Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ExxonMobil Refining and Supply Company**	**AI #:**	**2638**	**TEMPO Activity No:**	**PER20090009**
Facility Name:	**Baton Rouge Refinery-Specialties Complex**	**Remarks Submitted by:**	**Diane H. Leche**		
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)
Air Permit Briefing Sheet, I. Background.	**It is stated that "The Specialities Complex is an existing complex at BRRF that operated under state Permit 2341-V1." The existing permit is a Part 70 permit so it is suggested that the word 'state' be deleted.**	**Changed as requested.**
X. Applicable Regulations.	**LELA/TK0530 should be coded a '1' for NSPS K and Subpart A.**	**Unchanged for NSPS K and removed '2' for NSPS A. The tank has a storage capacity greater than 65,000 gallons and was constructed/modified or reconstructed between June 11, 1973, and May 19, 1978; thus, per 60.110(c)(2), the tank is a NSPS K tank. However, the email dated October 16, 2009, supplemental to the remarks from Company's Technical Review, indicated that the liquid stored in this tank has true vapor pressure equal to 0.017 psia; therefore, per 60.112(a) and 60.113(d)(1), this tank is exempt from the control and recording requirements.**

X. Applicable Regulations.	LELA/TK0531 should be coded a '1' for NSPS Kb and Subpart A.	Coded as '3' for NSPS Kb and removed '3' for Subpart A. The email dated October 8, 2009, supplemental to the remarks from Company's Technical Review, corrected the reconstruction date in the permit application. This tank was reconstructed in 2003. But the email dated October 16, 2009, also stated that the tank has maximum true vapor pressure <3.5 KPa; therefore, per 60.110b(b), NSPS Kb does not apply.
X. Applicable Regulations.	WCPLX/TK0806 should be coded a '1' for NSPS Kb and Subpart A.	Coded as '3' for NSPS Kb and removed '3' for Subpart A. The email dated October 8, 2009, supplemental to the remarks from Company's Technical Review, corrected the reconstruction date in the permit application. This tank was reconstructed in 1991. But the email dated October 16, 2009, also stated that the tank has maximum true vapor pressure <3.5 KPa; therefore, per 60.110b(b), NSPS Kb does not apply.
X. Applicable Regulations.	Typo: NSPS QQ should be shown as NSPS QQQ in the matrix table.	Corrected.
IX. Explanation for Exempt Status.	SPEC/LOADING. BRRF included a reference in the application to Subpart Y which should be deleted since no marine loading is associated with this permit.	Deleted as requested.
Inventories, SIC code	SIC code 4491, Marine Cargo Handling, should be deleted. All marine handling is covered in the BRRF Dock permit #2047.	Deleted as requested.
IX. Explanation for Exempt Status. SPEC/LOADING	OLD has been finalized since submittal of the application. No facilities in this permit are subject.	Deleted as requested.
X. Applicable Regulations.	GRP045 shows non-applicability for NSPS Ka. The modification dates for Ka should be changed to May 18, 1978, thru July 23, 1984 in the Notes column.	Corrected.
Specific Requirements GRP0097 GRP0098 SCN0003	TEMPO requirements 129, 145 and 162 refer to recordkeeping for Alternative Operating Scenarios under LAC 33:III:507.G.5. The regulation does not require recording the permit number. BRRF requests the requirement be changed.	Unchanged. This is the standard language from Tempo that specifies how to meet the requirement of LAC:III.507.G.5.
Specific Requirements UNF0001	TEMPO item 214 should be modified to delete all compounds except ethylene and propylene, as the other compounds are not HRVOCs.	Removed Toluene and Xylenes (all isomers) only. See the list of HRVOCs as specified in LAC 33:III.504.M.1.b.
Specific Requirements GRP0098	TEMPO requirements 130, 131 and 132 are not applicable. The vapors are returned to the process in normal operations.	Removed TEMPO requirements 131 and 132. The compliance with 40 CFR 63, Subpart CC should comply with the requirements of 40 CFR 63.119 through 63.121 as specified in 63.646(a) but 63.646(h) also states that 63.151 does not apply. Instead 63.654(f) should apply for the Notification of Compliance Status as specified in 63.646(j).
Specific Requirements GRP0098	TEMPO requirements 133, 134, 135 and 136 are for LDAR components and are not applicable to these tank sources.	Unchanged. As indicated in the Table 2 of the application, there are LDAR components subject to 63.148.

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