BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090010
Agency Interest No. 26336

Mr. Hermie L. Bundick
General Manager
Shell Chemical LP – Shell Norco Chemical Plant
P. O. Box 10
Norco, LA 70079

RE: Part 70 Operating Permit
Shell Chemical LP - Norco Chemical Plant - East Site
Norco, St. Charles Parish, Louisiana

Dear Hermie L. Bundick :

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.

Permit No.: 2283-V3

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

SGQ
c: EPA Region VI

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)

SHELL CHEMICAL LP
SHELL NORCO CHEMICAL PLANT – BOILERS EAST SITE
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL/MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Part 70 Air Operating Permit Renewal/Modification for Shell Chemical LP, P.O. Box 10, Norco, LA 70079 for the Shell Norco Chemical Plant - Boilers East Site. **The facility is located at 15536 River Road, Norco, St. Charles Parish.**

Shell Chemical LP requested a renewal/modification to the current Part 70 Air Operating Permit No. 2283-V2 dated January 8, 2009.

The facility proposes the following modifications to the current permit:

1. Revise the specific requirements for the Boilers 7, 8, 9, and 10 to clarify that the Opacity and SO_2 CEMS are not required under the federal requirements;

2. Update the specific requirements for Boilers 7, 8, 9, and 10 to clarify that the initial performance testing and associated recordkeeping is not required under the federal requirements; and

3. Change the facility based totals for some toxic air pollutants due to round off errors (Emissions increase in tons per year: Formaldehyde – 0.01; Naphthalene – 0.01; Nickel – 0.01; and Selenium – 0.01).

Permitted emissions for the Boilers East Site based on the above referenced modification in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	520.22	520.22	-
SO_2	4305.83	4305.83	-
NO_X	2512.38	2512.38	-
CO	389.13	389.13	-
VOC	66.00	66.00	-

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group,

P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, April 19, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, draft permit, and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the St. Charles Parish Library, East Regional Library Branch, 100 River Oaks Dr., Destrehan, LA 70047.

Inquiries or requests for additional information regarding this permit action should be directed to Syed Quadri, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3123.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 26336, Permit Number 2283-V3, and Activity Number PER20090010.

Scheduled Publication Date: Thursday, March 18, 2010

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

BOILERS EAST
AGENCY INTEREST NO. 26336
SHELL CHEMICAL PLANT – EAST SITE, SHELL CHEMICAL LP
NORCO, ST. CHARLES PARISH, LOUISIANA

I. BACKGROUND

The Boiler East is owned and operated by Shell Chemical LP as The Norco Chemical Plant – East Site under Part 70 Permit No. 2283-V2 dated January 8, 2009 and Prevention of Significant Deterioration (PSD) Permit Nos. PSD-LA-008 and 618 dated January 1, 1977 and January 1, 1997, respectively. These boilers are a part of an existing facility and produce steam for process heating and steam turbines.

II. ORIGIN

A permit application and Emission Inventory Questionnaire (EIQ) dated December 21, 2009 were received requesting a Part 70 permit renewal/modification.

III. DESCRIPTION

The Boilers East Unit is comprised of Boiler Nos. 7, 8, 9, and 10. These boilers produce high pressure steam which is used for process heating and operating steam turbines. Letdown facilities for immediate pressure and low pressure steam supply also utilized. Boiler No. 7 is gas-fired and Boiler Nos. 8, 9, and 10 are capable of handling either liquid and/or gaseous fuel.

Shell Chemical LP (SC) increased the maximum firing rate of Boiler No. 7 from 537 MM BTU/hr to 650 MM BTU/hr. The annual emissions from the facility and the Boiler No. 7 did not change the annual emissions. This increase in maximum firing rate was approved under Part 70 Permit No. 2283-V1dated December 18, 2006.

Shell Chemical LP (SC) revised the NOx emissions for Boilers No. 7, 8, 9, and 10 (Emission Points 1-72, 4-76, 5-76, and 6-76); revised the PM10 emissions; and updated the Federal and State regulations as appropriate under Part 70 Operating Permit No. 2283-V2 dated January 8, 2009.

The facility proposes the following modifications to the current permit:

1. Revise the specific requirements for the Boilers 7, 8, 9, and 10 to clarify that the Opacity and SO_2 CEMS are not required under the federal requirements;

2. Update the specific requirements for Boilers 7, 8, 9, and 10 to clarify that the initial performance testing and associated recordkeeping is not required under the federal requirements; and

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3. Change the facility based totals for some toxic air pollutants due to round off errors.

Permitted emissions for the Boilers East based on the above referenced modification in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	520.22	520.22	-
SO_2	4305.83	4305.83	-
NO_X	2512.38	2512.38	-
CO	389.13	389.13	-
VOC	66.00	66.00	-

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Benzene	0.01	0.01	-
Formaldehyde	0.56	0.57	+ 0.01
Naphthalene	0.08	0.09	+ 0.01
Polynuclear Aromatic Hydrocarbons	0.004	0.003	- 0.001
Total	**0.654**	**0.673**	**+ 0.019**
Other VOC		**65.327**	

Non VOC Toxic Air Pollutants (TAPs)

Arsenic (and compounds)	0.09	0.09	-
Beryllium (and compounds)	0.002	0.002	-
Cadmium (and compounds)	0.03	0.03	-
Chromium VI (and compounds)	0.02	0.03	-
Copper	0.12	0.12	-
Lead compounds	0.10	0.09	-
Manganese (and compounds)	0.21	0.21	-

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Non VOC Toxic Air Pollutants (TAPs)			
Mercury (and compounds)	0.01	0.01	-
Nickel (and compounds)	5.78	5.79	+ 0.01
Selenium	0.05	0.06	+ 0.01
Total	**6.412**	**6.432**	**+ 0.02**

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations and New Source Performance Standards (NSPS) and NESHAP. Prevention of Significant Deterioration does not apply.

This facility is part of a major source of toxic air pollutants.

V. CREDIBLE EVIDENCE

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. PUBLIC NOTICE

A notice requesting public comment on the permit was published in The Advocate, Baton Rouge, Louisiana and St. Charles Herald-Guide, Louisiana, on January **, 2010. Written and oral comments received during the comment period from the general public and organizations will be considered before issuing the permit. Copies of the public notice were mailed out to individuals on the mailing list maintained by Office of Environmental Services on January **, 2010. The proposed permit was sent to U.S. EPA via e-mail on January **, 2010. All comments received shall be considered before an action is taken on this proposed permit.

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VII. EFFECTS ON AMBIENT AIR

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
NA			

VIII. GENERAL CONDITION XVII ACTIVITIES

NA

IX. INSIGNIFICANT ACTIVITIES

NA

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																	
		5	9	11	13	15	2103	2104	2107	2111	2113	2121	22	2301	29	51	52	56	59
EQT21	1-72, Boiler No. 7			1	1	1										2			
EQT22	4-76, Boiler No. 8			1	1	1										1			
EQT23	5-76, Boiler No. 9			1	1	1										1			
EQT24	6-76, Boiler No. 10			1	1	1										1			
GRP007	BE-CAP																		
UNF003	BOILER EAST SITE		1	1	1	1					1				1	1		1	1

KEY TO MATRIX

1 -The regulations have applicable requirements which apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 -The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS					40 CFR 61			40 CFR 63 NESHAP						40 CFR			
		A	D	K	Kb	NNN	A	M	FF	A	F	G	CC	5Ds	4Zs	52	64	68	82
EQT21	1-72, Boiler No. 7		1			1		1	1										
EQT22	4-76, Boiler No. 8		1			1													
EQT23	5-76, Boiler No. 9		1			1													
EQT24	6-76, Boiler No. 10		1			1													
GRP007	BE-CAP																		
UNF003	BOILER EAST SITE	1					1	1	1	1								1	1

KEY TO MATRIX

1 -The regulations have applicable requirements which apply to this particular emission source.
The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 -The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, and fugitives) but do not apply to this particular emission source.

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NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
EQT21 1-72, Boiler No. 7	Comprehensive Toxic Air Pollutant Emission Control Program	Exempt	LAC 33:III.5105.B.3.a	Gas stream greater than 7000 BTU/lb collected on site is used as fuel
	Emission Standards for Sulfur Dioxide	Exempt	LAC 33:III.1503.C LAC 33:III.1511.D	Emission from the steam generating unit is less than 100 tons per year
The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit				