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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Rhodia, Inc.**	**AI #:**	**1314**	**TEMPO Activity No:**	**PER20070006**
Facility Name:	**Sulfuric Acid Plant**	**Remarks Submitted by:**			
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)
Briefing Sheet, Section I	Rhodia requests that the order of the last two sentences in the first paragraph be reversed to improve clarity.	Modified language in the first paragraph of the Background (Section I) of the Briefing Sheet.
Briefing Sheet, Section I	Rhodia requests that the second paragraph be revised as follows: 1. Insert "including Louisiana," after "various State parties"; and 2. Add the following sentence to the end of this paragraph: "As a result of the Consent Decree, emissions of SO2 will be reduced by more than 10,000 TPY by the completion of Phase III of the project."	Modified language in the second paragraph of the Background (Section I) of the Briefing Sheet. Included suggested language as stated in "1". However, included suggested language from "2" under Section III Description.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Briefing Sheet, Section III, Sulfuric Acid Plant	Revise the last sentence in the 3rd paragraph to read "The demisters also control HCl and particulate emissions."	Revised as stated.
Briefing Sheet, Section III, page 2	Suggest that discussion beginning on bottom of page 2 be re-arranged to emphasize that the main purpose of the consent decree was the SO2 abatement project and the increase in capacity via debottlenecking was also allowed. For this and other text revisions suggested, see suggested revised language in Attachment A.	Revised Briefing Sheet Section III language to emphasize the main purpose of the consent decree.
Briefing Sheet, Section III, page 3	Bullet 7 should be reworded to read "Revise PM_{10} emissions to include sulfuric acid mist emissions" per the April 2009 addendum. Suggest these items be added to bullet list • Incorporate three new permit shield requests; • Reconcile hydrogen sulfide emissions from the sulfur feed tank in light of data collected at similar Houston facility; and • Add a new caustic tank as an insignificant activity.	Bullet 7 regarding PM_{10} emissions was reworded as stated. The first two bullet items were added as stated. However, the third bullet item was already included on the existed bullet list; therefore, it was not added a second time.
Briefing Sheet, Section III, page 3	Rhodia requests that the sentence after the bullet list be revised as follows: "The revised application submitted on April 8, 2009 adjusted projected sulfuric acid mist emissions and incorporated an updated PSD analysis."	The sentence after the bullet list was revised as stated.
Briefing Sheet, Section IV	Rhodia requests that the first sentence in the 2nd paragraph be revised by referencing LAC 33:III.504.L and M, not just 504.L.	Revised to include 504.M.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Briefing Sheet, Section IV	Rhodia requests that the 3rd paragraph of this section be revised to read as follows: "The PSD analysis for NOx, PM10 and sulfuric acid mist uses a Baseline Actual Emissions (BAE) to Projected Actual Emissions (PAE) approach which excludes from PAE emissions Sulfuric Acid Units Nos. 1 and 2 emissions that could have been accommodated during the baseline period and that are unrelated to the proposed project, per LAC 33:III.509."	Revised third paragraph in Section IV.
Briefing Sheet, page 5	Please revise 3rd sentence is 1st paragraph to read "The ***facility*** is not a major source of Hazardous Air Pollutants..."	Revised language as stated.
Briefing Sheet, Permit Shield section	Rhodia requests that the following phrase be added at the end of each of the subsections 1 and 3. "Permit shield request granted."	There is no need to add the proposed language because the introductory statement under this part clearly states that "a permit shield has been determined for the referenced facility as follows:"

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Briefing Sheet, Permit Shield Section, Subsection 2	Rhodia requests that subsection 2 be revised as follows for clarity and to incorporate the recently issued BIF permit: "The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 61.348(e), certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.). The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently-issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace. Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Permit shield request granted."	Revised language as stated for permit shield no. 2.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Briefing Sheet, Permit Shield Section, Subsection 3	Insert "emitted from source Fug-TS" in the second sentence before the words "below their MERs". This is consistent with the October 2008 addendum which increased some class I and II TAPs above their MERs, but none of these are emitted from source Fug-TS.	Revised language as stated for permit shield no. 3.
Briefing Sheet Sec III, page 7	Need to add modeling results for metal TAPs to the table. Delete acrylonitrile and 1,3-butadiene because these are no longer >MER. Please add note to SO2 data stating "for Phase I emissions (worst case)".	Acrylonitrile and 1,3-Butadiene have been removed from the modeling table. A note has been added which references that SO_2 data are for "Phase I emissions (worst case)".
Briefing Sheet Sec VIII, page 8	On item GC8, please change "yearly" to "during turnarounds". On item GC15, emissions for VOC should be 0.06 instead of 0.006 (per October 2008 addendum).	For GC8, the background calculations changed after this technical review comment due to LDEQ Enforcement questions. Therefore, changed entire entry. For GC15, corrected to "0.06".
Briefing Sheet Sec IX, page 9	Suggest merging the sulfuric acid tanks into the first table. Regulation is LAC 33:III.501.B5.D. The information in the paragraph introducing the list of sulfuric acid tanks can be replaced with a footnote on tanks 30D040, 30D140, 30D150 stating "Insignificant only when storing product sulfuric acid."	Revised table to include those tanks listed separately.
Permit Section X, Table of Applicable Requirements	For the Facility Wide requirements – UNF002, Rhodia requests that LDEQ clarify that 40 CFR Part 61, Subpart A and 40 CFR Part 63, Subpart A are not applicable to all equipment at the facility, but rather only to specific equipment subject to a part 61 or part 63 standard. Clarification of this in the Statement of Basis or Response to Comments is sufficient.	It is LDEQ policy to include the Subpart A on the facility wide column in Section X Table 1. In the specific requirements report, there is a correlating requirement under the UNF which states that the affected facilities shall comply with the provisions of the respective subpart. The requirement for 40 CFR 63 Subpart A was added back into the permit.
Permit Section X, Table of Applicable Requirements	40 CFR 63 Subpart F does not apply to source "Facility Wide".	The "1" was removed from the table under 40 CFR 63 Subpart F.
Permit Section X, Table of Applicable Requirements	Rhodia requests that LDEQ delete the column for 40 CFR 264. This is a RCRA standard, not an air standard.	Even though 40 CFR 264 is a RCRA standard, it is part of the Consolidated Fugitives Program, and, therefore, is included by reference in the specific requirement section and newly added Appendix A. For consistency, it is also included in Section X, Table 1.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Section X, Table of Applicable Requirements	Rhodia requests that LDEQ footnote the applicable requirements for RLP013 and RLP014 with respect to 40 CFR Part 60, Subpart H to indicate that such requirements are being phased in at different times, pursuant to the Consent Decree schedule and that such dates are contained in the Specific Requirements. 40 CFR 60 Subpart A should have a "1" for sources RLP013 and RLP014.	There was proposed language provided later in the technical review comments which covers the phasing of these requirements at different times. Therefore, this comment will be deferred to those comments which propose that language mentioned above. A "1" was not added for these sources for 40 CFR 60 Subpart A. See response on previous page.
Permit Section XI, Table 2, p. 17	Rhodia requests that the information in the Notes column for EQT 154 and 155, first row, be revised to improve clarity, as follows: "EXEMPT – The Department has granted an exemption from the opacity standards of LAC 33:III.1311.C. as the particulate matter emissions are well below the process rate limitations."	The citation granting the exemption was changed to LAC 33:III.1311.E.
Criteria Pollutant Emission Rates	For source EQT 0142, pollutant sulfuric acid, per LDEQ rounding policy, TPY should be <0.01.	On HAPs&TAPs emission table, TPY of sulfuric acid has been corrected to "<0.01"
Criteria Pollutant Emission Rates	For source EQT 0149, pollutant sulfuric acid, per LDEQ rounding policy, TPY should be <0.01.	On HAPs&TAPs emission table, TPY of sulfuric acid has been corrected to "<0.01"
Criteria Pollutant Emission Rates	For source EQT 0152, per LDEQ rounding policy, all pollutants TPY should be <0.01.	On HAPs&TAPs emission table, TPY of all speciated pollutants have been corrected to "<0.01"
Inventory, page 1, ARE 0002	Contents are not "skimmed oil". VOC emissions are estimated based upon 55 gals of oil per month skimmed from sump. Suggest this be clarified by changing "Contents" column to read "55 gallons/mo oil skimmed from sump".	Language on table in "Contents" has been changed as requested.
Inventory, page 1, EQT 0151	Please add this clarifying remark to "Contents" column "Operating rates shown are spent acid receipts".	Added clarifying language as requested.
Inventory, page 1, EQT 0185	Please remove maximum operating rate. This was not on the EIQ form.	Maximum operating rate was removed.
Inventory, page 1, EQT 0278, 0279, 0280, 0281, 0282, 0283, 0284	For consistency with RLP 0013 and RLP 0014, the rates shown for "max operating rate" should be moved to the "normal operating rate" column.	Operating rates moved from "maximum" to "normal"

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Inventory, page 2, EQT 0154, 0155	Please remove maximum operating rate. This was not on the EIQ form.	"Maximum" operating rates removed.
Inventory, Group Membership	Please add EQT0176, CRG 0003, CRG 0004, and all the tanks included in CRG 0003 and CRG 0004 to Process Group PCS 0001. Please add CRG 0001, CRG 0002, and all the tanks included in CRG 0001 and CRG 0002 to Process Group PCS 0002.	Process Groups (PCS) 0001 and 0002 have been edited to include those requested tanks.
Inventory, Relationships	For RLP 0013 and RLP 0014, please remove all "controls emissions from" relationships. Because the emissions control actually occurs in the furnaces and processes which have been added to TEMPO, it is not accurate to say the release point controls emissions.	All relationships for RLP014 & RLP013 which stated "controls emissions from" have been removed.
Inventory, Fees	Fee number 0630 is for the CathyVAL plant (permit 2184-V1) and should not be listed here.	Fee Code 0630 has been removed from this permit.
Specific Requirements 2-10 for EQT 0150	Rhodia requests that these be labeled as State Only. There is no federally applicable standard. All of these specific requirements are periodic monitoring requirements, but they are not designed to assure compliance with any federally applicable requirement. The only substantive emission requirements for EQT 0150, the Spent Acid Barge Loading Scrubber, are the emission limits stated in the Emission Rate sheets. The authorized emissions are less than 1 TPY of VOC and less than 0.01 TPY of SO2.	The requirements listed under EQT 0150 (EIQ 26) have been labeled as STATE ONLY.
Specific Requirements 2 and 3 for EQT 0150	Rhodia requests that the Department revise these conditions to provide one excused excursion for each parameter per semi-annual period.	These requirements are STATE ONLY requirements and are not required to provide for excursions.
Specific Requirements 21-23	Rhodia requests that these requirements be deleted because compliance with 40 CFR Part 65 will constitute compliance with 2103. In addition, Table 2 of the permit should be revised to reflect this.	Requirements for LAC 33:III.2103 have been removed for source 27. Section X, Table 1 has changed to "2". And Table 2 now explains compliance of 2103 through compliance with 40 CFR 65.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 27-28 for EQT 0277	Rhodia requests that these requirements be labeled as state-only, and that all associated MRR requirements for these operating parameters also be labeled as state only (SRs 29-33). Rhodia further requests that an averaging period be inserted rather than "None specified" for the statistical basis. For the pH value, the statistical basis should be 4-hour block average. For the Flow Rate, the statistical basis should be 4-hour block average. For requirements 29-32, please remove the language "once every four hours". The pH and flow are measured more frequently and compliance is determined on a 4-hour average.	The requirements listed under EQT 0277 (EIQ 13) have been labeled as STATE ONLY. The averaging period has been changed to four hour average. The language "once every four hours" has been replaced with "continuously".
Specific Requirement 53 for EQT 0147	Rhodia requests that the statistical basis state "3-hour average" because the underlying rule performance testing requirements would require a minimum of 3 runs at 1 hour each to demonstrate the reduction efficiency.	The statistical basis was changed to three hour average.
Specific Requirement 70 for EQT 0147	Rhodia requests that the statistical basis state "3-hour average" because the underlying rule performance testing requirements would require a minimum of 3 runs at 1 hour each to demonstrate the reduction efficiency.	The statistical basis was changed to three hour average.
Specific Requirements 77-81 for EQT 0280	For consistency with permit shield subsection 2, these specific requirements should be replaced with one specific requirement as follows: "Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e)."	Added language as stated. Also removed requirements 77-81.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 99-100 for EQT 0281	For consistency with permit shield subsection 2, these specific requirements should be replaced with one specific requirement as follows: "Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e)."	Added language as stated. Also removed requirements 99-100.
Specific Requirements 89-91 for EQT 0280	Rhodia requests that these requirements be deleted because compliance with 40 CFR Part 65 will constitute compliance with 2103. In addition, Table 2 of the permit should be revised to reflect this.	Requirements for LAC 33:III.2103 have been removed for source U1-Furn. Section X, Table 1 has changed to "2". And Table 2 now explains compliance of 2103 through compliance with 40 CFR 65.
Specific Requirements 93	This requirement should be moved to U2-Process.	This requirement was removed from EQT0280 (EIQ U1-Furn). U2-Process already has this requirement.
Specific Requirements 92 and 111	Rhodia requests that these requirements be deleted because compliance with 40 CFR Part 65 assures compliance with all applicable federal requirements. Further, with respect to the CO requirement, LDEQ is authorized to establish periodic monitoring conditions under 501.C.6, but cannot establish emission limits. In the alternative, these requirements should all be labeled as state-only and should a) allow appropriate averaging periods and b) an e excused excursion from each parameter range for each semi-annual period, consistent with the excused excursion provision found in 40 CFR Part 65.	These requirements have been removed. The permit now contains applicable 40 CFR 65 requirements.
Specific Requirement 94	Rhodia requests that the statistical basis state "3-hour average" because the underlying rule performance testing requirements would require a minimum of 3 runs at 1 hour each to demonstrate the reduction efficiency.	The statistical basis was changed to three hour average.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 108	Rhodia requests that the statistical basis state "3-hour average" because the underlying rule performance testing requirements would require a minimum of 3 runs at 1 hour each to demonstrate the reduction efficiency.	The statistical basis was changed to three hour average.
Specific Requirement 173	Rhodia requests that the Department revise this Specific Requirement to state: "Effective January 1, 2011, Rhodia will comply with the monitoring requirements for SO2 set forth in the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007."	Revised language as stated.
Specific Requirement 174	Rhodia requests that this condition be revised to read as follows: "Effective January 1, 2011, meet a 365-day rolling average limit of 2.2 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 2011 and demonstrate compliance by January 1, 2012.) Which months: All year Statistical Basis: 365-day rolling average" The basis for this request is that the Consent Decree requires that the emission limits be stated in the Title V permit. Rhodia does not believe that reference to the Consent Decree is sufficient, nor does such reflect the intent of the parties. The Consent Decree will be terminated at some point in time, but the obligation to meet this requirement will continue through the permit.	Revised language as stated.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Requested addition of Specific Requirement for RLP 0013	Rhodia requests that the Department insert a specific requirement for RLP 0013 Sulfuric Acid Unit No. 2 stating: "Effective January 1, 2011, meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease."	Added language as stated.
Requested addition of Specific Requirement for RLP 0013	Rhodia requests that the Department insert a specific requirement for RLP 0013 – Sulfuric Acid Unit No. 2 stating: Conduct a SO2 Performance Test by May 1, 2011, to demonstrate compliance with the 3-hour average SO2 emissions limit. The test must consist of at least 9 runs and be conducted pursuant to 40 CFR Part 60, Appendix A, Reference Method 8 and Appendix B, Performance Specification 2. This can serve as the CEMS relative accuracy test required under Performance Specification 2, and as applicable, the required NSPS performance test under 40 CFR 60.8	Added language as stated.
Specific Requirement 175	Rhodia requests that this condition be revised to read as follows: "Effective January 1, 2011, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 C.F.R. Part 60, Subpart H."	Revised language as stated

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 176	Rhodia requests that this condition be revised to read as follows: "Effective January 1, 2011, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 C.F.R. Part 60, Subpart H."	Revised language as stated.
Specific Requirements 177 and 197	Rhodia requests that these requirements be deleted. The units are production devices, not control devices. Thus Chapter 11 is not applicable. Note the Chapter 13 is applicable.	These chapter 11 requirements have been removed from Unit No. 1 and Unit No. 2. However, these requirements are now placed under the newly created furnaces (U1-Furn, U2-SFurn, & U2-RFurn)
Specific Requirements 179-189	Rhodia requests that LDEQ add the following sentence at the end of each of these requirements: "This requirement applies from the effective date until December 31, 2010."	Revised language as stated.
Specific Requirement 190 and 209	Rhodia requests that these requirements be marked as state-only. There is no federal standard for NOx applicable to these units.	Added "STATE ONLY" to these requirements.
Specific Requirement 193	Rhodia requests that the Department revise this Specific Requirement to state: "Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO2 set forth in the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007."	Revised language as stated.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 194	Rhodia requests that this condition be revised to read as follows: "Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on May 1, 2012 and demonstrate compliance by May 1, 2013.) Which months: All year Statistical Basis: 365-day rolling average"	Revised language as stated.
Requested addition of Specific Requirement for RLP 0014	Rhodia requests that the Department insert a specific requirement for RLP 0014 Sulfuric Acid Unit No. 1 stating: "Effective May 1, 2012, meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.	Added language as stated.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Requested addition of Specific Requirement for RLP 0014	Rhodia requests that the Department insert a specific requirement for RLP 0014 – Sulfuric Acid Unit No. 1 stating: Conduct a SO2 Performance Test by August 29, 2012, to demonstrate compliance with the 3-hour average SO2 emissions limit. Such test must consist of at least 9 runs and be conducted pursuant to 40 CFR Part 60, Appendix A, Reference Method 8 and Appendix B, Performance Specification 2. This can serve as the CEMS relative accuracy test required under Performance Specification 2, and as applicable, the required NSPS performance test under 40 CFR 60.8	Added language as stated.
Specific Requirement 196	Rhodia requests that this condition be revised to read as follows: "Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 C.F.R. Part 60, Subpart H."	Revised language as stated.
Specific Requirement 195	Rhodia requests that this condition be revised to read as follows: "Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 C.F.R. Part 60, Subpart H."	Revised language as stated.
Specific Requirements 199-208	Rhodia requests that LDEQ add the following sentence at the end of each of these requirements: "This requirement applies from the effective date until April 30, 2012."	Added language as stated.
Specific Requirements 252-254 for CRG 003 and Specific Requirements 259-262 for CRG 004	Rhodia requests that these be deleted and an entry be added to Table 2 to state that compliance with Part 65 constitutes compliance with 2103.	Requirements for LAC 33:III.2103 have been removed for the Spent Acid Tanks. Section X, Table 1 has changed to "2". And Table 2 now explains compliance of 2103 through compliance with 40 CFR 65.
Specific Requirement 266	The process weight rate limit should be stated in this condition.	This requirement was replaced with an updated version which includes the process weight rate.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 268-274 for EQT 0142 and Specific Requirements 276-280 for EQT 0149	Rhodia requests that these requirements be labeled as State-Only as there is no underlying federally applicable standard	Added "STATE ONLY" at the end of these requirements.
EQT 357	LDEQ has misstated the requirements of Part 82. The rules do not prohibit all emissions, but do require that work practices be employed to minimize emissions to de minimis levels. Rhodia believes this should be deleted because General Condition T of the permit already adequately addresses compliance with Part 82, Subpart F. In the alternative, this condition could be rewritten to state that permittee should comply with the requirements of 40 CFR Part 82, Subpart F.	Removed this requirement as it is covered under Part 70 General Condition T.
EQT 365 and 366	Rhodia requests that these conditions be deleted. LDEQ needs to go through rulemaking under the Louisiana Administrative Procedures Act to enact substantive emission standards or work practice standards such as these requirements. These go beyond periodic monitoring and are not authorized under 501.C.6.	These are LA Policy HRVOCs requirements which are standard requirements for any Part 70 source in non-attainment parish.
General Comment	Please clarify in the Statement of Basis or Response to Comments that where an underlying rule provides for excused excursions from operating parameters, that such rule is applicable even where not stated in the specific requirements. In the alternative, please include all of such applicable provisions providing for excused excursions in the specific requirements.	
Statement of Basis, general	Please make any revisions to the Statement of Basis to correspond with changes made to the permit, as requested above.	Revised Statement of Basis to match Briefing Sheet.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Section III, page 5	Suggest that text similar to the following be added under heading Streamlined Equipment Leak Monitoring Program: "For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emission Program Consolidation Guidelines (see specific requirement 223 in permit 0840-00033-V1), Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for non-HON sources as the most stringent program. With this permit modification, Rhodia is reducing site-wide permitted emissions of all class I and II TAPs present in source FUG-TS below their MERs. Thus, LA non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA non-HON MACT since the program is already in place. A permit shield was requested to ensure that voluntarily complying with LA non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR Part 264 Subpart BB and 40 CFR Part 61 Subpart V)."	Added language as stated.

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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Rhodia, Inc.**	**AI #:**	**1314**	**TEMPO Activity No:**	**PER20070006**
Facility Name:	**Sulfuric Acid Plant**	**Remarks Submitted by:**			
Permit Writer:	**Scott J. Templet**	**Permit Writer Email address:**	**Scott.Templet@la.gov**		

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- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

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Briefing Sheet page 2 Package Boiler	Annual average heat input should be 50 instead of 53 (lowered in previous permit mod).	**Changed to 50 MM Btu/hr as stated.**
Statement of Basis page 2 Package Boiler	Annual average heat input should be 50 instead of 53 (lowered in previous permit mod).	**Changed to 50 MM Btu/hr as stated.**
Briefing Sheet page 3 Bullet List, 10th bullet	Note that BIF permit bas now been issued so this bullet should refer to the new BIF permit instead of "permit under review".	**Removed text "currently under review" as the BIF permit has been issued.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis page 4, 1st bullet	Note that BIF permit bas now been issued so this bullet should refer to the new BIF permit instead of "permit under review".	**Removed text "currently under review" as the BIF permit has been issued.**
Briefing Sheet Section X	There appears to be a problem with the automated numbering of the table. It has an "X" and an "XI".	**Corrected numbering throughout permit.**
Briefing Sheet Section X, Table of Applicable Requirements	Rhodia requests that LDEQ footnote the applicable requirements for RLP013 and RLP014 with respect to 40 CFR Part 60, Subpart H to indicate that such requirements are being phased in at different times, pursuant to the Consent Decree schedule and that such dates are contained in the Specific Requirements. 40 CFR 60 Subpart A should have a "1" for sources RLP013 and RLP014.	**Added footnote under table with dates that each unit applies to 40 CFR 60 Subpart H requirements.** **Also added a "1" under 40 CFR 60 Subpart A column for RLP013 & RLP014.**
Briefing Sheet Section XI, Table 2, p. 17	Rhodia requests that the information in the Notes column for EQT 154 and 155, first row, be revised to improve clarity, as follows: "EXEMPT – The Department has granted an exemption from the opacity standards of LAC 33:III.1311.C. as the particulate matter emissions are well below the process rate limitations."	**Revised comment on table as stated.**

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 12 and 13 for EQT 0150	Rhodia requests that the Department revise these conditions to provide one excused excursion for each parameter per semi-annual period. These requirements apply to the Spent Acid Barge Loading Scrubber. Requirement 12 specifies that the pH must be >= 10. S.U. and Requirement 13 specifies that the packed tower nozzle spray pressure must be >= 15 psig when vents are routed to the scrubber. LDEQ has added these as state-only operating parameters designed to assure compliance with state only emission limits for SO2 and VOC. The emissions of SO2 and VOC from this scrubber are very low – less than 0.01 TPY (i.e., 20 pounds) for SO2 and 0.93 TPY of VOC. There is no basis for not providing some level of excused excursions of operating parameters for a source this small. Even the most stringent SOCMI-HON regulations in 40 CFR Part 63, Subparts F and G, provide for one excused excursion per semi-annual period. LDEQ is establishing requirements here by permit rather than by gathering information on operating parameter variability and feasibility, as it should do by rulemaking. Rhodia does not object to monitoring these parameters. However, Rhodia does object to a requirement that there be 100% compliance with these parameters where LDEQ has not gone through a rulemaking to demonstrate that such is economically and technically feasible. Most federal MACT rules provide some excused excursions to account for the fact that no technology is perfect.	**Included language for each requirement that 'Permittee is allowed one excused excursion per semi-annual period'.**
Specific Requirement 37 for EQT 0277	Rhodia has scheduled a stack test on 9/30/09 to determine the appropriate minimum flow rate for the scrubber. 400 gpm was a preliminary estimate. For now, Rhodia requests that this requirement be modified to read "Minimum flow rate to be determined by stack test and approved by LDEQ". There should be enough time to insert the flow rate (established by stack test) before the final permit is issued.	**Added language to explain that the 400 gpm was a preliminary estimate and that the actual minimum flow was to be determined by a stack test scheduled for 9/30/09.**

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 322 for UNF 0002	This requirement has been added since the last technical review. Please remove it because it does not apply. Rhodia is a treatment facility for certain offsite customers' wastewater streams/residuals that are regulated by 40 CFR Part 63 Subaprts G and GGG. The Rhodia facility is only subject to certain storage/treatment standards and their related reporting requirements. Rhodia had documentation of an email communication from EPA confirming that 40 CFR Part 63 Subpart A does not apply to offsite treatment facilities. The only parts of 40 CFR Part 63 Subpart A that do apply to the Rhodia site are 63.1(b)(3) and 63.10(b)(3) relating to documentation of the site being an area source for HAPs. These requirements are appropriately included in the draft permit as specific requirement 304.	**This requirement was removed. The requirement number 305 lists to comply with 63.10(b)(3).**
Specific Reqt 154	Due to a typo in Rhodia's previous technical review comments, a relevant requirement was inadvertently deleted from the draft permit. The LAC 33:III.5109.A.1 citation (specific reqt 154) for Unit 2 Process should ALSO be listed for Unit 1 Process. This requirement addresses LA MACT for class I and II TAP metals. These metals are contained in waste feeds combusted in both Unit 1 and Unit 2 furnaces. Unit operations within the Unit 1 and Unit 2 processes provide the required MACT control.	**This requirement was copied to Unit 1 Process (EQT 283).**

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
UNF 002 Specific Requirements 350-351	Rhodia requests that these conditions be deleted. LDEQ needs to go through rulemaking under the Louisiana Administrative Procedures Act to enact substantive emission standards or work practice standards such as these requirements. These go beyond periodic monitoring and are not authorized under either LAC 33:III.501.C.6. or LAC 33:III.2113. Labeling such as state-only does not provide LDEQ with the authority to add requirements that go beyond those of LAC 33:III.Chapter 21 with respect to best housekeeping practices and LDAR requirements. There is nothing in these rules that requires Rhodia to make its facility "leak-free". Rhodia does not object to a requirement to comply with LAC 33:III.2113, the rule adopted by LDEQ and approved by EPA for the SIP, for housekeeping requirements.	**By LDEQ policy, these requirements are listed in permits which are located in a non-attainment area.**
General Comment	Please clarify in the Statement of Basis or Response to Comments that where an underlying rule provides for excused excursions from operating parameters, that such rule is applicable even where not stated in the specific requirements. In the alternative, please include all of such applicable provisions providing for excused excursions in the specific requirements.	**No general comment will be placed in the permit or statement of basis in reference to excused excursions. However, if an excused excursion is allowed by an underlying rule, then that excursion (if/when it happens) can then be noted on deviation or excess emission reports.**

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