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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Cora Texas Manufacturing Company, LLC**	**AI #:**	**1306**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	**White Castle Facility**	**Remarks Submitted by:**			
Permit Writer:		**Permit Writer Email address:**			

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 – III. Proposed Project/Permit Information – Application , Air Permit Briefing Sheet – II. Origin	Revise the permit submittal date from March 12, 2009 to March 17, 2009.	Change made.

Statement of Basis – III. Proposed Project/Permit Information – Project, Air Permit Briefing Sheet – III. Description	Revise the last sentence to state, "Also, tanks will be added and removed from the insignificant activities list."	Change made.
Air Permit Briefing Sheet – IX. Insignificant Activities	Remove 1-08, Gasoline Tank (6,932 gallons) from the list of insignificant activities. This tank does not meet the vapor pressure requirements of LAC 33:III.501.B.5.A.3. The tank must be a permitted source. This tank is included as EQT 17 in Air Permit Briefing Sheet – X. Table 1. Applicable Louisiana and Federal Air Quality Requirements.	Change made.
Air Permit Briefing Sheet – IX. Insignificant Activities	Delete the following tanks from the list of insignificant activities: - 6-92 Diesel Storage Tank (9,000 gallons) - 7-92 Diesel Storage Tank (2,000 gallons) - 8-92 Diesel Storage Tank (1,000 gallons) - 9-92 Bulk Oil Storage Tank (550 gallons) - 10-92 Bulk Oil Storage Tank (550 gallons) - 11-92 Bulk Oil Storage Tank (550 gallons) - M-1 Molasses Storage Tank (100,000 gallons) - M-2 Molasses Storage Tank (100,000 gallons) - M-3 Molasses Storage Tank (100,000 gallons) - M-4 Molasses Storage Tank (450,000 gallons)	Change made.
Air Permit Briefing Sheet – X. Table 1. Applicable Louisiana and Federal Air Quality Requirements	Delete the "1" for 2111 for UNF 1 Entire Facility. There is no specific requirement regarding LAC 33:III.2111 for UNF 1 Entire Facility.	Change made.

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Air Permit Briefing Sheet – X. Table 1. Applicable Louisiana and Federal Air Quality Requirements	Delete EQT 7 Gasoline Storage Tank (12-92). This tank is being deleted as a part of this permitting action.	Change made.
Air Permit Briefing Sheet – X. Table 1. Applicable Louisiana and Federal Air Quality Requirements & XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source & Inventories	Delete EQTs 9 and 10 HCl Storage Tanks (14-92 & 15-99). These tanks are included in IX. Insignificant Activities.	Change made.
Air Permit Briefing Sheet – X. Table 1. Applicable Louisiana and Federal Air Quality Requirements	For EQT 17 1-08 Gasoline Tank, add a "3" for Kb.	Addition made.
Emission Rates for Criteria Pollutants	Add VOC emissions for 1-08 Gasoline Tank of 0.32 lb/hr avg, 7.16 lb/hr max, and 1.42 tpy annual. This tank is not insignificant. See comment above.	Addition made.
Inventories	For 1-08 Gasoline Tank, add tank volume of 6,932 gallons and operating time of 8,760 hr/yr. This tank is not insignificant. See comment above.	Additions made.

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Inventories	For EQT 0001 S-1 Bagasse Boiler No. 1, revise flow rate to 73,459 cubic ft/min.	Change made.
Inventories	For EQT 0003 S-3 Bagasse Boiler No. 3, revise flow rate to 104,449 cubic ft/min.	Change made.
Specific Requirements	Add specific requirements for 1-08 Gasoline Tank. This tank is subject to LAC 33:III.2103.A, LAC 33:III.2103.H.3, and LAC 33:III.2103.I. This tank is not insignificant. See comment above.	Requirements added.
Specific Requirements – GRP 0002 – Boiler Emission Cap	Specific Requirement No. 139 should require that records of bagasse loaded be kept each month, as well as bagasse loaded for the last twelve months. This specific requirement currently refers to natural gas loading, which is covered under Specific Requirement No. 140.	Specific Requirement No. 139 has been changed to "Bagasse Throughput recordkeeping by electronic or hard copy monthly. Keep records of the total bagasse usage each month, as well as the total bagasse usage for the last twelve months. Make records available for inspection by DEQ personnel."

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