Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Joe N. Miles & Sons, Inc.**	**AI #:**	**17316**	**TEMPO Activity No:**	
Facility Name:	**Miles Bogalusa Mill**	**Remarks Submitted by:**	**Guy Parent, Enviro One**		
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)
Section III Air Permit Briefing Sheet "VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs)" section	**TAPs are listed under this section that are not VOCs and should be listed under the "Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs)" section. The compounds are: 1,1,1-Trichloroethane, Chlorine, Copper (and compounds), Dichloromethane, Hydrochloric acid, Phosphorus, and Tetrachloroethylene.**	**Change made.**
	The "After" Xylene (mixed isomers) emissions should be 0.121.	**Change made.**
	Based on the above changes, the total "Before" emissions should be 12.632. The total "After" emissions should be 15.101. The total "Change" should be +2.469.	**Change made.**
Section III Air Permit Briefing Sheet "Other VOC (TPY)" section	**The total should be 268.55.**	**Change made.**
Section III Air Permit Briefing Sheet	**The "Before" Arsenic emissions should be <0.001.**	**Change made.**
	The "Before" Cadmium emissions should be <0.001.	**Change made.**

"Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs)" section	The "Before" Chromium VI emissions should be 0.003.	Chromium VI is currently permitted at 0.002 TPY in Permit No.: 3060-00022-V2.
	The "Before" Manganese emissions should be 0.206.	Change made.
	Based on the above changes and the additional non-VOCs as discussed in the first item above, the total "Before" emissions should be 0.345. The total "After" emissions should be 3.832. The total "Change" emissions should be 3.487.	Chromium VI is currently permitted at 0.002 TPY in Permit No.: 3060-00022-V2. Therefore, "Before" emissions are 0.344 TPY and "Change" emissions are + 3.488.
General Information Location of Front Gate	No data was initially listed. The latitude and longitude coordinates (WGS84 Datum) of the front gate is: 30° 50' 7" 59 hundredths N 89° 50' 56" 42 hundredths W	LDEQ's Air Permit Report Program for Air Permits is experiencing problems with printing latitude and longitude coordinates on the General Information Sheet. Programming is currently working on the problem and will have this function working in the near future. These coordinates have been entered in the tempo database and will be available when the report program is functioning nominally.
Inventories Stack Information	The following sources need to be added to the table: EQT 0011 T4-1000 Gallon Gasoline AGST EQT 0006 C7-Silo Cyclone (Grinder)	Change made.
Emission Rates for Criteria Pollutants	For EQT 0003, the CO average hourly emission rate is blank. The emission rate should be 4.21.	Change made.
	For EQT 0004, the CO maximum hourly emission rate is blank. The emission rate should be 9.83.	Change made.
Emission Rates for TAP/HAP & Other Pollutants	For EQT 0001, Methyl Ethyl Ketone needs to be added to the table with the following emission rates: Average lb/hr = < 0.001, Maximum lb/hr = < 0.001, and Annual tpy = < 0.001.	Change made.
	For EQT 0001, annual tpy emission rate for Trichloroethylene should be 0.001.	Change made.
	For EQT 0002, Methyl Ethyl Ketone needs to be added to the table with the following emission rates: Average lb/hr = < 0.001, Maximum lb/hr = < 0.001, and Annual tpy = < 0.001.	Change made.
	For EQT 0002, annual tpy emission rate for Trichloroethylene should be 0.001.	Change made.
	For EQT 0003, Methyl Ethyl Ketone needs to be added to the table with the following emission rates: Average lb/hr = < 0.001, Maximum lb/hr = < 0.001, and Annual tpy = < 0.001.	Change made.
	For EQT 0004, Methyl Ethyl Ketone needs to be added to the table with the following emission rates: Average lb/hr = < 0.001, Maximum lb/hr = < 0.001, and Annual tpy = < 0.001.	Change made.
	For EQT 0004, for 1,2-Dichloropropane, the average lb/hr and annual tpy emission rates should be <0.001 and 0.002, respectively.	Change made.
	For EQT 0004, annual tpy emission rate for Acetaldehyde should be 0.941.	Change made.
	For UNF 0001, 1,2-Dibromoethane should be replaced with the name 1,2-Dichloroethane.	Change made.
	For UNF 0001, 2,4-Dichlorophenol should be replaced with the name 2,4-Dinitrophenol.	Change made.
	For UNF 0001, annual tpy emission rate for Xylene should be	Change made.

	For UNF 0001, the following TAPs and their respective annual emission rates need to be added: Cobalt (and compounds) <0.001 tpy Lead (and compounds) 0.008 tpy Manganese (and compounds) 0.272 tpy Mercury (and compounds) < 0.001 tpy Nickel (and compounds) 0.006 tpy Selenium (and compounds) < 0.001 tpy Zinc (and compounds) 0.071 tpy	Change made.
Specific Requirements 3 through 6, 12 through 15, 21 through 24, 30 through 33	Due to the configuration of the kilns, emissions can originate from not only the stack vents on top of the kilns, but also from openings on the floor of the kilns and openings along the walls of the kilns. Therefore, the facility believes that the emissions from each of the kilns can be classified as fugitive emissions. As stated in LAC 33:III.2115.M, fugitive emissions are excluded from the definition of "waste gas stream". The facility requests removal of these requirements from the air permit.	LDEQ confirms Joe N. Miles and Son's, Inc. request and removed stated requirements.
Specific Requirements 7 through 9, 16 through 18, 25 through 27, 34 through 36	The facility requests removal of these requirements from the air permit due to no change in the operational procedures nor any change in material and fuel throughput associated with the kilns. The facility would like to set up a meeting with the appropriate LDEQ personnel to discuss this issue.	LDEQ confirms Joe N. Miles and Son's, Inc. request and removed stated requirements.
Specific Requirements 57 and 60	EQT 0010 and EQT 0011 are each 1,000 gallon gasoline tanks subject to LAC 33:III.2103.A. This regulation requires that the container be designed and equipped with a submerged fill pipe or a vapor loss control system, not both. Since each of these tanks is equipped with a submerged fill pipe, the facility requests removal of these requirements from the permit.	Change made.
Specific Requirements 58 and 62	The facility requests removal of these requirements from the permit since neither of these tanks are pressure tanks.	Change made.