Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Monsanto Company**	**AI #:**	**1096**	**TEMPO Activity No:**	**PER20070010**
Facility Name:	**PCl3 Unit**	**Remarks Submitted by:**	**William C. Rhodes**		
Permit Writer:	**Scott J. Templet**	**Permit Writer Email address:**	**Scott.Templet@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)
Emission Rates for Criteria and TAP/HAP Pollutants	FUG 0005 (E.P. 9-94) has been established for fugitive emissions of VOC (Therminol) and Chlorine. The permit establishes average and maximum hourly emission limits, as well as annual emission limits. We believe that only annual emission limits are appropriate. A well-operated facility can reasonably be expected to control emissions of this nature on an annual basis; however, in an hour throughout the course of a year it is possible that multiple leaks could occur, or that a single, large event could occur. Either of these scenarios could result in an air permit exceedance, and given the magnitude of the emission limits, have no measurable impact on the environment.	Removed the maximum hourly emission limits from permit. However, the average hourly emission limits (which are a conversion from the annual emission limits) remained in the permit.