LDEQ-EDMS Document 43496285, Page 21 of 200

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Justiss Oil Company, Inc	**AI #:**	**160243**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	Olla IPNH Gas Treatment Facility	**Remarks Submitted by:**	**Amber B. Leonards, Environmental Engineer, COMM Engineering, Inc.**		
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)
All pages of permit containing facility name and company	Correct name of the facility should read: "Olla IPNH Gas Treatment Facility" and "Munoco Company" should be taken off of the company name.	**Corrected**
Page 3 of "Air Permit Briefing Sheet" Section	Emission totals for VOC, Benzene and Total VOC TAPS should be changed to the values indicated in the "mark-up"attachement.	**Corrected**
Page 2 of the "Inventories" Section	The information from the EIQ sheets for EPNs: AV-02 and GV-01 should be included in top table; The "relationships" table should be taken out all together – the condenser does not vent to the reboiler.	**Corrected**
Page 3 of the "Inventories" Section	Fee Number should be 0040 for less than 100 T/Yr source.	**Corrected**
Page 2 of "Emission Rates for Criteria Pollutants"Section	Total TPY for EPN: T-01 should be 0.19.	**Corrected**
Page 1 of "Emission Rates for TAP/HAP" Section	Total Ethylbenzene for EPN: CE-01 should be 0.001.	**Corrected**
Page 2 of "Emission Rates for TAP/HAP" Section	Total Benzene and N-Hexane for both EPN: DP-03 & EPN: DP-04 should be 0.00 and 0.001, respectively.	**Corrected**

Page 3 of "Emission Rates for TAP/HAP" Section	Toxic total for EPN: T-01 for N-Hexane should be 0.004.	
Specific Requirements 58 & 59	These requirements should not be applicable to this facility since the sweetening unit is only used to remove CO2 and not H2S.	**Requirements are applicable to this facility and were not removed.**
Specific Requirements 60 thru 77	These requirements should be removed from the permit since 40 CFR Part 60 Subpart JJJJ is not applicable to any of the engines located at this facility as confirmed by the rental company that Justiss rents these engines from.	**Requirements removed.**
Specific Requirements 14 thru 20	These requirements can be removed from the permit since the pumps at this facility are not equipped with dual mechanical seal systems as confirmed by Justiss.	**Requirements removed.**
Specific Requirements 21 and 40	These requirements can be removed from the permit as there are no pumps or valves that would be considered to have "no detectible emissions" at the facility.	**Requirements removed.**
Specific Requirements 22, 23, 41 and 42	These requirement can be removed from the permit as there are no pumps or valves that would be considered "unsafe to monitor" at the facility as confirmed by Justiss.	**Requirements removed.**
Specific Requirement 24	This requirement can be removed from the permit as this site is not considered an "unmanned plant site" as confirmed by Justiss.	**Requirements removed.**
Specific Requirement 36	This requirement can be removed from the permit as there are no pressure relief devices at this site equipped with "rupture disks" upstream of the pressure relief device as confirmed by Justiss.	**Requirements removed.**
Specific Requirements 25 thru 32	These requirements can be removed from the permit since the compressors downstream of the JT unit at the facility will be exempt from the requirements of 40 CFR Part 60 Subpart KKK as these compressors are not considered to be in VOC service as confirmed by Justiss.	**Requirements were removed based upon the gas analysis received from Justiss indicating that the equipments was not in VOC service.**

LDEQ-EDMS Document 43496285, Page 22 of 200