LDEQ-EDMS Document 39715877, Page 58 of 208

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**The Dow Chemical Company**	**AI #:**	**1409**	**TEMPO Activity No:**	**PER20080038**
Facility Name:	**Chlorine/Cell Service Plant**	**Remarks Submitted by:**	**1/15/2009 Serugudi mani**		
Permit Writer:	**Tuongvan Nguyen**	**Permit Writer Email address:**	**Tuongvan.Nguyen@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)
2573-V5	Title V Mod. Chlorine/Cell Service Plant – DOW Reconciliation of emissions from point sources. I do not see any Specific Condition for Asbestos Diaphragm cells manufacture Which should be subject to LAC 33:III. 5151. E provisions.	A specific requirement is added to ensure compliance with LAC 33: III.5151.E

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	The Dow Chemical Company	AI #:	1409	TEMPO Activity No:	PER20080038
Facility Name:	Chlorine/Cell Service Plant	Remarks Submitted by:	Denise Hale on 1/13/2009		
Permit Writer:	Tuongvan Nguyen	Permit Writer Email address:	Tuongvan.Nguyen@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)
Emission Rate Table for TAP/HAP	For EQT 0650 (EIQ V1A) • Methyl Chloride Max lb/hr should be 0.01 (not 0.02) • Toluene Max lb/hr should be <0.01 (not 0.01) For GRP 0082 (EIQ T0) • Ethyl Benzene Ave lb/hr should be 0.01 (not <0.01) • Methyl Chloride Ave lb/hr should be 0.01 (not <0.01)	
Throughout Tables: - Table Section X La Section Fed Section - Emission Rate Tables Criteria TAP/HAP - Inventory Tables	Remove EQT 0656 (EIQ V1G) from all tables. T-400B was removed from service in the past. EQT 0655 (EIQ V1F) should be reflected as T-400 throughout the permit, not T-400A. T-400 A/B was replaced with T-400 in an earlier permit. The Statement of Basis correctly lists T-400 in the Section III description. Verified by plant representative.	
Specific Requirements	For CRG 0020 - Remove EQT 0656 as a group member. Reason explained above...there is no T-400B.	

	For GRP 0083 – Remove EQT 0639 as a group member. Hydrogen Stack T-99E (EIQ UO) is not part of this CAP. EQT 0639 is correctly listed as a part of group CRG 0021. Specific Requirement #87 – Typo. "Keep record of the total VOC each month ..."	
Inventories Section	SIC Codes: SIC Codes 2812 and 2819 apply. Remove SIC codes 2821 and 2869 from the list as they do not apply to this plant.	
Air Statement of Basis	Typo under Streamlined Equipment Leak Monitoring Program. Should say "The permit does not include any streamlined requirements."	
General Information	Many of the people listed in the general information section are incorrect. The correct information will be updated to Mr. David Ferrand as directed on the General Information sheet.	