Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**The Procter & Gamble**	**AI #:**	**872**	**TEMPO Activity No:**	**PER20080007**
Facility Name:	**Alexandria Plant**	**Remarks Submitted by:**	**Melissa Grimme, Environmental Manager**		
Permit Writer:	**Shane Clary**	**Permit Writer Email address:**	**Shane.Clary@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 Permit 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 the 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)
Cover Letter	Replace Grace Allen with Regina Washington	**Change made.**
III Air Permit Briefing Sheet Description	Page 1- Under description second paragraph –Remove part of sentence "and then finish product is conveyed to temporary on site storage" This statement is not accurate of our operations.	**Change made.**
IX Air Permit Briefing Insignificant Activities	Page 4- Remove LOADOUT in 7 Detergent Process Vessels (LOADOUT, 7,773 gallons each). This is not a loadout.	**Change made.**
X Table 1. Applicable Louisiana and Federal Air Quality Requirements	Page 7- Verify if EQT 75 is applicable under LAC 33:III.Chapter 5	**EQT 75 has applicable Chapter 5 (Louisiana Policy) requirements**
X Table 1. Applicable Louisiana and	Page 8 – Under the 'Description' column, please revise "(Silo and FRL Filters 53 – 66)" to read "(Silo and FRL Filters 53-64)". The EIQ No. 03-137 corresponds to Filter No. 64, not 66.	**Change made.**

Federal Air Quality Requirements		
X Table 1. Applicable Louisiana and Federal Air Quality Requirements	Page 9 – Under the 'ID No'. Column, please add EQTs 166, 167, and 176. Also, under the 'Description' column, please add EIQ Nos. 03-190, 05-196 and 05-197. In the last grouping in parenthesis, please have it read as follows, "(Tank Vent Nos. 27-40, 42-44, 47, 53-64, 78, 79, 80, 81, 82, and 85)."	**EQT 166 (05-196 Tank Vent No. 88)** **EQT 167 (05-197 Tank Vent No. 89)** **EQT 176 (03-187 Tank Vent No. 79) were added** **03-190 was also added which refers to EQT 183 (Tank Vent No. 82)**
XI Table 1. Applicable Louisiana and Federal Air Quality Requirements	Page 14 – Under the 'Description' column, please revise "(Silo and FRL Filters 53 – 66)" to read "(Silo and FRL Filters 53-64)". The EIQ No. 03-137 corresponds to Filter No. 64, not 66.	**Change made.**
XI Table 1. Applicable Louisiana and Federal Air Quality Requirements	Page 15 – Under the 'ID No' column, please add EQTs 166, 167, and 176. Also, under the 'Description' column, please add EIQ Nos. 03-190, 05-196 and 05-197. For the last grouping in parenthesis, please have it read as follows, "(Tank Vent Nos. 27-40, 42-44, 47, 53-64, 78, 79, 80, 81, 82, and 85)."	**EQT 166 (05-196 Tank Vent No. 88)** **EQT 167 (05-197 Tank Vent No. 89)** **EQT 176 (03-187 Tank Vent No. 79) were added** **03-190 was also added which refers to EQT 183 (Tank Vent No. 82)**
XI Table 2. Explanation for Exemption Status or Non-Applicability of a Source	Page 23- Under Column 3 "Notes"- Remove "which is continuous" The site has monitoring conditions, however they are not continuous.	**Change made.**
Emission Rates for Criteria Pollutants	Please include emission rates for EIQ No. 144 (EQT 154). The emission rates for Total VOC are 2.56 avg lb/hr and 11.22 tpy. There is no maximum lb/hr rate, as this source is the Product Loadout CAP.	**Change made to GRP 0008.**
Emission Rates for Criteria Pollutants	For EQT 115 please change the VOC tpy rate from <0.01 to 0.01.	**Change made.**
Emission Rates for TAP/HAP & Other Pollutants	For EQTs 145, 146, and 147 please change the 1, 4 Dioxane avg lb/hr rate from <0.01 to 0.01.	**Change made for EQT 101 (03-145), EQT 102 (03-146), and EQT 103 (03-147).**
Emission Rates for TAP/HAP & Other Pollutants	For UNF 0001 (Facility Wide), please add the TAP 'Formaldehyde' to the listing at <0.01 tons/year.	**Change made.**
Inventories – Stack Information	For EQT 31, please change the diameter to 1.83 feet instead of 1.63 feet.	**Change made.**
Inventories – Stack Information	For EQT 33, please change the velocity to 68 feet/sec instead of 66 feet/sec.	**Change made.**

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Inventories – Stack Information	For EQTs 49 thru 54, 63, 64, 71, 72, 152 thru 161 was this diameter (0.33 feet) an assumption or default? Please remove if possible.	**Change made.**
Inventories – Stack Information	For EQTs 76 thru 79, and 81 thru 86 was this diameter (4 feet) an assumption or default? Please remove if possible.	**Change made.**
Inventories – Stack Information	For EQT 80, please remove parameters for velocity, diameter, and flow rate. These items were not provided on the EIQ sheet.	**Change made.**
Inventories – Stack Information	For EQT 103, please revise the flow rate to 74.91 instead of 74.24 ft3/min, and the temperature to 105 instead of 100 degrees F.	**Change made.**
Inventories – Stack Information	For EQT 104, please revise diameter to 0.33 feet instead of 0.25 feet, and the height to 43 feet instead of 34 feet.	**Change made.**
Inventories – Stack Information	For EQT 109, please revise the flow rate to 71.86 instead of 71.35 ft3/min, and the temperature to 82 instead of 78 degrees F.	**Change made.**
Inventories – Stack Information	For EQTs 144 and 145, please revise the flow rates to 74.24 instead of 72.24 ft3/min.	**Change made.**
Inventories – Stack Information	For EQTs 152 thru 161 was this height (20 feet) an assumption or default? Please remove if possible.	**Change made.**
Inventories – Stack Information	For EQT 191, please revise velocity to 160 feet/sec instead of 16 feet/sec. Also revise the flow rate to 20,000 ft3/min instead of 2,000 ft3/min.	**Change made.**
Inventories – Stack Information	For EQT 192, please add in the velocity and flow rate to read 25 feet/sec and 73 ft3/min. Change the height and temperature to 42 feet and 90 degrees F (instead of 34 feet and 80 degrees F).	**Change made.**
Inventories – Stack Information	For EQT 193, please add in the velocity and flow rate to read 25 feet/sec and 84 ft3/min. Change the temperature to 100 degrees F (instead of 80 degrees F).	**Change made.**
Inventories – Stack Information	For EQTs 194 and 195, please remove the diameter – does not correspond with EIQ sheet. Change the heights and temperatures to 16 feet and 70 degrees F (instead of 34 feet and 80 degrees F).	**Change made.**
Inventories – Stack Information	For EQT 196, please add in the velocity to read 25 feet/sec.	**Change made.**
Inventories – Stack Information	For EQT 199, please change the temperature to 81 degrees F instead of 100.	**Change made.**
Inventories – Subject Item Groups	Page 10 of 13- GRP 003 Add 5 to 1st heading and remove 4 from 2nd heading. Should read "Heaters NO. 1,2,3, and 5- Heaters No. 1, 2,3, and 5"	**Change made.**

Inventories – Annual Maintenance Fee	On bottom of page 12 of 13, the first three lines of the fee table have been duplicated. Please delete the last three rows (Fee Nos. 0500, 0630, an 3C).	**Change made.**
Specific Requirements	Page 4 of 22, Condition 35 practicable is misspelled	**Change made.**
Specific Requirements	Page 4 of 22, Condition 40 Please remove reference to NSPS standards and clarify stack test requirements. EQT 21 is not subject to any NSPS standards. A stack test was performed in 2001 and submitted to LDEQ on 5/18/01. Parameters tested VOC, NOx, and CO were tested to be less than 35% of permitted limit.	**The stack test requirement is per Louisiana Policy. The NSPS is included only as a reference for the test methods and procedures required to conduct the stack test.**
Specific Requirements	Page 15 of 22, Condition 144, please review applicable regulation [40 CFR 60.705(j)] previous permit [40 CFR 60.705(h)(j)]	**The [40 CFR 60.705(j)] citation is correct.**
Specific Requirements	On page 20 thru 22, GRPs 0002, 0003, 0004, 0006, 0008, and UNF 0001 have repetitive title descriptions. Please remove the first part of the title – i.e., GRP 0002 "Filters – Filters" (remove the first word).	**Change made.**
Specific Requirements	GRP 0003, add 5 to first title "Heaters No. 1, 2, 3, and **5**" Remove repetitive header. For "Group Members"- Remove **EQT 075**. Heater No. 4, EQT 075 is not a natural gas heater.	**Change made.**
Specific Requirements	Page 21 of 22, GRP 008- "Product Loadout- Product Loadout Cap" Remove Condition 202 "Submit report: Due annually…" This requirement was removed from specific conditions. Records are kept per condition 200,201, 203 and compliance certified in annual compliance certification.	**After several communications via email and phone, the limiting and reporting specific requirements now read as follows:** **Total emissions <= GRP 0008 Product Loadout CAP emission limits provided in Emission Rates For Criteria Pollutants and Emission Rates For TAP/HAP & Other Pollutants for all GRP 0008 Members combined. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the Total emissions for all GRP 0008 Members combined exceed the maximum listed in GRP 0008 Product Loadout CAP emission limits provided in Emission Rates For Criteria Pollutants and Emission Rates For TAP/HAP & Other Pollutants for any twelve consecutive month period. (State Only)** **Submit report: Due annually, by the 31st of March. Report the emissions produced by all GRP 0008 Members combined for each month of the preceding calendar year, as well as the twelve consecutive month total for each month, to the Office of Environmental Compliance, Enforcement Division. This report can be combined with reports required under LAC 33:III.537 G.C. XI. Any written report submitted in advance of the time frame specified in this requirement, may serve to meet the reporting requirements of this Condition provided all information specified in Paragraph D of Louisiana General Condition XI is included. (State Only)**

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