Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**UOP, LLC**	**AI #:**	**17846**	**TEMPO Activity No:**	**PER20070010**
Facility Name:	**SHREVEPORT PLANT**	**Remarks Submitted by:**		**Loree Fields, URS Corporation**	
Permit Writer:	**Hassan Ghosn**	**Permit Writer Email address:**		**Hassan.ghosn@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)
Statement of Basis, Section III (Proposed Project/Permit Information)	Under the "Application" subsection, it should state that "a permit application was submitted on November 5, 2007..." (instead of November 5, 2008)	Typo corrected.
Statement of Basis, Section III (Proposed Project/Permit Information)	Under the "Project" subsection, Item #3, the 4th bullet should state: "Change the monitoring requirement from NaOH concentration to pH" (remove the extra "NaOH" from the sentence)	The extra NaOH has been removed.
Statement of Basis, Section III (Proposed Project/Permit Information)	Under the "Project" subsection, Item #5 should state: "Establishment of a Catalyst Trial Emissions CAP, Emission Point CTEC, to cover the emissions from catalyst and catalyst base trial runs on SCM Lines 1, 2, and 3"	The sentence is changed as requested.

Statement of Basis, Section III (Proposed Project/Permit Information)	Under the "Project" subsection, Item #7 should state "....three replacement inorganic storage tanks and one new inorganic tank..." (instead of "three replacement inorganic storage tanks and one organic tank...") The 3 replacement inorganic storage tanks and the one new inorganic storage tank were approved under Case-by-Case Insignificant Activity requests.	The updated information has been incorporated.
Statement of Basis, Section III (Proposed Project/Permit Information)	Under the "Permitted Air Emissions" subsection, the 'before' PM10 value of 75.11 tons does include 42.08 tons of aluminum oxide, as stated; however, the 'after' PM10 value of 79.07 tons includes 44.15 tons of aluminum oxide.	Corrected as requested.
Statement of Basis, Section III (Proposed Project/Permit Information)	Under the "Permitted Air Emissions" subsection, the change in sulfur dioxide emissions should be +0.14 tons (instead of +0.16 tons)	Corrected as requested.
Air Permit Briefing Sheet, Section I (Background)	On Page 2, in the paragraph discussing the changes that were approved under Permit No. 0500-00020-09 (issued February 25, 1997), "aluminum dioxide" should be listed as "aluminum oxide", and the Permit Number should be listed as "0500-00020-09" (instead of 0500-00020-08)	Typos corrected.
Air Permit Briefing Sheet, Section I (Background)	On Page 3, in the paragraph discussing the changes that were approved under Permit No. 0500-00020-V2, the word "approved" is missing between the words "was" and "and".	Missing verb has been included.
Air Permit Briefing Sheet, Section II (Origin)	It should state that "A permit application and Emission Inventory Questionnaire was submitted by UOP LLC on November 5, 2007..." (instead of November 5, 2008)	Typo corrected.
Air Permit Briefing Sheet, Section III (Description)	The discussion of the new Line 1 SCR system, is currently listed on Page 6, and has the appearance of being part of the "Laboratory/Miscellaneous Sources" subsection. We request that this discussion be given a separate heading, or moved to the "Spherical Catalyst Manufacturing (SCM) Lines 1, 2, and 3" subsection. In the 4th paragraph of this discussion, "Emission Point 210-B" should be listed as "Emission Point 210-01-B".	DeNO$_x$ Project is used as a heading for this section to separate it from that of the Laboratory section. Also Emission Point 210-01-B has been consistently listed.
Air Permit Briefing Sheet, Section III (Description)	On Page 7, in Item #3 of the proposed changes, the 4th bullet should state: "Change the monitoring requirement from NaOH concentration to pH" (remove the extra "NaOH" from the sentence)	The extra NaOH has been removed.

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Air Permit Briefing Sheet, Section III (Description)	On Page 8, Item #5 of the proposed changes should state: "Establishment of a Catalyst Trial Emissions CAP, Emission Point CTEC, to cover the emissions from catalyst and catalyst base trial runs on SCM Lines 1, 2, and 3"	The sentence is changed as requested.
Air Permit Briefing Sheet, Section III (Description)	On Page 8, Item #7 of the proposed changes should state: "....three replacement inorganic storage tanks and one new inorganic tank..." (instead of "three replacement inorganic storage tanks and one organic tank...") The 3 replacement inorganic storage tanks and the one new inorganic storage tank were approved under Case-by-Case Insignificant Activity requests.	The updated information has been incorporated.
Air Permit Briefing Sheet, Section III (Description)	In the before and after facility total emissions listings, the 'before' PM10 value of 75.11 tons does include 42.08 tons of aluminum oxide, as stated; however, the 'after' PM10 value of 79.07 tons includes 44.15 tons of aluminum oxide.	Corrected as requested.
Air Permit Briefing Sheet, Section III (Description)	In the before and after facility total emissions listings, the change in sulfur dioxide emissions should be +0.14 tons (instead of +0.16 tons)	Corrected as requested.
Air Permit Briefing Sheet, Section IX (Insignificant Activities)	Under the "SCM Lines 1 and 2" subheading, the following storage tank should be added: "SV-200-11, Aqueous Nickel Nitrate Solution (15,000 gallons)". This new inorganic storage tank was approved under a Case-by-Case Insignificant Activity Request.	The updated information has been incorporated.
Air Permit Briefing Sheet, Section IX (Insignificant Activities)	Under the "Storage Tank with Negligible Pollutant Emissions" subheading, the following storage tank numbers should be revised: SV-600-14 is now SV-600-44; SV-600-15 is now SV-600-45; and SV-600-16 is now SV-600-46. These three inorganic storage tanks (utilized to store SOL) were replaced under an approved Case-by-Case Insignificant Activity Request.	The updated information has been incorporated.
Emission Rates for Criteria Pollutants, listing for GRP0005	The NOx annual emission rate for GRP0005 (Emission Point 140-CAP; the Boiler CAP) should be 53.85 tons/yr, instead of 53.58 tons/yr. (the average lb/hr value of 12.29 is listed correctly)	Typo corrected

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Emission Rates for TAP/HAP & Other Pollutants	Please note that the permitted emission rates of hydrofluoric acid (HF) have been moved from this table to the Specific Requirements section of the air permit. We request that the permitted emission rates of HF also be listed in this table, to avoid any possible confusion as to which TAP/HAP compounds are permitted. Therefore, we request the following six (6) items listed below.	This is a problem associated with TEMPO and will be resolved by using hydrofluoric acid instead of hydrogen fluoride.
Emission Rates for TAP/HAP & Other Pollutants, listing for EQT0026	A hydrofluoric acid (HF) emission rate of 2.2 lbs/hr (maximum) should be listed for EQT0026 (Emission Point 210-01-A).	Refer to the above response.
Emission Rates for TAP/HAP & Other Pollutants, listing for EQT0115	A hydrofluoric acid (HF) emission rate of 2.2 lbs/hr (maximum) should be listed for EQT0115 (Emission Point 210-01-B).	Refer to the above response.
Emission Rates for TAP/HAP & Other Pollutants, listing for GRP0010	Hydrofluoric acid (HF) emission rates of 1.25 lbs/hr (average) and 2.2 tons/yr (annual) should be listed for GRP0010 (Emission Point 210-330-CAP).	Refer to the above response.
Emission Rates for TAP/HAP & Other Pollutants, listing for GRP0012	Hydrofluoric acid (HF) emission rates of 2.8 lbs/hr (average), 8.39 lbs/hr (maximum) and 1.41 tons/yr (annual) should be listed for GRP0012 (Emission Point CTEC).	Refer to the above response.
Emission Rates for TAP/HAP & Other Pollutants, listing for RLP0002	Hydrofluoric acid (HF) emission rates of 0.625 lbs/hr (average), 0.92 lbs/hr (maximum) and 0.89 tons/yr (annual) should be listed for RLP0002 (Emission Point 210-02).	Refer to the above response.
Emission Rates for TAP/HAP & Other Pollutants, listing for UNF0001	A facility total hydrofluoric acid (HF) emission rate of 4.5 tons/yr should be listed for UNF0001 (facility total).	Refer to the above response.
Specific Requirements (for EQT0002)	EQT0002 should be listed as 110-01 – North Laboratory Fume Scrubber (instead of 310-09 – North Laboratory Fume Scrubber). EQT0002 is listed correctly in the "Inventories" section of the air permit.	Typo corrected.
Specific Requirement No. 267 (for GRP0006)	The SCM Line 2 CAP permitted emission rate for particulate matter is 1.80 tons/yr (instead of 1.92 tons/yr), and the permitted emission rate for chlorine is 1.19 tons/yr (instead of 2.19 tons/yr).	Typo corrected.

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