Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**CII Carbon, LLC**	**AI #:**	**2557**	**TEMPO Activity No:**	**PER20020001**
Facility Name:	**Chalmette Coke Plant**	**Remarks Submitted by:**	**Kevin Calhoun, Providence**		
Permit Writer:	**Kermit Wittenburg**	**Permit Writer Email address:**	**Kermit.Wittenburg@LA.GOV**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis	The Company address should be 2627 Chestnut Ridge Drive, Suite 200, Kingwood, Texas 77339	Done
Statement of Basis	CII requests that LDEQ remove Appendix A & B, or make reference in the Statement of Basis that the 100ppb is a 1-hour concentration and is not a regulatory limit.	Done
Inventory	EQT0003 – CII requests that the Maximum Operating Rate be listed at 49 tph instead of 350,000 tons/year, for consistency with other sources.	For this source, the total yearly throughput is essential information. The hourly maximum is identified under the "Contents" column. No change will be made.
Inventory	EQT0010 – The point source name should be Auxiliary Generator Engine No. 2. This is a small diesel generator, a revised calculation is attached.	This change requires updates to the emissions from the source and requires a change to Specific Requirement 119 as it will no longer comply by using sweet natural gas as a fuel. Changes will be made
Inventory	EQT0013 and EQT0014 – The maximum and normal operating capacity of the calcined coke storage tanks is 1.44 million pounds apiece.	Change made
Inventory	EQT0017 – This is a diesel storage tank, not gasoline, and should be listed as an insignificant activity.	Done

Specific Requirements	#4 & #9 – The multiclone does not have a separate vent to the atmosphere. The multiclone vents to the scrubber, which vents to the atmosphere. Visible emissions from the multiclone vent is not possible. Additional, due to the extremely high moisture content of the Cooler Scrubber Stack exhaust, a visible emissions reading is not practical. CII requests that these conditions be removed.	Done
Specific Requirements	#27 – CII requests clarification. The requirement states that CII must "list the hours that the scrubber operated out of the ranges specified." No ranges for the scrubber operation are specified in the specific requirements. CII requests that this be changed to "list the hours that the fan operated outside of the amperage range specified."	Done
Specific Requirements	#66 & #67 – CII requests clarification of these requirements. Requirement #66 requires records to be keep of the initial and additional compliance determination data. CII is uncertain what "compliance determination data" is being referred to. Requirement #67 requires submittal of results within "90 days after completion of test". CII is uncertain as to what "test" the requirement is referring to.	The initial installation of the SO2 CEMS requires an initial test to verify proper operation of the CEMS. The reference of the additional compliance determination data is referring to the annual RATA tests required for CEMS. The specific requirement language has been modified to clarify what is meant by initial compliance determination data
Specific Requirements	#79 – CII requests clarification as to which "data" this requirement is referring.	This was an unmodified duplicate of Specific requirement # 80. It has been deleted.
Specific Requirements	#79, #84, #85 & #96 – There is an inconsistency between these requirements with regard to how often records must be maintained. Requirements #79, #84 & #96 state "daily, while requirement #85 states hourly. CII request that the requirements be made consistent.	For Req. # 79 see above. Requirements 84 and 85 have been revised to clarify that one is for the "backup" thermocouples and the other is for the infrared sensor. The change makes all requirements consistent for 1 hour.
Specific Requirements	#92 & #93 – These requirements are identical. CII requests that one of the requirements be removed from the permit.	Done
Specific Requirements	#110 – CII requests clarification. This requirement requires to track the hours venting through the pyroscrubber stack for the last month plus the previous twelve months. Is the 500 hours per hour of allowable venting through the pyroscrubber stack on an annual or rolling twelve month basis?	As stated, it is for a rolling twelve month basis.
Specific Requirements	#127 – Remove this condition since this tank is actually a diesel storage tank and should be listed under insignificant activities.	Done
Specific Requirements	#144 – CII is requesting that this condition be removed. The Chalmette Coke Plant is not an area source of toxic air emissions and does not belong to one of the source categories listed in LAC 33:III.5301.	Done
FUG0001	CII is submitting an updated calculation for this point source – Loadout Fugitives.	Done (Emission Reduction tpy)

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