Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ExxonMobil Refining & Supply Company**	**AI #:**	**2638**	**TEMPO Activity No:**	**PER20070022**
Facility Name:	**Low Sulfur Mogas**	**Remarks Submitted by:**	**Diane H. Leche diane.h.leche@exxonmobil.com**		
Permit Writer:	**Dawei Pan**	**Permit Writer Email address:**	**Dawei.Pan@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)
Cover Letter	The second sentence states that "The permit is both a state preconstruction and Part 70 Operating Permit." BRRF did not request authorization for any construction activities with this application. The origin stated in the Air Permit Briefing sheet states that this is a renewal only, so perhaps this language is not a problem.	No change. Cover letter is standard Template and can't be altered.
Air Permit Briefing Sheet, Section II, page 1	Typographical Error: ExxonMobile should be replaced with ExxonMobil	Corrected as remarked.
Air Permit Briefing Sheet, Section VIII, page 4	On February 28, 2008, a case-by-case insignificant activity notification was submitted. Please incorporate this activity as General Condition XVII Activity No. GCXVII 4. The Activity Description is "Equipment Preparation." Emissions rates are 0.12 tpy VOC, 0.02 tpy NO_X, 0.13 tpy CO, 0.01 tpy PM, & 0.45 tpy SO_2.	Added as remarked.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet, Section IX, page 4	Add the following Insignificant Activity: [LAC 33:III.501.B.5 Table A.1] LSM/FLR-8/PILOT – 1.0 MM Btu/hr PM_{10} = 0.04 tons/yr SO_2 = <0.01 tons/yr NO_X = 0.16 tons/yr CO = 0.36 tons/yr VOC = 0.02 tons/yr	Added as remarked.
Air Permit Briefing Sheet, Section X, Table 1, pages 5 & 6	EQT689 and EQT690 both show the description as "HCN/CT-11 Heavy Cat Naphtha Cooling Tower #11". EQT690 should be described as "ICN/CT Intermediate Cat Naphtha Cooling Tower".	Corrected as remarked.
Air Permit Briefing Sheet, Section X, Table 1, page 6	EQT695 (ICN/F820) should be marked with a "1" denoting that 40 CFR 63 Subpart CC is applicable to this source.	Added as remarked.
Air Permit Briefing Sheet, Section XI, Table 2, page 8	ARE021 – LSM/WW The existing requirement is accurate but incomplete for NSPS QQQ. The permit covers several operating units. In addition to the stated text, please add the following for completeness. [40 CFR 60.692-1(d)(1)] DOES NOT APPLY – The Low Sulfur Mogas Complex Catch Basins and Sewer Vents process stormwater only. Stormwater sewer systems are not subject to the requirements of this subpart.	Added as remarked.
Air Permit Briefing Sheet, Section XI, Table 2, page 9	EQT691 – LSM/FLR-8 Remove this NSPS Subpart J exemption. This exemption is superseded by the Consent Decree (Civil Action No. SA-05-C-5809), which is provided in the draft permit as Specific Requirement No. 41.	Removed as remarked.
Air Permit Briefing Sheet, Section XI, Table 2, page 9	EQT692 – HCN/F201 LAC 33:III.1511 does not apply because this source is exempt from an emission limitation under LAC 33:III.1503. Please revise this statement to "Does Not Apply" or remove from Table 2.	Changed as remarked.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet, Section XI, Table 2, page 10	EQT693 – HCN/F202 LAC 33:III.1511 does not apply because this source is exempt from an emission limitation under LAC 33:III.1503. Please revise this statement to "Does Not Apply" or remove from Table 2.	Changed as remarked.
Air Permit Briefing Sheet, Section XI, Table 2, page 10	EQT694 & 695 – ICN/F810 & ICN/F820 LAC 33:III.1511 does not apply because this source is exempt from an emission limitation under LAC 33:III.1503. Please revise this statement to "Does Not Apply" or remove from Table 2.	Changed as remarked.
Air Permit Briefing Sheet, Section XI, Table 2, page 11	EQT696 – RHLA1/F700 LAC 33:III.1511 does not apply because this source is exempt from an emission limitation under LAC 33:III.1503. Please revise this statement to "Does Not Apply" or remove from Table 2.	Changed as remarked.
General Conditions	Update: Please update the 40 CFR Part 70 and Louisiana General Conditions as provided in the April 20, 2009 Louisiana Register.	Updated as remarked.
General Information Page 2 of 2	Update: Steven L. Blume is the current responsible official for BRRF. His contact information should be as follows: Steven L. Blume, Refinery Manager ExxonMobil Refining and Supply Company Baton Rouge Refinery P.O. Box 551 Baton Rouge, LA 70821 (225) 977-7848	The permit writer is not permitted to change the General Information. Please contact Mr. David Ferrand, Environmental Assistance Division, at (225)219-0775 or email the changes to facupdate@la.gov.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for Criteria Air Pollutants, Page 1 of 3	Corrections: Please update the emission rates for EQT0692, EQT0693, EQT0694, EQT0695, EQT0696, GRP0026, and GRP0093 to match the emission rates provided in the EIQ. Attachment 1 provides a table summarizing the corrected emission rates. Additionally, BRRF requests removal of the maximum hourly emission rate for Cooling Tower HCN/CT-11 (EQT0689) in light of the short-term emission limits policy. This change does not apply to ICN/CT, since it is subject to PSD.	Updated as remarked. Description is due to PSD limits. PSD-LA-667(M-2) is being amended to record all emission rates.
Inventories Page 1 of 2	Subject Item Inventory: • EQT0696 "Contents" column should state "CAP" Stack Information: • EQT0689: Vel = 16.35 ft/s, Flow = 1,763,000 acfm, Dia = 18 ft, & Ht = 54 ft • EQT0690: Vel = 31.67 ft/s, Flow = 2,469,000 acfm, Dia = 24 ft, & Ht = 36 ft • EQT0694: Vel = 18.9 ft/s, Dia = 4.67 ft, & Ht = 180 ft • EQT0695: Vel = 18.9 ft/s, Dia = 4.67 ft, & Ht = 180 ft Relationships: • RLP0162 (the Caustic Regen vent) is controlled by process furnaces EQT0693, 0694, or 0695. Please replace the reference to EQT0696.	Contents should be left blank. This column is for storage tanks. Stack information and relationships have been updated.
Specific Requirement #4	CRG049 – HCN/CT-11 and ICN/CT HCN/CT-11 is not subject to a BACT limit. ICN/CT is the only cooling tower in the Low Sulfur Mogas Complex subject to the 0.003% drift BACT limit from PSD-LA-667 (M-2). Please ungroup these cooling towers or state that BACT only applies to ICN/CT.	Removed from CRG049 and incorporated this requirement into ICN/CT source requirements.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement #20 - 26	CRG050 – ICN/F810 and ICN/F820 As stated in Section XI, Table 2 of the draft permit, these furnaces are exempt from an LAC 33:III.2201 NO_X emission limit because they are subject to a more stringent emission limit. However, LAC 33:III.2201 monitoring, recordkeeping, and reporting apply. Please remove all requirements for LAC 33:III.2201, except Subsection H, I, and J requirements. Specific Requirement Nos. 20 – 26 should be deleted.	Removed as remarked.
Specific Requirement #55 - 61	EQT0692 – HCN/F201 As stated in Section XI, Table 2 of the draft permit, this furnace is exempt from an LAC 33:III.2201 NO_X emission limit because it is subject to a more stringent emission limit. However, LAC 33:III.2201 monitoring, recordkeeping, and reporting apply. Please remove all requirements for LAC 33:III.2201, except Subsection H, I, and J requirements. Specific Requirement Nos. 55 – 61 should be deleted.	Removed as remarked.
Specific Requirement (ADD)	FUG0017 – LSM/FUG Add the following requirement: [LAC 33:III.506.H.1.a] Fugitive emissions of VOC shall be controlled by a monitoring program conforming to the LA Refinery MACT. The number of each type of component required to be monitored for each monitoring period under the applicable leak definition and repair programs shall be reported to the Department by inclusion with each periodic monitoring report. Fugitive emission piping components may be added to or removed from the permitted units, without triggering the need to apply for a permit modification provided: a. Changes in components involve routing maintenance or are undertaken to address safety concerns, or involve small piping revisions with no associated emissions increases except from the fugitive emission components themselves b. Changes do not involve any emissions increase associated with production rate or capacity change c. Actual emissions following the changes will not exceed the emission limits contained in this permit d. The components are promptly incorporated into any applicable leak detection and repair program	Added but corrected the citation number. The citation number should be LAC 33:III.507.H.1.a.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement #37	This requirement is a term from the original pre-construction permit. Chapter 22 now regulates these sources. BRRF requests deletion of this term.	Unchanged. Determined as BACT for these two furnaces under PSD-LA-667.
Specific Requirement #208	GRP0026 – HCN/FURN BRRF requests deletion of Specific Requirement No. 208, which requires submittal of reports for furnace caps. Should any conditions be violated, BRRF is obligated to self report non-compliance per General Conditions M and R. Requiring a report every year for emissions that are in compliance places an additional administrative burden on both LDEQ and BRRF.	This requirement remains. This is standard reporting requirement for Caps. Date coincides with Title V annual certification date for convenience.
Specific Requirement (ADD)	GRP0026 – HCN/FURN BRRF requests that the following PSD permit condition be included. To demonstrate compliance with the NO_X emission limit, Permittee shall calculate total NO_X tons for a 12-month rolling period. Total NO_X for the furnaces in the cap shall not exceed 118.35 tons per year. Permittee shall retain records for review by the Office of Environmental Compliance, Surveillance Division. Throughput above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. [PSD-LA-667(M-2)]	Added as remarked. However, citation is LAC 33:III.507.H.1.a. PSD-LA-667(M-2) only covered BACT requirements for CO, PM_{10}, and SO_2.
Specific Requirement #212	GRP0093 – ICN/FURN BRRF requests deletion of Specific Requirement No. 212, which requires submittal of reports for furnace caps. Should any conditions be violated, BRRF is obligated to self report non-compliance per General Conditions M and R. Requiring a report every year for emissions that are in compliance places an additional administrative burden on both LDEQ and BRRF.	This requirement remains. This is standard reporting requirement for Caps. Date coincides with Title V annual certification date for convenience.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement (ADD)	GRP0093 – ICN/FURN BRRF requests that the following PSD permit condition be included. To demonstrate compliance with the NO_X emission limit, Permittee shall calculate total NO_X tons for a 12-month rolling period. Total NO_X for the furnaces in the cap shall not exceed 114.98 tons per year. Permittee shall retain records for review by the Office of Environmental Compliance, Surveillance Division. Throughput above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. [PSD-LA-667 (M-2)]	Added as remarked. However, citation is LAC 33:III.507.H.1.a. PSD-LA-667(M-2) only covered BACT requirements for CO, PM_{10}, and SO_2.
Specific Requirement #214	RLP0162 – CAUSREG/PV Specific Requirement No. 214 states that organic HAP emissions are controlled using a flare per 40 CFR 63.643(a)(1). Organic HAP emissions from this process vent are controlled by introducing them into the flame zone of process heaters ICN/F810, ICN/F820, or HCN/F202. A flare is not used to control this vent stream. Please revise this requirement as follows: [40 CFR 63.643(a)(2) & (b)] Reduce emissions of organic HAP by 98 weight-percent or to a concentration of 20 ppmvd corrected to 3% oxygen, whichever is less stringent. Introduce the vent stream into the flame zone of the process heater or in a location such that the required percent reduction or concentration is achieved.	Revised by removal of 40 CFR 63.643(a)(1) and addition of two requirements: 40 CFR 63.643(a)(2) & (b).

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement (ADD)	RLP0162 – CAUSREG/PV LAC 33:III.2115 applies to this process vent. Please include the following as a specific requirement for this source: [LAC 33:III.2115.B] Nonhalogenated hydrocarbons shall be routed to a control device demonstrating 98% or greater destruction or removal efficiency or 20 ppmv, whichever is less stringent.	Added as remarked.
Specific Requirement #216	UNF012 – Low Sulfur Mogas Complex Specific Requirement No. 216 should be revised and applied to the ICN/CT source requirements. Revise the Specific Requirement as follows: Alternate means to achieve equivalent emission reductions approved by EPA: Blowdown system from ICN/CT shall be hard-piped to storage vessels subject to the requirements of NSPS Subpart Kb. Cooling tower blowdown and potentially other oily wastewater lines are routed to oil-water separator tanks subject to the requirements of NSPS Subpart Kb. These tanks are permitted with the Utilities Permit #2363.	Revised and moved this requirement to ICN/CT source requirements as remarked.
Specific Requirement #231	Please delete as duplicative with the General Conditions.	Deleted as remarked.
Specific Requirement #232	Please delete as quarterly reports are no longer required.	Deleted as remarked.
Statement of Basis Section II, page 2	Updates to existing permits: #2385-V5 Catalytic Cracking, Issued Jan. 8, 2009 #2589-V4, Light Ends, Issued Sept. 4, 2008 #2234-V4, Cokers, Issued Dec. 9, 2008 #2447-V2, Hydroprocessing, Issued Sept. 23, 2008 #2296-V3, LOFU, Issued July 30, 2008 #2261-V2, Reformer, Issued Aug. 18, 2008 #2363-V2, Utilities, Issued Nov. 5, 2008 (was WCLA) #0840-00127-V3, Marketing Terminal, Issued Jan. 11, 2007	Updated as remarked.
Statement of Basis, Section III, page 2	Please change "Project Description" to "Process Description".	Changed as remarked.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Section III, page 2	Prevention of Significant Deterioration. Please change to: This permit does not authorize any construction thus PSD and NNSR do not apply.	Changed as remarked.
Statement of Basis, Section III, page 2	MACT requirements: Please change last sentence to say: "The permit requires compliance with the appropriate MACT requirements." since there is no project authorized by this permit.	Changed as remarked.
Statement of Basis Section IV, page 5	Revision: The Chapter 22 Regulatory Analysis should be revised as follows: Furnaces that are not subject to a more stringent emission limit are included in the Facility-Wide Averaging Plan and will not be modified to comply with the provisions of this chapter. Compliance with LAC 33:III.Chapter 22 for furnaces not subject to a more stringent emission limit is achieved via this Facility-Wide Averaging Plan.	Revised as remarked.

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ATTACHMENT 1
CORRECTIONS TO EMISSION RATES FOR CRITERIA POLLUTANTS

Note: The following corrections correspond to the emission rates provided in the EIQ sheet for each source. Corrected emission rates are highlighted in yellow.

Subject Item	CO			NO_X			PM_{10}			SO_2			VOC		
	Avg lb/hr	Max lb/hr	Annual tons/y	Avg lb/hr	Max lb/hr	Annual tons/y	Avg lb/hr	Max lb/hr	Annual tons/y	Avg lb/hr	Max lb/hr	Annual tons/y	Avg lb/hr	Max lb/hr	Annual tons/y
ARE0021													0.65		2.84
EQT0689							0.26	-	1.15				0.44		1.93
EQT0690							0.51	1.01	2.22				1.42		6.21
EQT0692		5.48			9.92			0.50			2.10			0.36	
EQT0693		6.98			24.33			0.63			2.90			0.46	
EQT0694		13.26			9.15			1.20			5.30			0.87	
EQT0695		17.41			12.61			1.58			6.89			1.14	
EQT0696		12.38			35.42			1.12			4.73			0.81	
FUG0017													20.83		91.23
GRP0026	11.40		49.95	27.02		118.35	1.03		4.52	3.89		17.05	0.75		3.28
GRP0093	34.74		152.17	26.25		114.98	3.14		13.77	11.62		50.89	2.28		9.98