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# Worksheet for Technical Review of Working Draft of Proposed Permit

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| **Company Name:** | **Bunge North America, Inc** | **AI #:** | **103295** | **TEMPO Activity No:** | **PER19990001** |
| **Facility Name:** | **Destrehan Grain Elevator** | **Remarks Submitted by:** | **Robert L Henricks, PE** | | |
| **Permit Writer:** | **Hassan Ghosn** | **Permit Writer Email address:** | **Hassan.Ghosn@la.gov** | | |
| | **David Ferrand** | **Email address:** | **David.Ferrand@la.gov** | | |
| | **Bryan Johnston** | **Email address:** | **Bryan.Johnston@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) |
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| 2520-00048-VO – Statement of basis | Applicant Company legal name: Bunge North America, Inc. (Note: coma after America and period after Inc.) (Also for AI 1738, ID PER 19960002) | The "legal name" consistent with the application will be reflected in the various word documents associated with the permit. |
| | Facility name (not legal name) : Destrehan Grain Elevator | Noted. |
| | Name of the referenced contiguous facility: Oilseed Processing Plant versus Division (Also for AI 1738, ID PER 19960002) | Noted and incorporated into TEMPO database as well as in all permit related word documents. |
| | Page 3, Permitted Air Emissions: Include the footnote to which the "*" refers. | The missing note has been included. |
| | Page 3, Contiguous Facilities Summary: period is missing after the second sentence | Done. |
| | Page 3, Contiguous Facilities Summary: "*" footnote: Add a note that the n-hexane emissions are reported also as VOC. | The addition is not necessary, n-Hexane is a VOC and the reported VOC represents the total VOC. |

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| | **Page 4, IV Regulatory Analysis, Applicability and Exemptions of selected Subject Items: ID No. 1-72 & 2-72 do not reconcile with the Note which refers to grain dryers** | **Noted and properly modified.** |
| | **Page 5, V. Permit Shield: Bunge believes the requests were in accordance with LAC 33:III.507.I. Please supply details concerning the denial.** | **Request will not be granted because it does not meet the LDEQ requirements, a sample of which is given below:**<br><br>**"A request for a permit shield must be very specific. The application should outline all applicable federal requirements and set out the proposed terms and conditions to be followed in order to demonstrate compliance with each of the identified standards.**<br><br>**The above is an excerpt of a detailed policy guidance on permit shields posted on LDEQ website:**<br><br>http://www.deq.louisiana.gov/portal/tabid/2567/Default.aspx |
| | **Page 6, PTE definition. Bunge believes that the complete definition must be included. Add the following from LA Title 33, Part III, Section 507:** Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a stationary source. | **The suggested addition has been incorporated.** |
| | **Page 7: The listed definition for PSD does not exist in the LA rules. One option is to replace with the following from LA Title 33, Part III, section 509:** *Prevention of Significant Deterioration (PSD) Program*—a major source preconstruction permit program that has been approved by the administrator and incorporated into the State Implementation Plan to implement the requirements of this Section or the program in 40 CFR 52.21. Any permit issued under such a program is a major NSR permit. | **The language of LA 33:III:509.B has been incorporated.** |
| **2520-00048-V0 – Air Permit Briefing Sheet** | **Page 1, background: The Oilseed plant is located at 12466 River Road; the Elevator at 12442.** | **Noted and properly adjusted.** |
| | **Page 2, control equipment, paragraph 2 last sentence: Combined efficiency for 29/29A is taken as 70%. Change range to 70% to 99.9+%.** | **Requested change has been incorporated.** |
| | **Page 2 last sentence: Control systems have stacks/vents and the grain dryers have vents versus stacks.** | **Changed as requested.** |



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| | Page 3: Name of the referenced contiguous facility: Oilseed Processing Plant versus Division. | Noted and the information in the database has been accordingly adjusted. |
| 40 CFR Part 70 General Conditions | Page 22: 40 CFR Part 70 General Conditions, M: Certifications "shall be submitted to the Administrator as well as the permitting authority." The permit authority address is included but not that of the Administrator. Please include the Administrator address. | EPA Region VI Office at 1455 Ross Ave. Suite 1200, Dallas TX 75202.<br><br>Note that "Administrator" generally refers to the EPA Administrator or the individual or entity (regional offices, state agency.) to who his/her authority is delegated. |
| | Page 23: 40 CFR Part 70 General Conditions, Q: The listed conditions do not include all are specifically included in the referenced rule. Please include: The request, together with all information necessary to process such request, shall be submitted within 45 days of obtaining the relevant test results. | The General Conditions are standard (generic, or boiler plate like) and are included in every permit. They are not modifiable (customizable). However, the comments will be considered and appropriately incorporated in the next revision of the General Conditions. |
| Louisiana Air Emission Permit General Conditions | One primary justification for Title V permits was that they would include versus reference applicable rules or regulations. Please include for each condition the justifying LAC and delete each condition for which there does not exist such a code. | LDEQ is in the process of putting the General Conditions in the regulations. Once this is done, the permit can be modified to remove the General Conditions. |
| | For each reporting requirement please include the complete address of the location(s) to receive a report. | Please refer to LDEQ website: http://www.deq.louisiana.gov/portal/, click on ABOUT and then click on Where to send information. |
| | Paragraph VII references paragraph III, which is missing. | Noted and corrected. |
| Emission Rates for Criteria Pollutants | The "Subject Item" column includes the existing permit numerals (e.g., 1-72, etc.) and also a new numbering system (e.g., EQT 0001, etc.) different from the new system just introduced for TEMPO. It would be helpful if different groups within LDEQ communicated so one numbering system pleased everyone. Is there any reason that the TEMPO numbering system could not be used? | The subject item numerals are those provided by the facility, while the EQT numbers are automatically generated by LDEQ TEMPO database, based on the subject item type and on the order it is entered into the database, and is not subject to choice. |
| Specific Requirements, EQT0005, 4-72 | 1. LAC 33:III.1305: One primary purposes of the Part 70 program is to include versus reference applicable conditions. Please include the specific requirements of LAC 33:III.1305.A.1-7 in the permit | The requirement is clear and adequate as included. |
| Specific Requirements, EQT0005, 4-72 | 4. LAC 33:III.507.H.1.a: Must an inspection be conducted whenever a process is shutdown or only when there is an indication of emissions above the allowable? Please revise the condition. | Note that inspections are conducted to insure the integrity o the control system (baghouse) and its proper operation. Also inspection must be conducted when there is an operational problem (indicated by visible emissions or other reasons).<br><br>Please note that a shut down here means one for a turn around, repair, or maintenance. |



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| Specific Requirements, EQT0005, 4-72 | 4. LAC 33:III.507.H.1.a: Presuming that an element is a baghouse filter sock, there are other causes for abnormal baghouse operation which may affect emission compliance. Suggest replacing "Change elements as necessary." with "Conduct necessary maintenance." throughout this section. | The requirement is clear and adequate. Refer to the comment above for further clarifications. |
| Specific Requirements, EQT0005, 4-72 | 4. LAC 33:III.507.H.1.a: It would be helpful if the terms baghouse & filter were defined since the terms are obviously meant to refer to different types of control equipment. | The "Baghouse" refers to the overall physical structure of the control system and the "filter" or filter sock refers to the media capturing element of the baghouse. |
| Specific Requirements, EQT0016, 10-72 | 9. LAC 33:III.1311.B: Please check all TSP allowable emissions calculated based on the reported process rates and the process emission allowable code. For this process the rate is 500 tph, for which the allowable per this rule is 69.0 pph. | Noted and corrected. |
| Specific Requirements, EQT0046, 30 | 29. LAC 33:III.1311.B: Please check all TSP allowable emissions calculated based on the reported process rates and the process emission allowable code. For this process the rate is 10.5 tph, for which the allowable per this rule is 19.8 pph. | Noted and corrected. |
| Specific Requirements, EQT0069, 3-07 | 37. 40 CFR 60.302.d.3: Bunge was informed that the inclusion of a 20 mph wind speed as an operating condition is for the purpose of minimizing emissions during periods of sustained elevated winds <u>in the area of the clamshell unloading facility.</u> Revise condition 5 to reflect this thought as follows: "Cease unloading operations then the prevailing wind speed *in the immediate vicinity of the clamshell unloading facility* (averaged over three minutes) ..." | The requirement is properly identified for the Clamshell. |
| Specific Requirements, EQT0069, 3-07 | 37. 40 CFR 60.302.d.3: It will be difficult if not impossible for the anemometer beacon to be located where viewing it from some nearby location will not be obstructed by one of the numerous structures and structural elements in the immediate vicinity of this facility. Revise the third sentence of condition 6 as follows: "The beacon shall be located at a point where it is visible to facility personnel as well as to an off-site observer." | The language should be adequate and clear for the intended purpose of the requirement which is to ensure the highest possible visibility of the alarm. It will be modified to read "The anemometer beacon shall be located at a point where it is visible to <u>facility personnel</u> as well as <u>off-site observers</u>." |
| Specific Requirements, EQT0071, 32 | 48. LAC 33:III.1311.B: Please check all TSP allowable emissions calculated based on the reported process rates and the process emission allowable code. For this process the rate is 100 tph, for which the allowable per this rule is 51.3 pph. | Noted and adjusted. |
| Specific Requirements, CRG0001 | 51. LAC 33:III.1311.B: Please clarify that the TSP allowable emission rate is for each of the three grain dryers. | The TSP allowable emission rate is for each of the three grain dryers. |



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| Specific Requirements, CRG0003 | 56. LAC 33:III.1311.B: Please clarify that the TSP allowable emission rate is for each of the storage units. | Please refer to the above comment for CRG0001. |
| Specific Requirements, CRG0005 | 65. 40 CFR 60.302.b.2: The listed limit does not apply to EQT0025. | EQT0025 has been eliminated and replaced by EQT0024 which was the intended component. |
| Specific Requirements, CRG0007 | The controls are design 38,000 cfm baghouses, not very small bin vent design units. Does this change the conditions? | The change and hence the difference between the requirements under CRG0006 and CRG0007 is caused by the difference in the process rates associated with their elements (210 tons/hr Vs. 5040 tons/hr which leads to differences in the corresponding 1311.B limits). |
| GRP0004 | These conditions for EQT 0024 & 0068 are in addition to those stated when these sources are addressed separately. Should not all applicable conditions be listed together for each source? | Yes. The GRP0004 requirements only pertain to the unloading fugitive emissions cap to avoid double counting of those emissions. |
| UNF0001 | 96 LAC 33:III.1103: Include that smoke is defined as follows: Smoke—any small gas-borne particles resulting from incomplete combustion, consisting predominantly of carbon, ash, and other combustible material, and present in sufficient quantity to be observable. | This requirement was erroneously checked and has been replaced with LAC 33:III.1303.B which is the intended and appropriate requirement. |
| | 96 LAC 33:III.1303.B: Correctly state the referenced rule. | Please refer to the above response. |
| | 101 LAC 33:III.507.H.1.a: The cited rule enables that "Each permit … shall include … compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit as required by 40 CFR 70.6(a)(3)… where an applicable requirement does not require periodic testing or instrumental or non-instrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, as reported pursuant to 40 CFR 70.6(a)(3)(iii). Such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. Recordkeeping provisions may be sufficient to meet the requirements of this Subparagraph;" Bunge believes that the draft requirement to test 50% of all baghouses within 180 day is excessive to demonstrate compliance. Bunge had contacted the agency during its review of the application concerning what information would be necessary to discuss testing of representative source controls and applying the test results to other sources. The draft permit was to have addressed this issue. Bunge requests that this requirement be reconsidered before a final draft is ready for public notice. | The NSPS Baghouses for the Clamshell, Emission Point 3-07, and for the members of CRG0005, subject to the requirements of 40 CFR 60 – Subpart DD, will be identified and tested individually separate from the other baghouses at the facility.<br><br>The testing requirements for the rest of the baghouses will be replaced with manufacturer's certification. |



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| | 102 LAC 33:III.507.H.1.a: Please provide a copy of the cited ASTM D 6839-02 standard. The application Bunge found for this standard is: Test Method for Hydrocarbon Types, Oxygenated Compounds and Benzene in Spark Ignition Engine Fuels by Gas Chromatography | The intended reference is ASTM D6830-02:"Standard Test Method for Characterizing the Pressure Drop and Filtration Performance of Cleanable Filter Media". |
| | 105 LAC 33:III.5307.B Bunge requests a statement of non-applicability of this rule as none of the applicable facilities or chemicals are utilized at the permitted facility. | This requirement was inadvertently left checked. It is not applicable and has thus been removed. |
| General Information | Bunge requests that the legal name of the firm used as was included in the application for this permit: Bunge North America, Inc. | Noted. However, this is the format generated by and printed from LDEQ Database, TEMPO, which does not allow commas and periods and as such it cannot be changed in the TEMPO generated documents. However, the change as stated before will be incorporated into all the word documents associated with the permit. |
| | The air billing party, emission inventory billing party, owner & operator address for this facility is the same as the listed mailing address: 12442 River Road, Destrehan, LA 70047 | This was automatically generated by TEMPO under Bunge North America, Inc. organization number because of the contiguity of this facility with the Destrehan Oilseed Processing Plant. A separate organization ID was created to separate billing addresses for the two contiguous facilities. |
| Inventories | EQT0035: Correct the typo for the velocity. It should be 36.37. | It is 61.37, consistent with the information on the latest submitted EIQ. |
| | EQT0036: Correct the typo for the velocity. It should be 8.31. | Updated consistent with the information on the latest submitted EIQ. |
| | EQT0038: Correct the typo for the velocity. It should be 8.31. | Updated consistent with the information on the latest submitted EIQ. |
| | EQT0059, 60 & 61: Add the missing discharge area: 2100. | Updated consistent with the information on the latest submitted EIQ. |
| | EQT0072: Correct the typo for name. It should be Grain Tank 901. | Typo corrected. |
| | EQT0075: Correct the typo for name. It should be Grain Tank 902. | Typo corrected. |



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