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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**PCS Nitrogen Fertilizer, LP**	**AI #:**	**3732**	**TEMPO Activity No:**	**PER20070006**
Facility Name:	**Geismar Plant – Nitrate Group**	**Remarks Submitted by:**	**Cheryl Chris (formerly Cheryl Dawson)**		
Permit Writer:	**Kermit Wittenburg**	**Permit Writer Email address:**	**kermit.wittenburg@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)
Briefing sheet	At the end of the first paragraph on page 2, Section III (continued from page one) of the Briefing Sheet it states: "This change would install a selective catalytic reduction unit on Train No. 3 to control emissions of NOx. This unit would be installed in addition to the existing outlet of the Absorber Unit, and would be operated at all times." In the permit application we actually proposed the production of 65% acid and associated use of the SCR as an alternate scenario.	Added requested alternate operating scenario
General Information Report	On Page 1 of the General Information section all references to Fred Elliott should be changed to Hanson Leonard. Fred has retired and Hanson is now the General Manager. Also, my last name has changed from Dawson to Chris.	For the General Info sheet – please follow the instructions at the bottom of the page, which is to send the updated info to facupdate@la.gov.

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Specific Requirements Report	A general comment for Nitric Acid Trains 2 and 4: Specific Requirements 4 and 27 states "Submit report. Due in writing to the Office of Environmental Compliance, Surveillance Division within seven calendar days of start-up using procedures provided in LAC 33:I:3925. Explain conditions and duration of the start-up and list the steps necessary to remedy, prevent and limit the excess emissions." LAC 33:III:2307.C1.a provides an exemption for start-up that we use when needed. We don't always have excess emissions when we start-up but this specific requirement reads as though we must submit a report each time we start-up. Please clarify these Specific Requirements.	The language is mostly from the regulations, but modified the language to make it more clear when the report needs to be submitted.
Specific Requirements Report	Specific Requirement 59 for EQT0016 (Utility Boiler 2) cites 40 CFR 60.48(g), (h) and (i). The correct citation is 40 CFR 60.48b(g). This is repeated in Specific Requirements 61 and 62.	Found 4 specific requirements and corrected the citation
Specific Requirements Report	Also, please recall that we have an approved alternate monitoring plan for this boiler.	Incorporated elements of alternate monitoring plan as approved by LDEQ on May 28, 2002. Removed references to continuous NOx monitoring by CEMS
Specific Requirements Report	Specific Requirement 85 EQT0131 for the new nitric acid railcar pressure testing compressor states: "Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions." This is for a small, portable air compressor. How is this Specific Requirement to be satisfied?	Keep a copy of the calc (from the app) used to establish the SO2 emissions. If necessary – have a copy of diesel fuel MSDS to show typical sulfur content.
Specific Requirements Report	Specific Requirements 89 - 92 are in reference to the benzene NESHAP. These requirements are not applicable to us. Can you remove these from the permit? They make it appear as though these requirements are applicable.	Evaluated applicability of Benzene NESHAP and determined that requirements should be removed.

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Specific Requirements Report	Specific Requirements 86 and 87 have an opacity limit for fugitives. The citation is for stacks not fugitives. These should be removed.	With regards to the fugitives being subject to the opacity limit. § 60.70 Applicability and designation of affected facility. (a) The provisions of this subpart are applicable to each nitric acid production unit, which is the affected facility. The affected facility is every component associated with the entire train. § 60.72 Standard for nitrogen oxides. (a) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which: (1) Contain nitrogen oxides, expressed as NO_2, in excess of 1.5 kg per metric ton of acid produced (3.0 lb per ton), the production being expressed as 100 percent nitric acid. (2) Exhibit 10 percent opacity, or greater. The reference to the performance test establishes the date when the requirements become effective. The language then references affected facility again – that means the entire train, which would include the fugitive emission points, not just the stacks. In other words, there better not be any leaks with an opacity greater than 10%. The requirements will be left in.
Specific Requirements Report	Specific Requirement 99 should be 134.87 tons/yr not 129.79	Fixed

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Inventory Report	Average Production rate of Nitric Acid is 3,300 tons per day not 3,325.	Per the Application the average production is as follows: NAT#2 = 500 tpd, NAT#3=650 tpd, NAT#4=550 tpd and NAT#5=1,600 tpd. These summed = 3300 tpd. Changed.
Inventory Report	EQT0003 Max operating rate for Nitric Acid Train No. 2 is 520 tons per day	Added note. Revised total yearly production to average 500 tpd times 365 days per year.
Inventory Report	EQT0004 Max operating rate for Nitric Acid Train No. 3 is 650 tons per day	Revised when operating scenarios were implemented.
Inventory Report	EQT0004 Contents for Nitric Acid Train 3 is 65% or 57% nitric acid. The acid strength is not a function of the max or normal operating rates.	Revised when operating scenarios were implemented.
Inventory Report	EQT0007 Max operating rate for Nitric Acid Train No. 4 is 600 tons per day	Fixed
Inventory Report	EQT0007Normal operating rate for Nitric Acid Train No. 4 is 550 tons per day	Fixed
Inventory Report	EQT0009 Max operating rate for Nitric Acid Train No. 5 is 1750 tons per day	Added note.
Inventory Report	FUG0005 Column "Max operating rates" has entry of 1750 tons/day. This should be removed	The emission point list of the current application lists Max Operating Rates for each of the fugitive points, except Nitric Acid Train No. 2. Value will remain. Added other rates.