Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**The Folger Coffee Company**	**AI #:**	**1140**	**TEMPO Activity No:**	**PER20050006**
Facility Name:	**Gentilly Plant**	**Remarks Submitted by:**	**Vickie Mayeaux**		
Permit Writer:	**Tommy Menuet**	**Permit Writer Email address:**	**Tommy.menuet@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 Permit 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 the 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, Section II. Origin	Dates listed for additional information are incorrect. Correct dates should include: January 10, 2006, March 20, 2006, May 26, 2006, August 25, 2006, February 2, 2007, March 1, 2007, and April 20, 2007. [Folgers can provide duplicate copies of this info if needed]	**Dates for additional information was updated to include January 10, 2006, March 20, 2006, May 26, 2006, February 2, 2007 and April 20, 2007.**
Air Permit Briefing Sheet, Section III. Description	First paragraph - Should read "roasted, ground, and packaged in vacuum sealed bags and cannisters".	**Paragraph was changed to read "roasted, ground, and packaged in vacuum sealed bags and canisters."**
Air Permit Briefing Sheet, Section III. Description	R&G Process - Strike reference to "cans" in first paragraph	**The reference to "cans" in the first paragraph was removed.**
Air Permit Briefing Sheet, Section III. Description	R&G Process - Reference to "chaff arrestors" should be updated to read "scrubbers"	**"Chaff arrestors" was updated to "scrubbers" in the R&G Process description.**
Air Permit Briefing Sheet, Section III. Description	Instant Process - Strike "used as boiler fuel or". Chaff/grounds are no longer burned as fuel for the boiler.	**"Used as boiler fuel or" was removed from the Instant Process description.**
Air Permit Briefing Sheet, Section III. Description	List of changes requested in this renewal permit - Emissions sources associated with Hurricane Preparedness Project did include both a Preprocessed Coffee Bean Truck loading <u>and</u> a transfer filter receiver when originally authorized in the General Title V permit. However, in this renewal permit, the Truck loading source (EIQ No. 2-06) is being deleted. The transfer filter receiver remains. The list of changes should be revised accordingly.	**The list of changes was updated to remove the truck loading source (EIQ No. 2-06).**
Air Permit Briefing Sheet, Section III. Description	Estimated emissions in tons per year - "Before" emissions for PM_{10} in Permit V3 should be 207.46 TPY (not 207.40 TPY)	**"Before" emissions for PM_{10} in current draft permit was changed to 207.40 TPY.**
Air Permit Briefing Sheet, Section IX. Insignificant Activities	A new activity authorized previously via Case-by-Case Insignificant Activity should be added to this list: 2.75 MM Btu/hr low NOx natural gas burner. LDEQ Activity No. PER20070001 approved 2/7/07.	**The 2.75 MM Btu/hr low NO_x natural gas burner was added to the insignificant list.**
Table 1. Applicable Requirements, first row of data	ID Nos. 4-01, 5-01, 6-01, and 7-01 should be deleted here. These sources no longer exist and are being deleted in this renewal permit.	**ID Nos. 4-01, 5-01, 6-01 and 7-01 was deleted from the tables.**

Table 1. Applicable Requirements, first row of data	ID No. 11 should be subject to both Chapters 11 and 13 (not just 13 as is listed in the draft permit)	**ID No. 11 requirements were revised to reflect Chapter 11 as applicable.**
Table 1. Applicable Requirements, sixth row of data	ID No. 2-06 should be deleted here, along with source description in second column - strike "and Loading". Also, Chapter 11 should be applicable for this source.	**ID No. 2-06 was deleted from the tables and "and loading" was removed from the corresponding column.**
Table 1. Applicable Requirements, seventh row of data	ID Nos. 3-06 and 4-06 should be subject to Chapter 13 in addition to Chapters 11 and 15	**ID Nos. 3-06 and 4-06 requirements were revised to reflect Chapter 13 as applicable.**
Table 1. Applicable Requirements, page 10	ID Nos. 16-90 and 2-06 should be deleted here. These sources no longer exist and are being deleted in this renewal permit. Also, ID No. 1-01 should be deleted from first row since it is listed in the next row by itself.	**ID Nos. 16-90 and 2-06 were deleted from the applicable requirement table.**
Table 1. Applicable Requirements, page 11	ID Nos. 4-01, 5-01, 6-01, and 7-01 should be deleted here. These sources no longer exist and are being deleted in this renewal permit.	**ID Nos. 4-01, 5-01, 6-01 and 7-01 were deleted from the applicable requirements table.**
Table 1. Applicable Requirements, page 11	ID Nos. 7, 8, and 5-74 should be deleted here since they are listed in the last row of Table 1 (page 12)	**ID Nos. 7, 8 and 5-74 were deleted from the applicable requirements table.**
Table 1. Applicable Requirements, Page 11	ID No. 2-06 should be deleted here, along with source description in second column - strike "and Loading"	**ID No. 2-06 was deleted from the tables and "and loading" was removed from the corresponding column.**
Table 2. Explanation of Exemption or Non-Applicability, Page 13	NSPS Subpart Kb, Notes: maximum true vapor pressure for non-applicability should be 2.18 psia (not 2.716 psia)	**Maximum true vapor pressure for Kb tank was changed to 2.18 psia.**
Table 2. Explanation of Exemption or Non-Applicability, Page 13	Row directly below NSPS Subpart Kb - reg citation that should be listed here is believed to be LAC 33: III.Chapter 21 for Storage of Volatile Organic Compounds (not "0"). See existing General Title V Permit.	**Storage of Volatile Organic Compounds [LAC 33:III.2103.A] citation was added for ID Nos. 5-06, 6-06, 7-06 and 8-06**
Table 2. Explanation of Exemption or Non-Applicability, Page 14	ID Nos. 6, 7, 8, 11, 5-74, 4-00, 5-00, 56-00 thru 61-00, 1-76, and 3-04 should be added to this list along with ID Nos. 3-06 and 4-06 for Sulfur Dioxide Standards	**ID Nos. 6, 7, 8, 11, 5-74, 4-00, 5-00, 56-00 thru 61-00, 1-76, 3-04, 3-06 and 4-06 were listed in the table.**

Inventories, Page 1 of 15	EQT 010: Correct Max. and Normal Operating Rate should be 5,000 cfm	**The Maximum and Normal Operating Rate were changed to 5000 cfm.**
	EQT025: Source description should be "Line 6 and 7 Filler Filter Vent"	**The source description for EQT 025 was changed to "Line 6 and 7 Filler Filter Vent."**
	EQT029: Correct Max. and Normal Operating Rate should be 3,300 cfm	**The Maximum and Normal Operating Rate were changed to 3300 cfm.**
Inventories, Page 2 of 15	EQT062, EQT073, and EQT078: Correct Max. Operating Rate should be 22,000 cfm and correct Normal Operating Rate should be 20,000 cfm	**The Maximum and Normal Operating Rate were changed to 22,000 cfm and 20,000 cfm, respectively, for EQT 062, EQT 073 and EQT 078.**
	EQT064: Correct Normal Operating Rate should be 2,000 lb/hr	**The Normal Operating Rate was changed to 2,000 lb/hr.**
	EQT066: Correct Max. and Normal Operating Rate should be 18 MMBtu/hr	**The Maximum and Normal Operating Rate were changed to 18 MMBtu/hr.**
	EQT077: Correct Max. and Normal Operating Rate should be 40,000 lbGC/hr	**The Maximum and Normal Operating Rate were changed to 40,000 lb/hr.**
	EQT082: Correct Max. Operating Rate should be 1,500 acfm and correct Normal Operating Rate should be 900 lbGC/hr	**The Maximum Operating Rate was changed to 1,500 acfm and the Normal Operating Rate was changed to 900 lb/hr**
Inventories, Page 3 of 15	EQT130: Source description should be "Line 1 and 2/3 Filler Filter Vent"	**Source description was changed to "Line 1 and 2/3 Filler Filter Vent."**
	EQT152 and EQT153: Request Max. and Normal Operating Rates be listed as either 2.0 MW or 2,682 hp (instead of in units MMBtu/hr)	**Maximum and Normal Operating Rates for EQT 152 and EQT 153 were changed to 2.0 MW.**
	EQT154, EQT155, EQT156, EQT157: Source descriptions should be numbered sequentially (ie. Vessel No. 1, 2, 3, and 4). Also, Max. Operating Rate for each source should be 20,000 gallons/hr (not 40,000 gallons/yr) since maximum emissions are defined in the sources' emissions calculations on a hourly basis, not an annual basis.	**Tempo does not list sources by its EIQ No. but rather by its EQT No. Reordering of Vessel No. 1, 2, 3 and 4 has been declined.** **The Maximum Operating Rate for each source was changed to 20,000 gallons/hr.**
	EQT158: Operating Time should be 500 hrs/yr	**Operating Time was changed to 500hr/yr**
Inventories, Subject Item Groups	GP GRP: Group should **not** include EQT13, 65, 81, 117, 125, 132, 126, 124, 82, 76, or 53	**EQT 013, 065, 081, 117, 125, 132, 126, 124, 082, 076 and 053 were removed from GP GRP.**
	MS GRP: Group should **not** include EQT82	**EQT 082 was removed from MS GRP.**
	PQ CAP: Cap should **not** include EQT82	**EQT 082 was removed from PQ CAP.**
	GRP021: Source descriptions for EQT154, EQT155, EQT156, EQT157 should be numbered sequentially (ie. Vessel No. 1, 2, 3, and 4)	**Tempo does not list sources by is EIQ No. but rather by its EQT No. Reordering of Vessel No. 1, 2, 3 and 4 cannot be performed.**

LDEQ-EDMS Document 36000682, Page 4 of 754

Inventories, Stack Information	EQT006: Correct velocity = 24.17 ft/sec, diameter = 1.0 ft (not 4.2 sq ft), height = 29.5 ft	**The given values for velocity, diameter and height were updated in tempo.**
	EQT010: Correct velocity = 41.67 ft/sec, flow rate = 5,000 cfm	**The given values for velocity and flow rate were updated in tempo.**
	EQT029: Correct velocity = 51.45 ft/sec, flow rate = 3,300 cfm, diameter = 1.2 ft, height = 35 ft	**The given values for velocity, flow rate and diameter were updated in tempo.**
	EQT073 and 078: Correct velocity = 47.81 ft/sec, flow rate = 22,000 cfm, diameter = 3.13 ft, height = 61.5 ft	**The given values for velocity, flow rate, diameter and height were updated in tempo.**
	EQT082: Velocity = 23.29 ft/sec, flow rate = 1,500 cfm, diameter = 1.17 ft, height = 30 ft	**The given values for velocity, flow rate, diameter and height were updated in tempo.**
	EQT154, EQT155, EQT156, EQT157: Source descriptions should be numbered sequentially (ie. Vessel No. 1, 2, 3, and 4).	**Tempo does not list sources by is EIQ No. but rather by its EQT No. Reordering of Vessel No. 1, 2, 3 and 4 cannot be performed**
Emissions Rates	EQT 158: Correct PM10 = 0.04 TPY (not 0.05 TPY)	**The PM_{10} emission value for EQT 158 was updated.**
	GRP 008: Correct PM10 = 109.35 max lb/hr and 144.20 TPY (currently these numbers are inverted in the 2 columns for max lb/hr and TPY)	**The PM_{10} emission values for GRP 008 were updated.**
	GRP 008: Correct Acetaldehyde = 0.36 max lb/hr, Acrolein = 0.54 max lb/hr, Phenol = 0.25 max lb/hr. Also, need to add Total Reduced Sulfur emissions.	**Maximum lb/hr has been updated for Acetaldehyde, Acrolein and Phenol. Total Reduced Sulfur was added.**
Specific Requirements	Req No. 18: Recommend removing this requirement. We believe this requirement is listed in error, as it is listed only for EQT005 and this source is na existing source for which no "start-up" testing would apply.	**Requirement No. 18 was removed from the specific requirements..**
	Req No. 21: Request that language be modified to read "...Should visible emissions be detected, a full method 9 observation shall be conducted within 1 hour, weather permitting."	**Language for Requirement No. 21 was changed to read "... Should visible emissions be detected, a full method 9 observation shall be conducted within 1 hour, weather permitting."**
	Req Nos. 50, 51, and 52: Delete these requirements. Permitted emissions for this source (boiler) are now based only on natural gas fuel. Chaff/grounds are no longer burned in the boiler as fuel, per prior LDEQ Compliance Order.	**Requirement Nos. 50, 51 and 52 were removed from the specific requirements.**
	Req Nos. 323, 324, 325, 326, 382, 383, 384, 385, 407, 408, 409, 410: "Chaff arrestor" should be updated to read "Scrubber"	**"Chaff arrestor" was updated to read "Scrubber" for Requirement Nos. 323, 324, 325, 326, 382, 383, 384, 385, 407, 408, 409 and 410.**

LDEQ-EDMS Document 36000682, Page 5 of 754

	Req Nos. 812 and 813: Visible emissions monitoring and recordkeeping frequency should be weekly (not daily)	**Monitoring and recordkeeping frequency for requirement Nos. 812 and 813 was changed to weekly**
	Req No. 850: Should be deleted since non-TAP VOCs no longer must be listed, per LDEQ policy.	**Non-TAP VOCs are listed when there are other TAPs listed in permit.**
	Req Nos. 817, 818, 829, 830, 831, and 858: Request that these requirements be removed since the sources permitted under the CAPs/GRPs already have Specific Requirements limiting the allowable PM emissions based on the Process Weight Rate table/formulas in LAC 33:III.1311. In addition, the RSTR CAP has yet another Specific Requirement limiting hourly production throughput.	**Requirement Nos. 817, 818, 829, 830, 831 and 858 were removed from the specific requirements.**
Statement of Basis, Section II. Facility and Current Permit Status	First paragraph - Should read "roasted, ground, and packaged in vacuum sealed bags and cannisters".	**Paragraph was changed to read "roasted, ground, and packaged in vacuum sealed bags and canisters."**
	R&G Process - Strike reference to "cans" in first paragraph	**The reference to "cans" in the R&G Process was removed.**
	R&G Process - Reference to "chaff arrestors" should be updated to read "scrubbers"	**"Chaff arrestors" was updated to "scrubbers" in the R&G Process description.**
	Instant Process - Strike "used as boiler fuel or"	**"Used as boiler fuel or" was removed from the Instant Process description.**
Statement of Basis, Section III. Proposed Project	Page #s for the Statement of Basis need to be corrected	**Page numbers for the Statement of Basis was corrected.**
	Application - Dates for additional information should include: January 10, 2006, March 20, 2006, May 26, 2006, August 25, 2006, February 2, 2007, March 1, 2007, and April 20, 2007. [Folgers can provide duplicate copies of this info if needed]	**Dates for additional information was updated to include January 10, 2006, March 20, 2006, May 26, 2006, February 2, 2007 and April 20, 2007.**
	Project - List of changes requested in this renewal permit - In this renewal permit, the Truck loading source (EIQ No. 2-06) is being deleted. Therefore, should read "Reconciliation of seven new emission sources…", "Truck loading and..." should be deleted, and the spelling of "Preprocessed" should be corrected.	**Project list was updated to read "Reconciliation of seven new emission sources…" along with removal of "Truck loading and…." The correct spelling of Preprocessed was added to this section.**
Statement of Basis, Section IV. Regulatory Analysis	NSPS Subpart Kb, Notes: maximum true vapor pressure for non-applicability should be 2.18 psia (not 2.716)	**Vapor pressure was changed to 2.18 psia.**

LDEQ-EDMS Document 36000682, Page 6 of 754