Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Sterling Sugars, Inc.**	**AI #:**	**1304**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	**Sterling Sugars, Incl**	**Remarks Submitted by:**		**GEC, Inc.**	
Permit Writer:	**Tegan Treadaway**	**Permit Writer Email address:**		**Tegan.Treadaway@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)
General Permit Briefing Sheet (page 1 of 16)	The "Physical Location" and "Contact" information given are for another sugar mill. Please correct to reflect the Sterling Factory's location (609 Irish Bend Road, Franklin, LA, 70538) and contact information (Mr. Rivers Patout, Operations Manager at 611 Irish Bend Road, Franklin, LA, 70538).	
General Information (page 1 of 2)	Please change mailing addresses for all contacts to be "611 Irish Bend Road, Franklin, LA 70538". The "PO Box 572" address is no longer in use.	
Inventories (page 1 of 2) – Subject Item Inventory table	Please correct Maximum Operating Rates for Boilers 2 through 7 to match those rates shown in parentheses in the description column.	
Inventories (page 1 of 2) – Subject Item Inventory table	Please correct tank volumes for EQT 0010 and EQT 0011 (gasoline tank and diesel tank) to 1,000 gallons and 12,000 gallons, respectively.	

Specific Requirements #16, 38, 60, 79, 101, 122, and 146	For every boiler, the specific requirements include a statement that "Scrubber flow rate monitored by flow rate monitoring device once every 4 hours". As stated in the Compliance Assurance Monitoring (CAM) Plan submitted on February 20, 2009, the scrubber water pressure is recorded every four hours as an indication of scrubber performance in lieu of installing flow rate monitoring devices. The operating range of scrubber water pressure for sufficient flow was given in the CAM plan. It is requested that this statement made in the specific requirements be changed to reflect this monitoring approach (i.e. *"Flow rate is estimated based on scrubber water pressure, which is monitored once every four hours"*).	
Specific Requirements #15, 35, 56, 77, 102, 118, and 145	For every boiler, the specific requirements include a statement that the permittee shall conduct "Scrubber flow rate recordkeeping by electronic or hard copy once every 4 hours". For the same reasoning stated in the previous remark above, it is requested that this statement made in the specific requirements be changed to reflect this monitoring approach (i.e. *"Scrubber water pressure recordkeeping by electronic or hard copy once every four hours"*).	

LDEQ-EDMS Document 44056432, Page 39 of 380