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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Hexion Specialty Chemicals, Inc**	**AI #:**	**92534**	**TEMPO Activity No:**	**PER20090003**
Facility Name:	**Formaldehyde Plants I, II, & III**	**Remarks Submitted by:**	**September 25, 2009** → 11/12/2009 by company		
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)
General (Throughout Draft Permit)		
Sources	The following are not point sources at the Hexion Formaldehyde Plant and should not be included in emission estimates: • EQT0080 – SAMPLING should be listed as a General Condition XVII Activity. • EQT0081 – INSPECTIONS should be listed as a General Condition XVII Activity. • EQT0082 – SUMPS should be listed as a General Condition XVII Activity. This activity involves cleaning the sumps (EQT0033). • EQT0083 – WASHDOWN should be listed as a General Condition XVII Activity. • EQT0084 – ABSORBER is part of the process and is only vented to the atmosphere during shutdowns for WASHDOWN. It is otherwise routed to the process.	Not revised because emissions exceed MER
Estimated Emissions	• CO After – 139.20 tpy should be 139.22 tpy • Total VOC After – 114.61 tpy should be 114.10 tpy • Sulfuric Acid After - < 0.01 tpy should be 0.01 tpy • Formaldehyde After – 8.70 tpy should be 8.06 tpy • Methanol After – 36.43 tpy should be 37.40 tpy	Additional information will be submitted, emissions will change
Air Permit Briefing Sheet		
Section VII – Dispersion Modeling	Time Period should be 1997-2001	Revised
Section VIII – General Condition XVII Activities	The following activities should be added: • Safety Inspections – tank pressure, vacuum vents and gauges (Formaldehyde – 0.18, Methanol – 0.01) • Sampling (Formaldehyde – 0.15, Methanol – 0.03) • Removal of solids from sumps (Formaldehyde – 0.18, Methanol – 0.01) • Absorber column washdown (Formaldehyde – 0.18, Methanol – 0.01)	No added because of keeping emission points

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Inventories		
Tank Volume	The following tank volumes should be corrected: • EQT004 – should be 2,900 gallons • EQT005 – should be 144,791 gallons • EQT006 – should be 144,791 gallons • EQT009 – should be 49,233 gallons • EQT010 – should be 14,300 gallons • EQT012 – should be 14,200 gallons • EQT013 – should be 11,800 gallons • EQT014 – should be 11,800 gallons • EQT015 – should be 23,500 gallons • EQT018 – should be 23,500 gallons • EQT019 – should be 145,000 gallons • EQT021 – should be 166,700 gallons • EQT022 – should be 166,700 gallons • EQT023 – should be 18,000 gallons • EQT024 – should be 18,000 gallons • EQT028 – should be 9,989 gallons	Not included in the application but revised
Tank Description	• EQT021 – should be 85-05 Formaldehyde Storage Tank 9212 (Formaldehyde II Plant)	Revised
	• EQT022 – should be 85-06 Formaldehyde Storage Tank 9213 (Formaldehyde II Plant)	Revised
Stack Information	EQT046 – All stack information should be blank	Revised
Relationships	75-5A controlled by EPN 2001-1 (EQT048)	Revised

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates		
Criteria Pollutants	• EQT008 – VOC Maximum lb/hr should be 2.112	Use 2 decimal points, no change
	• EQT029 – PM10 average and maximum lb/hr should be 1.721, VOC average and maximum lb/hr should be 0.361	Use 2 decimal points, no change
	• EQT030 – PM10 average and maximum lb/hr should be 1.701	Use 2 decimal points, no change
	• EQT031 – PM10 average and maximum lb/hr should be 1.701	Use 2 decimal points, no change
	• EQT035 – VOC average lb/hr should be 3.100	No new EIQ, current permit 2019-V3 is correct, no change
	• EQT046 – VOC emissions should be 0.071 average lb/hr and 0.31 annual tpy (The submitted EIQ is incorrect.)	Revised
	• EQT047 – VOC average lb/hr should be 0.071	Use 2 decimal points, no change
	• EQT048 – VOC average lb/hr should be 0.191	Use 2 decimal points, no change
	• EQT049 – CO maximum lb/hr should be 7.042, SO2 maximum lb/hr should be 0.022	Use 2 decimal points, no change
	• EQT079 – CO average lb/hr should be 4.941, NOx average lb/hr should be 5.882, SO2 maximum lb/hr should be 0.042	Use 2 decimal points, no change
TAP/HAP & Other Pollutants	• EQT007 – Methanol average lb/hr should be 0.111	Use 2 decimal points, no change
	• EQT008 – Methanol maximum lb/hr should be 2.112	Use 2 decimal points, no change
	• EQT011 – Methanol average lb/hr should be 0.113	Use 2 decimal points, no change
	• EQT029 – Methanol average and maximum lb/hr should be 0.343	Use 2 decimal points, no change
	• EQT035 – Methanol average lb/hr should be 3.100, maximum lb/hr should be N/A. This is a capped source.	No change, keep emission from current permit, where is it capped from?
	• EQT044 – Methanol average lb/hr should be 0.113	Use 2 decimal points, no change
	• EQT048 – Formaldehyde average lb/hr should be 0.132	Use 2 decimal points, no change
	• EQT079 – Methanol average lb/hr should be 0.104	Use 2 decimal points, no change
	• FUG001 – Methanol annual tpy should be 1.31	Revised
	• FUG002 – Methanol average and maximum lb/hr should be 0.042	Use 2 decimal points, no change

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Specific Requirements		
Number 15	The facility is not an unmanned plant site.	Removed
Number 16 & 17	There are no unsafe-to-monitor pumps.	Removed
Number 18 thru 25	There are no compressors in organic HAP service.	Removed
Number 35	Add this statement; "As a voluntary emission reduction beginning April 2006, Hexion has elected to monitor valves in gas/vapor/light liquid service once every quarter."	Revised
Number 46	Add this statement; "As a voluntary emission reduction, Hexion performs Method 21 monitoring annually on the CVS."	Revised
Number 93	Formaldehyde Storage Tank Scrubber is EQT048	Revised
Number 94	These tanks are not HON vessels. No MACT is required.	MACT is required because Formaldehyde of entire facility > MER
Number 101	These tanks are equipped with a submerged fill pipe.	Revised
Number 104	Methanol is a Class III TAP. No MACT is required.	MACT is required because Formaldehyde emission of entire facility > MER
Number 107	Methanol is a Class III TAP. No MACT is required.	MACT is required because Formaldehyde of entire facility > MER
Number 120 & 121	There are no by-passes for this source.	Removed
Number 125 thru 131	This tank does not store W/W as it is part of the (recycle) process.	Revised
Number 132	Methanol is a Class III TAP. No MACT is required.	MACT is required because Formaldehyde of entire facility > MER
Number 133 thru 139	This tank does not store W/W as it is part of the (recycle) process.	Revised
Number 140	Methanol is a Class III TAP. No MACT is required.	MACT is required because Formaldehyde of entire facility > MER
Number 142 & 143	There are no by-passes for this source.	Removed
Number 147 thru 153	This tank does not store W/W as it is part of the (recycle) process.	Revised
Number 180 thru 183	System is not equipped with by-pass lines.	Removed
Number 184 thru 189	Remove any specific requirements not for hard piping (eg, ductwork) – System consists of only hard piping.	Removed # 187-189
Number 192 & 193	There are no by-passes for this source.	Removed
Number 194	40 CFR 63.148(i)(3) is for closed vent sytems (CVS) equipped with by-pass lines. The CVS does not have by-pass lines.	Removed
Number 195	40 CFR 63.148(j)(2) is for closed vent sytems (CVS) equipped with by-pass lines. The CVS does not have by-pass lines.	Removed
Number 196	The tanks are equipped with a submerged fill pipe.	Revised

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Specific Requirements (continued)		
Number 200	Should read "... using the procedures in 40 CFR 63.563(b)(1) through (b)(10), as applicable."	Revised
Number 203	The report due March 31st is a repetitive requirement as the site will submit the same information with in the Title V Annual Compliance Certification.	Removed
Number 235	Not Applicable – there are no monitoring requirements for boilers [40 CFR 63.113(b); also exempt from testing under 63.116]	Removed
Number 236 thru 240	System is not equipped with by-pass lines.	Removed
Number 241	Remove – this specific requirement is for the affected source, not the control device.	Removed
Number 243 & 244	System is not equipped with by-pass lines.	Removed
Number 245	40 CFR 63.148(i)(3) is for closed vent sytems (CVS) equipped with by-pass lines. The CVS does not have by-pass lines.	Removed
Number 246	40 CFR 63.148(j)(2) is for closed vent sytems (CVS) equipped with by-pass lines. The CVS does not have by-pass lines.	Removed
Number 257 thru 261	Remove any specific requirements not for hard piping (eg, ductwork) – System consists of only hard piping.	Removed
Number 262	Remove – this specific requirement is for the affected source, not the control device.	Removed
Number 264 & 265	System is not equipped with by-pass lines.	Removed
Number 266	40 CFR 63.148(i)(3) is for closed vent sytems (CVS) equipped with by-pass lines. The CVS does not have by-pass lines.	Removed
Number 267	40 CFR 63.148(j)(2) is for closed vent sytems (CVS) equipped with by-pass lines. The CVS does not have by-pass lines.	Removed
Number 271 thru 274	The ABSORBER is not a point source and therefore has no applicable requirements.	No change because it is a point source due to emission of formaldehyde > MER
Number 313	REMOVE – this has already been done	Removed

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