Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ConocoPhillips Company; Alliance Refinery**	**AI #:**	**2418**	**TEMPO Activity No:**	**PER20080007**
Facility Name:	**Unit 491/6191**	**Remarks Submitted by:**	**Sage Environmental Consulting, L.P.**		
Permit Writer:	**Corbet Mathis**	**Permit Writer Email address:**	**corbet.mathis@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.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Public Notice Sheet – First Page	The asterisk next to VOC states that benzene is being increased above the MER, but the proposed number on Page 4 of the Statement of Basis actually shows an overall benzene decrease. Please remove the footnote in the public notice.	Change made. Benzene is not being increase above the MER.
Air Permit Briefing Sheet – Section III Pages 3, 4 and Emission Rates for TAP/HAP & Other Pollutants Pages 3, 4 of 4	The emission numbers should be rounded off according to LDEQ instructions for the new forms. The following entries need to be revised: Listed / Should be Lead 0.005 tpy / 0.01 tpy Acetaldehyde 0.018 tpy / 0.02 tpy Acrolein 0.025 tpy / 0.03 tpy Benzene 1.298 tpy / 1.30 tpy Formaldehyde 0.077 tpy / 0.08 tpy Phenol 0.006 tpy / 0.01 tpy Chromium 0.009 tpy / 0.01 tpy	The application instructions state under the significant figures paragraph in section 24 that "In general, and despite the discussion above, it will be acceptable for these pollutants to be shown with two decimal places for emission rates greater than one lb/hr or TPY. For lb/hr emission rates less than one, report to the nearest hundredth of a lb/hr..." This was not followed in the application. Emission rates where taken to three decimal places so the totals were taken to three decimal places for consistency.

	Copper 0.007 tpy 0.01 tpy Manganese 0.007 tpy 0.01 tpy Zinc 0.079 tpy 0.01 tpy	
Air Permit Briefing Sheet – Section III Page 3	The emission of 2,2,4-TMP is listed as 8.300 tpy. The permit application shows 8.31 tpy.	Change Made. 2,2,4-TMP emissions for Unit 6191 fugitives were not added into the total since emissions are <0.01. The application instructions allow <0.01 to be counted as 0.01 thus making the total 8.31 TPY.
Air Permit Briefing Sheet – Section III Page 4	The emission of antimony is listed as <0.001 tpy. The permit application shows 0.001 tpy.	Both 491-H-1 and 491-H-2 show emissions of <0.001. Since the emissions are taken to three decimals, <0.001 is not counted as 0.001.
Regulatory Table 1 Footnote Page 10	ConocoPhilips is misspelled. It should be "ConocoPhillips"	Change made.
Regulatory Table 1	Source UNF 0010 should be marked as "applicable" for 40 CFR 61 Subpart FF as is listed in the current Title V permit. All FF Requirements are contained in the 308W Permit (1870-V0).	Change made.
Specific Requirements Section	Source EQT 0011 is applicable to LAC 33.III.Chapter 13 and 51, but no reference to either of these regulations is found in the Specific Requirements Section.	Added Chapter 13 and 51 requirements.
Specific Requirements Section	Source UNF 0010 is applicable to 40 CFR 82.150, but no reference to this regulation is found in the Specific Requirements Section.	Added requirement.
Insignificant Activity	Tank 491-T-HCl does not qualify as an Insignificant Activity. Emission calculations and an EIQ will be provided.	Added this tank as an emission point. See attached application, EIQ, and emission calculation forms.