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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Union Carbide Corp.**	**AI #:**	**2083**	**TEMPO Activity No:**	**20080010**
Facility Name:	**LP-3 Polyethylene Plant**	**Remarks Submitted by:**	**Deborah C. Rome**		
Permit Writer:	**LND**	**Permit Writer Email address:**	**Lourdes.Dugas@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)
1	Pg.1, Sec. III, 3rd parag, last sentence	Remove "normally at about 300 psig", replace with "at low pressures" as stated in permit application	Permit Briefing Sheet has been updated.
2	Pg.2, last bullet	Correct "Emission Points 042/1043", 042 should be 1042	Permit Briefing Sheet has been updated.
3	Pg.3, 5th bullet	Loading CAP, 1057 should be 1067 and 1053 needs to be added	Permit Briefing Sheet has been updated.
4	Pg.6, Sec IX	The two generators and two compressors are not stationary sources. They would be brought in to conduct work on an as needed basis.	LAC 33:III.501.B.5.B4 specifically mentions that *"This exemption does not include any transportable emissions units such as temporary compressors or boilers, unless regulated by Title II of the Clean Air Act."*
5	Pg.21, Table 2	UCC requested an exemption to LAC 33:III.1311.C per LAC 33:III.1311.E. The exemption is not listed in Table 2, will the exemption be granted?	The opacity exemption given at LAC 33:III.1311.E points to Table 3 from LAC 33:III.1321. UCC used the total capacity of the plant to obtain the value limitation from Table 3, making this a plant wide value, not an individual source value. As such, any

			individual equipment could be over its limit but not over the plant wide limit. Additionally, opacity is an indicator of particulate and proper operation of the control device; therefore, the specific condition is a guide to prevention and meets the periodic monitoring required by EPA, as well.
6	Statement of Basis, Pg.1, parag.2, last sentence	Not all catalyst used at LP-3 is produced on site. Please revise sentence to say "The catalyst, which can be..."	Statement of Basis has been updated.
7	Statement of Basis, Pg.2, parag.2, last sentence	Remove "normally at about 300 psig", replace with "at low pressures" as stated in permit application	Statement of Basis has been updated.
8	Statement of Basis, Pg.4, Proposed Permit	LP-3 existing permit # is 2350-V3	Statement of Basis has been updated.
9	Emission Rates for Criteria Pollutants, FUG 0023 (1036)	CO Avg <0.01 lb/hr, Max <0.01lb/hr, NOx Avg <0.01, Max <0.01. All are now listed as <0.001	From the "Louisiana Guidance for Air Permitting Actions" of 02/26/08, Page 28 of 181 <u>Criteria Pollutants</u> Report annual (i.e., TPY) emissions to 2 decimal places. If emission rate does not round to 0.01 TPY, report emissions as being < 0.01 TPY. Also report hourly (i.e., average lb/hr and maximum lb/hr) emissions to 2 decimal places unless the emission rate does not round to 0.01 lb/hr. If the hourly emissions rate rounds to 0.001, 0.002, 0.003, 0.004, or 0.005, report emissions as such. If the hourly emissions rate does not round to 0.001, report emissions as < 0.001. <u>Toxic Air Pollutants</u> TAP emissions should be reported as described above, except that: • annual and hourly emissions of chlorinated dibenzofurans and chlorinated dibenzo-p-dioxins, which have a Minimum Emission Rate (MER) of 0.0001 lb/year, must be reported to eight (8) decimal places, and • annual and hourly emissions of all other TAPs that have an MER of 50 lb/year or less should be rounded to three decimal places.
10	Emission Rates for Criteria Pollutants, RLP 1141 (1007)	VOC Avg 0.01 lb/hr, Max 0.3 lb.hr, 0.05 TPY. No info in table now.	Emission rates have been updated.
11	Emission Rates for	PM10 remove < from TPY #, EIQ sheet list 0.17 TPY	Emission rates have been updated.

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	Criteria Pollutants, RLP 1150 (1026)		
12	Emission Rates for Criteria Pollutants, RLP 1151 (1027)	PM10 remove < from TPY #, EIQ sheet list 0.17 TPY	Emission rates have been updated.
13	Emission Rates for TAP/HAP and Other Pollutants, FUG 0023 (1036)	Ammonia Avg <0.01 lb/hr, Max <0.01 lb/hr, both listed as <0.001 now	Check response # 9 above.
	Specific Requirements		
14	#13 pg. 1 of 24	References subpart XX, there is no NESHAP Subpart XX	Yes there is a NESHAP Subpart XX: National Emission Standards For Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations.
15	#14 pg. 1 of 24	References subpart XX, there is no NESHAP Subpart XX	Yes there is a NESHAP Subpart XX National Emission Standards For Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations.
16	#17 pg. 2 of 24	References subpart XX, there is no NESHAP Subpart xx	Yes there is a NESHAP Subpart XX - National Emission Standards For Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations.
17	#127 pg. 8 of 24	Citation is not correct, what should it be?	AI 2083 - Site Wide - UCC - St Charles Operations The Requirements Section has been updated. The correct citation is LAC 33:III.5109.B
18	#128 pg. 9 of 24	Please remove this State Only specific condition from the existing permit. A request was made for an exemption to LAC 33:III.1311.C since the emissions qualify to be exempt per LAC 33:III.1311.E. , discussed in Sec. 3 of the LP-3 permit application. The LP-3 Plant has at least 5 years of daily check sheets that show no opacity issues. These check sheets have been reviewed during agency inspections. The maintenance schedule on the filters is completed as indicated in the condition.	CRG002 - CFF - Control Fabric Filter (> 99% Eff) Check response # 5 above. UCC used the total capacity of the plant to obtain the value limitation from Table 3, making this a plant wide value, not an individual source value. As such, any individual equipment could be over its limit but not over the plant wide limit. Additionally, opacity is an indicator of particulate and proper operation of the control device; therefore, the specific condition is a guide to prevention and meets the periodic monitoring required by EPA, as well.
19	#129 pg. 9 of 24	The citation listed references a Total suspended particulate <= 100 lb/hr. Where does this limit come from? The total particulate emission for the LP-3 plant is approximately 6.5 lb/hr.	CRG 0003 - LAC 33:III Chapter 13 - Emission Standards for PM Applicability (1311) The limit has been updated.
20	#164 pg. 11 of 24	Please remove. Regulation does not apply to LP-3, a low density polyethylene process	EQT 986 - 1022-Flare The Requirements Section has been updated.
21	#165 pg. 12 of 24	Please remove. No halogenated hydrocarbons are present at LP-3	EQT 986 - 1022-Flare The Requirements Section has been updated.
22	EQT 0998, pg 14 of 24	Please add LAC 33:III.2103.A regulation. Specific requirement 227 is the citation.	EQT 998 - Storage Bullet (C-1406) As per application Table 4, this is a 66,000 gallons vessel, as such it has to comply with LAC 33:III.2103.B and 2103.E. LAC 33:III.2103.A is for vessels <= than 40,000 gallons.

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23	# 209 – 217, pg 15 of 24	Please remove, all apply to a Polyethylene terephthalate process. LP-3 is a Low Density Polyethylene process.	EQT 1000 – Column (C-1447) The Requirements Section has been updated.
24	#254 pg. 19 of 24	Please remove. Specific requirement 253, LAC 33:III.2121.F states the reporting requirements for the regulation that applies	FUG 023 1036 – Fugitive Emissions The requirement has been removed, after calling UCC's Deborah Rome and explaining the value of the requirement and verifying this was still UCC's wishes.
25	#270, 272, 273, 273, pg. 22 of 24	Please remove. Do not apply, no fuel used at this vent.	RLP 1141 1007 – Reduction Blow Tank Vent The Requirements Section has been updated.
26	#271, pg. 22 of 24	Exemption requested per LAC 33:III.1311.E. If exemption accepted please remove this specific requirement.	RLP 1141 1007 – Reduction Blow Tank Vent Check response #5 above.
27	#286-289, pg 23 of 24	Please remove all are addressed by specific requirement #290. If not removed #288 is not correct. Reports are no longer submitted quarterly.	UNF 012 LP-3 Polyethylene Plant LDEQ utilizes a computer program called TEMPO to maintain information on all facilities and to draft permits. TEMPO has the capability to provide notification messages when required reports are not received by a specified date. Several "general conditions" must be repeated in the Specific Requirements in order for TEMPO to retain these notification functionalities. In the event of a perceived discrepancy between a General Condition and the corresponding permit Specific Requirement, the General Condition shall prevail
	Inventories		
28	RLP 1140 pg. 1 of 9	Max and normal operating rate should be 2.4 ft^3/min	Inventories Section has been updated.
29	RLP 1141 pg. 1 of 9	Max and normal operating rate should be 2.4 ft^3/min	Inventories Section has been updated.
30	RLP 1142 pg. 2 of 9	Max operating rate should be 57 ft^3/min	Inventories Section has been updated.
31	RLP 1144	Max and normal operating rate should be 2000 ft^3/min	Inventories Section has been updated.
32	RLP 1145	Max and normal operating rate should be 2000 ft^3/min	Inventories Section has been updated.
33	RLP 1146	Max and normal operating rate should be 270 times/yr	Inventories Section has been updated.
34	RLP 1147	Max and normal operating rate should be 270 times/yr	Inventories Section has been updated.
35	RLP 1148	Max and normal operating rate should be 270 times/yr	Inventories Section has been updated.
36	RLP 1149	Max and normal operating rate should be 270 times/yr	Inventories Section has been updated.
37	RLP 1152	Operating Time should be 8760 hr/yr	Inventories Section has been updated.
38	RLP 1153	Operating Time should be 8760 hr/yr	Inventories Section has been updated.
39	RLP 1154	Max operating rate should be 251 ft^3/min	Inventories Section has been updated.
40	RLP 1155	Max operating rate should be 251 ft^3/min	Inventories Section has been updated.
41	RLP 1156	Operating Time should be 200 hr/yr	EIQ 1032 Off Grade Loading Bin Vent The Requirements Section has been updated. Called Deborah to verify that the sources are not off loading at the same time.
42	RLP 1163	Max operating rate should be 150 ft^3/min	Inventories Section has been updated.
43	RLP 1164	Max operating rate should be 100000 lb/hr, Normal operating rate should 68457 lb/hr	Inventories Section has been updated.
44	RLP 1165	Max operating rate should be 100000 lb/hr, Normal operating rate should 68496 lb/hr	Inventories Section has been updated.
45	RLP 1168	Max operating rate should be 61 ft^3/min	Inventories Section has been updated.

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46	RLP 1169	Max operating rate should be 895 ft^3/min	Inventories Section has been updated.
47	RLP 1170	Max operating rate should be 895 ft^3/min	Inventories Section has been updated.
48	RLP 1171	Max operating rate should be 895 ft^3/min	Inventories Section has been updated.
49	RLP 1172	Max operating rate should be 895 ft^3/min	Inventories Section has been updated.
50	RLP 1201	Max and normal operating rate should be 0.2g/batch	Inventories Section has been updated.
51	RLP 1205 pg. 3 of 9	Max and normal operating rate should be 4146 ft^3/hr	Inventories Section has been updated.
52	RLP 1208	Max and normal operating rate should be 4146 ft^3/hr	Inventories Section has been updated.

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