Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Shell Chemical Company**	**AI #:**	**1136**	**TEMPO Activity No:**	**PER20060014**
Facility Name:	**K Units and OFP**	**Remarks Submitted by:**	**September 24, 2007**		
Permit Writer:	**Syed Quadri**	**Permit Writer Email address:**	**Syed.Quadri@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)
Permit Section VI (page 3)	The official newspaper of record is the Gonzales Weekly Citizen, Gonzales, Louisiana.	
Permit Section VIII (page 4)	The row listing emissions related to K-2 thru K-5 and OFP Units Maintenance contains a value for VOC emissions. However, CO emissions related to maintenance equipment purges were not included in the application. Shell requests that a value of 4.329 tons per year CO be added to this category. A calculations page is attached.	ok
Permit Section XI (page 25)	FUG 018 (Source 01-06) : NSPS, Subpart VV, 40 CFR 60.480 does not apply to K-4 Unit either due to date of construction.	?
Emission Rates for Criteria Pollutants – Page 1 of 3	EQT 0690 (Source 22O-91): Average Emission Rate – VOC should be 0.01 lbs/hr.	ok

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements (Page 9 of 30)	EQT 0728 (K-4 Hotwell V-K2655): Source number is listed as 68-99. Source number is actually 69-88.	Typ OK
Specific Requirements (Pages 18 of 30 through 22 of 30)	FUG0018 (Source 01-06): K-4 is listed as subject to 40 CFR Part 60 Subpart VV. K-4 is exempt from VV requirements due to date of construction. Only the OFP unit is subject to Subpart VV. K-4 is subject to LAC 33:III.2122 regulations.	OK Add 2122 for K-4
Specific Requirements (Page 26 of 30)	UNF0002 (Alcohol & OFP Units): The K-5 and OFP units were addressed as part of the Geismar Olefin and Alcohol (GOAL) project. The GOAL project is subject to PSD Permit PSD-LA-647(M3)	
Inventories Table (Page 1 of 6)	EQT0664 (Source 08-83): Under the Contents section of the table, a value of 224 square feet is listed. This is actually a surface area for the source in question, which is not related to an operating rate. This information was mistakenly listed in the EIQ page for the source as a Normal Operating Rate. An EIQ sheet, revised to remove this reference, is attached.	NO (This is in control - not an operating rate)
Inventories Table (Page 2 of 6)	EQT0714 (Source 508-99): Under the Contents section of the table, a value of 147 square feet is listed. This is actually a surface area for the source in question, which is not related to an operating rate. This information was mistakenly listed in the EIQ page for the source as a Normal Operating Rate. An EIQ sheet, revised to remove this reference, is attached.	No (")

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for Criteria Pollutants – Page 2 of 3	EQT 0701 (Source 22Z-91): Average Emission Rate – VOC should be 0.02 lbs/hr and Annual Emission- VOC should be 0.08 tons/year.	EIQ OK
Emission Rates for Criteria Pollutants – Page 2 of 3	EQT 0706 (Source 37-96): Missing values for PM10. Average Emission Rate should be 0.005 lbs/hr, Max Emission Rate should be 0.22 lbs/hr, and Annual Emission Rate should be 0.02 tons/year.	No — EIQ [illegible] 1003 [illegible] 01
Emission Rates for Criteria Pollutants – Page 2 of 3	EQT 0710 (Source 504-99): Average Emission Rate - VOC should be 0.04 lbs/hr and Max Emission Rate - VOC should be 0.05 lbs/hr.	ok — [illegible]
Emission Rates for Criteria Pollutants – Page 2 of 3	EQT 0712 (Source 506-99): Average Emission Rate – CO should be 31.73 lbs/hr. 31.77	31.77 ← No EIQ
Emission Rates for Criteria Pollutants – Page 2 of 3	EQT 0719 (Source 554-99): Average Emission Rate – VOC should be 0.002 lbs/hr.	ok — [illegible]
Emission Rates for Criteria Pollutants – Page 2 of 3	EQT 0720 (Source 602-99): Annual Emission Rate – VOC should be 1.8 tons/year.	ok — typo
Emission Rates for Criteria Pollutants – Page 3 of 3	EQT 0726 (Source 652-99): Average Emission Rate – VOC should be 0.002 lbs/hr.	ok — [illegible]
Emission Rates for Criteria Pollutants – Page 3 of 3	EQT 0728 (Source 69-88): Revise VOC Emission Values. Average Emission Rate should be 4.187 lbs/hr, Max Emission Rate should be 5.024 lbs/hr, and Annual Emission Rate should 3.63 tons/year.	? EIQ need
Emission Rates for Criteria Pollutants – Page 3 of 3	GRP 0065 (Source K5CRUDECAP): Average Emission Rate – VOC should be 0.01 lbs/hr and Annual Emission Rate – VOC should be 0.04 tons/year.	? EIQ — No
Emission Rates for Criteria Pollutants – Page 3 of 3	GRP 0065 (SourceK5FINISHCAP): Average Emission Rate – VOC should be 0.004 lbs/hr and Annual Emission Rate – VOC should be 0.02 tons/year.	No EIQ
Emission Rates for TAP/Hap & Other Pollutants	EQT 0722 (Source 620-99) and EQT 0723 (Source 621-99). Emissions of toxic air pollutants (TAPs) were using combustion factors. These potential emissions rates were also included in the single source Emission Inventory Questionnaire (EIQ) sheet for each engine. Shell is requesting that the speciated TAPs be removed from each source as none meet the criteria specified for speciation as outlined in the LDEQ Air Permit Procedures Manual.	Maybe