Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ExxonMobil Chemical Company**	**AI #:**	**286**	**TEMPO Activity No:**	**PER20070023**
Facility Name:	**Baton Rouge Chemical Plant-AWT Combustor Unit**	**Remarks Submitted by:**	**Diane H. Leche**		
Permit Writer:	**Cathy E. Thompson**	**Permit Writer Email address:**	**Cathy.thompson@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.
- ***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 Facility and Current Permit Status	**BRCP suggests replacing the 3 paragraphs of description with the following: "ExxonMobil Chemical Company's Baton Rouge Chemical Plant (BRCP) operates under the following Part 70 permits:"** **And then follow with the list of currently effective BRCP permits. An excel spreadsheet with this list was provided for convenience and is shown in the last page of these comments.**	**Statement of Basis was revised.**
TEMPO Condition 114	**This condition requires an annual report of any exceedance of operating hours. Prior to the effective date of the Part 70 permit program, conditions such as this were required to clearly state what deviations must be reported. Since this unit now operates under a Part 70 permit, any deviations must be reported per the provisions of General Condition R. BRCP believes that this reporting serves no purpose other than to burden both LDEQ and BRCP with additional paperwork. BRCP requests deletion of this condition since it is a duplicative requirement.**	**Condition was deleted:**

TEMPO Condition 128	**BRCP notes that this condition is part of the General Conditions that are now included in the regulations. Should the General Conditions be modified, it would lead to confusion about which terms apply. BRCP also understands that some condition of this type is necessary as a 'flag' for the TEMPO system. BRCP requests this item be reworded to something such as:** **"Permittee shall submit Part 70 semiannual monitoring report as specified by the General Conditions."**	**Condition was not deleted but will not print out as part of the permit:** LDEQ utilizes a computer program called TEMPO to maintain information on all facilities and to draft permits. TEMPO has the capability to provide notification messages when required reports are not received by a specified date. Several "general conditions" must be repeated in the Specific Requirements in order for TEMPO to retain these notification functionalities. In the event of a perceived discrepancy between a General Condition and the corresponding permit Specific Requirement, the General Condition shall prevail.
TEMPO Condition 129	**BRCP notes that this condition is part of the General Conditions that are now included in the regulations. Should the General Conditions be modified, it would lead to confusion about which terms apply. BRCP also understands that some condition of this type is necessary as a 'flag' for the TEMPO system. BRCP requests this item be reworded to something such as:** **"Permittee shall submit Part 70 excess emission reports as specified by the General Conditions."**	**Condition was not deleted but will not print out as part of the permit:** LDEQ utilizes a computer program called TEMPO to maintain information on all facilities and to draft permits. TEMPO has the capability to provide notification messages when required reports are not received by a specified date. Several "general conditions" must be repeated in the Specific Requirements in order for TEMPO to retain these notification functionalities. In the event of a perceived discrepancy between a General Condition and the corresponding permit Specific Requirement, the General Condition shall prevail.
TEMPO Condition 130	**BRCP notes that this condition is part of the General Conditions that are now included in the regulations. Should the General Conditions be modified, it would lead to confusion about which terms apply. BRCP also understands that some condition of this type is necessary as a 'flag' for the TEMPO system. BRCP requests this item be reworded to something such as:** **"Permittee shall submit Part 70 annual certification reports as specified by the General Conditions."**	**Condition was not deleted but will not print out as part of the permit:** LDEQ utilizes a computer program called TEMPO to maintain information on all facilities and to draft permits. TEMPO has the capability to provide notification messages when required reports are not received by a specified date. Several "general conditions" must be repeated in the Specific Requirements in order for TEMPO to retain these notification functionalities. In the event of a perceived discrepancy between a General Condition and the corresponding permit Specific Requirement, the General Condition shall prevail.

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TEMPO Condition 140	**BRCP requests the list of HRVOCs be updated to reflect that only Ethylene and Propylene are regulated as HRVOCs.**	**Condition updated**
TEMPO Condition 102	**Remove - duplicates Condition 101.**	**Duplicate condition was removed**
Statement of Basis Currently effective permits for BRCP		**Table was incorporated into the Statement of Basis.**

Permit name	Permit #	Date Issued
MAINTRAIN	2031-V7	12/1/08
Co-Products	2367-V0	2/17/06
RGR - Refinery Gas Recovery	2361-V1	8/15/06
Aromatics	2290-V5	7/18/08
Phthalic Anhydride - PALA	1200-V2	7/16/04
OXO alcohol	2365-V2	11/20/07
OXO tankfield	2393-V1	12/27/07
Isopropyl Alchohol - IPA	1924-V3	11/17/05
POLY/#5 LE	2396-V0	10/31/05
Neo Acids	2379-V0	12/2/05
Plasticizer	2320-V0	12/20/05
Partial Oxidation - POX	2210-V0	4/4/05
Methyl Ethyl Ketone / Sec-Butyl Alcohol - MEK/SBA	2281-V1	11/20/07
NOVA	2123-V0	5/8/06
HALOBUTYL	2166-V1	7/16/04
VISTALON	2376-V1	8/13/08
E-1000	2156-V1	12/9/08
E-5000	1911-V1	12/12/06
Finishing Plant	0840-00035	7/16/04
Heartcut Distillate	2314-V0	2/22/06
AWT Unit	3006-V0	6/6/06
AWT Thermal Combustor	1977-V0	10/19/03
INFRASTRUCTURE	2390-V1	7/20/07
Turbine Generator - BRTG	2012-V1	8/21/08