Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**BASF Corporation**	**AI #:**	**2049**	**TEMPO Activity No:**	**PER20060028**
Facility Name:	**PYR/NVP/PVP/PVP-I Plants**	**Remarks Submitted by:**	**Megahn Brooks**		
Permit Writer:	**Kyle Prestenbach**	**Permit Writer Email address:**	**Kyle.Prestenbach@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)*
Air Permit Briefing Sheet – Page 4	General Condition XVII Activities – BASF requests removal of "HBVE Tank Truck Venting": *This is no longer applicable as the* HBVE addendum was rescinded.	**The GCXVII Activity was removed as requested.**
Air Permit Briefing Sheet – Page 5	Insignificant Activities – BASF requests rewording the fifth listed Insignificant Activity to "Lactic Acid Emissions."	**Lactic acid emissions are included in Source ID No. 5-90, PVP Spray Dryer Scrubber. Also, since lactic acid (2-hydroxypropanoic acid) is not a HAP, TAP, VOC, or other regulated pollutant, the proposed insignificant activity has been removed from the permit.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Multiple areas – Regulatory Tables, Specific Requirements, etc. – EQT0587 (2-90 PYR/NVP/PVP Plants – Flare)	Per 40 CFR 63.2535(c), "Compliance with 40 CFR part 60, subpart Kb and 40 CFR part 61, subpart Y. After the compliance dates specified in §63.2445, you are in compliance with the provisions of this subpart FFFF for any storage tank that is assigned to an MCPU and that is both controlled with a floating roof and in compliance with the provisions of either 40 CFR part 60, subpart Kb, or 40 CFR part 61, subpart Y. **You are in compliance with this subpart FFFF if you have a storage tank with a fixed roof, closed-vent system, and control device in compliance with the provisions of either 40 CFR part 60, subpart Kb, or 40 CFR part 61, subpart Y, except that you must comply with the monitoring, recordkeeping, and reporting requirements in this subpart FFFF.** Alternatively, if a storage tank assigned to an MCPU is subject to control under 40 CFR part 60, subpart Kb, or 40 CFR part 61, subpart Y, you may elect to comply only with the requirements for Group 1 storage tanks in this subpart FFFF." EQT0587, regarding 40 CFR 63 subpart FFFF, is only used as a control device for storage tanks with fixed roofs and closed vent-systems. EQT0587 complies with NSPS subpart Kb and therefore should only have monitoring, recordkeeping, and reporting requirements under 40 CFR 63 subpart FFFF. 40 CFR 63 subpart SS and 40 CFR 63 subpart A should not apply to EQT0587 per 40 CFR 63.2535(c).	**For any equipment, emission stream, or wastewater stream subject to 40 CFR 63 Subpart FFFF and another rule, the Permittee may elect to comply with the provisions as specified in 40 CFR 63.2535(a) through (l). The Flare, Source ID No. 2-90, is subject to 40 CFR 63 Subpart FFFF and 40 CFR 60 Subpart Kb. The Permittee elected to comply with 40 CFR 63.2535(c) which states that if a storage tank with a fixed roof, closed-vent system, and control device is in compliance with 40 CFR 60 Subpart Kb, then it is also in compliance with 40 CFR 63 Subpart FFFF, except that the Permittee must comply with the monitoring, recordkeeping, and reporting requirements in 40 CFR 63 Subpart FFFF. Since the flare is only used as a control device for storage tanks with fixed roofs and closed-vent systems in compliance with NSPS Subpart Kb, the requirements from 40 CFR 63 Subpart A and Subpart SS as previously referenced from Subpart FFFF were removed and the following requirements were added:** ***"After the compliance dates specified in 40 CFR 63.2445 of Subpart FFFF, the Permittee is in compliance with the provisions of 40 CFR 63 Subpart FFFF for any storage tank that is assigned to an MCPU and that has a fixed roof, closed-vent system, and control device in compliance with the provisions of 40 CFR 60 Subpart Kb, except that the Permittee must must comply with the monitoring, recordkeeping, and reporting requirements in 40 CFR 63 Subpart FFFF. For any equipment, emission stream, or wastewater stream subject to the provisions of both 40 CFR 63 Subpart FFFF and another rule, the Permittee also must identify the subject equipment, emission stream, or wastewater stream, and the provisions with which the Permittee will comply, in the notification of compliance status report required by 40 CFR 63.2520(d). Subpart FFFF. [40 CFR 63.2525(c)]"*** ***"Permittee shall comply with all applicable reporting requirements of 40 CFR 63.2520. Subpart FFFF. [40 CFR 63.2520]"*** ***"Permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63.2525. Subpart FFFF. [40 CFR 63.2525]*** **Also, the MACT requirement (LAC 33:III.5109.A) was modified to reflect the above changes. The MACT requirement was changed to the following:** ***"Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Compliance with the performance requirements of 40 CFR 60.18 of Subpart A, as referenced in 40 CFR 63.2535(c) of Subpart FFFF, is determined as MACT. [LAC 33:III.5109.A]"***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement #347	BASF requests the regulatory citation for requiring the facility to "maintain, to the extent practicable, a leak free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur". BASF believes that "practicable" and "leak free" are subjective terms that are left to individual interpretation. If no such regulatory citation exists, BASF requests removal of the above statement.	**Specific Requirement # 347 is standard language for sources emitting HRVOCs in the Baton Rouge Non-Attainment Area. As such, it will remain in the permit.**
Specific Requirements #138 - #143	Per LAC 33.III.2149.A.2.C "any batch process vent stream for which an existing combustion device or recovery device is employed to control VOC emissions is assumed to meet the 90 percent reduction requirement until the combustion device or recovery device is replaced for any reason. Such units shall be exempt from any monitoring, recordkeeping and reporting requirements under this Subchapter." EQT0599 meets the 90 percent reduction requirement for VOC, therefore Specific Requirements #138 - #143 should not apply.	**Since this emission source (6-90 PVP-I Scrubber) meets the exemption criteria of LAC 33:III.2149.A.2.c, Specific Requirements # 138 – 143 were removed from the permit. However, an explanation for exemption was added in Table 2.**
Specific Requirements #220 - #314	BASF requests clarification that Specific Requirements #220 - #314 apply only to the PVP Plant. The PVP Plant is the only Plant in Permit No. 2039-V1 that is subject to 40 CFR 63 subpart FFFF and therefore 40 CFR 63 subpart H.	**The following requirement was added for clarification as requested:** ***"The requirements of 40 CFR 63 Subpart G (40 CFR 63.162 through 182) and 40 CFR 63 Subpart FFFF (40 CFR 63:2480) apply only to components in OHAP service (> 5% by weight total organic HAPs) in the PVP Plant. The PVP Plant is the only plant in this permit that is subject to 40 CFR 63 Subpart FFFF and therefore 40 CFR 63 Subpart H. [40 CFR 63.160, 40 CFR 63.2480]"***
Specific Requirements #320 - #331	BASF requests clarification that Specific Requirements #320 - #331 apply "Site-wide" but do not apply to the PYR/NVP/PVP/PVP-I Plants as these Plants do not contain benzene.	**Site-wide requirements have been moved from the unit group, UNF0003, to the Agency Interest group, AI2049. Only requirements pertaining specifically to the PYR/NVP/PVP/PVP-I Plants appear in UNF0003.**

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