Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ExxonMobil Refining & Supply Company**	**AI #:**	**2638**	**TEMPO Activity No:**	**PER20090003**
Facility Name:	**BRRF-DOCKS**	**Remarks Submitted by:**	**Diane H. Leche**		
Permit Writer:	**Dawei Pan**	**Permit Writer Email address:**	**Dawei.Pan@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.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis Existing Part 70 Permits	**Many of these permits have been updated. Following is a complete list.** **2755-V3 Pipestills 10/08/08** **2385-V5 Cat Complex 1/08/09** **2447-V2 Hydroprocessing 9/23/08** **3060-V0 Hydrofining 1/18/08** **2261-V2 Reforming 8/18/08** **2176-V3 Low Sulfur Mogas 4/11/06** **2589-V4 Light Ends 9/4/08** **2234-V4 Cokers 12/9/08** **2341-V1 Specialties 10/11/07** **2296-V3 Light Oils Finishing 7/30/08**	**Updated as remarked except for 0840-00127-V3 (its effective date should be 5/13/2008).**

	2300-V0 Sulfur Plant 3/20/06 2363-V2 Utilities 11/05/08 2795-V3 Refinery Tank Farm 11/29/07 2047-V1 Docks 4/11/06 0840-00127-V3 Marketing Terminal 5/13/08 2926-V0 Complex Labs 8/31/05	
Statement of Basis Section VI	BRRF questions why non-applicability is restated in the Statement of Basis since it already is covered in the permit in Section XI Table 2. This is duplicative and could lead to conflicts in applicability.	Statement of Basis highlights selected exemptions and regulations applicability determinations for the benefit of the public.
Specific Requirement #1	BRRF requests that Specific Requirement 67 be included under Specific Requirement 1 which is an NSPS Subpart J citation.	Changed by the change of the citation # LAC 33:III.501.C.6 to 60.100 for this requirement.
Specific Requirement #2	BRRF requests deletion of this requirement. BRRF does not use a CEMS to comply with NSPS J. BRRF has applied for an AMP which is referenced in Specific Requirement #67.	Removed.
Specific Requirement #12	BRRF requests removal of this citation. These are past dates and the requirement is redundant with subsequent statements.	Removed.
Specific Requirement #14	Please remove #14. This requirement is also listed in #15.	Removed.
Specific Requirement #28	Please remove requirement. This requirement is not applicable to a flare.	Removed.
Specific Requirement #40	Please remove requirement. This requirement is also listed in #39.	Removed.
Specific Requirements #47, 48, & 49	Please remove requirements. These requirements are not applicable to a flare as the control device.	Removed.
Specific Requirement #59	The second sentence of this requirement is part of BRRF's waiver on vapor tightness test documentation for NESHAP Subpart Y. Please move this requirement under a Subpart Y requirement or on its own line.	Divided this requirement into two requirements: 63.560 and 63.654(c).
Specific Requirement #62	Please remove. This requirement does not provide clarity of what the requirement is for LAC 2108. BRRF complies with LAC33:III.2108.C which requires greater than 90% control.	Removed #62 and added LAC 33:III.2108.C requirements.
Specific Requirement #81	Please revise this requirement to read, "Comply with the requirements 40 CFR 61.340 through 61.355, Subpart FF. Subpart CC. [40 CFR 63.641 & 647(a)]"	Changed.
Specific Requirement #82	Please remove this requirement. Subpart Y is not applicable to this source. Subpart FF is applicable for complying with Subpart CC.	Removed.
Specific Requirement #83	This requirement should read, "Equip with a submerged fill pipe and an IFR, EFR, or vapor loss control system."	Changed.
Specific Requirements #84 & 85	Please remove these requirements. This source is not a loading source. Therefore, LAC33:III.2108 is not applicable.	Removed.
Specific Requirement #87	Please remove this requirement. 40 CRF 60.Subpart GGG is not applicable to the Docks facility.	Removed
Specific Requirement #88	BRRF requests to reword this condition to read as follows: "Compliance with 40 CFR 61 Subpart V is demonstrated by implementing..."	Changed.

Specific Requirement #89	BRRF requests to reword this condition to read as follows: "Compliance with 40 CFR 63 Subpart CC is demonstrated by implementing..."	Changed.
Specific Requirement #91	BRRF requests to reword this condition to read as follows: "Compliance with LAC33:III.2122 is demonstrated by implementing..."	Changed.
Specific Requirements #92 and 93	BRRF requests deletion of these requirements since they duplicate the emission rate tables.	Removed.
Specific Requirement #161	Please remove this requirement. BRRF complies with the General Requirements of Subpart FF under 61.342(c)(3)(ii).	Changed by reseting the specific requirements for the Facility with the benzene emission equal or greater than 10 Mg TPY.
Specific Requirement #165	Please remove this requirement. BRRF complies with Subpart FF reporting requirements under 61.357(d).	Changed by reseting the specific requirements for the Facility with the benzene emission equal or greater than 10 Mg TPY.
Specific Requirement #173	40 CFR 63.7990 is part of Subpart HHHHH and is not applicable to this facility.	Removed.
Specific Requirement #175	Please remove as this is not applicable for containers using Level 1 or 2 controls per Table 3 to Subpart GGGGG [See §63.6(e)(3)]	Removed.
Specific Requirement #176	Please remove as this is not applicable for containers using Level 1 or 2 controls per Table 3 to Subpart GGGGG [See §63.6(e)(3)]	Removed.
Specific Requirement #177	Please remove as not applicable. No continuous monitoring systems currently used or required for compliance with this subpart at this site.	Removed.
Specific Requirement #178	Please remove as not applicable. No continuous monitoring systems currently used or required for compliance with this subpart at this site.	Removed.
Specific Requirement #179	Please remove as not applicable. No continuous monitoring systems currently used or required for compliance with this subpart at this site.	Removed.
Specific Requirement #181	Please delete as not applicable. This facility is not currently subject to 40 CFR 63, Subpart DD.	Removed.
Specific Requirement #183	Please update to add that the site is allowed to transfer without certification if material will be directly disposed in a landfill or other land disposal unit in accordance with 63.7936(b)(1).	Revised.
Specific Requirement #184	BRRF notes that this requirement is not applicable since the site only has containers. Thus 63.7937(b) and (d) are not applicable.	Revised. 63.7937(c) is applicable.
Specific Requirement #185	BRRF notes that this requirement is not applicable since the site only has containers. Thus 63.7937(b) and (d) are not applicable.	Revised. 63.7938(c) is applicable.
Specific Requirement #186	BRRF notes that only 63.7941(i) applies.	Revised. 63.7941(i) is applicable.
Specific Requirement #188	Please remove as this is not applicable for containers using Level 1 or 2 controls per Table 3 to Subpart GGGGG [See §63.6(e)(3)]	Removed.
Specific Requirement #190	BRRF notes that 63.79523(b) and (d) are not applicable to this site.	Revised. 63.7952(c) is applicable.
Specific	BRRF requests deletion of this requirement since it duplicates the General Conditions.	No change. LDEQ utilizes a computer

Requirement #194		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.
Specific Requirement #195	BRRF requests deletion of this requirement since it is no longer applicable.	No change. 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.
Specific Requirements #213 and 214	BRRF requests requirement 213 be updated to reflect the correct list of HRVOCs which only includes ethylene and propylene. #214 should be deleted as duplicative.	Revised #213 with updated HRVOC list per LAC 33:III.504.M.1. Deleted #214 duplicate.
Specific Requirement #217	BRRF requests deletion; this is duplicates requirement #67.	Deleted duplicate requirement #217.
Specific Requirement #229	Please remove this requirement. The requirements of this section do not apply to sources complying with applicable federal standards in 40 CFR Part 63.	Removed.
New Specific Requirement	Under UNF0001, please add the following requirement: NESHAP for Source Categories Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j) |40 CFR 63.52(e)| Facilities subject (or potentially subject) to 112(j) determinations must submit Part 1 permit applications by May 15, 2002. A Part 1 permit application was submitted on May 15, 2002 for the following MACT standards: Industrial Commercial Institutional Process Boilers and Heaters, Reciprocating IC Engines, Organic Liquid Distribution and Site	Added.

LDEQ-EDMS Document 42547741, Page 50 of 167

	Remediation.	
Specific Requirements #233 & 234	Please remove these conditions. BRRF is a major source of toxic air pollutants.	Removed.
Section XI. Table 2. Facility Wide	Please add the following: NESHAP for Source Categories Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j) [40 CFR 63.40 & 63.43(a)] DOES NOT APPLY. The requirements of this subpart that implement Section 112(g) of the CAA, applies to the construction or reconstruction of a new process or production unit which emit or have the potential to emit >=10 TPY of any HAP or >=25 TPY of any combination of HAPs. No such construction or reconstruction is included in this permit.	Added.
Section XI. Table 2. DOCKS/LOADING Docks Non-MVR Loading Emissions	Please add the following: EXEMPT. Emissions from VOCs with a true vapor pressure of less than 1.5 psia at the loading temperature of the liquid are exempt from the control requirements of this Section. [LAC33:III.2108.A]	No change. This statement is already in the table.
Section XI. Table 2. DOCKS/LOADING Docks Non-MVR Loading Emissions	Under NESHAP for Source Categories Subpart Y – Marine Tank Vessel Tank Loading Operations, the exemption for MACT standards should read as follows: "Exempt from MACT standards. Loading operations of commodities with a TVP < 1.5 psia are exempt from the MACT standards. [40 CFR 63.562(d)(1)]	Revised; also added "exempt from RACT standards".
Section XI. Table 2. DOCKS/MVR LOAD Flare Emissions	Under NESHAP for Source Categories Subpart Y – Marine Tank Vessel Tank Loading Operations, please add as follows: "Exempt from MACT standards. Loading operations with aggregate emissions < 10 tons of any HAP and < 25 tons of all HAPs are exempt from the MACT control standards. [40 CFR 63.560(a)]	Revised.
Section XI. Table 2. DOCKS/TK0001 Boat Gasoline Storage Tank	Under Compliance Assurance Monitoring for Major Stationary Sources, 40 CFR 64.2(b), please reword "Notes" to read as follows: DOES NOT APPLY – This tank has no add-on controls.	Revised.