust flow. The Stack Information – stack height for EQT0061 should be	This change was made as requested.

	deleted. This emission source represents rented or temporary engines fuel tanks. The value listed represents an assumed average for the purpose of modeling emissions; however, as the equipment will change, the actual exhaust stack height will also change.	
Draft Permit Inventories Section Page 1	UNF 0001 should be deleted from the Group Membership Table. It is listed as a member of GRP0003. This is inaccurate. GRP003 is described as BCO Barge Cleaning Operations. UNF is a Group including all sources at the facility. The Barge Cleaning Operations does not include all sources at the facility (i.e. IC engines, painting) and therefore, the group UNF001 should not be included in GRP0003.	This change was made as requested.
Permit Statement of Basis Section VI – Periodic Monitoring	Please remove the operating time requirements for Sources ARE002 – ARE006 and EQT004 & EQT 008. Emissions from these sources are not steady state and operating time is not an appropriate parameter for estimating emissions to compare to emission limitations. In accordance with Louisiana General Condition XI.C, the facility is required to determine compliance with emission limits on a quarterly basis and report and deviations. Records of actual emission estimates are available to demonstrate compliance with these emission limitations.	This change was made as requested.
Specific Requirements	Please remove Specific Requirements 104, 107, 108, 112, 130, 131, 132, 133, 138, 139, 140, 141, 146, 147, 148, 149, 154, 155, 156, 157, 166, 167, 168, 169, 185, 188, 194 & 195. These specific conditions require the recording and reporting of operating time for AREA 002 – ARE 006 and EQT004 & EQT008. Emissions from these sources are not steady state and operating time is not an appropriate parameter for estimating emissions to compare to emission limitations. In accordance with Louisiana General Condition XI.C, the facility is required to determine compliance with emission limits on a quarterly basis and report and deviations. Records of actual emission estimates are available to demonstrate compliance with these emission limitations.	This change was made as requested.
Specific Requirements	Consolidate Specific Requirements 1 thru 86 for ARE 002. Compliance with NESHAP II does not require individual entries of each coating; to include individual coating categories as specific requirements is unduly burdensome to Bollinger. Bollinger requests that the specific requirements for NESHAP II are revised to a single specific requirement that reads as follows, "Comply with all applicable conditions of NESHAP II."	The NESHAP II requirements for ARE002, 3-64 – Painting operations were not removed as Bollinger requested. Individual sources within a permit require sufficient limitation, monitoring, compliance, testing, recordkeeping, and reporting requirements to adequately explain to regulatory and other public entities which citations apply to a source. Also, the Specific Requirements are potentially applicable depending on the specific coatings employed by Bollinger.
Permit Statement of Basis Section VI – Periodic Monitoring	The Oil Wash Pump (EIQ No. 29-02) is listed as EQT026. The Source ID for this emission source is EQT027 in the inventory section of the draft permit. Please change the Source ID to	This change was made as requested.

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	EQT027.	
Permit Statement of Basis Section VI – Periodic Monitoring	The monitoring requirements for internal combustion engines include recording the operating time. Emission estimates provided in the permit application are based on fuel usage. As these engines do not operate at a consistent power output and cycle up and down, estimating emission based on horsepower hour could overestimate emissions. Please modify the monitoring requirements for EQT026, 027, 032, 057, 057& 059 to allow for operating time or fuel usage.	The limitation, monitoring, recordkeeping, and submittal requirements for EQT026, 27-02 – Diesel Generator Engine, EQT027, 29-02 – Diesel Oil Wash Pump, EQT032, 02-04 – Diesel Fired Portable Welding Machine, EQT057, 3-07 – Drydock Generator, EQT058, 4-07 – Yard Emergency Generator 2, and EQT059, 5-07 – Midstream Fueler Pump Engine, have been revised for fuel usage instead of operating time in the draft permit as requested. This change was done because the estimated emissions in the application are based on fuel usage (as stated in the comment).
Specific Requirements	Please modify Specific Requirements 231, 233, 238, 239, 242, 243, 244, 245, 250, 251, 252, 253, 397, 398, 399, 400, 403, 404, 405, 406, 409, 410, 411, 412 to allow for monitoring operating time <u>or</u> fuel usage. Emission estimates provided in the permit application are based on fuel usage. As these engines do not operate at a consistent power output and cycle up and down, estimating emission based on horsepower hour could overestimate emissions. Please modify the monitoring requirements for EQT026, 027, 032, 057, 057& 059 to allow for operating time or fuel usage.	The limitation, monitoring, recordkeeping, and submittal requirements for EQT026, 27-02 – Diesel Generator Engine, EQT027, 29-02 – Diesel Oil Wash Pump, EQT032, 02-04 – Diesel Fired Portable Welding Machine, EQT057, 3-07 – Drydock Generator, EQT058, 4-07 – Yard Emergency Generator 2, and EQT059, 5-07 – Midstream Fueler Pump Engine, have been revised for fuel usage instead of operating time in the draft permit as requested. This change was done because the estimated emissions in the application are based on fuel usage (as stated in the comment).
Permit Statement of Basis Section VI – Periodic Monitoring	Please remove the monitoring for EQT008 for monitoring the heat content of the flare gas. This is not applicable to this facilities operation. The facility flares gas from LPG barges needing to be depressurized for cleaning or for a cargo change. These barges carry LPG which has a known heat content from reference texts and/or manufacturers data to assure that the BTU content is > 300 Btu/scf. This is not a facility which is venting gas from a process which can be variable. The facility is required to record the contents of each barge vented to the flare. The contents of the barge along with reference texts showing the heat value of the contents is sufficient to ensure compliance with the requirements of the condition to maintain a > 300 Btu/scf requirements.	The annual monitoring requirements of the heat content for the flare gas have been removed from the Statement of Basis as requested.
Specific Requirements	Please remove Specific Conditions 186 & 187 which requires annual monitoring of flare gas heat input. The facility flares gas from LPG barges needing to be depressurized for cleaning or for a cargo change. These barges carry LPG which has a known heat content from reference texts and/or manufacturers data to assure that the BTU content is > 300 Btu/scf. This is not a facility which is venting gas from a process which can be variable. The facility is required to record the contents of each barge vented to the flare. The contents of the barge along with reference texts showing the heat value of the contents is sufficient to ensure compliance with the requirements of the condition to maintain a > 300 Btu/scf requirements.	The flare gas heat content input annual monitoring and recordkeeping requirements have been removed as requested.

Specific Requirements	Specific requirements 90 & 91 refer to LAC 33:III.2123.C.11. These regulations are currently proposed to change (AQ296 proposed December 2008) which would renumber this regulation to C.10. Please change reference to Section 2123.C so this regulatory change does not affect the permit citation.	This change was made as requested.
Specific Requirements	Specific Requirement 178 should be modified to include language that the facility will utilize a flare as the control device and this is an equally effective control device.	This change was made as requested.
Specific Requirements	Specific Requirements 180 and 182 should be removed as they are not applicable to flares.	This change was made as requested.
Specific Requirements	Please change the wording of Specific Requirement 93 from "Permittee shall…" to "Permittee may choose…" as this is an alternative means to demonstrate compliance with the limits outlined in LAC 33:III.2123.C that the facility may choose but is not required to use.	The requested change was made as follows. The language of the citation has been modified to read 'Permittee shall demonstrate compliance with LAC 33:III.2123.C in accordance with LAC 33:III.2123.D.
Specific Requirements	Please remove Specific Requirement 100. This is not required to be performed. This is a test method that is to be utilized if the facility must compare the cleaning effectiveness of solvents, but the regulation does not require the facility to compare the cleaning effectiveness of solvents.	This change was made as requested.
Specific Requirements	Please modify Specific Condition 120 to read "Fully enclose the item or surround the structure to be blasted <u>or prepare and implement a BMP as described in LAC 33:III.1331.</u>" The regulation allow the option to prepare and implement a BMP and this permit should not remove this option.	This change was made as requested.
Specific Requirements	Please remove Specific Condition 229. LAC 3:III.1305 applies to fugitive emission sources. EQT0026 is a diesel engine and not a fugitive source of emissions.	This change was made as requested.
Specific Requirements	Please remove Specific Requirements 232, 234, 235, 236 and 237. A emissions stack test and daily monitoring of manifold temperature and pressure, fuel header pressure, fuel flow and injector timing is not warranted for an engine of this size used at a frequency of this engine. The largest pollutant emitted, NOx, has a Potential to Emit < 6.40 TPY. This monitoring is not consistent with monitoring requirements of like engines at other Bollinger facilities and other facilities throughout the state and results in a competitive disadvantage to other like operations throughout the state.	This change was made as requested.
Specific Requirements	Please remove Specific Requirement 121. The facility does not have a blast cabinet. If this requirement must be left in the permit, please revise to read "If a blast cabinet is used, re-circulate blast cabinet exhaust…"	This change was made as requested.

Specific Requirements	EQTs0034, 0035, 0036, 0037, 0038, 0039, 0040, 004, 0054 all have identical requirements. Please group these sources in the Specific Requirements section. This will assist in organizing the requirements and make compliance with the permit less burdensome.	This change was made as requested.
Specific Requirements	EQTs0042, 0043 and 0047 all have identical requirements. Please group these sources in the Specific Requirements section. This will assist in organizing the requirements and make compliance with the permit less burdensome.	This change was made as requested.
Specific Requirements	EQTs0044, 0045, 0046 all have identical requirements. Please group these sources in the Specific Requirements section. This will assist in organizing the requirements and make compliance with the permit less burdensome.	This change was made as requested.
Specific Requirements	EQTs0048, 0049, 0050, 0051, 0052, 0053. all have identical requirements. Please group these sources in the Specific Requirements section. This will assist in organizing the requirements and make compliance with the permit less burdensome.	This change was made as requested.
Specific Requirements	Specific Requirement 388 requires that a exhaust backpressure monitor be installed and operated on EQT0057 – Drydock Generator. The referenced regulation [40 CFR 60.4209(b)] on applies to engines who must use an add-on control device to comply with PM10 standards. The proposed engine will not require a add on control device to meet the emission limitations. Please remove this Specific Requirement or include clarifying language preceding the requirement " If the equipment is equipped with a diesel particulate filter to comply with the emission standards ..."	The following language has been added to the permit condition: "If the equipment is equipped with a diesel particulate filter to comply with the emission standards ..."
Specific Requirements	Please remove Specific Requirement 391 requiring a performance test. As the facility is required to purchase an engine which is certified to meet the emissions standards, See Specific Condition 390, a performance test is not required by the cited regulation.	This change was made as requested.
Specific Requirements	Please remove Specific Requirement 394. LAC 33:III.1305 applies to fugitive emission sources. The equipment, EQT0057 – Drydock Generator, is not a fugitive or area source of emissions and is not a listed requirement for other like sources.	This change was made as requested.
Specific Requirements	Please remove Specific Requirement 395. LAC 33:III.1311.B This requirement is not applicable to internal combustion engines and is not a listed requirement for other like sources.	This change was made as requested.
Specific Requirements	Please remove group UNF 0001 from the group member description of GRP 0003 – Marine Vessel and Tank Venting on page 36 of 41 of the Specific Requirements section. UNF 0001 is a group for the entire facility and does not belong in this group.	This change was made as requested.

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Specific Requirements	Please include clarifying language to Specific Conditions 420, 421 and 425 that this requirement only applies to venting and cleaning operations of barges with a current cargo with a vapor pressure > 1.5 psia.	This change was made as requested.
Specific Requirements	Please modify the 1st sentence in the second paragraph of Specific Requirement 428 to read as follows: "Substitution of VOC TAPs is allowed between those TAPs listed in the emission table of Section III Description <u>and the Emission Rates for TAP/HAP & Other Pollutants table</u> of this permit ...". This modification is requested to clarify that this flexibility applies to the limits listed in both areas of the permit.	This change was made as requested.
Specific Requirements	Please remove items 5 of Specific Condition 430. This parameter was suggested when the facility intended to utilize a closed loop control system with a condenser and is no longer applicable as the facility will utilize a once through thermal oxidation control system for controlling barge venting and cleaning operations.	This change was made as requested.
Specific Requirements	Please remove Specific Condition 433. This requirement is no longer applicable as the facility will utilize a once through thermal oxidation control system for controlling barge venting and cleaning operations and not a closed loop venting system with a condenser.	This change was made as requested.
Specific Requirements	Please change the Total VOC limit to 88.12 TPY limit for GRP0004 in Specific Requirement 438. This is the sum emissions for each member of the group.	This change was made as requested.
Specific Requirements	Please modify the 1st sentence in the second paragraph of Specific Requirement 438 to read as follows: "Substitution of VOC TAPs is allowed between those TAPs listed in the emission table of Section III Description <u>and the Emission Rates for TAP/HAP & Other Pollutants table</u> of this permit ...". This modification is requested to clarify that this flexibility applies to the limits listed in both areas of the permit.	This change was made as requested.
Specific Requirements	Please remove EQT005 – Oily Water Tank 02 from Specific Requirement 439. This emission point has been removed from the facility and is not listed anywhere else in the permit.	This change was made as requested.
Specific Requirements	Please add "Except as provided in 5109.c.(1)..." at the beginning of Specific Requirement 466 to account for the exemptions listed in the applicable regulation.	This change was made as requested.

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Specific Requirements	Please add a specific requirement for each source ARE003, ARE0004, and ARE005 stating " Permittee may emit TAPs, including those not specifically listed, at the greater of the Facility Total rates listed in the Emission Rates for TAP/HAP & Other Pollutants Table or the Minimum Emission Rate . Use of any TAP not listed in the TAP/HAP & Other Pollutants table is allowed so long as Facility Total emissions do not exceed the Minimum Emission Rate and emissions do not cause the Facility Total TAP emissions Total to exceed the listed limits.	The specific requirement was added as requested.
Specific Requirements	Please remove Specific Requirements 101, 110, 112, 132, 141, 149, 156, 167, 194, 233, 244, 252, 378, 400, 404, 412, 430, 440. These Specific Requirements require the facility to submit and a report on each monitoring parameter each year by March 31st. The facility is also required to submit each year certified reports of Annual Emissions of Criteria Pollutants (EI), Toxic Air Pollutants (TEDI), Quarterly Deviation Reports (Part 70 General Condition R.3, Quarterly Emission Exceedence Reports (Louisiana General Condition XI.C, Title V Semi-Annual Monitoring Reports and Title V Annual Certification Statements). Bollinger believes this report provides redundant information as these other regulatory required reports, constitutes an unnecessary burden, and is not consistent with other recent Title V permits issued by the agency for similar yards owned by Bollinger Shipyards Inc. (See Title V Permits for Bollinger Larose, L.L.C. and Bollinger Lockport Shipyards, L.L.C.)	Specific requirements 112, 132, 141, 149, 156, 167, 194, 233, 244, 252, 400, 404, and 412 were removed as requested. The other requirements have been modified with a new submittal date of July 1st instead of March 31st.
Specific Requirements	Specific Condition 162: The second sentence should be modified by adding the following to the end of the sentence but prior the note in parenthesis: "In addition to barges with a vapor pressure greater than 1.5 psia, the facility shall control emissions from the following cargos by thermal oxidation when operating conditions will result in the vapor pressure exceeding that listed below(...."	This change was made as requested.
Emission Rates for TAP/HAP & other Pollutants Table	As the facility is allowed to substitute TAPs within emission sources and allowed to emit TAPs not specifically listed up to the MER, please remove the limit on TAPs for individual sources on the TAP/HAP & Other Pollutants table since these limits are allowed to be exceeded in accordance with the requirements of listed in the Specific Requirements section of the permit. Facility Wide Totals listed under Source ID UNF001 are the only limits needed to be included in the table.	The individual TAP limits were removed for the following sources: ARE002, 3-64 – Painting Operations; ARE003, 12-64 – Abrasive Blasting; ARE004, 3-02 – Metal Cutting; ARE005, 4-02 – Welding; EQT009, 5-03 – Truck Loading; EQT012, 9-93 – Wash Water Surge Tank, S-1; EQT013, 10-93 – Wash Water Surge Tank, S-2; EQT018, 6-01 – Oily Water Tank 01; EQT022, 23-02 – Water Treatment Tank WTT-1; EQT023, 24-02 – Water Treatment Tank WTT-2; FUG001, FUG – Fugitive Emissions; GRP003, 2-64 – Marine Vessel and Tank Venting