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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Taminco Higher Amines, Inc.**	**AI #:**	**3263**	**TEMPO Activity No:**	**PER20080002**
Facility Name:	**St. Gabriel Plant**	**Remarks Submitted by:**	**Taminco/URS Corporation**		
Permit Writer:	**Scott J. Templet**	**Permit Writer Email address:**	**Scott.Templet@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)
Cover letter	Mr. Oscar Corona's title is "Site Manager"	Corrected to "Site Manager"
Air Permit Briefing Sheet, page 3	Amietol production should be 138,592,000 pounds/yr.	Corrected production for Amietol as requested.
Air Permit Briefing Sheet, page 4	Replace the second sentence of the third paragraph with the following: "TK-217 is currently routed to absorber T-112; however, Taminco is requesting the flexibility to route emissions from this tank to the atmosphere when storing M12 and M21 due to their low vapor pressures."	Added clarifying language as requested.
Air Permit Briefing Sheet, page 4	In the third paragraph, change the scrubbing media to "10% sulfuric acid."	Changed the scrubbing media as requested.
Air Permit Briefing Sheet, page 10	No change to chlorine emissions is proposed. "Before" and "After" should match with a 0 for "Change."	Corrected Before and After emissions to be equal and corrected the resulting change to no change.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet, page 12	Under Alternate Operating Scenarios for the Butyls Project, please add the following: "Tank TK-217 (Source 8-76E) is currently permitted to store monoisopropylamine (MIPA) and is routed to the Low Pressure Absorber T-112 (Source 40-96) or Sump No. 3. However, Taminco would like the flexibility to route the emissions from this tank when storing butyls to the Low Pressure Absorber T-107 (Source 10-76)."	Added this alternate operating scenarios as requested.
Air Permit Briefing Sheet, page 13	The formatting on Section VIII General Condition XVII Activities needs to be corrected so table fits on the page.	Formatting was fine on my copy and pages printed with entire table.
Air Permit Briefing Sheet, page 14	Remove TEA emissions for G14 Change Tank Landing Losses. There are no TEA emissions for this activity.	The TEA emission were removed from G14 activity.
Air Permit Briefing Sheet, page 22	Remove "1" for 40 CFR 64 applicability for the Wastewater Unit (EQT030).	The "1" was removed from the applicability table for the Wastewater Unit as requested.
Air Permit Briefing Sheet, page 27	Change NSPS Subpart D citation to "(40 CFR 60.40)" for the Boilers.	Corrected NSPS Subpart D citation on the non-applicability table (table 2).
Statement of Basis, page 3	Amietol production should be 138,592,000 pounds/yr.	Corrected production for Amietol as requested.
Statement of Basis, page 3	Replace the second sentence of the sixth paragraph with the following: "TK-217 is currently routed to absorber T-112; however, Taminco is requesting the flexibility to route emissions from this tank to the atmosphere when storing M12 and M21 due to their low vapor pressures."	Added clarifying language as requested.
Statement of Basis, page 4	In the first paragraph, change the scrubbing media to "10% sulfuric acid."	Changed the scrubbing media as requested.
Statement of Basis, page 6	Delete or explain "(for both options combined)" listed under "Permitted Air Emissions."	Deleted that text as it was included for a previous permit and did not apply to this permit.
Statement of Basis, page 6	No change to chlorine emissions is proposed. "Before" and "After" should match with a 0 for "Change."	Corrected Before and After emissions to be equal and corrected the resulting change to no change.
Emission Rates for TAP/HAP & Other Pollutants, page 1	Add max lb/hr rate (0.005 lb/hr) for n-butyl alcohol for EQT018.	Added the max lb/hr rate for n-butyl alcohol for EQT018.
Specific Requirements, SR#10, page 1	Remove Specific Requirement No. 10, LAC 33:III.2201.E.1.c. Taminco does not make use of the facility-wide averaging plan.	Removed specific requirement no. 10 as requested and also removed specific requirement no. 24 as it was an identical requirement for the other boiler.
Specific Requirements, page 11	Change source description for EQT029 to "C-102 Process Recycle Compressor."	Corrected the source description as requested.
Specific Requirements, SR#156, page 13	Change scrubbing media for EQT050 to "40% Acetic Acid."	Changed the scrubbing media as requested.
Inventories, page 1	Change "Normal Operating Rate" for EQT006 to 28.9 MM gallons/yr.	Changed "Normal Operating Rate" for EQT006 as requested.
Inventories, page 1	Change "Tank Volume" for EQT011 to 508,370 gallons and "Normal Operating Rate" to 20.2 MM gallons/yr.	Changed "Tank Volume" and "Normal Operating Rate" as requested.
Inventories, page 1	Change "Description" for EQT022 to "7-96 – U331 large Cooling Tower No. 1."	Corrected description as requested.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Inventories, page 1	Change "Description" for EQT029 to "42-96 – C-102 Process Recycle Compressor."	Corrected description as requested.
Inventories, page 1	Change "Description" for EQT037 to "3-08 – DEHA Receiver 4568."	Corrected description as requested.
Inventories, page 2	Change "Contents" for EQT049 to "10% Sulfuric Acid as scrubbing media."	Changed the contents for EQT049 as requested.
Inventories, page 2	Change "Contents" for EQT050 to "40% Acetic Acid as scrubbing media."	Changed the contents for EQT050 as requested.

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