Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Kinder Morgan Liquids Terminal St. Gabriel LLC**	**AI #:39978**		**TEMPO Activity No:**	**PER20030006**
Facility Name:	**Kinder Morgan Liquids Terminal St. Gabriel LLC**	**Remarks Submitted by:**	**Bliss M. Higgins, ENVIRON on behalf of Kinder Morgan Liquids Terminal St. Gabriel LLC**		
Permit Writer:	**Traci Green**	**Permit Writer Email address:**	**Traci.green@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)
Emission Rates for Criteria Pollutants	Please remove EQT 0016, 1-98, North Truck Loading Rack, from this table. This source does not emit – it is routed to the enclosed flare or thermal oxidizer	**Max lb/hr for EQT 0016 removed from the permit.**
Emission Rates for Criteria Pollutants	Please remove FUG 0001 from this table. Fugitive emissions are included under the CAP. Max lb/hr rate is not applicable. Average lb/hr rates provided in application emission calculation are higher than the max lb/hr rate presented in this table.	**Max lb/hr for FUG 001 removed from the permit.**
Emission Rates for TAP/HAP	Please remove EQT 0016, 1-98, North Truck Loading Rack, from this table. This source does not emit – it is routed to the enclosed flare or thermal oxidizer	**Max lb/hr for EQT 0016 removed from the permit.**
Emission Rates for TAP/HAP	Please remove FUG 0001 from this table. Fugitive emissions are included under the CAP. Max lb/hr rate is	**Max lb/hr for FUG 001 removed from the permit.**

	not applicable. Average lb/hr rates provided in application emission calculation are higher than the max lb/hr rate presented in this table.	
Specific Requirements	CRG0002, 1. Please revise first statement to read "Comply with the applicable NSPS Kb Recordkeeping requirements of..."	**Language changed to :** **- Comply with the applicable NSPS Kb Recordkeeping requirements of SCN0001 if the maximum true vapor pressure at any temperature is 0.5 psia or greater but less than 0.75 psia**
Specific Requirements	EQT0002, 2-88, SR 9. Please remove. This appears to be a repeat of SR 8.	**Duplicate SR removed.**
Specific Requirements	EQT0032, 49-88, SR 40. Please revise to read "Comply with the recordkeeping and reporting requirements of SCN012 and SCN017 if 343,423 gallons or more of benzene (or any commodity containing 70 percent or more by weight of benzene) are loaded ~~or transferred~~ annually." Note that the requirements apply if the facility annual benzene loading is ≥ 343423 gallons.	**Language changed to:** **- Comply with the recordkeeping and reporting requirements of SCN0012 and SCN0017 if 343,423 gallons or more of benzene (or any commodity containing 70 percent or more by weight benzene) are loaded or transferred annually.**
Specific Requirements	EQT0035, CCS1 SR 48. Please delete the words "the regulation's" as there is not an applicable regulation for the monitoring.	**Language changed to :** **VOC, Total monitored by specified method(s) daily. Monitor VOC breakthrough using portable VOC detector until the reliable life expectancy of the canister is established.**
Specific Requirements	EQT0035, CCS1 SR 48. Please delete the words "the regulation's" as there is not an applicable regulation for the monitoring.	**Duplicate comment from above.**
Specific Requirements	GRP0001 Facility VOC/HAP CAP. Please revise the SR's for this GRP to include VOC and HAP emissions from all facility wide sources and activities. Loading, fugitives, tank cleaning, flares and thermal oxidizers are not mentioned. VOC and HAP emissions from these sources and activities will also be calculated, tracked, and included under the CAP.	**Language changed to:** **This calculation shall include emissions from all facility wide sources and activities.**
Specific Requirements	SCN0012, BB Benzene Transferring. Please revise the Scenario title to read "BB Benzene Transfer Requirements Annual Loading >=343423 gals." Note that the requirements apply if the facility annual benzene loading is ≥ 343423 gallons.	**SCN0012 Heading changed to "BB Benzene Annual Loading >=343423 gals Requirements". TEMPO does not have the spacing required for the recommended Scenario Title.**
	SCN0001, Kb Recordkeeping. Please add EQT0019 to	**EQT 0019 added to SCN0001.**

LDEQ-EDMS Document 37059989, Page 47 of 170

	this scenario.	
Specific Requirements	SCN0001, Kb Recordkeeping. This Scenario appears on page 23 of 24, after SCN0018. Can it be moved up in order to precede SCN0002? The current placement can lead the reader to believe SCN0001 is not in the permit.	**SCN0001's location in the permit is determined by the TEMPO database. No change made.**
Air Permit Briefing Sheet	Page 2 – edit: "An authorization to construct and operate (ATC) an internal floating tank…." should read "…floating roof tank…."	**Change Made.**
Air Permit Briefing Sheet	Page 3 – DESCRIPTION – name change referenced on previous page is not consistent. Rather than Kinder Morgan Liquids Terminals LLC, name should be Kinder Morgan Liquids Terminals St. Gabriel, LLC.	**Name changed for consistency.**
Air Permit Briefing Sheet	Page 3 – DESCRIPTION Last line indicates that KMLT – St. Gabriel requests a "synthetic permit modification…". Please change to read, "permit modification to establish synthetic minor limits on potential to emit"...	**Language changed to:** KMLT - St. Gabriel requests a permit modification to establish synthetic minor limits on potential to emit:
Air Permit Briefing Sheet	Facility wide emission rates "Before" emissions are different from Section 6 of the permit application. Please verify.	**"Before" emissions are taken directly from the current permit (1280-00018-05). No change made.**
Air Permit Briefing Sheet	General Condition XVII Activities. Please change Line Cleaning schedule to 12 lines/year. Please change Vacuum Trucking schedule to 12 trucks/year. The number of activities per month may vary.	**Table updated.**
Inventories	Page 2, Stack information – EQT0010, 2-98 T.O. shows both diameter and discharge area as 5.4. Diameter reference should be deleted.	**Stack Information updated.**
Inventories	Page 2, Stack Information - EQT0035 and EQT0036, CCS1 and CCS2. Please remove velocity values.	**Stack Information updated.**
Inventories	Page 4, Group Membership – The table shows extra zeroes for the Group numbers. Can these be removed for consistency with the permit Specific Requirements?	**The Group numbers displayed in " Member of Groups" are determined by the TEMPO database. No change made.**

LDEQ-EDMS Document 37059989, Page 48 of 170