

STATE OF LOUISIANA
Department of Environmental Quality



BUDDY ROEMER
Governor

PAUL TEMPLET
Secretary

October 16, 1991

Mr. Thomas Diggs
Chief, Planning Section
U. S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Diggs:

RE: Bubble permit modification, State Permit No. 1838T (M-2),
The Dow Chemical Company, Plaquemine, Iberville Parish,
Louisiana

Please find enclosed a copy of the referenced permit. By letter dated August 21, 1991, The Dow Chemical Company requested a modification to their bubble permit to reflect a turnover rate for one of the affected tanks greater than originally permitted. The increased turnover rate results in an emissions estimate of 2.04 tons methanol per year, a 0.69 ton per year increase above the original projection. The revised permit reflects this change. Offsets available from the project are more than adequate to preserve the net air quality benefit required for bubbling emissions.

Also enclosed for your files is a copy of the August 21 submittal. Thank you for your assistance in this matter.

Very truly yours,

Gus Von Bodungen
Gus Von Bodungen, P.E.
Administrator

GVB/ATT/

cc: Capital Regional Office



UNION CARBIDE CORPORATION
 ETHYLENE OXIDE/GLYCOL DIVISION
 TAFT PLANT
 P.O. BOX 50, HAHNVILLE, LOUISIANA 70057

June 26, 1984

RECEIVED

JUN 27 1984

AIR QUALITY DIVISION

Mr. Bharat Contractor
 Department of Environmental Quality
 Air Quality Division
 P.O. Box 44066
 Baton Rouge, Louisiana 70804

SUBJECT: SIP Compliance

Dear Mr. Contractor:

With reference to your question of 6/22/84 concerning the Glyoxal Unit Reactor vent (source 337), I have the following to offer relative to the scrubber performance:

- The inlet concentration of Hydrocarbons (acetaldehyde) is = 44.6% by weight.
- The outlet concentration of Hydrocarbons (acetaldehyde) is = .1% by weight.
- The inlet to the scrubber =

$$\frac{60,000 \text{ lb}}{\text{Day}} \times \frac{44.6\% \text{ ACH}}{100} \times \frac{330 \text{ Days}}{\text{Yr.}} \times \frac{\text{Tons}}{2,000 \text{ lb}} = 4415 \frac{\text{tons}}{\text{Yr.}}$$
- The outlet of the scrubber =

$$\frac{60,000 \text{ lb}}{\text{Day}} \times \frac{.1\% \text{ ACH}}{100} \times \frac{330 \text{ Days}}{\text{Yr.}} \times \frac{\text{Tons}}{2,000 \text{ lb}} = 9.9 \frac{\text{Tons}}{\text{Yr.}}$$
- The overall removal efficiency of the scrubber =

$$\frac{4415 - 9.9}{4415} \times 100\% = 99.8\% \quad = 2.266 \text{ lb/}$$

Therefore, it is our contention that if this unit were in operation today it would meet the requirements of Section 22.8 and Union Carbide should be allowed the use of the 9.9 ton credit.

Further review of this matter will have to be undertaken to determine the actual methods utilized in deriving the concentrations of inlet and outlet Hydrocarbons of the scrubber. This information will be forwarded to you at a later date.

If you should have any further questions on this issue, feel free to contact myself or Urbain Breaud.

Sincerely,

K. P. Gros

KPG/pd
 1163e

40 CFR Part 52

[LA-2-1-5200; FRL-5075-9]

Approval and Promulgation of Air Quality Implementation Plans; Louisiana; Alternative Emission Control Plan for Dow Chemical, U.S.A., Louisiana Division, Plaquemine, LA

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

SUMMARY: The EPA is announcing final approval of the alternative emission reduction (bubble) plan for the Dow Chemical Plaquemine facility as a revision to the Louisiana State Implementation Plan (SIP). The bubble plan uses the emissions reduction credit (ERC) from a process modification at the Glycol II expander unit in lieu of controlling emissions from four volatile organic compounds (VOC) storage tanks. The bubble plan was reviewed for consistency with the final Emissions Trading Policy Statement (ETPS) published by the EPA in the Federal Register on December 4, 1986. The ERC is determined to be valid for emissions trading.

EFFECTIVE DATE: This final rule is effective on November 3, 1994.

ADDRESSES: Copies of the documents relevant to this action are available for public inspection during normal business hours at the locations listed below. The interested persons wanting to examine these documents should

make an appointment with the appropriate office at least two working days in advance.

U.S. Environmental Protection Agency, Region 6, Air Programs Branch (6T-A), 1445 Ross Avenue, Dallas, TX 75202.

Air and Radiation Docket and Information Center, U.S. Environmental Protection Agency, 401 M Street, SW., Washington, DC 20460.

Louisiana Department of Environmental Quality, Air Quality Division, 7290 Bluebonnet, Baton Rouge, LA 70810.

FOR FURTHER INFORMATION CONTACT: Bill Deese or Russell Parr of the EPA Region 6 Air Programs Branch at (214) 665-7253 and at the EPA Region 6 address.

SUPPLEMENTARY INFORMATION:

Background

On October 19, 1983, the Governor of Louisiana submitted a request to revise the Louisiana SIP to include an alternative emission reduction plan for the Dow Chemical facility located in Plaquemine, Iberville Parish. The State submittal contains verification that adequate public notice was given and a public hearing was held for the bubble plan. The EPA proposed to approve the bubble plan in a rulemaking document published on June 21, 1991 (56 FR 28509). Brief background information about the bubble plan is provided in this final rulemaking notice; see the proposed rulemaking notice for a more

comprehensive discussion of relevant issues and details.

In June 1977, a process modification instituted at the Glycol II expander unit reduced actual emissions of VOC from a waste gas vent by 455.1 tons per year (TPY), from 595.7 to 140.6 TPY. The modification involved adding an additional reactor to the process that reduced the amount of VOC entering and being emitted from the incinerator. The bubble plan uses the emissions reduction from the waste gas vent to offset uncontrolled emissions from four VOC storage tanks. Louisiana Administrative Code requires emissions from the four VOC storage tanks be controlled. Allowable emissions from the four tanks are 0.45 TPY, and total actual emissions from the tanks are 42.33 TPY. The actual emissions from one of the methanol tanks (8X) is 0.69 TPY greater than what was presented in the proposal (1.35 TPY as proposed versus 2.04 TPY as approved), due to an increased turnover rate reported by the Dow Chemical Company after publication of the proposed rulemaking notice. Of the 455.1 TPY ERC generated from the waste gas vent, 41.88 TPY is utilized to offset the noncompliance emissions from the four storage tanks and 5.7 TPY is utilized for improvement in air quality, leaving 407.5 TPY of ERC remaining. The 5.7 TPY improvement in air quality is a State requirement imposed on Dow Chemical. The entire trade as approved is summarized in the following table.

ERC from reduction of vent emissions
(-455.1 TPY)

Emissions from four VOC storage tanks
(+41.88 TPY)

Net air quality benefit
(+5.7 TPY)

REMAINING ERC¹
[-407.5 TPY]

Source	Actual			Allowable			
	Before bubble	After bubble	Change	Before bubble	After bubble	Change	ID
Storage tanks	5.72	5.72	0.0	0.16	5.72	5.56	6L
	2.04	2.04	0.0	0.03	2.04	2.01	8X
	28.00	28.00	0.0	0.14	28.00	27.86	8S
	6.57	6.57	0.0	0.12	6.57	6.45	8T
Waste gas vent	595.7	140.6	-455.1	595.7	140.6	-455.1	2L
Air quality benefit	0.0	0.0	0.0	0.0	5.7	5.7	
Total	638.03	182.93	-455.1	596.15	188.63	-407.5¹	

¹ The 407.5 tons per year of remaining ERC has been voided for future use by Dow Chemical as credit. This has been reflected in the State permit number 1838T(M-2) dated October 16, 1991.

The figures in the table for the waste gas vent have had the ethane component removed because the EPA policy does

not treat ethane as a VOC. Currently, emissions from three of the VOC storage tanks (6L, 8S and 8T) are controlled.

Discussion

The State submittal was reviewed for compliance with requirements of

section 110 of the Clean Air Act (CAA), 40 CFR part 51, and proposed and final ETPS published by the EPA on April 7, 1982 (47 FR 15076) and December 4, 1986 (51 FR 43814), respectively. The EPA Evaluation Report titled Alternative Emission Control Plan for Dow Chemical, U.S.A., has been prepared and updated to correspond with circumstances presented in this final rulemaking notice.

Before the EPA would grant final approval of this bubble, the State of Louisiana was required to furnish the EPA with the following assurances specified in the proposed rulemaking: (1) That the State will document that none of the ERC was ever utilized in former planning to develop the SIP for the area so the entire 595.7 TPY serves as baseline; (2) that the State will document that the 407.5 TPY of remaining ERC designated for the bank is voided; (3) that the State will submit a revised, more enforceable permit—modeled after the ones finally issued and approved for Vulcan Materials Company, Geismar Chemical, and American Cyanamid Company Fortier facility bubbles and, ultimately, corresponding with the emissions table presented above; (4) that the State is addressing the post-87 SIP call; (5) that the State will submit a plan to demonstrate attainment for the area; and (6) that the State has resources to fulfill the requirements of numbers (4) and (5). On October 16, 1991, the permit was revised and a copy forwarded to the EPA. The State of Louisiana provided assurances addressing each of the six required elements in a letter to the EPA dated September 17, 1991.

Public Comment and EPA Response

Besides responses from the State of Louisiana, the EPA received one comment on the proposed June 21, 1991, rulemaking in response to publication of the proposed approval. The Ohio EPA, Division of Air Pollution Control, submitted the following comment. The comment has been paraphrased to reflect what the EPA believes is an accurate summary of the commenters' concerns.

In order for ERC to be valid, the 1977 process change should have occurred after the SIP baseline year in effect for ozone at the time of the submittal. This would ensure the emission reduction as surplus. The proposed rulemaking did not identify the SIP baseline year in effect when this bubble was submitted to the EPA on October 19, 1983. The EPA may want to require the affected storage tanks to meet the RACT regulations in the future ozone SIP

without the benefit of the 1977 process change.

EPA Response: The final ETPS of December 4, 1986 (51 FR 43814) sets out current policy for approving bubbles. The EPA policy differs depending on whether the bubble is in a nonattainment area with an approved attainment demonstration (NAWAD) or a nonattainment area lacking an approved attainment demonstration (NALAD). When this bubble was submitted to the EPA on October 19, 1983, Plaquemine and Iberville Parishes were considered NAWAD. With the subsequent SIP call on May 26, 1988, these two parishes were considered part of the Baton Rouge Metropolitan Statistical Area and, therefore, were converted to NALAD. The EPA has determined that different requirements should apply to a pending bubble in a SIP call area, such as this one. Namely, the existing bubble can continue to use the baseline that was consistent with the assumptions in the original attainment demonstration. For this bubble, the EPA interprets the baseline as the emission level established by the underlying Reasonably Available Control Technology (RACT) regulation. RACT, in this case, is determined by the regulation approved by the State of Louisiana in 1980 which requires incineration (a control device). This control device was already installed when the process improvement resulting in the additional reduction of VOC was made in 1977. The additional reductions result from the process improvement before the incinerator, thereby reducing the amount of VOC going to the control device.

To be valid for trading purposes, an emission reduction must be surplus, enforceable, permanent, and quantifiable. First, Dow has shown that a significant VOC reduction was achieved, beyond what was required by RACT, by the process modification. Second, the emission reductions were made enforceable when the State issued to Dow a modified permit [Permit Number 1838T(M-2)] on October 16, 1991, that delineated the terms of the emission trade. Third, the emission reductions are permanent since the process change is permanent. Finally, the ERC's are quantifiable in that the VOC emissions can be calculated and the reduction in waste gases produced by the process can be measured. Therefore, the emission reduction credits associated with this bubble are valid.

With regard to requiring the affected storage tanks to meet the RACT regulation in future ozone SIP's, much of this has already been accomplished.

Waste gas vents (emission point 2L) have been rerouted for recovery by the ethylene recovery unit under State Permit Number 2032. The tanks used for hexane storage (emission points 8S and 8T) have been replaced by pressurized tanks under State Permit Number 2033. One of the methanol tank vents (emission point 6L) will be rerouted for recovery under State Permit Number 2037. Only one methanol tank vent (emission point 8X) remains uncontrolled as originally proposed. Emissions from this vent have been revised from 1.37 tons per year to 2.04 tons per year based on an increased turnover rate.

Final Action

The EPA is taking final action to approve the alternative emission reduction (bubble) plan for the Dow Chemical Plaquemine facility as submitted by the Governor of Louisiana in a letter dated October 19, 1983, and amended with a permit number 1838T(M-2) dated October 16, 1991, and State assurances provided in a letter from the Louisiana Department of Environmental Quality dated September 17, 1991.

Nothing in this action should be construed as permitting or allowing or establishing a precedent for any future request for revision to any SIP. Each request for revision to the SIP shall be considered separately in light of specific technical, economic, and environmental factors and in relation to relevant statutory and regulatory requirements.

Under the Regulatory Flexibility Act, 5 U.S.C. 600 *et seq.*, the EPA must prepare a regulatory flexibility analysis assessing the impact of any proposed or final rule on small entities. 5 U.S.C. 603 and 604. Alternatively, the EPA may certify that the rule will not have a significant impact on a substantial number of small entities. Small entities include small businesses, small not-for-profit enterprises, and government entities with jurisdiction over populations of less than 50,000.

SIP approvals under section 110 and subchapter I, part D, of the CAA do not create any new requirements, but simply approve requirements that the State is already imposing. Therefore, because the Federal SIP-approval does not impose any new requirements, I certify that it does not have a significant impact on any small entities affected. Moreover, due to the nature of the Federal-State relationship under the CAA, preparation of a regulatory flexibility analysis would constitute Federal inquiry into the economic reasonableness of State action. The CAA forbids the EPA to base its actions

concerning SIPs on such grounds. *Union Electric Co. v. U.S.E.P.A.*, 427 U.S. 246, 256-66 (S.Ct. 1976); 42 U.S.C. 7410(a)(2).

The Office of Management and Budget has exempted this action from review under Executive Order 12866.

Under section 307(b)(1) of the CAA, petitions for judicial review of this action must be filed in the United States Court of Appeals for the appropriate circuit by December 5, 1994. Filing a petition for reconsideration of this final rule by the Administrator would not affect the finality of this rule for purposes of judicial review nor would it extend the time within which a petition for judicial review may be filed, and would not postpone the effectiveness of this rule. This action may not be challenged later in proceedings to enforce its requirements (see section 307(b)(2)).

List of Subjects in 40 CFR Part 52

Environmental protection, Air pollution control, Carbon monoxide, Hydrocarbons, Incorporation by reference, Ozone, Reporting and recordkeeping requirements, Volatile organic compounds.

Note: Incorporation by reference of the State Implementation Plan for the State of Louisiana was approved by the Director of the Federal Register on July 1, 1982.

Dated: September 7, 1994.

J.D. Winkle,
Regional Administrator (6A).

Part 52, chapter I, title 40 of the Code of Federal Regulations is amended as follows:

PART 52—[AMENDED]

1. The authority citation for part 52 continues to read as follows:

Authority: 42 U.S.C. 7401-7671q.

Subpart T—Louisiana

2. Section 52.970 is amended by adding paragraph (c)(62) to read as follows:

§ 52.970 Identification of plan.

(c) * * *

(62) Alternative emission reduction (bubble) plan for the Dow Chemical facility located in Plaquemine, Iberville Parish, as adopted by the Louisiana Environmental Control Commission on July 28, 1983, submitted by the Governor on October 19, 1983, and amended by the Louisiana Department of Environmental Quality with permit number 1838T(M-2) issued on October 16, 1991.

(ii) Incorporation by reference.

(A) Permit number 1838T(M-2) as issued by the Louisiana Department of Environmental Quality on October 16, 1991.

(ii) Additional material.

(A) Letter dated September 17, 1991, from the Administrator of the Office of Air Quality at the Louisiana Department of Environmental Quality to the Chief of the Planning Section at the Air Programs Branch of the U.S. Environmental Protection Agency—Region 6, furnishing State assurances.

* * * * *

[FR Doc. 94-24419 Filed 10-3-94; 8:45 am]
BILLING CODE 6560-50-P

40 CFR Part 52

[TX-41-01-8273a; FRL-5075-8]

Approval and Promulgation of Air Quality Implementation Plans; Texas; Revision to the State Implementation Plan (SIP) Addressing Ozone Monitoring

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

SUMMARY: EPA is approving a revision to Texas' SIP for ozone. This action is based upon a revision request which was submitted by the State to satisfy the requirements of the Clean Air Act (Act), as amended November 15, 1990, and the Photochemical Assessment Monitoring Stations (PAMS) regulations. The PAMS regulation requires the State to provide for the establishment and maintenance of an enhanced ambient air quality monitoring network in the form of PAMS by November 12, 1993.

DATES: This final rule is effective December 5, 1994 unless adverse comments are received by November 3, 1994. If the effective date is delayed, timely notice will be published in the Federal Register (FR).

ADDRESSES: Written comments should be addressed to Mr. Thomas H. Diggs, Chief, Planning Section, at the EPA Regional Office listed below. Copies of the documents relevant to this action are available for public inspection during normal business hours at the following locations. The interested persons who want to examine these documents should make an appointment with the appropriate office at least 24 hours before the visiting day.

U.S. Environmental Protection Agency, Region 6, Air Programs Branch (6T-A), 1445 Ross Avenue, suite 700, Dallas, TX 75202-2733.

The Air and Radiation Docket and Information Center, U.S. Environmental

Protection Agency, 401 M Street, SW., Washington, DC 20460.

Texas Natural Resource Conservation Commission (TNRCC), Air Quality Planning Annex, 12118 North IH-35, Park 35 Technology Center, Building A, Austin, TX 78753.

FOR FURTHER INFORMATION CONTACT: Ms. Patricia Cupp, Planning Section (6T-AP), Air Programs Branch, USEPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, telephone (214) 665-8015.

SUPPLEMENTARY INFORMATION:

I. Summary of State Submittal

On November 15, 1993, the TNRCC submitted to the EPA a SIP revision, incorporating PAMS into the ambient air quality monitoring network of State or Local Air Monitoring Stations (SLAMS) and National Air Monitoring Stations (NAMS). The State will establish and maintain PAMS as part of its overall ambient air quality monitoring network.

Section 182(c)(1) of the Act and the General Preamble (57 FR 13515) require that the EPA promulgate rules for enhanced monitoring of ozone, oxides of nitrogen (NOX), and volatile organic compounds (VOC) no later than 18 months after the date of the enactment of the Act. In addition, the Act requires that, following the promulgation of the rules relating to enhanced ambient monitoring, the State must commence actions to adopt and implement a program based on these rules, to improve monitoring for ambient concentrations of ozone, NOX, and VOC and to improve monitoring of emissions of NOX and VOC.

The final PAMS rule was promulgated by the EPA on February 12, 1993 (58 FR 8452). Section 58.40(a) of the revised rule requires the State to submit a PAMS network description, including a schedule for implementation, to the Administrator within six months after promulgation or by August 12, 1993. Further, § 58.20(f) requires the State to provide for the establishment and maintenance of a PAMS network within nine months after promulgation of the final rule or by November 12, 1993.

On August 23, 1994, the TNRCC submitted a PAMS network description for the State of Texas, including a schedule for implementation. This submittal is currently being reviewed by the EPA and is intended to satisfy the requirements of 40 CFR 58.40(a). Since network descriptions may change annually, they are not part of the SIP as recommended by the Guideline for the Implementation of the Ambient Air Monitoring Regulations 40 CFR part 58.



STATE OF LOUISIANA

Department of Environmental Quality



BUDDY ROEMER
Governor

PAUL TEMPLET
Secretary

Mr. Larry D. Adcock
General Manager
Dow U.S.A., Louisiana Division
P.O. Box 150
Plaquemine, LA 70765

Dear Mr. Adcock:

RE: Bubble permit modification, The Dow Chemical Company,
Plaquemine, West Baton Rouge Parish, Louisiana

This is to inform you that the permit modification requested for the above referenced facility has been approved under LAC 33:III.505. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operation begins. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed, properly operated, and maintained as specified in the application.

The permit number cited below should be referenced in future correspondence regarding this facility.

Done this 16th day of October, 1991.

Permit No.: 1838T(M-2)

Very truly yours,

Mike D. McDaniel, Ph.D.
Assistant Secretary

MMcD:ATT:tr

cc: Capital Regional Office

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY REGULATORY DIVISION
BRIEFING SHEET

THE DOW CHEMICAL COMPANY
PLAQUEMINE, WEST BATON ROUGE PARISH, LOUISIANA

I. BACKGROUND

The Dow Chemical Company operates a synthetic chemical manufacturing facility near Plaquemine, Iberville and West Baton Rouge Parishes, Louisiana. In response to a compliance schedule for hydrocarbon emission reductions sent by the state in March 1981, Dow proposed a bubble for emissions from four storage tanks and two reactor vents. This review is for a modification to State Permit No. 1838T (M-1).

II. ORIGIN

Dow submitted information on an increased turnover rate for one of the methanol tanks permitted under State Permit No. 1838T (M-1) in a letter dated August 21, 1991.

III. DESCRIPTION

In their submittal of November 1, 1982, and December 14, 1982, Dow requested a SIP revision (bubble) to offset emissions from four large storage tanks and two reactor vents. Dow has agreed to offset, by use of the bubble strategy, all hydrocarbon emissions from these sources. The bubble strategy meets all requirements for applicability as set forth in the EPA's Emission Trading Policy, published on April 7, 1982 (47 FR 15076). The offset will be taken from emission reduction credits (ERC's) at Dow. The ERC's are a result of various hydrocarbon reduction projects implemented since 1977. The ERC's were approved December 16, 1982 by the Air Quality Division and the Louisiana Environmental Control Commission as part of the Dow hydrocarbon compliance schedule. This bubble is permanent and one-way, i.e. the ERC's will not be returned to Dow. Further, Dow has agreed to offset emissions from the four tanks at a ratio of 1.1 to 1.0 tons. Therefore, there will be a net air quality benefit with approval of the bubble proposal.

Dow further clarified the bubble calculation in a submittal of additional information dated February 26, 1990. Reductions of emissions over the amount required to offset the emissions from the tanks and establish the net air quality benefit by the bubble had previously been referred to as emission reduction credits. These reductions occurred outside the

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY REGULATORY DIVISION
BRIEFING SHEET

THE DOW CHEMICAL COMPANY
PLAQUEMINE, WEST BATON ROUGE PARISH, LOUISIANA

current contemporaneous window as defined under Prevention of Significant Deterioration regulations, and they are not available for further use as offsets or credits. Table I presents the offset calculation.

Since the signing of the original bubble permit, waste gas vents (Emission Point 2L) have been rerouted for recovery by the ethylene recovery unit under State Permit No. 2032. The tanks used for hexane storage, Emission Points 8S and 8T, have been replaced by pressurized tanks under State Permit No. 2033. One of the methanol tank vents, Emission Point 6L, will be rerouted for recovery under State Permit No. 2037. Only one methanol tank vent, Emission Point 8X, remains uncontrolled as originally proposed. Emissions of 1.37 tons per year originally estimated for the tank have been revised to 2.04 tons per year based on an increased turnover rate. The higher emission rate is reflected in Table I.

IV. TYPE OF REVIEW

The original permit was reviewed in accordance with requirements for emissions trading as set forth in the Federal Register, 47 FR 15076.

V. PUBLIC NOTICE

Public notice for the original proposal appeared in newspapers in Baton Rouge, New Orleans, Shreveport, Monroe, Lake Charles, and Alexandria thirty days prior to public hearing. No public notice was required for this administrative change to the permit.

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY REGULATORY DIVISION
 BRIEFING SHEET

THE DOW CHEMICAL COMPANY
 PLAQUEMINE, WEST BATON ROUGE PARISH, LOUISIANA

TABLE I
 OFFSET CALCULATION

<u>Emissions from four VOC storage tanks ERCs</u>	<u>Net air quality benefit required</u>	<u>ERCs from reduction of vent emissions</u>		<u>Remaining</u>
+41.88 TPY	+5.7 TPY	-455.1 TPY	=	-407.52 TPY

Emissions (tons/year)

Sources	<u>Actual</u>			Change	<u>Allowable</u>		
	Before Bubble	After Bubble			Before Bubble	After Bubble	Change
Storage Tanks							
6L	5.72	5.72	0	.16	5.72	5.56	
8X	2.04	2.04	0	.03	2.04	2.01	
8S	28.00	28.00	0	.14	28.00	27.86	
8T	6.57	6.57	0	.12	6.57	6.45	
Waste Gas Vents							
2L	595.7	140.6	-455.1	595.7	140.6	-455.10	
Air Quality Benefit							
	0	0	0	0	5.7	5.7	
Total	638.03	182.93	-455.1	596.15	188.63	-407.52	

SPECIFIC CONDITIONS

THE DOW CHEMICAL COMPANY
PLAQUEMINE, WEST BATON ROUGE PARISH, LOUISIANA

1. Permittee shall maintain on site available for inspection by Air Quality Compliance Division personnel a record of the contents of methanol tank (Emission Point 8x). The record shall include parameters necessary and sufficient to determine compliance with an emission rate of 2.04 tons per year by the use of the formulas in "Compilation of Air Pollutant Emission Factors, Third Edition" (AP-42). These records shall be maintained for a period of at least two years.

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GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.505. If the emissions are determined to be greater than those allowed by the permit or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The permit application and the attached data sheets establish the emission and operating limitations and are a part of the permit. The synopsis is based on the Compliance schedule submitted July 14, 1981, and additional information submitted on November 1, 1982, December 14, 1982, February 26, 1990, May 14 and 15, 1990, and August 21, 1991.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - (a) construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - (b) if construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semi-annual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is

GENERAL CONDITIONS

certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Louisiana Air Quality Regulatory Division.

- VI. The permittee shall notify the Department of Environmental Quality, Air Quality Regulatory Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Division's test manual or any other methods approved by the U.S. EPA. Any deviation from or modification of the methods used for testing shall have prior approval from the Louisiana Air Quality Regulatory Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate, but in no event later than 180 days after initial start-up (or restart-up after modification). The Air Quality Compliance Division Surveillance Section shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Regulatory Division within forty-five (45) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling port in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up of each project or unit, report to the Louisiana Air Quality Regulatory Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to , malfunctions and upsets.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least two (2) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the

GENERAL CONDITIONS

Air Quality Regulatory Division with the following information in writing within five (5) days of such conditions:

- a. Description of noncomplying emission(s);
- b. Cause of noncompliance;
- c. Anticipated time the noncompliance is expected to continue, or, if corrected, the duration of the period of noncompliance;
- d. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
- e. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- 1) Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- 2) Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- 3) Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and,
- 4) Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII. 4) above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged

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violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.918 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Louisiana Air Quality Regulatory Division, within ninety (90) days after the event, to amend this permit.