Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**American Sugar Refining, Inc.**	**AI #:**	**1329**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	**Chalmette Cane Sugar Refinery**	**Remarks Submitted by:**	**Bliss Higgins, ENVIRON International**		
Permit Writer:	**Tommy Menuet**	**Permit Writer Email address:**	**tommy.menuet@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)
Section X. Table 1 – Applicable La. and Fed. Air Quality Requirements	Table 1 shows "68" and "82" as Chapters under LAC 33:III with a "2" for UNF1. It is actually 40 CFR 68 and 82 that should be marked with a "2" for UNF1. The "LAC" portion of Table 1 should have the columns for "68" and "82" deleted. The "40 CFR" portion of Table 1 should have a column added for "82," and 40 CFR 68 and 82 should be designated with "2" for UNF1.	**Change made.**
	Delete the "1" for LAC 33:III.Ch. 5 for EQT 84 and GRP 3 on page 10. Ch 5 is shown as applicable for UNF1, and no other sources that are subject to Ch 5 requirements are listed with a "1."	**Change made.**
Inventories	For EQT 007 (Char Kiln North – Kiln 7), delete the listed max operating rate of 31 MMBtu/hr. This rate was not previously listed in the V0 permit and no updates were provided for this source with the current application. Normal operating rate is correctly listed as 1.7 MMBtu/hr.	**Change made.**

Emission Rates for Criteria Pollutants	For EQT 0007 through 0024 (Char Kilns), the max lb/hr limit for $SO_2$was lowered from 0.006 to 0.001. Max limit should remain at 0.006 lb/hr. TPY limit should remain 0.006 as proposed to reflect 8760 hrs/yr at the average hourly emission rate of 0.001 lb/hr.	**Change made**
Specific Requirement Nos. 4, 11, 180, 183, 186, 189, and 192	Delete Specific Requirement Nos. 4, 11, 180, 183, 186, 189, and 192. None of the natural gas fired sources (EQT 001-002, EQT 007 -024, EQT 076-080) are subject to LAC 33:III.Chapter 15 per LAC 33:III.1502.A.3 because they emit or have the potential to emit less than 5 tpy of SO2. This non-applicability status is appropriately captured in Table 2 - Explanation for Exemption Status on page 18 of the draft permit. The Ch 15 requirements were correctly deleted for all the Char Kilns (EQT 007-024) in the draft permit but were not deleted for the #1 Boiler (EQT 002), #7 Boiler (EQT 001), or High Pressure Boilers 2 – 6 (EQT 076-080).	**Change made.**
Specific Requirement Nos. 6 and 13	Revise language in Specific Requirement Nos. 6, and 13 to delete the sentence, "Every five years re-performance testing shall be conducted." Language is ambiguous because the requirement also states performance testing is "Due within five years, plus or minus 6 months, of when the previous performance test was performed, or within one year after the issuance of a permit renewal, whichever comes later."	**The specific requirement for stack testing boilers at this facility is "Conduct a performance/emissions test: Due within five years, plus or minus 6 months, of when the previous performance test was performed, or within one year after the issuance of a permit renewal, whichever comes later. Re-performance test shall be conducted every five years from the previous test. The stack test's purpose**
Specific Requirement No. 113	Revise sentence to read "or within one year after the issuance of a permit renewal" Revising the language will be consistent with Specific Requirement Nos 6 and 13.	**Change made.**
Specific Requirement No. 203	Specific Requirement No. 203 requires natural gas recordkeeping by electronic or hard copy *weekly* and that records be kept of total natural gas usage each *month*, as well as the total natural gas usage for the last twelve months. We request that the requirement be revised to require natural gas recordkeeping by electronic or hard copy monthly, instead of weekly. This is consistent with the requirement to track natural gas usage and NOx emissions on a monthly and 12-month rolling basis.	**For consistency, LDEQ revised Specific Requirement No. 206 to read, "Natural gas usage calculated by technically sound method monthly. Keep records of the natural gas usage each month, as well as for the last twelve months. Make records available for inspection by DEQ personnel."**
Specific Requirement No. 204	Specific Requirement No. 204 requires NOx emissions recordkeeping by electronic or hard copy *weekly* and that records be kept of total NOx emissions each *month*, as well as the total NOx emissions for the last twelve months. We request that the requirement be revised to require NOx emissions recordkeeping by electronic or hard copy monthly, instead of weekly. This is consistent with the requirement to track natural gas usage and NOx emissions on a monthly and 12-month rolling basis.	**For consistency, LDEQ revised Specific Requirement No. 206 to read, "Nitrogen oxides emissions calculated by technically sound method monthly."**

Specific Requirement No. 205	Delete Specific Requirement No. 205 which requires that an annual report of natural gas usage be submitted to DEQ by March 31 of each year. This is consistent with our request above to delete the natural gas usage limit.	**LDEQ requires that the annual usage of natural gas be reported to the Office of Environmental Compliance, Enforcement Division.**
Specific Requirement No. 206	Specific Requirement No. 206 requires, "Natural gas monitored by technically sound method weekly." We request the requirement be revised to specify "natural gas usage monitored..." for clarification and that the monitoring be on a monthly basis. This is consistent with the requirement to track natural gas usage and NOx emissions on a monthly and 12-month rolling basis.	**For consistency, LDEQ revised Specific Requirement No. 203 to read, "Natural gas meter reading (obtain from a gas meter, electronic counter, etc.) recordkeeping by electronic or hard copy monthly. Keep records of the meter readings each month, as well as for the last twelve months. Make records available for inspection by DEQ personnel."**
Specific Requirement No. 207	Specific Requirement No. 207 requires, "Nitrogen oxides monitored by technically sound method weekly." This requirement should be changed to "Nitrogen oxide emissions calculated by technically sound method monthly" for clarification. NOx emissions are to be calculated based on emission factors and natural gas usage. Requiring calculations be made on a monthly basis is consistent with the requirement to track natural gas usage and NOx emissions on a monthly and 12-month rolling basis. As noted above, Specific Requirement No. 207 could specify that the NOx emissions calculations should use the average emission factor from the most recent stack test for each boiler.	**For consistency, LDEQ revised Specific Requirement No. 204 to read, "Nitrogen oxides emissions recordkeeping by electronic or hard copy monthly. Keep records of the total NOx emissions each month, as well as the total NOx emissions for the last twelve months. Make records available for inspection by DEQ personnel."**

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