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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Terrebonne Parish Consolidated Government	**AI #:**	8838	**TEMPO Activity No:**	PER20080001
Facility Name:	Houma Municipal Power	**Remarks Submitted by:**	**Guy Parent/Ed Lee, Enviro One**		
Permit Writer:	Dustin Duhon	**Permit Writer Email address:**	dustin.duhon@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)
	Title V Permit	
Air Permit Briefing Sheet, Section IX - "Insignificant Activities"	**Please include the following insignificant activity that was inadvertently omitted from the air permit application:** **5,000 gallon Demin Blowdown Tank (Citation - LAC 33:III.501.B.5.B.8)**	**This change was made.**
Emission Rates for Criteria Pollutants **EQT0011 – NOx Emissions**	**Inadvertent error was made in the emission calculation for EQT0011. NOx emission factor needs to be revised to 204 lb/MM scf (0.20 lb/MM BTU) based on 40 CFR 60 Subpart D NOx requirement of 0.20 lb/MM BTU.** **The revised emission calculation will be submitted under separate cover and certified by the Responsible Official and a Professional Engineer.**	**The associated change in emissions was made.**

Emission Rates for TAP/HAP & Other Pollutants	For EQT 0009, annual emission rate for Chromium VI (and compounds) should be 0.001 tpy.	This change was made.
	For EQT 0010, for Benzene, the average and maximum hourly emission rates should each be 0.001 lb/hr.	This change was made.
	For UNF 0001, the following TAPs and their respective annual emission rates need to be added: Acetaldehyde 0.005 tpy Sulfuric Acid 0.001 tpy	This change was made.
EQT 0009 - Specific Requirement Nos. 15 and 16	Due to firing of natural gas, the facility requests the removal of the requirements to test for Total Gaseous Organic Concentration, Sulfur Dioxide emissions, and Particulate Matter emissions.	All stack testing requirements were removed for this source.
EQT 0009 - Specific Requirement No. 17	This condition requires performance/emissions testing for NOx and CO within five years of prior performance test or within 180 days after issuance of permit renewal, whichever comes later. However, Specific Requirement No. 16 includes all the requirements of Specific Requirement No. 17. Based on this information, the facility requests removal of Specific Requirement No. 17.	All stack testing requirements were removed for this source.
EQT 0009 - Specific Requirement No. 19	This condition is identical to Specific Requirement No. 16; therefore, the facility request removal of Specific Requirement No. 19.	All stack testing requirements were removed for this source.
EQT 0010 – Specific Requirement Nos. 22 and 25	Due to firing of natural gas, the facility requests the removal of the requirements to test for Total Gaseous Organic Concentration, Sulfur Dioxide emissions, and Particulate Matter emissions.	This change was made.
EQT 0010 - Specific Requirement No. 26	This condition is identical to Specific Requirement No. 22; therefore, the facility request removal of Specific Requirement No. 26.	This change was made.
EQT 0010 - Specific Requirement No. 27	This condition requires performance/emissions testing for CO within five years of prior performance test or within 180 days after issuance of permit renewal, whichever comes later. However, Specific Requirement No. 22 includes all the requirements of Specific Requirement No. 27. Based on this information, the facility requests removal of Specific Requirement No. 27.	This change was made.
EQT 0011 - Specific Requirement No. 41	This condition requires performance/emissions testing for CO within five years of prior performance test or within 180 days after issuance of permit renewal, whichever comes later. For this emission source, EQT 0011, there are no other performance/testing requirements in the draft permit. Please confirm that this is the only parameter to be tested.	LDEQ confirms that only CO should be tested. This source is equipped with a NOx CEMS. It is LDEQ policy not to require stack testing for pollutants for which the source has a CEMS. A NOx stack test would be required if the source were not equipped with a NOx CEMS.
	Acid Rain Title IV Permit	
Page 1	TEMPO Activity Number on Acid Rain Permit should be PER20080001 rather than PER20090001.	PER20080001 is the activity number that applies to the Title V Permit Renewal. PER20090001 is the activity number that applies to the Acid Rain Permit Renewal.
Page 1	Unit 1-76-16 is mislabeled at 1-76-15.	This change was made.