Mr. Larry Devillier Supervisor, Permit Section Office of Air Quality and Radiation Protection Louisiana Department of Environmental Quality P.O. Box 82135 Baton Rouge, Louisiana 70884-2135

Re: Union Carbide Chemicals and Plastics Company, Inc. PSD Applicability

Dear Mr. Devillier:

We have reviewed the application dated May 18, 1993, from Union Carbide Chemicals and Plastics Company, Inc. concerning a permit to construct and operate a new polyethylene (PE) production facility at its Taft/Star Complex located near Taft, St. Charles Parish Louisiana.

The new PE production facility will require steam from an existing power system consisting of four boilers. The boilers will increase emissions as a result of the PE project. This increase must be included in the net emission increase for the PE project. You have suggested the following methodology for computing the net emissions increase. The potential emissions from the new PE facility at maximum production capacity plus the increased emissions from the existing boilers attributable to the new facility operating at maximum capacity will be the increase attributable to the proposed change. For this specific situation, where the existing boilers are not being modified and the demand from the new PE unit on the existing boilers can be specifically quantified, the emissions increase from the existing boilers that occurs as a direct result of the proposed PE project should be based on the maximum utilization for which the new PE unit would be permitted. At present, we agree that this methodology is applicable to this proposed project.

I trust this answers the question that you posed in your August 10, 1993 letter regarding net emission increase. If you have any questions, please call Mr. Reverdie Daron Page of my staff at (214) 655-7222.

Sincerely yours,

ORIGINAL SIGNED BY JOLE C. LUEHRS Jole C. Luehrs Chief New Source Review Section (6T-AN)

cc: David Solomon

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