Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**North American Fabricators, LLC**	**AI #:**	**27507**	**TEMPO Activity No:**	**PER20090002**
Facility Name:	**North American Fabricators**	**Remarks Submitted by:**	**Guy Parent, Enviro One**		
Permit Writer:	**Sam Phillips**	**Permit Writer Email address:**	**Sanford.phillips@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)
Air Permit Briefing Sheet, Section III - Description	**Please remove the first bulleted item of the second paragraph which states "Increase the permitted operating rate of all facility emission sources."** **The annual plate throughput for the plasma cutter is being decreased as a result of this permitting action; therefore, this statement is invalid.**	**The change will be made.**
	The last bulleted item of the second paragraph states "Increase in the annual plate throughput for the plasma cutter, Emission Point 1-06 (Area 005)." **Please revise this item to read "Decrease in the annual plate throughput for the plasma cutter, Emission Point 1-06 (Area 005)."**	**The change will be made.**

(Emission Rates for TAP/HAP & Other Pollutants continued)	For UNF 0001, the Ethyl benzene annual emission rate should be 5.625 tpy.	The change will be made.
	For UNF 0001, the Manganese (and compounds) annual emission rate should be 0.307 tpy.	The change will be made.
	For UNF 0001, the Methyl isobutyl ketone annual emission rate should be 6.738 tpy.	The change will be made.
	For UNF 0001, the Toluene annual emission rate should be 16.464 tpy.	The annual emission rate will be changed to reflect the correct emission rate: 14.465 tpy.
Specific Requirements – UNF 0001	Please revise Specific Requirement No. 136 to read as follows: With the exception of ARE 0004, a variance or permit modification shall be required to emit any TAP not listed in the "Emission Rates for TAP/HAP & Other Pollutants" section of this permit. For ARE 0004, a variance or permit modification shall be required to emit any TAP not listed in the "Emission Rates for TAP/HAP & Other Pollutants" section of this permit in an amount greater than its respective Minimum Emission Rate (MER).	Specific Requirement No. 136 will be removed from the permit. The request for permitting action to allow for the emission of TAPs/HAPs above the MER already explicitly stated in Louisiana State Air regulations. Thus, this requirement is duplicative and not necessary. In accord with current LDEQ practice, however, requirements will be placed on ARE0004 which regulate the emissions of TAPs/HAPs and associated monitoring of TAPs/HAPs.
	Statement of Basis	
Section III. Proposed Project/Permit Information - Project	Please remove the first bulleted item of the second paragraph which states "Increase the permitted operating rate of all facility emission sources." The annual plate throughput for the plasma cutter is being decreased as a result of this permitting action; therefore, this statement is invalid.	The change will be made.
	The last bulleted item of the second paragraph states "Increase in the annual plate throughput for the plasma cutter, Emission Point 1-06 (Area 005)." Please revise this item to read "Decrease in the annual plate throughput for the plasma cutter, Emission Point 1-06 (Area 005)."	The change will be made.
Section III. Proposed Project/Permit Information – Permitted Air Emissions	Barium (and compounds) needs to be added to this section with no "Before" emissions, "After" emissions of < 0.001, and "Change" emissions of < 0.001.	The change will be made.
	The "After" and "Change" Benzene emissions should be < 0.001 and –0.001, respectively.	The change will be made.
	The "Before" and "Change" Carbon tetrachloride emissions should be 0.500 and –0.500, respectively.	The change will be made.
	Cobalt (and compounds) needs to be added to this section with no "Before" emissions, "After" emissions of 0.001, and "Change" emissions of + 0.001.	The change will be made.