Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Westlake Polymers**	**AI #:**	**9061**	**TEMPO Activity No:**	**PER20090003**
Facility Name:	**Polyethylene manufacturing Complex**	**Remarks Submitted by:**	**July 14, 2009**		
Permit Writer:	**Dan Nguyen**	**Permit Writer Email address:**	**Dan.nguyen@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; Page 13 of 19	**EQT005 Poly 1 Cooling Tower should indicate a "1" for 40 CFR 63 Subpart FFFF Applicability.**	**The draft permit has been revised as requested**
Section X; Page 17 of 19	**FUG002 Poly 2 Equipment Fugitives should not have a "1" for 40 CFR 60 Subpart A, and 40 CFR 60 Subpart DDD Applicability. The entire Poly 2 Unit is subject to the State Rule 2122 for fugitive emissions from equipment leaks. A small number of fugitive components are also subject to 40 CFR 63 Subpart FFFF in the Poly 2 Unit.**	**The draft permit has been revised as requested**
Section X; Page 17 of 19	**FUG006 B Line Poly 1 Equipment Fugitives should not have a "1" for 40 CFR 60 Subpart A, and 40 CFR 60 Subpart DDD Applicability. The entire B Line Poly 1 Unit is subject to the State Rule 2122. A portion of the B Line Poly 1 Unit is subject to 40 CFR 63 Subpart FFFF for fugitive emissions from equipment leaks.**	**The draft permit has been revised to update regulatory applicability for fugitive components**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Inventories. Relationships. Page 5 of 7.	EQT 0101 Sulfuric Acid Tank is not controlled by the EQT0008 Flare. This line item should be deleted from the Relationships list.	The draft permit has been revised as requested
Inventories. Group Membership. FUG Groups. Page 7 of 7.	The Working Draft of the permit groups the Common Requirements Groups to streamline the permit. The groupings do not reflect the regulatory status of the FUG groups. Westlake has not consolidated the fugitive emission program requirements, applying the 40CFR63 FFFF requirements to components that are in HAP service. The regulatory status for the FUG groups is: A Line – 2122 only. B Line – Some components 2122 only and some components 40CFR63 FFFF F Line – All NSPS DDD. Some components 40CFR63 FFFF. J Line – 2122 only. K Line – 2122 only. POLY 2 Utilities - Some components 2122 only and some components 40CFR63 FFFF.	The draft permit has been revised to update regulatory applicability for fugitive components
Specific Requirements CRG 003 FUGITIVES4F	The Group Members included in this Common Requirements Group should be adjusted as indicated above. This CRG applies to a portion of the FUG 002, FUG 003, FUG 006, and FUG 007, not all of the components associated with those FUGS.	The draft permit has been revised to update regulatory applicability for fugitive components
Specific Requirements CRG 004. Number 101	EQT 047 shall maintain TRE > 1.9 to maintain status as a Group 2 Process Vent. The < 5.0 TRE is associated with a recovery device, which EQT 047 does not have.	The draft permit has been revised as requested
Specific Requirements EQT 006 Poly 1 Cooling Tower.	Please delete Specific Requirements 109, 110, and 111. These Specific Requirements address performance tests, but the cooling tower is subject to a routine sampling and analysis program. The routine sampling program should not trigger performance testing notification obligations.	The draft permit has been revised as requested
Specific Requirements EQT0018	Please delete Specific Requirements 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, and 180. These Specific Requirements address 40 CFR 60 Subpart DDD requirements, but the Regenerative Thermal Oxidizer is not subject to those requirements, as it meets the concentration exemption.	The draft permit has been revised as requested
Specific Requirements EQT 0034. Number 187	EQT 034 shall maintain TRE > 1.9 to maintain status as a Group 2 Process Vent. The < 5.0 TRE is associated with a recovery device, which EQT 034 does not have.	The draft permit has been revised as requested

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