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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Bunge North America, Inc.**	**AI #:**	**1738**	**TEMPO Activity No:**	**PER19960002**
Facility Name:	**Destrehan Oilseed Processing Plant**	**Remarks Submitted by:**			
Permit Writer:	**Hassan Ghosn**	**Permit Writer Email address:**	**Hassan.Ghosn@la.gov**		
	Tegan Treadaway	**Email address:**	**Tegan.Treadaway@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)
2520-00010-VO, I. Background	This part begins on page 2. Is there a missing page 1?	No missing page. Page 1 is the cover page.
	Page 2, paragraph 2, line 10: The replacement of two extractors with one was approved on February 20, 1995, versus April 4.	LDEQ's Records show that the replacement was approved on both dates. 2/20/95 will also be added.
	Page 2, paragraph 2, lines 10 - 13: The following sentence should be removed as it does not apply to this facility: "Removal of two underground storage tanks, addition of a 500-gallon gasoline storage tank, a dust car lead-out shed and a clean-up system for the headhouse, upper and lower runway was granted under a Small Source Exemption issued on July 6, 1995."	LDEQ's Records show that the exemption was for this facility.
	Page 2, paragraph 2, line 18: Missing: Installation of new soybean expander equipment was approved on March 31, 1997.	Updated as it appears in LDEQ records.

2520-00010-VO, I. Background	Page 2, paragraph 3, line 2: The CD was lodged October 25, 2006, versus October 26. In addition, the Consent Decree should be more specifically referenced to include the parties and court. Thus, Bunge requests that the first sentence of this paragraph be re-written as follows: "On January, 16, 2007, the United States District Court for the Central District of Illinois entered a Consent Decree in United States, et. al. v. Bunge North America, Inc., in Civil Cause No. 2:06-CV-02209-MPM-DGB) that includes provisions applicable to this facility (hereinafter the "Consent Decree" or the "CD"). The Louisiana Department of Environmental Quality was a party to the CD." Further, as a general comment, DEQ should capitalize "Consent Decree" and "CD" everywhere those terms are used in the permit.	The paragraph has been modified to incorporate the offered suggestions and the Consent Decree lodging date has been corrected.
	Page 2, paragraph 3, line 5: The CD in part, (a) ... and (b) specified for the soybean oil extraction facility a revised extraction solvent loss limit.	Will read as follows: and (b) specified for the soybean oil extraction facility a revised extraction solvent loss limit.
2520-00010-VO, Section II. Origin	Page 3, Section II: Add a comma after July 11, 2007, in the next to last sentence and add a comma after May 12, 2008, in the last sentence.	Corrected as Suggested.
2520-00010-VO, III. Description	Page 3, paragraph 1, line 4: To more correctly describe the process the following change should be made: solvent oil extraction.	The description was taken from that provided by the facility. The entire process is extraction of oil by solvent and consists of a number of different steps of which oil extraction is one and solvent extraction is another. Re-ordering the steps may be needed as follows: "Processing consists of soybean preparation, oil extraction, solvent recovery, storage, and product (soybean, soybean meals and/or soybean oil) shipping.
	Page 3, paragraph 2, line 4: The preferred spelling is "conveyors."	Typo corrected here and should also be corrected in the permit application.
	Page 6, in the table at the top of the page, the heading indicates that ammonia and chlorine are VOC TAPs. As these TAPs are not VOCs, the heading should be revised to delete "VOC"	The heading has been revised and properly adjusted
2520-00010-VO, III. Description, Under the heading, Contiguous Facility Summary	Page 6, paragraph 1, line 1: Change name to Oilseed Processing Plant from Oilseed Processing Division. Further, Bunge requests that the Statement of Basis clearly indicate that the totals shown in the chart on page 6 are for information only and do not constitute facility-wide emission caps.	The name of the facility has been changed as requested to Destrehan Oilseed Processing Plant. Please incorporate the new name throughout the revised application. The reported emissions are the permitted limits facility-wide.

2520-00010-VO, VII. Effects on Ambient Air	As was included on the pre-draft for the contiguous facility, add above the table: "Dispersion Model(s) Used: AERMOD*" with the foot note "*Modeling was performed for the contiguous stationary source."	Table heading and Modeling Code used have been included.
2520-00010-VO, VIII. General Condition XVII Activities	Is there a difference between entering NONE versus NA for covered Work Activity? None was entered for the contiguous Bunge grain elevator.	No. NONE will be used throughout.
2520-00010-VO, Section IX Insignificant Activities	Bunge notes that LDEQ has listed both "A" list and "B" list activities here. Bunge believes that "B" list activities need not be listed, and should not be so that confusion is not created with respect to any other "B" list activities that may later be added. Because "B" list are permitted by rule and do not require identification in the permit, it is preferable that these not be listed in the permit.	The "B" list items have been removed from the draft permit and should not be included in the application in the future.
2520-00010-VO, Permit Shield	For the reasons discussed in Exhibit 1 to these comments, Bunge requests that the Department grant a permit shield and that the public notice of the proposed permit include a statement per LAC 33:III.507.I. that a permit shield is being considered.	Permit shield will not be granted. A permit shield has to do with controversial, gray area issues. All of the items listed for which the shield is requested are clear cut and as such do not warrant a permit shield. Furthermore, a permit shield deals with alternate methods for applicability determinations, i.e., identification of ways and means by which compliance with, or exemption from applicable requirements is achieved. Please refer to the guidance on the Department's website. http://www.deq.louisiana.gov/portal/
2520-00010-VO, X. Table 1. Applicable Requirements	The ID No. column includes the existing permit numerals (e.g., 1A-91, etc.) and also a new numbering system (e.g., EQT001, etc.) different from the new system just introduced for TEMPO. It would be helpful if the 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 ID number is a concatenation of the assigned TEMPO ID and the Emission Point ID.
	The correct spelling of the bean drier & cracking system is ESCHER WYSS.	Typo corrected.
2520-00010-VO, X. Table 1. Applicable Requirements, UNF001-OPD	Bunge requests that the "1" be removed from the following columns as these requirements are not applicable to the facility as a whole, but instead are applicable only to specific EQTs or Groups and should instead be marked in the row for such individual EQTs or groups : Column for LAC 33:III.2111 – applies only to pumps and compressors – this should be applicable only to ID No. FUG0001 group. Column for 40 CFR 60 NSPS A – applies only to the EQTs that have a specific applicable NSPS standard. Column for 40 CFR 63 NESHAP Subpart A – applies only to the EQTs or groups that have a specific applicable NESHAP standard	LAC 33:III.2111 has been removed. LAC 33:III.2113 is the intended citing. Specific Requirements 144 and 159 state that "all affected facilities" shall comply with these provisions. This means equipment in this permit that is subject to NSPS or NESHAP.

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2520-00010-VO, X. Table 1. Applicable Requirements, UNF001-OPD	Bunge requests that LDEQ add a column for reference to LAC 33:III.2113 and place a "1" in that column for the row for plant wide requirements. In addition, a specific requirement should be added to reflect applicability of 2113.	Refer to response above.
2520-00010-VO, X. Table 1. Applicable Requirements, EQTs018-023	Bunge requests that a row be added to Table 1 and that a "1" be added to the columns for LAC 33:III. Ch. 5 and 9. Further, a "2" or a "3" should be added to the columns for Section 2103, for the reasons stated below in Bunge's request to modify Table 2.	Chapters 5 and Chapter 9 requirements are assigned facility-wide. In some instances, however, Chapter 5 is assigned to individual emission points when these points are subject to specific requirements (such as 504, 509, 507). Vegetable, mineral, and fuel oils are generally considered non-VOCs and as such are not subject to LAC 33:III. Chapter 21 and were not addressed in either Table 1 or Table 2 of the draft permit. However, at the request of the applicant these tanks will be added to both Tables 1 and 2 when the application tables are changed accordingly and submit to LDEQ.
2520-00010-VO, X. Table 1. Applicable Requirements, EQTs020-023	Soybean Oil Storage Tanks A, B, C & D: Extraction solvent emissions are regulated under 40 CFR 63, Subpart GGGG. Please add to the table a "1" under this requirement for each of these tanks	These tanks are not "Solvent laden vessels", their contents are generally considered non-VOCs. However, if the facility does not believe that this is enough to over rule the "oil extraction process components" interpretation then GGGG applies and these tanks will be subject to the applicable requirements of GGGG and the draft permit will reflect this fact.
2520-00010-VO, X. Table 2, EQT 001 and EQT 002	A citation should be added to the row for Control of Emissions of Nitrogen Oxides (NOx). Please add "[LAC 33:III.Ch.22]"	The provisions of LAC 33:III.Chapter 22 only applies to facilities located in the Baton Rouge Nonattainment Area and the Region of Influence.
2520-00010-VO, X. Table 2, EQT 0018	Boiler Fuel Oil Tank: Bunge requests that LDEQ add a row to this table indicating that LAC 33:III.2103 is not applicable to this tank because the vapor pressure of the stored material is less than 1.5 psia.	Adjusted accordingly based on updated EIQ.
2520-00010-VO, X. Table 2, EQT 0019	Mineral Oil Storage Tank: Bunge requests that LDEQ add a row to this table indicating that LAC 33:III.2103 is not applicable to this tank because the vapor pressure is less than 1.5 psia.	Adjusted accordingly based on updated EIQ.
2520-00010-VO, X. Table 2, EQT 0020 through 023	Soybean Oil Storage Tanks: Bunge requests that LDEQ add a row to Table 2 indicating that these tanks are exempt from LAC 33:III.2103 because the vapor pressure is less than 1.5 psia	Adjusted accordingly based on updated EIQ.
2520-00010-VO, X. Table 2,	Hexane Storage Tanks 1-4 - LDEQ has misnumbered these tanks in Table 2 as being EQT 024-027. In the Inventories and in Table 1, they are appropriately identified as EQTs 026 through 029. Bunge requests that the column with the ID No. be revised to show the correct EQT numbers for these tanks.	Typo corrected.

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2520-00010-VO, X. Table 2. EQT 032	Cooling Tower: Regulation 40 CFR 63, Subpart F is listed as not applicable because chlorine is not a listed hazardous air pollutant in Table 4. Subpart F applies to SOCMI facilities. This facility is a soybean oil extraction facility, not a SOCMI facility. While Bunge has no problem with LDEQ including this entry, LDEQ should also add that Bunge is not a SOCMI facility. Bunge requests that LDEQ also add to Table 2 and entry indicating that NESHAP Part 63, Subpart Q is not applicable because the cooling tower is not operated with chrome-based water treatment chemicals.	40 CFR 63, Subpart F is removed and replaced with the appropriate regulations 40 CFR 63, Subpart Q.
40 CFR Part 70 General Conditions	Page 19: 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 in each specific condition where this requirement exists, or in the alternative, in the Briefing Sheet section of the permit, include a general statement that wherever notice is required to be sent to the Administrator, the following address [insert the address] should be used.	The Administrator refers to EPA Region VI whose address is the same as the one the facility sends a copy of its application to.
	Page 20: 40 CFR Part 70 General Conditions, Q: The listed conditions do not include all of the conditions that are specifically included in the referenced rule that are applicable. Please revise the general condition to 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 40 CFR 70 General Conditions are as stated general and as such the applicant shall visit the cited reference(s) cited at the end of each of the listed General Conditions.
Louisiana Air Emission Permit General Conditions	For each reporting requirement please include the complete address of the location(s) to receive a report. Again, this could be done as a general informational provision in the Briefing Sheet sections of the permit.	The complete addresses can be found at LDEQ website www.deq.louisiana.gov/portal/ under ABOUT then Where to send information.
	Bunge objects to Louisiana State Only General Condition XVIII, concerning appeals. It is contrary to La. R.S. 30:2024 which provides that a request for hearing prevents the DEQ decision from becoming final. It is contrary to EPA's Title V rules and general appeal rules under 40 CFR Part 124 which indicate that contested conditions are stayed. It is also contrary to LDEQ general conditions in numerous existing permits, which will end up causing confusion and violation of fair notice, due process and equal protection. This provides no protection to arbitrary inaction by LDEQ in not acting on suspension requests. Bunge requests that the version of General Condition XVIII used in LDEQ's prior version of the General Conditions be reinstated.	This General Condition has been changed on 10/23/08.
2520-00010-VO, Statement of Basis, II. Facility and Current Permit Status	Page 1, paragraph 1, line 4: To more correctly describe the process the following change should be made: solvent ~~extraction,~~ oil extraction.	The description was taken from that provided by the facility. The entire process is extraction of oil by solvent and consists of a number of different steps of which oil extraction is one and solvent extraction is another. Re-ordering the steps may be needed as follows: "Processing consists of soybean preparation, oil extraction, solvent recovery, storage, and product (soybean, soybean meals and/or soybean oil) shipping.

	Page 1, paragraph 2, line 4: The preferred spelling is "conveyors."	Adjusted accordingly based on updated EIQ..
	Page 2, paragraph 3, line 2: To more correctly describe the process the following should be inserted after the first sentence: The flakes then are fed to a dryer-cooler (DC) unit in sequence to reduce the moisture. The DC is a stacked pan unit similar to the DT discussed above. The base of each pan in the unit is perforated.	Suggestion incorporated.
	Page 2, paragraph 4, line 3: To more correctly describe the facility, replace "OPD" with "oilseed processing plant."	Replaced as suggested.
2520-00010-VO, Statement of Basis, III., Contiguous Facilities Summary	Page 5, Contiguous Facilities Summary: Table "*" footnote: Expand the note to clarify that the n-hexane emissions are reported also as VOC.	The footnote is adequate as is. The VOC refers to total VOC (toxics and non toxics).
2520-00010-VO, Statement of Basis, IV. Regulatory Analysis, Applicability & Exemptions	Cleaver Brooks Boiler, 1A-91 & 1B-91, LAC 33:III.1313.C: The note includes the following: "Complies if burning natural gas" The boilers are also approved for the combustion of distillate oil as a secondary fuel. According to the AP42 emission factor used in the application for distillate fuel oil particulate emissions, distillate oil combustion particulate would also comply with this limit. Also, the limit applies to all fuels. Please explain the reasoning for including the "Complies if burning natural gas" in the note	The statement "Complies if burning natural gas" is based on historical data and not AP42 emission factors.
2520-00010-VO, Statement of Basis, IV. Regulatory Analysis, MACT Requirements	Paragraph 1: The NESHAP at 40 CFR 63, Subpart GGGG limit is misstated. Please change the MACT limit to 0.20 gallons per ton. See 40 CFR 63.	Correct unit is used. The limit is in gal/ton as stated in the Applicability and Exemptions of Selected Subject Items Table.
2520-00010-VO, Statement of Basis, IV. Regulatory Analysis, MACT Requirements	Paragraph 2: The Consent Decree limit is misstated. Please change the CD limit to 0.19 gallons per ton. Bunge has requested EPA to revise the Consent Decree to change this limit to 0.20 gallons per ton. To avoid the necessity of a significant or minor permit modification, with the associated processing fee, Bunge requests that LDEQ add language to the permit to indicate that any revision of the limit in the Consent Decree approved by EPA and LDEQ, up to the NESHAP GGGG limit of 0.20 gallons per ton may be incorporated into the permit as an administrative amendment.	Correct unit has been incorporated. The change in the CD limit will be incorporated upon EPA approval prior to the draft being public noticed. After the public notice any change that relaxes a condition will be issued as a modification and the draft shall be public noticed again prior to issuing the permit.
2520-00010-VO, Statement of Basis, V. Permit Shield	Page 8, V. Permit Shield: Bunge believes the requests were in accordance with LAC 33:III.507.I. In addition, Bunge is supplementing its request for a permit shield with the information contained in Exhibit 1. Bunge urges LDEQ to reconsider the permit shield request in light of these materials. In addition, if LDEQ denies any part of the permit shield request, we ask that LDEQ supply details concerning the basis for the denial in the Statement of Basis.	Request for a shield will not be granted. Refer to the response to the comment on the second row on page 3 for further details.

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2520-00010-VO, Statement of Basis, VI. Periodic Monitoring	Paragraph 2: The term "filter vents" is used in conjunction with visual emission monitoring. Please include in the glossary a definition of this term and list the specific emission source(s) to which this requirement applies.	Emissions from dust collecting systems (baghouses) are generally released from their vents through the filtering media, after being captured and collected by the control system, the baghouse, referred to herein as filter vents, where emissions can be visually monitored. The term "filter vents" will be replaced by "baghouses filter vents" for additional clarity.
2520-00010-VO, Statement of Basis, VI. Periodic Monitoring	Paragraph 3: Bunge is of the opinion that this requirement is meant to apply only to the extraction solvent. Very minor VOC and n-hexane emissions also result from the combustion of fuel in the facility boilers. Please clarify.	This is clearly in reference to the Hexane VOC & n-Hexane HAP Emissions CAP (see Specific Requirements under GRP0003) which identifies the group's members (emission points). Also note that the Statement of Basis represents an abbreviated summary of the Permit but is not part of the Permit Document.
2520-00010-VO, Statement of Basis, VI. Periodic Monitoring	Paragraph 4: Bunge sees no regulatory reason for requiring the daily recording of solvent loss. All permit limits (MACT and the Consent Decree) pertain to monthly inventory reconciliation to determine the 12 month rolling solvent loss. Please provide a justification for this requirement. Bunge believes that this requirement is excessive to demonstrate compliance. The requirement for daily solvent loss recording is unrelated to compliance assurance for which monthly loss documentation is already required. Bunge requests that this requirement be reconsidered before a final draft is ready for public notice.	Refer to Page 24 of the "CD" and 40 CFR 63.2862.
2520-00010-VO, Statement of Basis, VII. Glossary	The listed definition for PSD does not exist in the LA rules. As is stated in LA Title 33, Part III, section 509: "For the purpose of this Section, the terms below shall have the meaning specified herein as follows. *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.
2520-00010-VO, Statement of Basis	As a general matter if LDEQ makes any change to the draft permit based on these comments, please make corresponding changes to the Statement of Basis.	Noted.
GENERAL	Any requirement including an hourly or annual limit should include the basis or method of calculating the limit to the extent not explicitly provided in an underlying applicable rule.	Noted.
2520-00010-VO, Emission Rates for Criteria Pollutants	FUG 0001, 13-91: The fugitive VOC losses are included in the solvent VOC & n-hexane CAPs. The max lb/hr VOC emission limit should be 76.2. The avg. hourly & annual limits should not be included.	Adjusted accordingly.
2520-00010-VO, Emission Rates for Criteria Pollutants	GRP 0002, BE-CAP: The listed NOx emissions are for fuel oil only. The NOx limits should be as follows: Avg. lb/hr – 8.97; tons/yr – 39.27.	Incorporated as noted.

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2520-00010-VO, Emission Rates for Criteria Pollutants	SCN 0001, 1A-91G: The PM10 limit is missing. The PM10 limit should be 0.58 lb/hr.	PM10 limit has been included.
2520-00010-VO, Emission Rates for TAP/HAP Pollutants	FUG 0001, 13-91: The fugitive n-hexane losses are included in the solvent VOC & n-hexane CAPs. The max lb/hr n-hexane emission limit should be 49.8. The avg. hourly & annual limits should not be included for this Id No. FUG 0001.	Corrected accordingly.
2520-00010-VO, Inventories	EQT0003, 2-91: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT0004, 3-91: Operating time should be as in the application: 8760 years.	Updated accordingly.
2520-00010-VO, Inventories	EQT0005, 4-91: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT0006, 5-91: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT0007, 6-91: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT0015, 12-91: Operating time should be as in the application: 2555 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT0018, 16-96: If an operating rate is needed for the tank, which has a capacity of 120,000 gallons, the maximum annual throughput is 1,780,750 gallons.	Adjusted accordingly based on updated EIQ. (1.78 MM gal/yr is reported because the corresponding TEMPO field only takes up to 6 digit numbers).
2520-00010-VO, Inventories	EQT0019, 17-96: The capacity of the tank is 37,500 gallons. A typical annual throughput is 6,000 gallons.	Adjusted accordingly based on updated EIQ.
2520-00010-VO, Inventories	EQT0020, 18A-96: If an operating rate is needed for the tank, which has a capacity of 63,600 gallons, the maximum annual throughput is 24,252,000 gallons.	Adjusted accordingly based on updated EIQ (24.252 MM gallons/yr is reported because the corresponding TEMPO field only takes up to 6 digit numbers).
2520-00010-VO, Inventories	EQT0021, 18B-96: If an operating rate is needed for the tank, which has a capacity of 63,600 gallons, the maximum annual throughput is 24,252,000 gallons.	Refer to the above response.
2520-00010-VO, Inventories	EQT0022, 18C-96: If an operating rate is needed for the tank, which has a capacity of 63,600 gallons, the maximum annual throughput is 24,252,000 gallons.	Refer to the above response.
2520-00010-VO, Inventories	EQT0023, 18D-96: If an operating rate is needed for the tank, which has a capacity of 20,800 gallons, the maximum annual throughput is 24,252,000 gallons.	Refer to the above response.
2520-00010-VO, Inventories	EQT0023, 18D-96: The correct description is Soybean Oil Tank.	New description is adopted
2520-00010-VO, Inventories	EQT0024, 19-97: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT026, 21A-91: If an operating rate is needed for the tank, which has a capacity of 23,000 gallons, the maximum annual throughput is 290,472 gallons.	Adjusted accordingly based on updated EIQ.
2520-00010-VO, Inventories	EQT027, 21B-91: If an operating rate is needed for the tank, which has a capacity of 10,500 gallons, the maximum annual throughput is 290,472 gallons.	Refer to the above response.
2520-00010-VO, Inventories	EQT0287, 21C-91: If an operating rate is needed for the tank, which has a capacity of 23,000 gallons, the maximum annual throughput is 290,472 gallons.	Refer to the above response.

2520-00010-VO, Inventories	EQT029, 21D-91: If an operating rate is needed for the tank, which has a capacity of 23,000 gallons, the maximum annual throughput is 290,472 gallons.	Refer to the above response.
2520-00010-VO, Inventories	EQT0031, 1-01: EQT0024, 19-97: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	FUG0001, 13-91: Historical normal operating rate is 121 tph.	Updated accordingly.
2520-00010-VO, Inventories	FUG0001, 13-91: Operating time should be as in the application: 8760 hours.	Updated accordingly.
2520-00010-VO, Inventories	EQT0002, 1B-91: Stack exit feet per second velocity should be identified as 28.09.	Typo corrected.
2520-00010-VO, Inventories	EQT0003, 2-91: Stack exit temperature °F should be as in the application: 77.	Updated accordingly.
2520-00010-VO, Inventories	EQT0007, 6-91: Stack diameter feet is missing, should be 1.78.	Stack diameter included.
2520-00010-VO, Inventories	EQT0010, 8B-91: Stack parameters should be as in the application: Velocity – 62.79 ft/sec; Flow – 18469 acfm; Temperature – 116 °F.	Stack information updated. EIQ reports flow of 18489 not 18469 acfm. EIQ Revised.
2520-00010-VO, Inventories	Relationships/Groups: The Mineral Oil Absorber System Cap includes the Extractor System and the Evaporator/Condenser System. Should not this be reflected in the Relationships/Groups table(s)?	If you wish to explicitly show this relationship you need to supply separate EIQs (with only max. hourly rates) for the Extractor System and the Evaporator/Condenser System to include under the MINERAL OIL ABSORBER SYSTEM – CAP.
2520-00010-VO, Specific Requirements	General: One primary purposes of the Part 70 program is to include, versus reference, applicable conditions. Please include the specific requirements of the cited rules in the permit.	That is presumably done here. If not please identify the specific requirement that is not followed by a citation.
2520-00010-VO, Specific Requirement No. 1	CRG0001 BH002 RQMTS 1, LAC 33:III.1311.B. This rule is correctly summarized in that "The rate of emission shall be the total of all emission points from the source." However, by grouping 4 sources does not make them 1 source. EQT 0003, EQT 0013, EQT 0014 & EQT 0015 are each individual emission sources and as such are each allowed emissions of 57.1 lb/hr in accordance to 1311.B. Bunge requests that this be revised. In the alternative, this limit could be deleted as each of these emission points already has a maximum hourly PM10 limit in the emission rate sheets that is well below 57.1 lb/hr.	Each member of a common requirement group (CRG) must comply with each of the specific requirements listed under that CRG. As to the statement "The rate of emission shall be the total of all emission points from the source" The source refers to a single process emission point. However, to avoid confusion the statement will be removed from the SR No. 1.

2520-00010-VO, Specific Requirements No. 2	CRG0001 BH002 RQMTS 2, LAC 33:III.501.C.6: Bunge has requested specific limits for these 4 sources based in part on a baghouse exhaust dust loading. However, the limits requested are the hourly and annual emission rates included in the application. Please delete the grain loading limit as it is unreasonable and goes beyond the legal requirements. LAC 33:III.501.C.6 cannot be used to impose substantive emission limits, but rather is to be used in "gap-filling" for periodic monitoring requirements when an underlying applicable rule, such as 1311.B., does not specify monitoring. There simply is no underlying rule that justifies a gr/dscf limit for these sources. In the alternative, and without waiving the foregoing, Bunge requests that this limit be marked as "state-only" as there is no applicable federal rule.	The requested specific limits were mainly based on the baghouse exhaust (filter vent) dust loading. To demonstrate compliance with these limits LDEQ has to verify the accuracy of the calculation basis (the dust loading or gr/dscf (which is measurable). If you believe that this loading factor is only good for the average hourly and maximum annual emission rates, then include a different value to generate the maximum hourly rate. Also note that the dust loading factor has been used in conjunction with a number of NSPS requirements.
2520-00010-VO, Specific Requirement No. 3	CRG0001 BH002 RQMTS 3, LAC 33:III.507.H.1.a: Bunge requests that this SR be revised to require an inspection be conducted only when there is an indication of emissions above the allowable. Because there will be daily visible emissions monitoring, this will be sufficient to ensure compliance with LAC 33:III.1311.B, which is the only applicable requirement stated. The emissions from these emission units are very small. See PM10 emission rate sheets. Please revise the condition throughout this section.	Visible emissions are associated with the filtering media which is not sufficient to ensure the integrity and proper functioning of the baghouse. The control system, as you recognized in your comment below. Inspection will be conducted when there is a shut down for turn around, repair or maintenance.
2520-00010-VO, Specific Requirements No. 3	CRG0001 BH002 RQMTS 3, 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.	As stated above, this requirement addresses the physical parameters of the system critical to its proper operation (enclosure, door, filtering media or filter bags... for leaks , obstructions, or defective filtering media) while another requirement addresses the conditions of the emissions released from its vent "filter vent". Also note that conducting necessary maintenance is required for the proper functioning of the control system covered under LAC 33:III.905.
2520-00010-VO, Specific Requirements Nos. 3-6	CRG0001 BH002 RQMTS 3, 4, 5 & 6; LAC 33:III.507.H.1.a: It would be helpful if the terms baghouse & filter & filter vent & gaskets were defined since the terms are obviously meant to refer to different types of control equipment.	Refer to the above response. Also note that shut down refers to shut downs for turn around or repair and maintenance. For further clarity, this explanation will be incorporated into Specific Requirement No. 4.
2520-00010-VO, Specific Requirements Nos. 7-12	CRG0002 group members, if a such a group is required, it should not include CRG0004, but rather EQT0004.	Typo corrected.
2520-00010-VO, Specific Requirement 7	CRG0002, requirement 7: Comment to requirement 1 also applies to this SR. Also, the second source, Flaking, is not included in the group name.	Refer to the response to the comment on SR No. 1.
2520-00010-VO, Specific Requirements No. 8	CRG0002, requirement 8: Comment to Specific Requirement 2 also applies to this SR.	Refer to the response to the comment on Specific Requirement No. 2.
2520-00010-VO, Specific Requirements Nos. 9-12	CRG0002: Comments to Specific Requirements 3-6 also apply to these Specific Requirements.	Refer to the response to comment on SR No. 3.

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2520-00010-VO, Specific Requirements No. 14	CRG0003, requirement 14: Comment to requirement 1 also applies to this SR.	Refer to the response to comment on SR No. 1.
2520-00010-VO, Specific Requirements Nos 15-19	CRG0003: Comments to Specific Requirements 3-6 also apply to these Specific Requirements	Refer to the response to comment on SR No. 3.
2520-00010-VO, Specific Requirements No. 21	CRG0004, requirement 21: Comment to requirement 1 also applies to this SR. Additionally, the stated TSP emission rate is incorrect for the meal additive tank.	Refer to the response to comment on SR No. 1. The TSP is correct according to the reported rate on the EIQ.
2520-00010-VO, Specific Requirements No. 22	CRG0004, requirement 22: Comment to requirement 2 also applies to this SR.	Refer to the response to comment on SR No. 2.
2520-00010-VO, Specific Requirements Nos. 23-26	CRG0004: Comments to Specific Requirements 3-6 also apply to these Specific Requirements	Refer to the response to comment on SR No. 3.
2520-00010-VO, Specific Requirements	CRG0005: The correct name is Hexane Storage Tanks 1-4, as n-hexane is only one isomer of the solvent.	CRG named as requested.
2520-00010-VO, Specific Requirements	CRG0005:LDEQ has cited only the MRR requirements of 40 CFR Part 63, Subpart GGGG in SRs Nos 27-28. LDEQ should add a specific requirement incorporating the substantive requirements of GGGG as well – i.e., 40 CFR 63.2840. This should be done either here, or under the specific requirements for UNF0001	The requirement has been added here and on the UNF0001.
2520-00010-VO, Specific Requirements No. 29	CRG00005, Hexane Storage Tanks, requirement 29, LAC 33:III.2103.I.6: The records required to be maintained by this SR cited rule only apply "for any storage tank exempted under Paragraph G.5" of 2103. G.5 states: "G. Exemptions. The provisions of this Section (e.g., LAC 33:III.2103) do not apply to: 5. with regard to the requirements of Paragraph C.1 of this Section, any storage tank that is used for less than two weeks in the calendar year, provided that the tank is empty and liquid-free when not in use." Because the tanks do not qualify for the exemption under 2103.G.5, this specific requirement should be deleted.	Replaced with the appropriate recordkeeping requirement.
2520-00010-VO, Specific Requirements No. 30	CRG00005, Hexane Storage Tanks, requirement 30, LAC 33:III.507.H.1.a: This requirement is an unnecessary burden with no regulatory benefit. Similar records are maintained under SR27 & 28 which serve the required regulatory purpose and which constitute Maximum Achievable Control Technology Also, it is impossible to determine the HAP content of each individual tank due to tank interconnections required by National Fire Prevention Association ("NFPA") code. Because enhanced monitoring is already provided through the MACT standard, there is no basis for "gap-filling" through addition of this MRR periodic monitoring requirement under the auspices of Section 507.H.1. In addition, see the comments concerning this provision made in connection with the Statement of Basis. For all of these reasons, please delete this SR.	Replaced with the appropriate recordkeeping requirement.

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2520-00010-VO, Specific Requirements No. 34	**EQT0003, Secondary Dehulling, requirement 34: Although this source is controlled by a baghouse filter, the comments to SR 42 also apply to this SR. Further, this condition does not say what pollutant a performance test is required for. SR 37 implies that SO2 and H2SO4 testing may be required but the source is not subject to any standard for these pollutants.**	**The test to be performed on EQT0003 is for PM_{10}, the submittal of its results is required under SR No. 37. The units and chemicals included between brackets (lbs/MMBTU, gr/dscf, lbs SO_2/ton, 100% H_2SO_4, Etc.) are offered for illustration purposes only. With the additional information provided on 10/08/08 no test is necessary.**
2520-00010-VO, Specific Requirements No. 35	**EQT0003, Secondary Dehulling, requirement 35: Comment to requirement 2 also applies to this SR.**	**Refer to the response to comment on SR No. 2**
2520-00010-VO, Specific Requirements	**EQT0004, 3-91, Escher Wyss: Correct the spelling of the manufacturer's name: ESCHER WYSS**	**Typo corrected.**
2520-00010-VO, Specific Requirements No 42	**EQT0004, 3-91, Escher Wyss, requirement 42: LAC 33:III.501.C.6: The cited rule states that** "The permitting authority shall incorporate into each permit sufficient terms and conditions to ensure compliance with all state and federally applicable air quality requirements and standards at the source and such other terms and conditions as determined by the permitting authority to be reasonable and necessary. It is the intent of this regulation that suitable controls be applied to new installations and relocations and in cases where modifications are to be made or where significant changes in emissions are anticipated." Bunge believes that the draft requirement to test within 180 day is excessive to demonstrate compliance. Bunge requests that this requirement be reconsidered before a final draft is ready for public notice. There are three reasons that proposed Specific Requirement ("SR") 42 should be significantly revised. The first reason is that it is unreasonable and goes beyond the legal requirement to have sufficient periodic monitoring, as discussed in more detail below. This is because the test schedule is impossible and extremely expensive and disruptive of operations. The second reason is that the source has its own Process Weight Rate limit and already has periodic monitoring requirements imposed under the group number and additional periodic monitoring under SR42 is completely unreasonable and unnecessary. The third reason is that SR 42 is ambiguous in that it could be interpreted to require performance testing following ordinary unit shutdowns, and not just monitoring within 180 days after the effective date of the upcoming Initial Title V permit. The citation of authority for SR 42 is LAC 33:III.501.C.6. The correct monitoring citation should be LAC 33:III 507.H.1.A, which is the Louisiana "periodic monitoring rule" adopted to fulfill requirements of the federal "periodic monitoring" rule in 40 C.F.R. 70.6(a)(3). That rule, provides that LDEQ may "gap fill" by adding periodic monitoring requirements such as proposed SR42 "[w]here the applicable requirement does not require periodic testing or instrumental or no instrumental monitoring (which may consist of recordkeeping designed to serve as monitoring)." It further provides that "Such monitoring requirements shall assure use of terms, test	**SR No. 42 to 44 for EQT0004 will be deleted because these requirements on EQT0004, with the most recent citation, will appear under CRG0002.** **Testing requirement has been replaced with manufacturer certification as a result of the additional information supplied recently (September 30, 2008) by the facility which provides manufacturers guarantees of the dust loading factor of the filter media installed on the non-NSPS baghouses.** **As to the cyclones, two of those will be tested. Emission Points 3-91 ESHER WYSS DRIER & CRACKING and 6-91 SOYBEAN FLAKING.**

methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. Recordkeeping provisions may be sufficient to meet the requirements of [Sec. 70.6(a)(3)(i)(B)]."

A number of court decisions, EPA responses to petitions for objections to Title V permits, and other EPA guidance make it clear that periodic monitoring must be "reasonable" and tailored to the particular underlying standard for which compliance is to be assured. In this particular case, the only underlying standard requiring periodic monitoring for the cyclone is the Process Weight Table requirements of LAC 33:III.1311.B. "no matter to the atmosphere from any process or process equipment in excess of the amount shown in LAC 33:III.1321, Table 3....The rate of emission shall be the total of all emission points from the source."

LDEQ has imposed a maximum Process Weight Rate limits on this source. For example, for EQT0004 SR 7 imposes a limit of 57.1 lb/hr TSP as the 1311.B. Process Weight Rate standard. The maximum hourly emissions authorized in the Emission Rate Table for this source is only a small fraction of the Process Weight Rate allocated in this SR. Specifically the SR7 limit of 57.1 lbs/hr compares to the maximum hourly emission rate for that source in the emission rate table of 2.47 lb/hr. So the emissions from the cyclone is not even 3.3% of the Process Weight Rate standard. Of even more importance, LDEQ has already applied periodic monitoring on EQT0004 through SRs 9 through 12. These require a visible emission check on a daily basis. Further, records must be kept of the visible emission checks. In addition, maintenance must be conducted as necessary upon each occurrence of a process unit shut down or whenever visible emission checks indicate that maintenance is necessary. Records of the maintenance must be kept. Thus, for the cyclone, there are already periodic monitoring requirements sufficient to assure compliance with the Process Weight Rate standard without the added burden and expense of a stack test.

The requirement in SR42 to test the cyclone is completely unnecessary to assure compliance with SR7. In a letter from EPA Region 9 to the Bay Area Air Quality Management District ("BAAQMD") EPA reviewed the factors in selecting appropriate periodic monitoring. (This guidance is found at http://www.epa.gov/Region7/programs/artd/air/title5/t5memos/baypm.pdf.) EPA stated that "opportunities for less burdensome monitoring" should be determined by "relating a unit's likelihood of violating a limit" to the monitoring requirements selected. When a facility's overall particulate emissions are low (such as in Bunge's case) and where there is not significant likelihood of violating the standard (such as here, where
maximum emissions are less than 3.3% of the standard), then lesser, more reasonable monitoring should be required. The letter states "for example, the permittee and/or permitting authority might show that compliance is assured if the associated control device is maintained at its required efficiency, and that this

	efficiency can in turn be assured by monitoring specific operating parameters and performing maintenance at required frequencies." LDEQ HAS already done this through the requirement for daily visible emission checks followed by prompt corrective action and recordkeeping to demonstrate such measures have been undertaken. Thus, the requirement under SR42 for a performance test is unrelated to compliance assurance with the cyclone control for which daily visible emission checks are already required.	
2520-00010-VO, Specific Requirements No. 46	**EQT0005, 4-91, Soybean Dehulling, requirement 46: Comment to requirement 2 also applies to this SR.**	**Refer to the response to comment on SR No. 2.**
2520-00010-VO, Specific Requirements Nos. 47-50	**EQT0005, 4-91 – Soybean Dehulling: Comments to specific requirements 3-6 also apply to these SRs.**	**Refer to the response to comment on SR No. 3.**
2520-00010-VO, Specific Requirements no. 52	**EQT0006, 5-91, Soybean Conditioning, requirement 52: Comment to requirement 2 also applies to this SR.**	**Refer to the response to comment on SR No. 2.**
2520-00010-VO, Specific Requirements Nos. 53-56	**EQT0006, 5-91 – Soybean Conditioning: Comments to specific requirements 3-6 also apply to these SRs.**	**Refer to the response to comment on SR No. 3.**
2520-00010-VO, Specific Requirements No. 57	**EQT0008, 7-91, MOAS, requirement 57: Comment to requirement 13 also applies to this SR.**	**This requirement applies only when the currently approved compliance option (mass balance for the entire facility) selected by the facility is to be changed. And guarantees a timely review and approval of the new compliance option. By the way there is no Comment on SR No. 13).**
2520-00010-VO, Specific Requirements Nos. 61-64	**EQT0024, 19-97 – Hull Pellet Cooling: Comments to specific requirements 3-6 also apply to these SRs**	**Refer to the response to comment on SR No. 3.**
2520-00010-VO, Specific Requirements No. 66	**EQT0025, 20-97, Hull transfer, requirement 66: Comment to requirement 2 also applies to this SR.**	**Refer to the response to comment on SR No. 2.**
2520-00010-VO, Specific Requirements Nos. 67-70	**EQT0025 – Hull transfer: Comments to specific requirements 3-6 also apply to these SRs**	**Refer to the response to comment on SR No. 3.**
2520-00010-VO, Specific Requirements	**GRP0002, Boilers: LDEQ should insert a specific requirement for the substantive requirements of NSPS Dc. LDEQ has cited only the MRR provisions.**	**The requirements for 40 CFR 60 - Subpart Dc are included under the oil burning scenarios of the boilers.**

2520-00010-VO, Specific Requirements No. 84	GRP0002, Boilers, requirement 84: The fuel oil use limit should be in gallons to eliminate any confusion as to the conversion (55 or 42) between barrels and gallons: 1,780,750. We are not a petroleum refinery.	The annual oil throughput of 1,780,750 gal/yr will be reported (entered into TEMPO) as 1.78 MM gallons/yr is because the corresponding TEMPO field only accepts up to six figure numbers.
2520-00010-VO, Specific Requirements No. 86	GRP0002, Boilers, requirement 86: Please correct the SO_2 limit based on approved fuels to 39.27 tons/yr.	The approved limit is what appears as a total on the application emissions calculation sheet less those due to natural gas combustion.
2520-00010-VO, Specific Requirements No. 88	GRP0002, Solvent Emissions, requirement 88: The extraction solvent and solvent n-hexane emission limits pertain to inventory losses. Even though a portion of these losses are NOT emissions, due to residual solvent/n-hexane in the oil and meal products, for simplicity purposes, because the applicable MACT and Consent Decree limits have an inventory disappearance basis, the total solvent and solvent n-hexane permit limits are the inventory losses. Therefore, each compliance report which must address solvent loss will compare the permit limits to the total inventory disappearance. However, emission reports will continue to be based on the calculations in the Title V permit application that were historically used to apportion these solvent inventory losses. Please comment concerning this being the specific intent of this SR.	The facility opted to use a mass balance approach to account for the solvent loss (disappearance). Consequently, reported emissions shall be the same as the solvent inventory loss, otherwise approved method of calculations must be used.
2520-00010-VO, Specific Requirements, No. 93 and 94	SCN0001, N-Gas fired Boiler, 1A-91. These requirements should be deleted as the Boiler is not subject to the NSPS Dc standard when burning only natural gas. In place of these requirements, LDEQ should add a specific requirement stating: "93. Alternative operating scenarios. This boiler operates primarily under the scenario of firing natural gas only. The boiler may operate under an alternative operating scenario consisting of burning fuel oil. When making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. [LAC 33:III.507.G.5]"	SR No. 92, 93 and 94 are eliminated because the boilers are not subject to NSPS Dc when burning natural gas.
2520-00010-VO, Specific Requirements No. 96	SCN0001, N-Gas fired Boiler, 1A-91, requirement 96, LAC 33:III.1313.C: : Bunge requests that this requirement be modified to read: "Complies by using pipeline natural gas as fuel during the operating scenario when only natural gas is fired. This specific requirement does not apply during the alternative operating scenario where fuel oil is fired. See requirements for "SCN0002 Oil Fired Boiler 1-East for requirements applicable to the alternative operating scenario for fuel oil firing."	By definition sweet and pipeline natural gas are naturally occurring fluid mixtures of hydrocarbons that contain < 1.5 and 0.3 gr/ 100 scf. As such pipeline natural gas can readily be classified as sweet natural gas.

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2520-00010-VO, Specific Requirements 95 and 96	SCN0001, N-Gas fired Boiler, 1A-91, requirement 95 & 96: The requirements includes the following: "Complies by using sweet natural gas as fuel." Previously, in the Statement of Basis, IV. Regulatory Analysis, Applicability & Exemptions "Complies if burning natural gas" was used. For consistency please use one term throughout the permit. Bunge understands that they mean the same: pipeline natural gas, which we ask to be used.	Sweet natural gas (low sulfur content) will be used throughout. Refer to the response of the above comment.
2520-00010-VO, Specific Requirements No. 97	SCN0001, N-Gas fired Boiler, 1A-91, requirement 97: The reference to the Consent Decree date should be "the January 16, 2007, Consent Decree entry date." In addition, Bunge requests that the "statistical basis" be changed from "none specified" to "3 hour average." The performance testing methodology requires a minimum of 3 runs and minimum duration of 1-hour; thus, the limitation should be applied as a 3-hour average to be consistent with the underlying testing methodology.	A statistical basis of 3–hr has been incorporated.
2520-00010-VO, Specific Requirements Nos. 98 and 127	SCN0001, N-Gas fired Boiler, 1A-91, Requirements 98 & 127: Historically the boiler emission tests to confirm NOx compliance have been conducted on alternate years for each boiler. Bunge requests that the timing be changed so that the tests are required during the fifth year of the subject permit with the results included in the application for the reissued Title V permit. In addition, Bunge requests that LDEQ modify the language of the second sentence to read as follows: "The stack test's purpose is to demonstrate compliance with the NOx standard set forth in the Consent Decree. The test must be conducted at greater than 80% of the permitted maximum capacity, unless otherwise approved in writing by the administrative authority."	The requirement will be changed to read as follows: "Conduct a performance/emissions test: Due within twelve months of submitting the application for permit renewal. The stack test's purpose is to demonstrate compliance with the NOx standard, set forth in the Consent Decree, and compare with the initial compliance test results and therefore must be conducted at greater than 80% of permitted maximum capacity, unless otherwise approved by the administrative authority. Test..."
2520-00010-VO, Specific Requirements No. 99	SCN0001, N-Gas fired Boiler, 1A-91, Requirement 99: Bunge believes that LDEQ may not legally impose requirements beyond those agreed by EPA/LDEQ and Bunge in the Consent Decree. The Consent Decree, Attachment G, establishes the NOx standards, testing and monitoring requirements. There, it was agreed and stipulated that monitoring would be per the existing state permit requirements. In addition, there is no justification for documenting hourly boiler data and the corresponding hourly NOx emissions. As for the other sources and the records required for the boiler by SR101 records should be required no more frequently than daily with monthly emissions records.	Monitoring and recordkeeping requirements are needed to demonstrate compliance with the CD NOx limit. The applicant elected to use surrogate parameters for NOx established and agreed to by the applicant and LDEQ (refer to the ATC issued on 8/16/05 and subsequent correspondence and discussions on the matter). However, the requirement will be changed to read as follows: "Equipment/operational data recordkeeping by electronic or hard copy daily for the fuel rate and the pressure of the natural gas supplied; by pipeline without intermediate bulk storage, to the boiler. Records shall be kept on site for inspection by LDEQ personnel for five years."
2520-00010-VO, Specific Requirements No. 100	SCN0001, N-Gas fired Boiler, 1A-91, Requirement No. 100 is a duplicate of requirement 98 and should be deleted. See also requested changes to requirement No. 98.	No. These are two different requirements: SR No. 100 is the initial test while SR No. 98 is at or prior to renewals every five years.
2520-00010-VO, Specific Requirements	Bunge requests that LDEQ add "Alternative Operating Scenario for Oil Burning" to the heading SCN0002	The Label SCN means alternate scenario.

2520-00010-VO, Specific Requirements No. 102 and 103	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91, Requirements 102 and 103: These should be combined into one specific requirement. These are both compliance alternatives allowed under 40 CFR 60.42c(d). They do not both apply at the same time, but rather, the facility may choose to comply with the standard by doing either. By stating these as two separate specific requirements, LDEQ requires that both be met, which goes beyond the NSPS standard and intent. DEQ could simply add an "or" after the word "malfunction" in SR 102 and add in the language of 103 there.	SR No. 102 will only be retained.
2520-00010-VO, Specific Requirements No 105	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91, Requirements 105. As for other boilers of this size category burning distillate fuel as a secondary fuel, the documentation of sulfur content for each delivery of fuel oil should be the single requirement for SO_2 compliance documentation and should be so stated in the permit. The NSPS rule at 40 CFR 60.42c(h) clearly allows compliance through fuel oil supplier certification in lieu of a performance test. That option must be afforded by the permit as well. Thus, this SR should be deleted, or in the alternative, modify this SR by adding the following before the word "conduct" : "Unless the facility demonstrates compliance with NSPS Dc SO2 standards through compliance with 40 CFR 60.42c(h),"	SR No. 105 will be removed and supplier certification (alternate compliance demonstration, per 40 CFR 60.8(b)) will be retained.
2520-00010-VO, Specific Requirements No 107	Requirement 107: This cite should be corrected by including reference to 40 CFR 60.48c(f)(1) as parts f.2 through f.4 apply to fuels not permitted to be combusted. Also, this part refers to sulfur dioxide compliance, not particulate.	Reference 40 CFR 60.48c(f)(1) will only be cited since distillate oil only will be used for the alternate scenario.
2520-00010-VO, Specific Requirements No 110 and 111	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91, Requirements Nos. 110 and 111. Please clarify that no excess emission report is due for the NSPS SO2 standard where a fuel certification is used. Also, please clarify that no excess emission report is due for any quarterly period where the unit is not operating under this alternative operating scenario.	The requirement calls for quarterly reporting of emissions limitations exceedances. Since compliance is demonstrated using supplier certification, then no exceedances would result and thus no reports are required. The same holds true when no emissions are released.
2520-00010-VO, Specific Requirements No 112	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91, Is not requirement 112 a duplicate of 107 requirement? If so, please delete.	SR No. 107 and SR No. 112 are different requirements: The former is for PM10 (alternate) compliance through certification [540 CFR 60.45c(a)] reported at the end of each year, while the latter is under reporting and recordkeeping [40 CFR 60.48c(f)] kept for five years.

2520-00010-VO, Specific Requirements No 115	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91. Requirement No. 115. Bunge requests that LDEQ make a determination that this boiler is exempt from the provisions of LAC 33:III.1101 per section 1111. The basis for this request is that the boiler, when operating under this scenario, is subject to the NSPS Dc opacity standard. Such standard was established at a level determined to be the most stringent standard that a new source in this category could feasibly comply with. LDEQ should not require a more stringent opacity standard as such is not technically or economically feasible, as has been demonstrated through the NSPS Dc standard rulemaking and periodic reviews of that standard by EPA. Bunge requests that this determination be made prior to the issuance of a draft permit, and if excluded, this SR should be deleted.	LAC 33:III.1101.B is a state requirement more stringent than the corresponding federal requirement of40 CFR 60 – Subpart Dc [40 CFR 60. 43c(c)] and shall also apply only when the boiler is burning fuel oil. However, the language in the former will state that compliance with 40 CFR 60.43c(c) constitutes for this case compliance with LAC 33:III.1101.B.
2520-00010-VO, Specific Requirements No 116	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91 Bunge requests that LDEQ change the statistical basis from "none specified" to "3 hour average" for the same reasons as stated in comment on requirement No. 96	A statistical basis of 3–hr has been incorporated.
2520-00010-VO, Specific Requirements No 118	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91 Bunge is not required by the Consent Decree to conduct a performance test for NOx when burning fuel oil; thus, this specific requirement should be deleted.	The requirement has nothing to do with the Consent Decree, however, the requirement has been deleted because NOx emissions are less than 40 tons/yr.
2520-00010-VO, Specific Requirements No. 119	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91Why cannot requirements 113 and 119 be combined, as they both refer to fuel records?	These are two different requirements. One is federal and the second is state that includes documentation for (lower) sulfur content in connection with the distillate oil fuel cap. That being said, the facility may meet both requirements by keeping a suitable single record.
2520-00010-VO, Specific Requirements No. 120	SCN0002, Oil- fired Boiler, EQT 0001, 1A-91 Requirement 120 invents a no visible emission opacity limitation that is not supported by any federally applicable rule. When burning fuel oil, the NSPS Dc rule contains MRR for compliance with the NSPS Dc opacity standard which is not a "no visible emission standard." The opacity requirements are already stated in SR 104. Thus this SR should be deleted as the cited rule, LAC 33:III.507.H.1.a, does not apply when an NSPS standard already establishes a standard AND already sets forth appropriate MRR.	SR No. 120 will be removed because the NSPS opacity standard is adequate.
2520-00010-VO, Specific Requirements Nos. 121-149	All comments above concerning the requirements for the East boiler (requirements Nos. 92-120) also pertain to the corresponding specific respective requirements for the West boiler (Nos. 121-149).	Refer to the responses to comments 92 through 120.
2520-00010-VO, Specific Requirements Nos. 150-152	"GRP 0005" Requirement 150 is applicable to the GRP0005 baghouses and cyclones. There is no such group under the proposed permit and Bunge has not requested any such group. As there is no listing of the sources that compose this group, Bunge respectfully requests that this and the following two requirements be deleted from the permit.	The members of the group are identified. These were inadvertently left out.

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2520-00010-V0 Specific Requirement 153	UNF001 Soybean Oilseed Processing Plant. Bunge requests that this provision be deleted here and inserted instead only for those EQTs that are legally subject to an NSPS standard. The entire facility is not subject to NSPS standards and it is confusing to place it here.	The requirement states "affected facilities" shall comply which refers to equipment subject to NSPS.
2520-00010-VO, Specific Requirements Nos 166 through169	UNF001 Soybean Oilseed Processing Plant. These requirements should be deleted as they are duplicative of the Part 70 General Conditions, and in some cases, do not contain exactly the same language as the Part 70 General Conditions, causing potential confusion about compliance requirements.	These requirements are necessary for reporting functions in TEMPO.
2520-00010-VO, Specific Requirements No. 173	UNF001 Soybean Oilseed Processing Plant. Requirement 173 refers to best practical housekeeping and maintenance practices required for organic compounds. This is an excellent example of misleading the permittee by merely referencing but not including the associated requirements. The referenced requirement is LAC 33:III.2113.A. But not addressed is the following requirements of this rule: 4. Each facility shall develop a written plan for housekeeping and maintenance that places emphasis on the prevention or reduction of volatile organic compound emissions from the facility. This plan shall be submitted to the Office of Environmental Services upon request. A copy shall be kept at the facility, if practical, or at an alternate site approved by the department. 5. Good housekeeping shall be determined by compliance with LAC 33:III.2121 (Fugitive Emission Control) and the maintenance and the housekeeping plan required by LAC 33:III.2113.A.4. Again, Bunge requests that the rules be included, word for word, not cited or summarized.	The requirement is specific and identifies all relevant details.
2520-00010-VO, Specific Requirements No. 176	UNF001 Soybean Oilseed Processing Plant. Requirement 176, to conduct emission tests within 180 days of issuance of the Title V permit on 50% of the facility baghouses is not supported by the cited rule. The only basis cited by LDEQ for this SR is LAC 33:III.507.H.1.a. That cited rule states 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	In this case testing is required to verify the accuracy of the emissions' estimating method used to demonstrate compliance with the PM_{10} NAAQS STANDARDS. The requirement to test 50% of all baghouses was inadvertently left in and has been removed. Only the requirements under GRP0005 will be retained which is to test two of the four cyclones.

	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. There are several reasons that proposed SR 176 should be significantly revised. The first reason is that it is unreasonable and goes beyond the legal requirement to have sufficient periodic monitoring, as discussed in more detail below. This is because it requires testing of more baghouses than should require performance testing and because the test schedule is impossible and extremely expensive and disruptive of operations. The second reason is that individual baghouses each have their own Process Weight Rate limit and already have periodic monitoring requirements imposed under their individual EQT numbers and additional periodic monitoring under SR176 is completely unreasonable and unnecessary. The third reason is that SR176 is ambiguous in that it could be interpreted to require performance testing following ordinary unit shutdowns, and not just monitoring within 180 days after the effective date of the upcoming Initial Title V permit. The citation of authority for SR 176 is LAC 33:III.507.H.1.a., which is the Louisiana "periodic monitoring rule" adopted to fulfill requirements of the federal "periodic monitoring" rule in 40 C.F.R. 70.6(a)(3). That rule, provides that LDEQ may "gap fill" by adding periodic monitoring requirements such as proposed SR 176 "[w]here the applicable requirement does not require periodic testing or instrumental or non-instrumental monitoring (which may consist of recordkeeping designed to serve as monitoring)," It further provides that "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 [Sec. 70.6(a)(3)(i)(B)]." A number of court decisions, EPA responses to petitions for objections to Title V permits, and other EPA guidance makes it clear that periodic monitoring must be "reasonable" and tailored to the particular underlying standard for which compliance is to be assured. In this particular case, the only underlying standard requiring periodic monitoring for the baghouses is the Process Weight Table requirements of LAC 33:III.1311.B. "no person shall cause, suffer, allow, or permit the emission of particulate matter to the atmosphere from any process or process equipment in excess of the amount shown in LAC 33:III.1321, Table 3....The rate of emission shall be the total of all emission points from the source." LDEQ has imposed a maximum Process Weight Rate limits on a number of individual baghouses throughout the permit. In each case, the maximum hourly emissions authorized in the Emission Rate Table for these baghouses is only a small fraction of the Process Weight Rate allocated in these SRs. The emissions from the baghouse are not even 1% of the Process Weight Rate standard in many cases. Of	**Refer to the response to SR No. 42 for responses to the remainder of this comment.**

	even more importance, LDEQ has already required "gap-filling" periodic monitoring through requiring a visible emission check on a daily basis and requiring restoration of operations within no more than 3 working days. Further, records must be kept of the visible emission checks. In addition, filter elements must be changed as necessary upon each occurrence of a process unit shut down or whenever visible emission checks indicate that maintenance is necessary. Records of the maintenance must be kept. Thus, for each such baghouse, there are already periodic monitoring requirements sufficient to assure compliance with the Process Weight Rate standard without the added burden and expense of a stack test. . In a letter from EPA Region 9 to the Bay Area Air Quality Management District ("BAAQMD") EPA reviewed the factors in selecting appropriate periodic monitoring. (This guidance is found at http://www.epa.gov/Region7/programs/artd/air/title5/t5memos/baypm.pdf.) EPA stated that "opportunities for less burdensome monitoring" should be determined by "relating a unit's likelihood of violating a limit" to the monitoring requirements selected. When a facility's overall particulate emissions are low (such as in Bunge's case) and where there is not significant likelihood of violating the standard (such as here, where maximum emissions are less than 1% of the Process Weight Rate standard), then lesser, more reasonable monitoring should be required. The letter states "for example, the permittee and/or permitting authority might show that compliance is assured if the associated control device is maintained at its required efficiency, and that this efficiency can in turn be assured by monitoring specific operating parameters and performing maintenance at required frequencies." LDEQ HAS already done this through the requirement for daily visible emission checks followed by prompt corrective action and recordkeeping to demonstrate such measures have been undertaken. The EPA guidance also indicates that another means to develop reasonable streamlined periodic monitoring is to consider how far the emissions would be below the standard during "worst-case" operations. Under this specific permit, only two sources emit appreciable amounts of particulate – EQTs 0004(10.81 TPY) and EQT 0007 (6.95 TPY). Even these are well below their process weight rate limits. Thus, the requirement under SR176 for a performance test on 50% of the baghouses is unrelated to compliance assurance with the individual baghouses for which daily visible emission checks are already required or for the loading spouts where other periodic monitoring through work practices is required. Moreover, even if a performance test were reasonable, which is not the case for any of the baghouses to demonstrate assurance with the Process Weight Rate standard, the requirement to test 50% of these within 180 days is completely unreasonable. It takes time to schedule stack testers to come to the facility and time to coordinate	

	testing requirements with seasonal shipping activities. LDEQ has specified that testing must occur at 95% of operating capacity absent explanation. It is likely impossible to schedule and conduct such testing within the time period specified. Last, and without waiving any prior objections to the performance testing requirement, Bunge notes that the wording of SR176 is ambiguous in that it specifies that testing must occur within 180 days after "issuance of the Initial Title V permit, or within 60 days after achieving normal production rate if unit is shutdown." Any testing deadlines should run from the effective date of the permit, not the issuance date. Further, the language should be clarified by changing it to read: "within 180 days after the effective date of the Initial Title V permit, or, if an emissions unit is temporarily out of operation during that 180 day period, it shall have 180 days from restart to complete any required testing." For additional guidance on periodic monitoring requirements, please refer to the following: Natural Resources Defense Council v. EPA, 194 F.3d 130 (DC Cir. 1999); Appalachian Power Co. v. EPA, 208 F.3d 1015 (DC Cir. 2000); and to the EPA Administrator's final decisions in In the Matter of Pacificorp's Jim Bridger and Naughton Electric Utility Steam Generating Plants, Petition No. VIII-00-1 (November 16, 2000) (Pacificorp) (available at http://www.epa.gov/region07/programs/artd/air/title5/petitiondb/petitions/woc020.pdf); In the Matter of Fort James Camas Mill, Petition No. X-1999-1 (December 22, 2000) (Fort James) (available at: http://www.epa.gov/region07/programs/artd/air/title5/petitiondb/petitions/fortjamesdecision1999.pdf). Notice of these decisions was published in the Federal Register. See 66 FR 85, January 2, 2001 (Pacificorp); 66 FR 13529, March 6, 2001 (Fort James).	
2520-00010-VO, Specific Requirements No. 177	**UNF001 Soybean Oilseed Processing Plant. Bunge seeks clarification as to what is meant by "initial performance test." To the extent that this SR requires keeping any past records that Bunge no longer has before the effective date of the permit, Bunge objects to this requirement.**	**Initial performance test refers to any test conducted to demonstrate compliance with limits set in the permit. Some of these tests may have been performed before the issuance date of a permit, particularly initial Part 70 permits. In these situations "past" records must be made available by the facility as stated.**
2520-00010-VO, Specific Requirements No. 187-189 and 191-192	**UNF001 Soybean Oilseed Processing Plant: Bunge requests that LDEQ define "SPOC" in the permit**	The definition of "SPOC" can be found in LAC 333:III.111 and for convenience is given below: "*SPOC*—the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC).