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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Cabot Corporation	**AI #:**	1291	**TEMPO Activity No:**	PER20040002 &3
Facility Name:	Ville Platte Plant	**Remarks Submitted by:**	Calvin Ardoin, Cabot Ville Platte		
Permit Writer:	Rusty J. Jack	**Permit Writer Email Address:**	rusty.jack@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)
Cover Letter, Draft PSD Permit	The current Facility General Manager at Cabot Ville Platte is Mr. Mark Suellentrop. This should be corrected in the cover letter.	The change has been made.
PSD Permit, Preliminary Determination Summary, Statement of Basis	Cabot Corp should be corrected to read Cabot Corporation.	The changes have been made.
PSD Briefing Sheet	The text under the heading BEST AVAILABLE CONTROL TECHNOLOGY should be revised to ensure accuracy and prevent unnecessary confusion. The text should read: "BACT was established under the 1999 PSD permit to be	The change has been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
	the use of 4 percent sulfur feedstock, on an annual average."	
PSD Briefing Sheet	The text under the heading TYPE OF REVIEW should be revised to ensure accuracy and prevent unnecessary confusion. The text should read: "This permit updates the 1999 PSD permit to reflect subsequent approvals by the Department."	The change has been made as appropriate.
Preliminary Determination Summary, Section IV, A.	The text under the heading BEST AVAILABLE CONTROL TECHNOLOGY should be revised as requested above to ensure accuracy and avoid unnecessary confusion.	The change will not be made. Section IV is standard for all Louisiana PSD permits.
Preliminary Determination Summary, BACT Analyses for NOx	The text should be revised as follows: "BACT was established under the 1999 PSD permit. The BACT analysis for NOx has not changed as a result of the proposed changes."	The change has been made as appropriate.
Preliminary Determination Summary, Section IV, B, C, & D	The text in these sections incorrectly implies that Cabot is undertaking a major project which triggers PSD. As stated elsewhere in the Summary, this permit merely updates the 1999 PSD permit. The text in the referenced section describes the 1999 permitting and therefore does not accurately describe the basis for this proposed updated PSD permit and, as drafted, will cause unnecessary confusion. The text should be revised.	The change will not be made. Please see the previous comment regarding Section IV.
PSD Permit, Specific Conditions, Section 2	The text in Section 2 does not accurately describe the BACT determination contained in the 1999 PSD permit. The text should be revised to be consistent with suggested language above in the "PSD Briefing Sheet"	The change has been made.
Statement of Basis, Permitted Air Emissions	The permitted air emissions listed in the permit are incorrect.	The statement of basis has been corrected.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Title V, Specific Requirement 1, EQT 0003 Title V, Specific Requirement 70, EQT 0008	EQT 0003 is not controlled by a flare. It is an emergency vent used when Unit 1 is taken offline and the use of this vent allows emissions from Unit 2 to continue to be directed to the combined VP1 & 2 flare. This is adequately addressed in the specific requirements for EQT 0004. The same comment applies to requirement 70 which allows Unit 2 to be vented and for Ville Platte to continue to control emissions from Unit 1 through the combined Unit 1 & 2 flare. This is adequately addressed in the specific requirements for EQT 0004. We request that both of these requirements be deleted from the permit.	The change will not be made. 40 CFR 63.1103(f)(3) regulates both the main filter and flare.
Title V, Specific Requirement 7, EQT 0004 Title v, Specific Requirement 125, EQT 0031 Title V, Specific Requirement 173, EQT 0033	As previously stated, this requirement is not consistent with 40 CFR 63.11(b) (4) and the Ville Platte CAM. The requirements applicable to each flare should be revised to read: "Presence of a flame monitored by pilot flame monitor continuously. Use of a thermocouple or any other equivalent device to detect the presence of a flame."	The change has been made.
Title V, Specific Requirement 44, EQT 0004. Title V, Specific Requirement 162, EQT 0031 Title V, Specific Requirement 210, EQT 0033	This requirement, for each of the three flares, should be corrected to read: "Flare Pilot Temperature > 400 F"	The change has been made.
Title V, Specific Requirement 157, EQT 0031 Title V, Specific Requirement 205, EQT 0033	The requirements (157 and 205) should be deleted since the plant will comply with the language proposed in Specific Requirement 156.	The requirements were changed to provide clarity and to ensure compliance with LAC 33:III.Chapter 15.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Title V, Specific Requirement 237, EQT 0038	This requirement should be revised to require that compliance be determined on a wet basis to be consistent with the requirements for other sources.	The change has been made.
Title V, Specific Requirement 265, GRP 0001	The proposed reference to "conductive and/or ultraviolet applications" should be deleted from the permit. Ville Platte produces carbon black to specific customer product specifications which do not reference customer end uses. It is suggested that this requirement be revised as follows: "Feedstock sulfur < = 4 % by weight on an annual average."	The reference to conductive and/or ultraviolet applications was removed. The phrase "on an annual average" will not be added as this statistical basis is clearly defined in the requirement.
Title V, Specific Requirement 269, GRP 0001	The reference to rubber and industrial grade carbon black should be deleted from the permit.	The change has been made.
Title V, Specific Requirement 270, GRP 0001	A portion of the uncombusted tailgas at Ville Platte is used to fuel the dryers and oil heaters. Therefore, this requirement should be revised to read: "Flares shall be used as MACT for toxic air pollutant emissions of process gases except for uncombusted tailgas which is used as a fuel in the dryers and oil heaters."	The changes have been made.
Title 5, Specific Requirement 270, GRP 0001	This requirement should be corrected to read: "... a pilot flame sensing device."	A similar change has been made.
Title V, Specific Condition 274, CRG 0001	This requirement should be revised to be consistent with requirement 266. The proposed 99.95 % requirement should be revised to 99.9 %.	The change has been made.
~~Title V, Specific Requirement 295, UNF0001~~	~~No "compliance date" is established for the written startup, shutdown & malfunction plan. It is suggested that the LDEQ require the plan six months after the EPA publishes final regulations and/or guidance required to develop a sound plan.~~	
Inventories – EQT_0034	Change Height from 265 to 276 feet.	The change has been made.
Emission Rates for Criteria	Change PM10, SO2 and VOC annual emission rates from	The change has been made.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Pollutants – EQT0003	0.10 to <0.10 tpy.	
Emission Rates for Criteria Pollutants – EQT0027	Change CO annual emission rate from <0.10 to 0.10 tpy.	The change has been made.
Emission Rates for Criteria Pollutants – EQT0027	Add SO2 maximum emission rate of 0.003 lb/hr.	The change has been made.
Emission Rates for TAP/HAP & Other Pollutants – EQT0041	Change Ammonia annual emission rate from <0.10 to 0.002 tpy.	The emissions will be reported as <0.01 TPY.
Air Permit Briefing Sheet – III. Description & Statement of Basis – III. Proposed Project/Permit Information Title V Air Permit Briefing Sheet, Page 3.	Change facility wide "after" emission rates to: PM10: 292.808, SO2: 24,549.965, NOx: 1,552.42, and VOC: 374.109 tpy based on 4/26/07 submittal.	The changes have been made.
Air Permit Briefing Sheet – III. Description & Statement of Basis – III. Proposed Project/Permit Information Title V Air Permit Briefing Sheet, Page 4	Change facility wide "after" emission rates for~~to~~ Carbonyl sulfide: 46.82 and Hydrogen sulfide: 245.60 tpy.	The changes have been made.
Statement of Basis – VI. Periodic Monitoring Specific Requirements 7, 44, 125, 162, 173, and 210	Clarify that monitoring is for the flare pilot for EQT 0004, 0031, and 0033 and that the temperature monitoring is for the flare pilot.	The change has been made.
Air Permit Briefing Sheet – VI. Periodic Monitoring	Remove the continuous emission monitoring requirement from EQT 0031.	The change has been made.
Air Permit Briefing Sheet – X.	Add a "1" for FUG01, 65-Plantwide Fugitives for LAC	The change has been made.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Table 1. Applicable Louisiana and Federal Air Quality Requirements	33:III.Chapter 51.	
Air Permit Briefing Sheet – XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source	Change EQT 23-25 NSPS Subpart Kb Non-applicability note from "Capacity ≤ 151 m^3..." to "Capacity ≥ 151 m^3..."	The change has been made. Capacity was removed because it is not relevant to the inapplicability of NSPS Subpart Kb.
Statement of Basis – Header	Change Proposed Permit Number from 0920-00001-V2 to 0920-00001-V1.	The change has been made.
Specific Requirement Nos. 274-278	Delete EQT0046 (33) from CRG0001 Filters. This source is being deleted.	The change has been made.
Specific Requirement Nos. 53, bg80, and 250	Clarify that 40 CFR 64.6(c)(2) defines excursion or exceedance as an exhaust opacity greater than 20% except for not more than one 6-min period in 60 consecutive minutes.	The changes have been made.
Specific Requirement Nos. 38, 96, 156, 204 and 237	Update requirement to "Sulfur dioxide ≤ 2000 ppmv on a wet basis and at standard conditions. In order to demonstrate compliance with the sulfur dioxide emission limitations of LAC 33:III. Chapter 15, monitor input sulfur and calculate sulfur dioxide emissions for sources which burn or decompose sulfur-containing fuel and/or feedstock." This is consistent with language in one of Cabot's competitor's permit.	The requirements were changed to reference the method used to determine compliance with SO_2 limitations required by PSD-LA-587(M-2) and specified in the Facility-Wide Process Emissions CAP.
PSD Permit Page 3	Change PSD CO net emissions ~~change~~ to -83,075.94 tpy.	The change has been made.
Specific Requirement Nos. 271	Delete "Process feedstock with a sulfur content of 1.25% (annual average) or less by weight to produce industrial grade carbon black."	The change has been made.
PSD BEST AVAILABLE CONTROL TECHNOLOGY (pg. 5)	Delete the first sentence of the third paragraph. BACT for SO_2 has been determined to be 4% by weight on an annual average.	The change has been made.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
PSD BACT Analyses for SO2 (pgs. 10-11)	Clarify that the sulfur content of the feedstock oil to 4 wt% on an annual average was determined to be BACT. Delete the discussion of BACT as "no controls" from page 11.	The change has been made.
Statement of Basis IV. Prevention of Significant Deterioration/Nonattainment Review	Clarify that the sulfur content of the feedstock oil to 4 wt% on an annual average was determined to be BACT.	The change has been made.
PSD Permit Specific Conditions No. 3 Specific Requirement No. 273	Please update based on language in Specific Requirement 316.	The change will not be made because SR 316 under UNF 01 requires SO_2 recordkeeping for the overall facility operations, while SR 273 under GRP01 requires recordkeeping for the units under the Process Emissions CAP.
PSD Permit Specific Conditions No. 5 Specific Requirement No. 266	This specific condition also applies to 66-93.	The change has been made.
Title V Air Permit Briefing Sheet, Page 4	The table on pages 3 and 4 contains the following footnote: "emission estimates include those from the Unit 5 project. The unit was never constructed." This same footnote should be listed for the VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAP) table on page 4.	The change has been made.
General Information	We will email Mr. David Ferrand with suggested updates for the General Information.	The general information has been updated accordingly.

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