**LOUISIANA**

**Application for Approval of Emissions**

**of Air Pollutants from Part 70 Sources**

**Instructions**

**Introduction**

The *Application for Approval of Emissions of Air Pollutants from Part 70 Sources* provides information to the Louisiana Department of Environmental Quality (LDEQ) Air Permits Division. This information is used to assess air pollution from a proposed facility or modification and the measures that will be used to control air pollution to meet applicable laws and regulations. Authority to request this information is contained in the Louisiana Administrative Code, Title 33. Copies of this regulation are available from the **Legal Division**, or on the LDEQ website at:

<http://deq.louisiana.gov/resources/category/regulations-lac-title-33>.

**Scope**

The *Application for Approval of Emissions for Part 70 Sources* form is intended to apply to a single geographical location of a plant or facility. Treat facilities in geographically dispersed locations separately for the purpose of determining when to submit an application. Submit a separate application for each facility whenever an application is necessary. The *Louisiana Guidance for Air Permitting Actions* is a useful guide in completing the forms. The current version can be found on the Internet at: <http://deq.louisiana.gov/page/air-permits-division>.

**When to Submit an Application for Approval of Emissions**

Applications are submitted primarily for one of three reasons: (1) to obtain a permit for a new facility or a modification of an existing facility, (2) to reconcile permitted emissions to reflect actual or potential emission levels when they are found to differ, or (3) to obtain a permit for an existing facility that is without a permit but is or will become subject to permit requirements. This latter condition may exist because (a) the facility was in existence prior to June 19, 1969, a status known as "grandfathered"; (b) the facility was previously specifically exempted because of its small size; or (c) the facility, because of its small size, was never considered by the Air Permits Division for either a permit or an exemption.

To avoid unnecessary delays, applications should be submitted as far in advance as possible of construction of the facility or modification. Some construction projects require prior approval of LDEQ Divisions other than the Air Permits Division. Exact review times vary with the complexity of the application, the completeness of the application, and the current workload of the Air Permits Division. **The permit or other approval must be obtained before construction commences.**

Note: All major sources of air pollutants are required to obtain an operating permit by Title 40, Part 70, of the Code of Federal Regulations. There are no "grandfathered" major sources. Consult LAC 33:III.Chapter 5 for more information on permitting requirements.

**What Should be Submitted and What Should be Kept**

Route the original application and attachments and two photocopies of the original application and attachments to the attention of the current Assistant Secretary of the Office of Environmental Services at the following address:

Louisiana Department of Environmental Quality

Office of Environmental Services

P.O. Box 4313

Baton Rouge, LA 70821-4313

Attach a check for the appropriate air permit application fee to the original application. Do **NOT** attach copies of this check to the two photocopies of the original application. Do not send cash.

Keep a photocopy of the application and attachments for your records. For all Part 70 applications, a copy with attachments should be submitted directly EPA Region 6 (6PD-R), 1445 Ross Avenue, Ste. 1200, Dallas, TX 75202-2733.

**Basis for Reported Emissions**

All emission estimates must be supported by calculations or other bases (test results, similar facilities, etc). Emission calculations, and any other supporting information that forms the basis for the estimates, must be submitted with the application per LAC 33:III.517.D.9. Fugitive emission estimates require the same type of documentation as stationary point sources. Calculations should include information necessary to determine and regulate emissions such as capacity or operating rates. See the *Louisiana Guidance for Air Permitting Actions* for guidance regarding the preparation of emissions calculations.

**Acceptable Answers**

If certain questions or fields in the application, including any EIQ sheet, are not applicable, indicate "none" or "not applicable" (N/A). Terms such as "not significant," "nil," "trace," etc. are not appropriate. The use of absolute zero or 100% control efficiency is not acceptable for emission generating sources. Please attach additional sheets if more space is needed to completely convey the requested information.

The applicant must submit all known information at the time the air permit application is submitted. If insufficient or indefinite information is submitted, it may be impossible for LDEQ to issue an air permit based on the air permit application.

If you have any questions about the level of information required to be submitted in an air permit application, contact the Air Permits Division at (225) 219-3417.

**Professional Engineer Required**

A Louisiana Registered Professional Engineer must certify an application for a major source permit.

**General**

Do not write information in the top or left side margin of this form. File folder bindings may cover the information.

Do not alter the formatting of the items in this application form. Do not alter this form in any way, except as directed by the instructions for the *Application for Approval of Emissions of Air Pollutants from Part 70 Sources*.

Please consult the *Louisiana Guidance for Air Permitting Actions* for a discussion regarding **contiguity** of facilities that fall under common ownership or control.

Emission tests performed in support of emission estimates must be done by an LDEQ-accredited laboratory per LAC 33:I, Subpart 3, Laboratory Accreditation. Any laboratory other than one operated by the company seeking the permit that performs analyses or tests and provides chemical analyses, analytical results, or other test data to the department must be an accredited laboratory by LDEQ. The department will not accept laboratory data generated by any such laboratories that have not received accreditation for the test or analysis that was performed to obtain this data.

**Common Definitions**

As used in these instructions, these terms have the following meanings:

Agency Interest Number (A.I. Number) - The Agency Interest Number is a unique identifier assigned to each facility by LDEQ. Existing facilities in the state have AI numbers assigned to them. New facilities will be assigned an A.I. Number after LDEQ receives the application.

Facility – A collection of emission sources that are collocated at a common site and operate as one in order to produce, process, transport, or otherwise handle materials for industrial uses.

Emission Point ID No. – A number assigned to an emission point or emission source by the permit applicant that is used to uniquely identify an emission point or emission source.

Stack – Any point in a source designed to emit solids, liquids, or gases into the air via a pipe, duct, or other similar orifice.

TEMPO - An acronym standing for Tools for Environmental Management and Protection Organizations. This is the main computer database program used by LDEQ to store data and generate permits on all facilities and units.

Process Unit – A portion of a larger facility that is completely described by one Standard Industrial Classification Code (SICC). An applicant may choose to permit each process unit at its facility separately.

1. **Facility Information**

*Facility Name or Process Unit Name (if any)* – Enter the name by which the facility or process unit (for process unit-specific permits) is commonly known. Use the check boxes provided to indicate if the application seeks to permit all process units as a facility or only a specific process unit (commonly known as a process unit-specific permit application).

*Agency Interest Number (A.I. Number)* - Enter the Agency Interest Number, if known. Otherwise, enter “unknown” into this field.

*Currently Effective Permit Number(s)* – Enter the permit number for each air quality permit that is currently effective for the facility or process unit, including any Acid Rain permits, PSD permits, etc.

*Company – Name of Owner* – Enter the name of the company that owns the facility or process unit.

*Company – Name of Operator (if different from Company – Name of Owner)* – Enter the name of the company that operates the facility or process unit, if this company is different from the one listed in the *Company – Name of Owner* field. Otherwise, leave this field blank.

*Parent Company (if Company – Name of Owner given above is a division)* – Enter the name of the parent company of the company listed in the *Company – Name of Owner* field, if one exists. Otherwise, leave this field blank.

*Ownership -* Check the box that describes the type of entity that owns the facility.

1. **Physical Location and Process Description**

Answer the two questions provided. For the first question, give a brief description of what the facility produces, processes, or fabricates in order to accomplish its primary business function. For the second question, give a brief summary of the modifications or changes that are proposed by the application.

*Nearest town (in the same parish as the facility)* – Enter the closest town **in the same parish as the facility** (even if the facility is more commonly associated with a town in another parish).

*Parish(es) where facility is located* – Enter the parish(es) in which the facility is located.

Enter in the spaces provided the shortest radial distance in miles from the facility to Texas, Arkansas, Mississippi, and Alabama.

Enter in the spaces provided the Latitude and Longitude (in degrees, minutes, seconds, and hundredths) of the facility Front Gate. This should be the location of the main gate through which facility staff enter and exit. If no gate exists, then give the location of the main entrance through which facility staff enter and exit.

Enter in the space provided the distance, in kilometers, between the facility represented in this application and the nearest Class I Area.

Provide the physical address and location description in the blanks provided. Ensure that the address provided is accurate and up-to-date. Provide driving directions if no physical address exists. These directions should originate from the nearest intersection of highways. An example of an acceptable set of driving directions is as follows:

“From the intersection of US Hwy 165 & LA Hwy 10 in Oakdale, LA, travel E on Hwy 10 (Oakdale Road) for 2 miles. Turn S onto Kings Rd (Parish Road 1025). Travel approx. 3.5 miles to the facility.”

If the facility is not accessible by automobile, list the following:

* The name of the body of water in which it is located;
* The name of the nearest town located in the same parish. This should be the same town as the one listed in the “*Nearest town (in the same parish as the facility)*” above; and
* The distance and direction from the referenced town.

Check the boxes provided to indicate that the required map and required descriptions were included with the application. If a map, a description of the facility’s processes and products, and a description of the proposed project are not included with the application, the application will not be considered technically complete.

The map should indicate the location of the facility and its relation to nearby cities, towns, and named roadways. The scale of the map should be large enough to show the nearest town located in the same parish as the facility and the nearest named roadway and should display the name of each of these landmarks. LDEQ maintains aerial photography of the entire State of Louisiana which can be accessed at the following web site: <http://map.deq.state.la.us>. Maps generated from this web site are acceptable, provided that they possess the level of detail indicated above.

The description of the facility’s processes and products should include a discussion of how each emissions source operates, with emphasis given to the methods by which each emissions source releases pollutants to the atmosphere. This discussion should also clearly detail how the facility processes raw materials into finished products, noting all major steps in the process. If appropriate, the storage of raw materials and/or product should be part of the discussion. The description should be placed behind the *Louisiana Application for Approval of Air Pollutants.* This description should also be accompanied by a Process Flow Diagram (PFD) that illustrates the information conveyed in the description referenced above.

The description of the proposed project should be attached to the permit application. It should describe, in detail, exactly what changes to the facility will occur, as well as the associated emissions changes. The description should be placed behind the *Louisiana Application for Approval of Air Pollutants.*

1. **Confidentiality**

Check the box provided to indicate if confidentiality is requested for any information. Emissions data cannot be held confidential. If “yes,” remove all sections of the permit application for which confidentiality is requested and submit them separately from the rest of the permit application to the address below. Written justification to substantiate the confidentiality request must accompany the request. All data and information provided on this form and attachments, other than air pollution emission rates, will be held in confidence upon determination by the Secretary that such data and information, if made public, would divulge methods or processes entitled to protection as trade secrets. Information for which confidentiality is requested should not be submitted in the permit application submitted to the LDEQ Air Permits Division. Confidential information must be submitted separately to the Office of the Secretary address noted below.

Office of the Secretary

Louisiana Department of Environmental Quality

P.O. Box 4301
Baton Rouge, LA. 70821-4301

In the blanks provided, enter the name(s) of the section(s) of the permit application that have been removed and submitted separately to the above address.

1. **Type of Application**

Check the box in the first row if this application is a renewal.

In the second row, select only one of the available boxes, if applicable, to further describe the application.

Select “Entirely New Facility” if the facility or process unit has not yet been constructed.

Select “Significant modification of existing facility” if the application seeks permission to incorporate a change that meets one of the following criteria [LAC 33:III.527.A]:

1. The change constitutes a Title I modification, as defined in LAC 33:III.502.
2. The change constitutes a significant change in existing monitoring terms and conditions.
3. The change is a relaxation of reporting or recordkeeping permit terms and conditions.

 Select “Minor modification of existing facility” if the application seeks permission to incorporate a change that meets all of the following criteria [LAC 33:III.525.A]:

1. The modification would not violate any federally applicable requirement or standard or any applicable provisions of LAC 33:III, Air Quality Regulations.
2. The modification would not constitute a Title I Modification.
3. The modification would not involve significant changes to existing monitoring, reporting, or recordkeeping requirements. This determination is made on a case-by-case basis.
4. The modification would not seek to establish or alter emission limits which incorporate a case-by-case determination of MACT under Section 112(g) or 112(j) of the Clean Air Act or an alternative emissions limit under Section 112(i)(5) of the Clean Air Act or an equivalency determination of RACT.
5. The modification would not seek to establish or change a permit term or condition for which there is no underlying federally applicable requirement and that the owner or operator has assumed solely to avoid a federally applicable requirement.
6. The modification would not seek to establish or exceed an enforceable emissions assumed to establish minor source status or to avoid classification as a Title I modification.
7. The modification is not otherwise determined by the permitting authority to be a significant modification.

A modification may also be considered a Minor Modification if it is used to incorporate the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such procedures are explicitly provided for in the State Implementation Plan (SIP) or in federally applicable requirements.

Select “Reconciliation only” if the application seeks to update emissions based on test data, updated emission factors, or any other basis that does not involve the modification of any portion of the facility or process unit. The “Reconciliation only” box may also be selected if a facility becomes subject to a newly promulgated regulation without modifying the facility.

*NSR Analysis:* Select “PSD” or “NNSR,” if applicable, to indicate that the activities proposed in this application trigger one or more NSR programs. If either box is checked, all Tables in Section 24 of the application must be completed as directed in the instructions for Section 24.

In the space provided, indicate if this application will update or completely replace an air permit application currently under review. If yes, enter the date that the previous application was submitted.

If the application updates a previously submitted application, then the new application in addition to the previously submitted application will be reviewed. If the application completely replaces a previously submitted application, the previously submitted application will be not be reviewed or considered for the purposes of generating an air permit. Only the newly submitted application will be considered the current application. If a sufficient application fee was submitted with the previously submitted air permit application, it may not be necessary to submit an additional fee. See the guidance in Section 5 for more details.

For a previously unpermitted existing facility, select the appropriate box in the space provided to best describe why the existing facility is unpermitted. If unsure about the “grandfathered” or “exempt status,” select “previously unpermitted.”

1. **Fee Information**

FEE PARAMETER: If the fee code(s) for this facility or process unit are based on an operational parameter, enter that parameter in this blank. Some examples of these parameters are number of employees, horsepower, capital cost, number of units, and number of production lines. Consult the facility or process unit’s appropriate fee code(s) for more details.

INDUSTRIAL CATEGORY: Enter the primary Standard Industrial Classification Code (SICC) in the space provided. SIC codes can be found at the following web address: <http://www.osha.gov/pls/imis/sicsearch.html>. This code should reflect the primary business function of the facility to be permitted. Add any secondary SICC that describes a secondary business function. For process unit-specific permits, the primary SICC should describe the process unit of concern.

PROJECT FEE CALCULATION: Enter each applicable fee code for the project on each row. Add additional rows as necessary.

*Fee Code* - Enter all applicable fee codes as found in LAC 33:III.223, Table 1. Multiple fee codes should only be entered in accordance with LAC 33:III.211.B.3.

*Type* - Enter “New,” “Major,” or “Minor” to signify that the application will be for a “New Application,” “Major Modification,” or “Minor Modification,” as defined in LAC 33:III.211.B.13. These terms do NOT have the same meaning as used elsewhere in state or federal regulation. For the purpose of calculating fees, only the definitions shown in LAC 33:III.211.B.13 should be used to determine the meanings of these terms. These definitions should not be used for any other purpose.

Some fee codes provide for a minimum fee. For these fee codes, the fee submitted for the appropriate permit type (either “New,” “Major,” or “Minor”) can be no less than this minimum fee.

*Existing Capacity* - Enter the production capacity as it currently exists and relates to the fee code(s) entered.

*Incremental Capacity Increase* - Enter the amount by which the capacity will increase over the previously permitted capacity as a result of the changes proposed by the application. If no capacity change is proposed in the application, enter “N/A.”

*Multiplier* - If the fee code allows for a fee based on rated capacity, number of units, etc., enter the correct multiplier. For example, Fee Code 0330 allows for a fee per ton of daily rated capacity. If the facility has 10 tons of daily rated capacity, then the multiplier would be 10.

*Surcharges* - If any new NSPS, PSD, and/or Air Toxics (see LAC 33:III.Chapter 51) requirements will be applicable, check the appropriate boxes. Surcharges should be applied after all other fee calculations have been performed.

The “NSPS” box should be checked when a new piece of equipment is incorporated into the permit that is subject to any regulation under 40 CFR 60. When this box is checked, it corresponds to a 25% surcharge on the base permit application fee.

The “PSD” box should be checked when the applicant applies for a PSD permit. When this box is checked, it corresponds to a 50% surcharge on the base permit application fee. See Section 24 of the permit application and the associated instructions in order to determine how to apply for a PSD permit.

The “Air Toxics” box should be checked if the facility is considered a “major source” of Toxic Air Pollutants (TAP) according to the definition found in LAC 33:III.5103 and if the emissions of any TAP at the facility will increase by an amount that is greater than the Minimum Emission Rate (MER) listed in LAC 33:III.5112, Table 51.1. When this box is checked, it corresponds to a 10% surcharge on the base permit application fee.

*Total Amount* - Enter the final permit fee calculation in the space provided.

*Grand Total* – Enter the sum of all values found in the *Total Amount* column. Attach a check for this amount, made payable to “Louisiana Department of Environmental Quality,” to the completed application. Do **NOT** attach copies of this check to any documents submitted to LDEQ. Do not send cash.

\*\*For modifications\*\* If only a portion of the facility is being modified, fees may only be paid for that portion if:

a. the modified portion of the facility can fall entirely under a separate SICC than the rest of the facility to be permitted, and

b. the facility to be permitted does not entirely fall under single fee category.

Additional fees are typically not required when supplemental information is provided for a permit application or when an application is updated. The Department requires additional fees when changes that affect regulatory applicability are made to a permit application. See LAC 33:III.Chapter 2 for more details.

*\*\*Optional\*\* Fee Explanation* – Use the space provided to explain the fee determination made in the above table. It is not required to complete this item. However, a thorough description can reduce confusion over the methodology by which the fee amount was determined.

Electronic Fund Transfer (EFT): If paying the permit application fee using an EFT, complete this section. Else, leave blank.

When paying an application fee using an EFT, complete the relevant “Remarks” field provided by your financial institution. These remarks should, at a minimum, state the Agency Interest Number(s) and the name of the facility(ies) or process unit(s) (for process unit-specific permits) to which the EFT should apply.

LDEQ strongly encourages applicants **NOT** to use EFT for facilities that do not have an Agency Interest Number assigned to them. If the applicant must use an EFT for such a facility, please contact LDEQ prior to submittal of the EFT for guidance.

*EFT Transaction Number* – Enter the transaction number or other relevant unique identifying number for this EFT.

*Date of Submittal* – Enter the date that the EFT was made.

*Total Dollar Amount* – Enter the total dollar amount for this EFT. List the total amount of the EFT and **NOT** the portion of the EFT that should be applied to the permit application fee for the permit application in question. This number may not necessarily match the calculated permit application fee. This is due to the fact that, in some instances, applicants pay multiple permit application fees using a single EFT.

For questions regarding fees, call the LDEQ Customer Service Center at 225-219-LDEQ (5337) or Toll Free at 1-866-896-LDEQ (5337).

1. **Key Dates**

Enter the estimated date that the construction proposed by the application will commence (if applicable) and the estimated date that the operations proposed by the application will commence.

1. **Pending Permit Applications For Process Unit-Specific Permits Only**

*\*\* This section should only be completed if this permit application will be for a process unit-specific permit. A process unit-specific permit means a permit for a process unit and not for the entire facility.\*\**

The purpose of this section is to indicate which other process units at the facility are currently applying to LDEQ for a permit or permit modification. Add lines to this table as necessary in order to show all such process units. *\*\*It is not necessary to update this table during the permit review process, unless requested by LDEQ.\*\**

*Process Unit Name* – Enter the name of the process unit at the facility for which a permit or permit modification is being sought.

*Permit Number* – Indicate the currently effective permit number of the process unit entered in the “Process Unit Name” column. If the process unit is previously unpermitted, enter “previously unpermitted” into this field.

*Date Submitted* – Enter the date that the application for the process unit named in the previous column was submitted to LDEQ. This is generally the date that the Responsible Official signs the application.

1. **LAC 33:I.1701 Requirements**

The LAC 33:I.1701 Requirements section must be completed when applying for an initial permit, permit renewal, or change of ownership. Air permit modification requests are exempt from this requirement unless they include, or are limited to, a change of ownership. If a Certificate of Registration and/or a Certificate of Good Standing must be submitted, include the required certificates in the application. These certificates can be obtained from the Secretary of State for the State of Louisiana. See the Secretary of State’s website for more information: <http://www.sos.louisiana.gov/>.

1. **Permit Shield Request**

Any permit shield request that does not fit the criteria set forth in the tables contained within this section will not constitute a valid permit shield request. Permit shields may be requested for regulations referenced in the Consolidated Streamlined Fugitive Emissions Program and federally-applicable requirements included in the Louisiana State Implementation Plan. If no Permit Shield is being requested, check “No.”

*Non-applicability determination for* –If the permit shield is being sought based on a non-applicability determination, check the appropriate regulation in the first table.

*Interpretation of monitoring, recordkeeping, and/or reporting requirements and/or means of compliance for* – If the permit shield is being sought based on an interpretation of the monitoring, recordkeeping, and/or reporting requirements, and/or the method of compliance with a regulation, check the appropriate box in the second table.

*Specific Citation(s)* – Enter the specific citation(s) from the regulation(s) previously checked in the first column for which a permit shield is being sought. General citations such as “40 CFR 60 Subpart A” are not acceptable and may lead to a denial of the permit shield request. An example of an acceptable citation is “40 CFR 60.8(a).”

*Explanation* – Enter an explanation that details the reason(s) for requesting a permit shield. This explanation should clearly detail how the applicant interpreted the regulation(s) specifically cited in the previous column in order to form the basis of this request. If the explanation will require more space than is provided, enter “See Attached Pages” into this field, use separate page(s) to fully explain the request, and attach the page(s) directly behind this page of the *Application for Approval of Emissions of Air Pollutants from Part 70 Sources.*

1. **Certification of Compliance with Applicable Requirements**

*Responsible official.*

Enter the name, title, company, address, phone number, and email address of the Responsible Official or his Duly Authorized Representative. The Responsible Official or his Duly Authorized Representative must meet the requirements of LAC 33.III.502 - Responsible Official.

*For sources currently in compliance:* The Responsible Official or his Duly Authorized Representative must sign and date this form, attesting to the truthfulness of the statements on this form as they pertain to applicable requirements for which the company and facility are in compliance.

*For sources not currently in compliance:* In the space provided in Section 14.b of this application, provide a description of how compliance will be achieved, including a schedule for compliance. See the instructions for Section 14.b for more details.

**Certification.** The Responsible Official, or his Duly Authorized Representative, should sign and date the form. This signature is required for all permit applications. If this signature is not provided, the permit application will not be considered to be administratively complete.

Approval of a delegation of authority to a Duly Authorized Representative can be requested by completing a *Duly Authorized Representative Designation Form* (Form\_7218) available on LDEQ’s website at <http://deq.louisiana.gov/page/air-permit-applications>. In some circumstances, a person or job title can not be considered to be a Duly Authorized Representative until the person or job title is approved by LDEQ. See the instructions for the *Duly Authorized Representative Designation Form* for more details.

*Professional Engineer.*

A Louisiana Registered Professional Engineer, or his designee, must certify the application for a major source, including Part 70 sources per LAC 33:III.517.B.3. The engineer's name, title, company, address, phone number, and email address should be entered. If this signature is not provided in a permit application for a major source, the permit application will not be considered to be administratively complete.

The Responsible Official, or his designee, should sign and date the form confirming its accuracy and completeness. A Louisiana Registered Professional Engineer should sign and date the form confirming that the engineer supervised the preparation of the calculations, drawings, and designs. The form should also show the Professional Engineer’s Louisiana Registration Number, and the engineer’s seal should be prominently displayed on the page.

1. **Personnel**

List the names and contact information for each section. Select the primary contact for technical questions pertaining to the permit application by checking the box labeled “Primary Contact” next to the contact’s name.

*Manager of Facility who is located at plant site* - List the on-site manager of the facility. If the facility is unmanned or is not manned by a full-time staff, list the contact information for a person who can be available on-site during inspections, emergency events, or other such instances.

*On-site contact regarding air pollution control* – List the on-site air pollution control contact for the facility. If the facility is unmanned or is not manned by a full-time staff, list the contact information for a person who is able to speak for the facility about air pollution control.

*Person to contact with written correspondence* – List the person to whom written correspondence generated during the air permitting process can be forwarded.

*Person who prepared this report* – List the person who primarily prepared the permit application.

*Person to contact about Annual Maintenance Fees* – *\*\*Optional\*\** List the person who can be contacted regarding annual permit maintenance fees. If no person is specified in this field, the Responsible Official will be contacted for this purpose.

It is **NOT** necessary to list any personal contact information, such as personal email addresses or personal cellular phone numbers. This section is intended to convey work-related contact information to LDEQ. The applicant may choose to provide personal contact information if desired, but it is **NOT** required.

If the personnel mentioned in this section do not have an email address, note this in the appropriate blank. LDEQ strongly encourages applicants to include email addresses for the personnel mentioned in this section in order to facilitate a rapid line of communication during the permit application process.

1. **Proposed Project Emissions**

Enter the emissions for the proposed project into this table. The totals shown in this table should be for the facility or process unit of concern (for process unit-specific permits). Speciate all criteria pollutants, Toxic Air Pollutants (TAPs), and Hazardous Air Pollutants (HAPs) for the proposed project.

*Pollutant* **-** List each pollutant for which the permit application proposed a limitation. This includes TAPs and HAPs. The limitations for each TAP and HAP should be speciated for the change proposed by this permit application.

*Proposed Emission Rate (tons/yr)* **-** Enter the proposed emission rate, in tons per year (tpy), for each pollutant listed in the previous column.

1. **History of Permitted Emissions**

List in chronological order each air quality permit issued to this facility or process unit (for process-specific permits) within the past ten years. Begin with the first permit issued and end with the most recent. If applying for a process unit-specific permit, list only the permits that have been issued to the process unit of concern.

Also include in the table, in chronological order, any small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since issuance of the most recent State Operating Permit or Part 70 operating permit. It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit.

*Permit Number* **-** Enter the permit number of each action issued to this facility or process unit. For small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service, enter the name of the action in this column. For example, enter “Exemption” in this column for an exemption.

*Date Action Issued* **-** Enter the date the permit action was issued. This will be the date that the appropriate official at LDEQ signed the document.

1. **Enforcement Actions and Schedule for Compliance**

The purpose of this section is to determine any requirements, conditions, or limitations that have been imposed upon the facility and/or process unit (for unit-specific permits) by any air quality enforcement actions, settlement agreements, and consent decrees so that they can be incorporated into the final permit. If no such enforcement actions exist, check “No.” *\*\*It is not necessary to update this table during the permit review process, unless an enforcement action is issued that incorporates terms and conditions that must be incorporated into the final permit.\*\**

Subsection a - List all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. It is not necessary to list any such activities issued before the issuance of the currently effective Title V Operating Permit or State Operating Permit. It is not necessary to list any such actions that do not pertain to the enforcement of air quality regulations. Add additional rows to this table as necessary. It is not necessary to attach a copy of any of the referenced actions.

*Type of Action or Tracking Number* – List the type of enforcement action issued. Choose from either “Enforcement Action,” “Settlement Agreement,” or “Consent Decree.” If known, the applicant may list the tracking number attached to this action in lieu of the type of enforcement action.

*Issuing Authority* – List the regulatory body that issued the air quality enforcement action, settlement agreement, or consent decree.

*Date action issued* – Enter the date that the enforcement action, settlement agreement, or consent decree was issued. This is the date that the appropriate official(s) at the issuing agency or agencies signed the document.

*Summary of Conditions Included?* – Indicate if a summary of the conditions imposed by the referenced document is attached to the application. This summary should be shown in Section 22, Table 2. *If a summary of the conditions imposed by the referenced document is not included, it may delay the processing of the application.*

Subsection b - If the facility or process unit for which application is being made is not in full compliance with all applicable regulations, provide a description of how compliance will be achieved, including a schedule for compliance. Indicate remedial measures and milestones leading to compliance with any applicable requirements and include a schedule for submitting certified progress reports (no less than every six (6) months). The compliance schedule must include an enforceable sequence of dates by which specific actions will occur at the source, leading to compliance with all applicable requirements. The schedule must resemble, and be at least as stringent as, that contained in any judicial consent decree or administrative order or compliance order to which the source is subject. If any compliance issues are being addressed in a pending enforcement action, then state which enforcement action addresses these issues. See LAC 33:III.517.E.4 for more details. Use the blanks provided. Add additional rows to this table as necessary.

1. **Letters of Approval for Alternate Methods of Compliance**

List any correspondence that has been issued by LDEQ, EPA, or another regulatory body to the facility that provides for or supports a request for alternate methods of compliance with any applicable regulations. Also, list any letters from any regulatory body issued to the facility addressing circumstances that could prevent the facility from achieving strict conformity with any applicable regulation. These letters will be used to determine when/if alternate methods of compliance must be addressed in the final permit. If no such letters exist, check “No.”

*Date Letter Issued* – Enter the date that the letter was issued by the regulatory body.

*Issuing Authority* – Enter the name of the regulatory body that issued the letter.

*Referenced Regulation(s)* – Enter the specific citation(s) referenced by the letter.

*Copy of Letter Attached?* – Indicate whether or not a copy of the referenced letter is attached to the permit application. *If a copy of the letter is not attached to the permit application, it may have to be requested by an additional information request, thereby delaying the processing of the application.*

1. **Initial Notifications and Performance Tests**

The purpose of this section is to indicate that certain one-time requirements have been satisfied. Each initial notification or performance test should be listed on a separate line. It is only necessary to do this for the facility or process unit (for unit-specific permits) for which this application is submitted. If there are no initial notification or performance test requirements to note, check “No.”

*Initial Notification or One-time Performance Test?* – Enter either “Initial Notification” or “One-time Performance Test,” to indicate which type of requirement has been satisfied.

*Regulatory Citation Satisfied* – Indicate which regulation has been satisfied by entering the regulatory citation that requires the notification or performance test be performed. An example of a correctly entered citation is “40 CFR 63.7506(b).” Entering “40 CFR 63, Subpart DDDDD” is not correct.

*Applicable Source(s)* – Indicate the emissions source(s) for which the regulatory citation has been satisfied.

*Date Completed/Approved –* For each initial notification or one-time performance test listed in first column, enter the date that the notification or performance testing requirement was satisfied. The requirement is not considered to be satisfied until all required submittals are made and all required approvals are granted. If the approval is still pending with the approving authority, enter “pending” in this field.

1. **Existing Prevention of Significant Deterioration (PSD) /Nonattainment New Source Review (NNSR) Limitations**

Indicate if the emission source(s) represented in this permit application operates under one or more NSR permits by choosing “yes” or “no.”

If “yes,” complete the table provided; if “no,” enter “N/A” into the table. Group all limitations by permit.

*Permit Number* – Enter the permit number of each PSD permit issued to the facility. For process unit-specific permits, only those PSD permits issued to the process unit of concern should be noted.

*Date Issued* **-** List the date that the permit action was issued. This will be the date that the appropriate official at LDEQ signed the document.

*Emission Point ID* No. - Enter the Emission Point ID No. for each source as displayed on the EIQ forms submitted with this application.

*Pollutant* – Enter the pollutant for which a limitation has been established.

*BACT/LAER Limit* – Enter each currently applicable limitation imposed by each PSD/NNSR permit. Limitations that have been superseded by subsequent PSD/NNSR permits should not be listed. Group the limitations by permit.

Typically, PSD/NNSR permit limitations are expressed in terms of an operating parameter, such as heat input, power output, or production rate. If such a limit exists, it must be stated in this table. It may be necessary to review all of the text in the permit document to list all applicable limitations.

*Averaging Period* - Enter the averaging period over which compliance must be determined in order to comply with the BACT/LAER limits listed in the previous column.

*Description of Control Technology/Work Practice Standard­* – Enter a brief description of the control technology and/or work practice standard used to comply with the BACT/LAER limit previously stated.

1. **Air Quality Dispersion Modeling**

Any facility or process unit seeking a PSD permit must submit air quality dispersion modeling results as required by LAC 33:III with this application. Any application seeking a PSD permit that does not contain the required modeling may not be deemed technically complete. The purpose of air quality dispersion modeling is to show compliance with the Louisiana Toxic Air Pollutant Ambient Air Standards (AAS) and/or National Ambient Air Quality Standards (NAAQS).

Answer the two questions provided. If the answer to both questions is “no,” enter “none” in the table. If the answer to either question is “yes,” then complete the table using the most recent air quality dispersion modeling data available.

Enter the date that the most recent air quality modeling results as required by LAC 33:III were submitted. Enter “none” if modeling results for the facility or process unit have never been submitted to the department.

*Pollutant* – Enter each pollutant for which modeling was performed.

*Time Period* – Enter the averaging period of the standard for which modeling was performed to demonstrate compliance with the AAS or NAAQS. Criteria pollutants may have more than one averaging period associated with them. If modeling for more than one averaging period for a pollutant was conducted, enter each averaging period on a separate line.

*Calculated Maximum Ground Level Concentration* – Enter the maximum ground level concentration, expressed in µg/m3 (micrograms per cubic meter), that was shown in the modeling results.

*Louisiana Toxic Pollutant Ambient Air Standard or (National Ambient Air Quality Standard {NAAQS})* – Enter the standard, expressed in µg/m3 (micrograms per cubic meter), against which the concentration entered in the previous column was compared to show compliance. A NAAQS standard should be placed in parentheses. Other standards should not be in parentheses.

1. **General Condition XVII Activities**

Very small emissions to the air resulting from routine operations that are predictable, expected, periodic, and quantifiable; that are submitted by the permitted facility; and that are approved by the Air Permits Division are considered authorized discharges. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY;
2. Be less than the minimum emission rate (MER) for each Toxic Air Pollutant (TAP);
3. Be scheduled daily, weekly, monthly, etc.; or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example].

Enter all activities to be considered as General Condition XVII Activities as appropriate. Expand each table as necessary to accommodate all such activities. If the facility does not have General Condition XVII Activities, check “No.”

*Work Activity* – Enter a descriptive name of the activity to be considered.

*Schedule* – Enter the frequency at which the activity will take place.

*Emission Rates – TPY* – Enter the emissions generated by the proposed activity in tons per year (tpy). Include calculations to support the emissions estimates stated. If calculations are not provided, the application will not be considered to be technically complete.

1. **Insignificant Activities**

Enter all proposed Insignificant Activities in this table. Expand each table as necessary. If no Insignificant Activities are proposed, check “No.” See LAC 33:III.501.B.5 to determine what types of activities can be considered insignificant. EIQ forms are not required to be submitted for insignificant activities. If they are submitted, please note on the EIQ sheet itself that the source represented on the EIQ sheet is a proposed insignificant activity.

In some cases, the aggregate emissions of all Insignificant Activities of a certain type (i.e., storage tanks) must not exceed five (5) tons per year (tpy). If the applicable Insignificant Activity exemption criterion provides for this restriction, supporting emissions calculations must be submitted for each Insignificant Activity claimed under that exemption provision. Per LAC 33:III.501.B.5, “*aggregate emissions* shall mean the total emissions from a particular insignificant activity or group of similar insignificant activities (e.g., A.1, A.2, etc.) within a permit per year.”

Though they are not required, LDEQ may request, on a case-by-case basis, that supporting emissions calculations be provided to show the appropriateness of the designation of Insignificant Activity.

In all cases, calculations should be submitted for any activity that is proposed to be declared insignificant per LAC 33:III.501.B.5.D. If an activity is clearly addressed by a citation other than LAC 33:III.501.B.5.D, the other citation must be used. An activity will not be granted Insignificant Activity status under LAC 33:III.501.B.5.D if it is clearly addressed by another citation.

It is not necessary to list LAC 33:III.501.B.5 – Table B or Table C activities in an air permit application.

Each time a permit application is submitted, this list should show **ALL** Insignificant Activities, including any that were approved in previous permits or case-by-case insignificant activity notifications.

*Emission Point ID No.:* - If an Insignificant Activity was a permitted source in previous permit for the facility, enter the Emission Point ID No. by which it was formerly known. If the source does not have an Emission Point ID No. associated with it, enter “N/A.”

*Description* – Enter a descriptive name of the activity to be considered.

*Physical/Operating Data* – Enter the pertinent operating parameters that are required to determine whether or not the proposed activity qualifies as an Insignificant Activity. For example, if claiming that a storage tank is insignificant under LAC 33:III.501.B.5.A.3, supply the volume of the tank.

*Citation* – Enter the specific regulatory citation that provides for the proposed activity to be considered insignificant. All citations will begin with LAC 33:III.501.B.5. For example, a piece of external combustion equipment with a design rate of less than 1 million BTU per hour would require the citation of “LAC 33:III.501.B.5.A.5.”

1. **Regulatory Applicability for Commonly Applicable Requirements**

Answer each question by checking either “yes” or “no.” For each “yes” answer, address the applicability for the regulations referenced in the paragraph in which the question appears. Applicability should be addressed in Section 22 of this application.

It is not necessary to state all applicable requirements for 40 CFR 61, Subpart M, or for 40 CFR 82, Subpart F in Section 22 of this application. Simply state whether or not these regulations are applicable. This simplistic approach should not be taken for any other state or federal regulations.

1. **Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping**

For each table, add additional rows to accommodate all emission points and emission sources. Revise the headings of the tables in this section as necessary in order to address all applicable regulations.

**Table 1** – The purpose of Table 1 is to provide a summary of the applicability or non-applicability of the regulations to each emission point or emission source.

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*Emission Point ID No.* – Enter the Emission Point ID No. for each source as displayed on the EIQ forms.

*Descriptive Name of the Source*– For each Emission Point ID No., enter the descriptive name of the equipment.

Where each Emission Point ID No. row in the table intersects with each regulation displayed in the column headings, place a 1, 2, or 3 in the column beneath the heading, or leave the column blank. Use the Key To Matrix guidance found underneath Table 1 as a reference for this task. Alter the regulations referenced in the column headings in order to address all applicable regulations. Add columns as necessary to address all applicable regulations. To accommodate additional Emission Point ID Nos., add additional rows to the table.

For entries that are subject to ANY requirement of a regulation, a “1” should be entered in the column. Even if a piece of equipment or activity is only subject to monitoring, recordkeeping, and/or reporting requirements, a “1” should be entered in the appropriate column.

For entries that are subject to a regulation, but are completely exempted due to a specific exemption statement within the regulation, a “2” should be entered into the column. This means that the source is completely exempt from any provisions of the regulation, including monitoring, recordkeeping, and/or reporting requirements. If a piece of equipment or activity is not completely exempt from a regulation, then “2” is not the appropriate entry.

For entries that are subject to a regulation, but do not have ANY applicable requirements, a “3” should be entered into the column. For example, a grain dryer with column plate perforations less than 2.4 millimeters in diameter that is constructed after August 3, 1978 is subject to 40 CFR 60, Subpart DD. However, this regulation does not impose ANY requirements on this type of source. When entering such a source in this table, a “3” would be placed under the 40 CFR 60, Subpart DD column.

For entries that are not subject to a specific regulation due to meeting a specific criterion, a “3” should be entered into the column. For example, if a fossil-fuel fired steam generating boiler was constructed or modified prior to August 17, 1971, it is not subject to 40 CFR 60, Subpart D. When entering such a source in this table, a “3” would be placed under the 40 CFR 60, Subpart D column.

Leave the appropriate space blank under a column when the regulation clearly does not apply to the emissions source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler under any circumstances.

**Table 2** – The purpose of Table 2 is to show how the regulations apply to each emission point or emission source. If this form is not completed such that it addresses all regulations that apply to each emission point or emission source, as well as the entire facility or process unit to be permitted, the application will not be deemed to be technically complete.

*Emission Point ID No.* – Enter the Emission Point ID No. for each source as displayed on the EIQ forms.

*Applicable Requirement* - For each emission point or emission source represented in the application, list applicable state and federal regulations and pollution abatement programs. Clearly identify federal requirements from state requirements for each emission point or emission source.

*Compliance Method/Provision* - List the proposed air pollutant control measures that will be employed to limit emissions in accordance with the regulations listed in the previous column. For each emission point or emission source, arrange the regulatory requirements for each applicable regulation according to the type of requirement specified by the regulation.

All requirements for each applicable regulation that impose emissions limitations (i.e., lb/MMBTU, percent opacity, parts per million, etc.) should be grouped together under the heading *“Requirements that limit emissions or operations.”*

All requirements for each applicable regulation related to the frequency and/or duration of monitoring activities should be grouped together under the heading *“Requirements that specify monitoring.”*

All requirements for each applicable regulation that require records to be kept and retained should be grouped under the heading *“Requirements that specify records to be kept and requirements that specify record retention time.”*

All requirements for each applicable regulation that require reports to be submitted according to a certain timeframe should be grouped together under the heading *“Requirements that specify reports to be submitted.”*

All requirements for each applicable regulation that require performance testing to be performed should be grouped together under the heading *“Requirements that specify performance testing.”*

If the regulations allow a number of different compliance methods from which to choose, indicate which compliance method will be used. The difference between Reporting and Notification requirements is that Reporting requirements are required to be satisfied on a periodic basis. Notification requirements are satisfied by a one-time submittal of information. No other submittals will be required to satisfy a Notification requirement. Notification requirements that have been satisfied should be addressed in Section 16 of this application.

*Compliance Citation* – Enter the specific regulatory citation that allows for the method of compliance stated in the previous column. General citations such as “40 CFR 60 Subpart A” are not acceptable. An example of an acceptable citation is “40 CFR 60.8(a).” If the requirement originates from an enforcement action, settlement agreement, or consent decree listed in Section 14, cite the proper action and the page(s) on which the requirement appears here.

*Averaging Period/Frequency* – Enter the averaging period over which compliance must be determined or the frequency with which the activity prescribed by the regulation must be performed in order to demonstrate compliance. If the regulation allows the applicant to choose an averaging period or frequency to demonstrate compliance, the choice should be indicated in the column.

*State-Only Requirement* – If the requirement is a State-Only Requirement, note it in this column. For a condition to be considered State-Only, it must not be required by any federally enforceable regulation. Also, it must not be used to avoid applicability of any federally enforceable regulation. (Any regulation established for this purpose is also considered federally enforceable.) See the *Louisiana Guidance for Air Permitting Actions* for a more thorough discussion of requirements that can be considered State-Only.

**Table 3** – The purpose of Table 3 is to show how a given emission point or emission source is exempt from the regulations or why the regulations do not apply to a given emission point or emission source.

*Emission Point ID No.* – Enter the Emission Point ID No. for each source as displayed on the EIQ forms.

*Requirement* – List the requirement for which an exemption or non-applicability is being claimed.

*Exempt or Does Not Apply* – Enter “Exempt” if the source is exempt from the regulation listed in the previous column or “Does Not Apply” if the regulation listed in the previous column is not applicable to the source. To be exempt from a regulation means that the emission point or emission source would otherwise be subject to the regulation, except for a certain criterion. For example, when determining the applicability of LAC 33:III.2103 to a storage tank, the tank would be *exempt* if it stored JP-4 fuels in horizontal underground tanks. The same regulation would *not apply* if the storage tank were less than 250 gallons in volume.

*Explanation* – Give the reasoning behind the exemption or non-applicability determination.

*Citation Providing for Exemption or Non-applicability* – Give a specific regulatory citation that provides for the exemption or statement of non-applicability.

**Table 4** – The purpose of Table 4 is to show how any emissions from various pieces of equipment are routed to a common point of emission, or which sources are members of an Emissions Cap. This includes both sources that are represented in the permit and sources that are not represented in the permit. See the instructions for Section 23 to determine what sources should be represented as a permitted source.

*Emission Point ID No.* – Enter the Emission Point ID No. for each source as displayed on the EIQ forms. If the listed source is not represented on an EIQ form included with this application, assign an Emission Point ID No. to the source.

*Description* - Enter a descriptive name for this source. This name should describe the contents, fuel(s), etc. of this source, as appropriate.

For example:

* If the source is a diesel tank with a capacity of 10,000 gallons, the entry for this field can be “10,000 gal Diesel Tank.”
* If the source is a boiler that uses natural gas as a fuel source, the entry for this field can be “Natural gas-fired boiler.”

*Construction Date* – Enter the date that the equipment described in the previous column was constructed.

*Routes to:* - Enter the Emission Point ID No. of the emission point to which this source routes its emissions. An EIQ sheet must be submitted for the Emission Point ID No. listed in this column.

*Operating Rate/Volume* – Enter the operating rate of the source. If the source is a storage tank, enter the volume of the tank.

*Applicable Requirement(s)?* – Choose “yes” or “no” to indicate whether or not there are any requirements applicable to the emissions source noted in this row. If “yes,” address the appropriate regulations in Tables 1 and 2 of this section.

1. **Emissions Inventory Questionnaire (EIQ) Forms**

An EIQ form should be completed for each emission point and emission source at the facility or process unit (for process unit-specific permits) that does not qualify as a General Condition XVII Activity or an Insignificant Activity. Emissions sources that are routed to a common control device or point source may submit one EIQ sheet for the common emissions point. Equipment that route their emissions to the common emissions point should be included in Table 4 of the application.

The EIQ form exists as a separate Microsoft Excel document and is considered part of the *Application for Approval of Emissions of Air Pollutants from Part 70 Sources*. Fill in each blank as applicable. If fields are left blank when the guidance below indicates that an entry should be made, the application may not be deemed technically complete.

**Continuity of successive EIQs**

Each time the type or quantity of air pollutants emitted changes due to a change in facility operations, a new EIQ and permit application may be required. Over the course of many permit modifications, this may lead to a number of EIQ sheets being submitted for the same emission point or emission source. It is important that each new EIQ flows logically from any previously-submitted EIQ and that together all of the EIQs that are submitted for any emission point or emission source describe adequately the progressive changes to the emission point or emission source. The most recently received EIQ form for a given emission point or emission source will be considered to be the current EIQ. It will completely supersede any previously submitted EIQ for the purposes of stating current operational parameters and emissions data.

Successive EIQs should use consistent terminology and employ a numbering system for emission points or emission sources (Emission Point ID No.) that maintains continuity. Changes and new information should be clearly noted. See the line-by-line guidance for the EIQ form for more details.

**Emissions CAPs**

For a group of emissions sources subject to an emissions cap, one “CAP EIQ” should be submitted for sources subject to the cap. This “CAP EIQ” must show the Average lb/hr and Tons per year emissions for all sources encompassed by the emissions cap. In general, an individual EIQ should also be submitted for each point source included in the CAP. The EIQ for each point source included in the CAP should show the Maximum lb/hr for each pollutant that will be attributed to the source, but should show no other emissions.

**Acceptable answers**

If any fields in the EIQ form are not applicable (such as Shell Height for a steam generating boiler), indicate "none" or "not applicable" (N/A). Terms such as "not significant," "nil," "trace," etc. are not appropriate for any field. The use of absolute zero or 100% control efficiency is not appropriate. The names of certain pollutants have been pre-entered into the form.

Please attach additional sheets if more space is needed.

**Rounding**

In selecting the number of digits and decimal places in a lb/hr or TPY emission rate calculation, it is necessary that (1) there is sufficient detail to determine if an applicable requirement applies, and (2) there is an adequate and meaningful reference to assist in demonstrating compliance after permit issuance.

It is not necessary to list or speciate a pollutant as being emitted by a given source if the pollutant is emitted in a quantity less than 0.0005 tons per year (TPY). The only exceptions to this rule are chlorinated dibenzofurans and chlorinated dibenzo-p-dioxins, each of which has a Minimum Emission Rate (MER) of 0.0001 lbs/year.

Criteria Pollutants. List annual (i.e., TPY) emissions to 2 decimal places. If the emission rate does not round to 0.01 TPY, list emissions as < 0.01 TPY. Also list hourly (i.e., average lb/hr and maximum lb/hr) emissions to 2 decimal places unless the emission rate does not round to 0.01 lb/hr. If the hourly emissions rate rounds to 0.001, 0.002, 0.003, 0.004, or 0.005, list emissions as such. If the hourly emissions rate does not round to 0.001, list emissions as < 0.001.

Examples include:

lb/hr or TPY rates greater than one

* + 25.444 would be reported as 25.44
	+ 25.445 would be reported as 25.45

lb/hr rates less than one

* + 0.25 would be reported as 0.25
	+ 0.244 would be reported as 0.24
	+ 0.058 would be reported as 0.06
	+ 0.005 would be reported as 0.01
	+ 0.0045 would be reported as 0.005
	+ rates less than 0.001 lb/hr would be reported as < 0.001

TPY rates less than one

* + 0.115 would be reported as 0.12
	+ 0.114 would be reported as 0.11
	+ 0.005 would be reported as 0.01
	+ rates less than 0.005 TPY would be reported as < 0.01

Toxic Air Pollutants. The annual emission rate in tons per year (TPY) should generally be listed to two (2) decimal places according to the guidance above, with the following exceptions: 1) Chlorinated dibenzofurans and chlorinated dibenzo-p-dioxins, which have a Minimum Emission Rate (MER) of 0.0001 lbs/year, must be rounded to eight (8) or more decimal places; and 2) all other TAPs that have an MER of 50 lbs/year or less must be rounded to three decimal places.

Examples include:

lb/hr rates for TAPS with an MER greater than 50 lbs/yr

Follow the guidance shown above for Non-TAPs.

lb/hr rates less than one for TAPS with an MER less than or equal to 50 lbs/yr

* + 0.0045 would be reported as 0.005
	+ 0.0044 would be reported as 0.004
	+ rates less than (<) 0.001 lb/hr would be reported as < 0.001

TPY rates for TAPS with an MER greater than 50 lbs/yr

Follow the guidance shown above for Non-TAPs.

TPY rates less than one for TAPS with an MER less than or equal to 50 lbs/yr

* + 0.0045 would be reported as 0.005
	+ 0.0044 would be reported as 0.004
	+ rates less than (<) 0.001 TPY would be reported as < 0.001

Polynuclear Aromatic Hydrocarbons (PAH) are a grouping of pollutants that are classified collectively as a Class II Toxic Air Pollutant (TAP). They are part of a larger set of pollutants known as Polycyclic Organic Matter (POM), which is otherwise not regulated by the Office of Environmental Services, Air Permits Division. When it is impossible to separate PAH from POM in order to report emissions, POM should be reported instead of PAH. POM will then be regulated as a surrogate for PAH.

Facility Emission Rate Totals. In general, when combining individual source emission rates to obtain facility totals, consider the "less than" rates to be the shown digit(s), i.e., < 0.01 would be added as 0.01. However, if all the sources for a particular pollutant are small and include "less than" rates, it may be preferable to sum in a manner reflecting facility-specific process knowledge to avoid the incorrect conclusion that there is a quantifiable (and perhaps significant) total emission, when there is not. Finally, in rounding off total emission rates, utilize the same protocols as described above (e.g., 24.51 lb/hr + 0.002 lb/hr = 24.512 lb/hr would be reported as 24.51 lb/hr).

**General**

Do not write information in the top or left side margin of the EIQ form, as folder bindings may cover the information.

For all types of engines, speciate out all criteria pollutants individually. It is not sufficient to add pollutants together. For example, do not represent the NOx and VOC emissions as one combined emission rate named NOx + NMHC, NOx + VOC, or any other similar naming method.

All Part 70 permit applications that will trigger Prevention of Significant Deterioration (PSD) review must include the carbon dioxide equivalent (CO2e) emissions from the project on the EIQ for each affected emissions point. For greenhouse gases (GHGs), entering speciated GHG emission does not mean that emissions limitations for each GHG will appear in the final permit. GHG emission rates will be included in air permits in accordance with LDEQ policy and US EPA guidance.

**Sources with Multiple Vents**

For sources that have many vents to the atmosphere, it is possible to group these emission points together under one EIQ (and one Emission Point ID No.) It is important that all such grouped emission points are not able to emit at individually variable rates. For example, a paper machine at a paper mill is very large and can emit pollutants from many different locations. It is not possible to cause any one of its emission points to emit at a higher rate without increasing the emission rates for each of the rest of them as well. This type of source may be represented with one EIQ (and one Emission Point ID No.)

**Line-By-Line Instructions**

*Date of submittal* – Enter the date that the EIQ was submitted to LDEQ. If a revised EIQ is later submitted for whatever reason, this date must be revised to reflect the later date.

*Emission Point ID No.* - Use any identification number to identify sources. Be consistent and use the same number on calculations, maps, future correspondence, etc. If a source has an Emission Point ID No. associated with it from a previous permit, continue to use that Emission Point ID No. to refer to that source. If an emission point or emission source becomes inactive, retire its ID number permanently. Do not use it for other emission points or emission sources at the facility.

**Do not assign Emission Point ID Nos. that contain the following text strings: “EQT,” “ARE,” “GRP,” “TRT,” or “RLP.”** These text strings conflict with those used by the information storage and retrieval software used by LDEQ. These strings are considered reserved and should not be used under any circumstances by the applicant.

*TEMPO Subject Item ID No.* - If the emission point or emission source has been assigned an equipment number by LDEQ, enter it here. These generally begin with the letters EQT, ARE, or GRP followed by a four digit number. If a prior permit has been issued through the TEMPO system, the numbers will be listed in the permit in multiple places. If this source was not previously assigned a TEMPO Subject Item ID No., enter “N/A.” Do NOT assign such a number to the emission point or emission source if one was not previously assigned by LDEQ.

*Descriptive name of the Emissions Source* – Enter a descriptive name for this source.

*Approximate Location of Stack or Vent* – From the drop-down boxes, enter the Method and Datum that were used to determine the location of the source. Also enter the location of the source in both Universal Transverse Mercator (UTM) and Cartesian (Latitude and Longitude) Coordinates. A unique coordinate pair for each EIQ should be entered, rather than the same coordinate pair for all EIQs. Select the correct UTM Zone from the drop-down box provided. The latitude and longitude measurements, which must be entered in the degrees-minutes-seconds-hundredths format, should show values for the degree, minute, second, and hundredths measurements. An accurate value should be entered into each of these blanks.

*Stack and Discharge Physical Characteristics Change?* – If the stack parameters to be entered in the blanks will be a change from the most recently submitted EIQ form for the source, or if an EIQ has not been previously submitted for the source, choose “yes” from the drop-down box. Otherwise, choose “no.”

*Diameter (ft) or Stack Discharge Area (ft^2)* – Enter either the estimated diameter or the estimated area of the stack through which the source emits pollutants. Place the diameter or the area in the appropriate blank. For non-round exits, list the discharge flow area.

*Height of Stack Above Grade (ft)* – Enter the estimated height, in feet, of the stack through which the source emits pollutants.

*Stack Gas Exit Velocity* – Enter the estimated exit velocity of the gases exiting the stack through which the source emits pollutants.

*Stack Gas Flow at Process Conditions Not at Standard (ft^3/min)* – Enter the estimated flow rate, in cubic feet per minute, of the stack gases exiting the stack through which the source emits pollutants. Note: The flow must be given at process conditions, NOT at standard conditions.

*Stack Gas Exit Temperature (°F)* – Enter the estimated temperature, in degrees Fahrenheit, of the gases exiting the stack through which the source emits pollutants.

*Operating Hours (hours per year)* – Enter the maximum estimated number of hours per year that the source operates. This value will form the basis of the emission limitations for which the source will be permitted. This value should not exceed 8,784 hours per year which is the total number of hours in one leap year.

*Date of Construction or Modification* – Enter the month, day, and year that this piece of equipment was constructed or modified from the drop-down boxes provided. Using the drop-down box provided below the space provided for the date, indicate whether such date is the date that the source was constructed, modified, or proposed to be constructed. In order to determine if the source has been modified, see the definition of “modification” as represented in the applicable regulations. If this date is not provided, then the application may not be considered to be technically complete.

If the source is an internal combustion engine, take special care to consult the definition of the terms “construction,” “reconstruction,” and “modification” as represented in 40 CFR 60 Subpart IIII, 40 CFR 60 Subpart JJJJ, and 40 CFR 63 Subpart ZZZZ, as applicable. The definitions of these terms specify dates that are unique to these regulations. The definitions of these terms may not be equivalent to their definitions as represented in other similar regulations.

*Percent of Annual Throughput Through This Emission Point* – Enter the percentage of the total operational time that the source operates during each of the three-month periods listed.

*Type of Fuel Used and Heat Input* – In the Type of Fuel column, enter each fuel that is fired by the source (if applicable). If more fuels are fired than can be entered in the space provided, enter the most commonly used fuels until the available space is exhausted. In the Heat Input (MMBTU/hr) column, enter the heat input value in units of millions of British Thermal Units per hour (MMBTU/hr) for each fuel listed in the previous column.

*Notes* – Add any explanatory notes that are necessary to convey a complete understanding of the information presented in the EIQ form. If the EIQ represents an alternate operating scenario or an emissions cap, use this field to make that statement.

**Operating Parameters (include units)** – In the Parameter column, enter the value, including units, in each row. In the Description column, enter any additional information necessary to enhance the understanding of the information contained in the adjacent Parameter column entry.

*Normal Operating Rate/Throughput* - Enter the rate at which the source operates under normal operations. The Average (lb/hr) and Annual (tons/yr) values in the Emission Rate section that appears later in the form are based on this value.

*Maximum Operating Rate/Throughput* - Enter the highest rate at which the source can operate. The Maximum (lb/hr) value in the Emission Rate section that appears later in the form is based on this value.

*Design Capacity/Volume/Cylinder Displacement* – Enter the maximum rate at which this source can operate regardless of any type of synthetic restrictions, including those originating from permits, operational constraints, control devices, or situational conditions. For tanks, this value should be the shell volume, NOT the working volume. For engines, this value should be the liters of displacement per cylinder.

*Shell Height (ft)* – For a tank, enter the height of the tank shell in feet; otherwise, leave blank.

*Tank Diameter (ft)* – For a tank, enter the internal diameter of the tank in feet; otherwise leave blank. This diameter should be read at the portion of the tank with the largest internal diameter.

*Fixed Roof* – For a tank, check this box to indicate if the tank has a fixed roof. For any source other than a tank, leave blank.

*Floating Roof* – For a tank, check the appropriate box to indicate if the tank has an external floating roof or an internal floating roof. For any source other than a tank, leave blank.

*Date Engine Ordered* – For any type of internal combustion engine, list the date on which the engine was ordered from the manufacturer from the drop-down boxes provided. For any source other than an internal combustion engine, leave blank.

*Engine Model Year* – For any type of internal combustion engine, list the engine’s model year. For any source other than an internal combustion engine, leave blank.

*Date Engine Was Built by Manufacturer* – For any type of internal combustion engine, enter the month and year that the engine was built by the engine’s manufacturer from the drop-down boxes provided. For any source other than an internal combustion engine, leave blank.

**Air Pollutant Specific Information** – The information in this section displays and summarizes the emissions produced by the source and the controls placed on the emissions.

*Emission Point ID No.* - Enter identification number assigned to the source.

*Pollutant* – The Criteria Pollutants are already listed on the form. Use the blank rows and the drop boxes to enter all other pollutants of concern for the emission point. Speciate all of the TAPs and HAPs that are emitted by the emission point.

*Control Equipment Code* – Using the chart found at the end of these instructions as a cross-reference, choose the code from the drop-down box that corresponds to the best description of the control device that controls each pollutant of concern. If no control device is used for the pollutant, leave this field blank.

*Control Equipment Efficiency* – If control equipment is used to control emissions of a given pollutant, enter the control efficiency of the control device used. “100%” is not an acceptable entry for this column. If control equipment is used, “0%” is not an acceptable entry for this column. If no control device is used for the pollutant, leave this field blank.

*HAP/TAP CAS Number* – Enter the Chemical Abstracts Service (CAS) number for each speciated TAP or HAP. When a speciated TAP or HAP is chosen from the drop-down box in the *Pollutant* column, the CAS number should be automatically entered, if one exists.

*Proposed Emission Rate* – Enter the requested emission rates for each pollutant in accordance with the guidance found in the *Louisiana Guidance for Air Permitting Actions*. Guidance that describes how to speciate pollutants and the accuracy with which emissions must be reported can be found in the *Rounding* section above.

Average (lb/hr) – Enter the average hourly emission rate of each pollutant. When the average is converted to tons per year (tpy) using the value entered in the *Normal Operating Hours (hours per year)* field, it should result in the Annual (tons/yr) entry for that pollutant.

Maximum (lb/hr) – Enter the maximum hourly emission rate of each pollutant. The Maximum lb/hr for each source will be reviewed and established in the permit by LDEQ on a case-by-case basis.

Annual (tons/yr) – Enter the maximum yearly emission rate of each pollutant. When the Annual emission rate for each pollutant is converted to pounds per hour using the value entered in the *Normal Operating Hours (hours per year)* field, it should result in the Average (lb/hr) entry for that pollutant.

*Permitted Emission Rate (Current)* – *Annual (tons/yr)* – Enter the maximum yearly emission rate of each pollutant for this source as permitted in the current permit. If this source is not currently permitted, leave blank.

*Add, Change, Delete, or Unchanged* – Use the drop-down box provided to select a code that best represents how the emissions in the *Emission Rate* section compare to currently permitted levels. A code should be entered for each pollutant. The codes are explained as follows:

A – Add

C – Change

D – Delete

U - Unchanged

*Continuous Compliance Method* – If the source utilizes continuous monitoring to demonstrate compliance with an emission limitation for a given pollutant, enter the type of monitor in the field provided. An entry should be made for each pollutant for which continuous monitoring is used. If no continuous monitoring system is used, leave this field blank.

Common methods of continuous monitoring are supplied as options in this drop-down box. The codes provided are as follows:

CEMS – Continuous Emissions Monitoring System

COMS – Continuous Opacity Monitoring System

PEMS – Predictive Emissions Monitoring System

Parametric – used for some form of parametric monitoring

CMS – Continuous Monitoring System. When using this code, explain within this application what is being monitored to verify compliance.

*Concentration in Gases Exiting at Stack* – For each pollutant with a *Continuous Compliance Method* indicated in the previous field, enter the stack gas concentration with which the monitoring system is used to show compliance, if applicable.

**24. New Source Review Applicability Summary**

New Source Review (NSR) is a complex regulatory program. LDEQ urges applicants who are unfamiliar with NSR to review the *Louisiana Guidance for Air Permitting Actions* manual for more information.

This section is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself.

***\*\**** *Definitions:* Where these instructions reference definitions of certain terms, the definitions can be found in LAC 33:III.504 (for NNSR) and LAC 33:III.509 (for PSD). ***\*\****

***\*\**** *Emissions and Emissions Limits:* When requested to provide information about actual and allowable emissions, these values should be reported in tons per year (TPY). ***\*\****

***\*\**** *FAQ: I already know my project will trigger NSR. Must I complete Subsections 24.A and 24.B in their entirety?* ***\*\****

No, if an applicant has determined that NSR is required for a given pollutant, complete only Column A of Subsection 24.A, then proceed to Subsection 24.C and Subsection 24.D (24.D only if PSD review is required). For pollutants that do not trigger NSR, Subsections 24.A and 24.B must be completed in their entirety.

*If I complete these tables correctly, is it necessary to include a written discussion of this information as well?* Yes, a detailed written explanation/discussion of the information summarized in these tables should be provided.

**24.A. Project Summary**

Each emissions unit at the facility or process unit (for process unit-specific permits) should be addressed in Subsection 24.A. In the event a project affects emissions units located in multiple process units, all affected emissions units should be addressed in this subsection.

*Emission Point ID No.:*

Enter the Emission Point ID No. of the emissions unit (as it is provided on its EIQ Sheet).

*Description:*

Enter the description of the emissions unit that corresponds with the Emission Point ID No. entered in the first column.

*24-Month Period (associated with each pollutant):*

Note the consecutive 24-month period selected by the applicant for each pollutant. When a project involves multiple emissions units, only one consecutive 24-month period can be used to determine “Baseline Actual Emissions” for the affected emissions units; however, a different consecutive 24-month period can be used for each regulated pollutant. For additional restrictions that may apply, see clauses a.iv and b.v of the definition of “Baseline Actual Emissions.”

*Column A and Completion of Other Columns:*

Using the codes below, indicate if the emissions unit will be new (N), modified (M), affected (A), or unaffected (U).

**N:** New sources are generally those yet to be constructed. See the definition of “Emissions Unit” for exceptions. Complete columns E and F. Column F will equal column E. Columns B and C would equal “0,” and column D is not appropriate for new sources; therefore, these columns should be left blank.

**M:** Modified sources are existing sources that will undergo a physical change or change in the method of operation as part of the proposed project. Complete columns B and C and *either* column D or column E, but not both. Here, use of “projected actual emissions” is at the discretion of the applicant. See subparagraph d of its definition. Complete column F. For increases, column F equals column D or E minus the lower of column B or C. For decreases, column F equals the *lower* of column B or C minus column D or E.

**A:** Affected sources are existing sources that will not be modified, but will experience an increase in actual *annual* emissions as a result of the proposed project (e.g., increase in throughput through a tank, increase in the firing rate of a boiler, etc.). Complete column C and *either* column D or column E, but not both. As before, use of “projected actual emissions” is at the discretion of the applicant. Complete column F. Column F equals column D or E minus the lower of column B or C.

**U:** Unaffected sources will not be modified or experience an increase in actual annual emissions as part of the proposed project. Columns B-F should not be completed. Unaffected emissions are not required to be listed individually.

*Column B: Pre-Project Allowables*

Enter pre-project allowables for each emissions unit (i.e., the TPY emission limit established by the facility’s existing permit). Interim limits authorized by any type of enforcement instrument should not be used.

*Column C: Baseline Actual Emissions*

Enter “Baseline Actual Emissions” for each emissions unit. Note that the definition of “Baseline Actual Emissions*”* may require actual emissions during the consecutive 24-month period selected to be adjusted downward. See clauses a.ii, b.ii, & b.iii.

*Column D: Projected Actual Emissions (optional)*

Enter “Projected Actual Emissions” (in TPY) for each emissions unit. This column is for *existing* emissions units only; see the definition of “Emissions Unit.” Note that use of “Projected Actual Emissions” is discretionary (see subparagraph d of its definition), as the applicant may elect to use the emissions unit’s “Potential to Emit” instead. If “Potential to Emit” is selected, this column should not be completed.

*Column E: Post-Project Potential to Emit (PTE)*

Enter “Potential to Emit” (i.e., requested permit limits in TPY) for each emissions unit.

*Column F: Change*

Complete as described in the instructions for Column A.

**N:** Column F will equal column E.

**M:** For increases, column F equals column D or E minus the lower of column B or C. For decreases, column F equals the *lower* of column B or C minus column D or E.

**A:** Column F equals column D or E minus column C.

Finally, sum the changes on a per pollutant basis.

**24.B. Creditable Contemporaneous Changes**

Review the data in Column F of Subsection 24.A. For each pollutant, sum only the *increases* associated with the proposed project (do not subtract the decreases). If this increase exceeds the significance level for a given pollutant, a netting analysis, and completion of Subsection 24.B, is required for that pollutant. If this increase does not exceed the significance level for a given pollutant, completion of Subsection 24.B is not required.

*Contemporaneous Period:*

Enter the contemporaneous dates. Note that the contemporaneous periods under NNSR and PSD differ.

*Column A: Date of Modification*

Enter the date of each contemporaneous change.

*Column B: Pre-Project Allowables*

Enter pre-project allowables for each emissions unit (i.e., the TPY emission limit established by the facility’s permit prior to the contemporaneous change). Interim limits authorized by any type of enforcement instrument should not be used.

*Column C: Baseline Actual Emissions*

Enter “Baseline Actual Emissions” for each emissions unit. Note that the definition of “Baseline Actual Emissions” may require actual emissions during the consecutive 24-month period selected to be adjusted downward. See clauses a.ii, b.ii, & b.iii. Here, “current” in the context of a contemporaneous emissions change refers to limitations on emissions and source operation that existed just prior to the date of the contemporaneous change. Also, refer to the *Louisiana Guidance for Air Permitting Actions* when calculating contemporaneous emissions changes for electric utility steam generating units, as additional restrictions apply.

*Column D: 24-Month Period*

Note the consecutive 24-month period selected by the applicant for each pollutant. Contemporaneous changes do not have to adhere to the restrictions in clauses a.iii and b.iv in the definition of “Baseline Actual Emissions.” When evaluating emissions increases from multi-unit modifications, if more than one emissions unit was changed as part of a single project during the contemporaneous period, the applicant may select a separate consecutive 24-month period to represent each emissions unit that was part of the project.

*Column E: Post-Project Potential to Emit (PTE)*

Enter “Potential to Emit” for each emissions unit (i.e., the emission limit in TPY established by the facility’s permit after the contemporaneous change).

*Column F: Change*

For contemporaneous increases, column F equals column E minus the lower of column B or C. For contemporaneous decreases, column F equals the *lower* of column B or C minus column E. Finally, sum the contemporaneous changes on a per pollutant basis.

**24.C. BACT/LAER Summary**

For each emissions unit identified as “New” or “Modified” in Section 24.A, complete the table for each pollutant that will trigger NSR. If LAER is not required per LAC 33:III.504.D.3, indicate such.

*BACT/LAER:*

Note whether the determination is pursuant to LAC 33:III.504 (LAER) or LAC 33:III.509 (BACT).

*Limitation:*

Enter the BACT/LAER limitation (e.g., 0.04 lb/MM Btu (HHV), 3.5 ppmvd @ 15% O2, 1.5 lb/ton, 1.0 g/hp-hr) based on a “top down” selection process. To the extent possible, limitations should be reported using RACT/BACT/LAER Clearinghouse (RBLC) standard emission units by process type code. See the *Louisiana Guidance for Air Permitting Actions* for more information.

*Averaging Period:*

Propose an averaging period (e.g., 30-day rolling average, 24-hour average, hourly maximum, annual average) for each BACT/LAER limitation noted above.

*Description of Control Technology/Work Practice Standard(s):*

Provide a description of the control technology and/or work practice standards that will be employed to achieve the BACT/LAER limitation (e.g., low NOX burners, electrostatic precipitator followed by a baghouse, good combustion practices, use of gaseous fuels).

**24.D. PSD Air Quality Analyses Summary**

For more detailed information on air quality modeling, refer to LDEQ's Air Quality Modeling Procedures, available at <http://deq.louisiana.gov/page/air-permits-division>.

*Column A: Preliminary Screening Concentration*

Enter the preliminary screening results for each pollutant that triggered PSD review.

*Column B: Level of Significant Impact*

Fixed column; values commonly referred to as monitoring significance levels.

If column A < column B, further modeling is not required. Enter “NR” (for “not required”) in columns D-H and column J. Conversely, if column A ≥ column B, both refined modeling and a determination of increment consumption are required. Complete columns D-H and column J.

*Column C: Significant Monitoring Concentration*

Fixed column; values commonly referred to as preconstruction monitoring thresholds.

If column A < column C, pre-construction monitoring is not required. Conversely, if column A ≥ column C, pre-construction monitoring is required, and the applicant should contact the Office of Environmental Services, Air Permits Division, at (225) 219-3417.

*Column D: Background*

Enter pre-project ambient conditions at the facility or proposed location; data obtained from LDEQ monitors or pre-construction monitoring results.

*Column E: Maximum Modeled Concentration*

Enter the modeled results evaluating emissions from the affected source, as well as emissions from all sources within the Area of Impact (AOI) plus 50 kilometers or as otherwise approved in the Air Modeling Protocol.

*Column F: Modeled + Background Concentration*

Column F equals column D plus column E.

*Column G: NAAQS*

Fixed column.

*Column H: Modeled PSD Increment Consumption*

Enter the amount of increment consumed based on modeling results. Note that if the facility or proposed location is within 100 kilometers of Breton Wildlife Refuge, modeled values must be less than the maximum allowable *Class I* increments. See LAC 33:III.509.C.

*Column I: Allowable Class II PSD Increment*

Fixed column.

**24.E. Nonattainment New Source Review Offsets**

Complete this section only if the proposed project triggers NNSR. Complete the section on NOx if the project triggers NNSR for NOx. Complete the section on VOC if the project triggers NNSR for VOC. Complete the section on SO2 if the project triggers NNSR for SO2.

**24.F. Economic Impact**

Answer the questions provided. Indicate an estimate of the number of temporary and permanent jobs that will be created as a result of the proposed project. It is not necessary to update this information if it is determined to have changed during the permit application process.

**24.G Notification of Federal Land Manager (FLM)**

This section should only be completed if the activities proposed in this permit application trigger NNSR or PSD. Otherwise, leave blank.

Answer the questions provided. If the answer to the first question is “No,” complete the Q/d equation provided. If the result of the equation is less than 10, skip to Section 25. If Q/d is greater than or equal to 10, complete the rest of Section 24.G. If the answer to the first question is “Yes,” skip to the next question (i.e., 24.G.b) and do not perform the Q/d calculation.

If LDEQ receives a PSD or NNSR permit application for a source that may affect a Class I area, it notifies the FLM charged with direct responsibility for managing the Class I area in question. LDEQ may direct the applicant to contact the FLM directly to avoid unnecessary delays.

The FLM is responsible for evaluating a source’s projected impact on the Air Quality Related Values (AQRVs) and recommending that LDEQ either approve or disapprove the source’s permit application based on anticipated impacts. The FLM also may suggest changes to or conditions for a permit. However, LDEQ makes the final decision on permit issuance. The FLM also advises reviewing agencies and permit applicants about other FLM concerns, identifies AQRVs and assessment parameters for permit applicants, and makes ambient monitoring recommendations.

The meaning of the term “may affect” is interpreted by EPA policy to include all major sources or major modifications (see LAC 33:III.504 and 509) which propose to locate within 100 kilometers of a Class I area. However, if a major source proposing to locate at a distance greater than 100 km is of such size that LDEQ or the FLM is concerned about its potential impact on relevant AQRVs, LDEQ can ask the applicant to perform an analysis of the source’s potential impacts on such values. This is because certain meteorological conditions, or the quantity or type of air emissions from large, but distant sources, may cause adverse impacts. This determination will be made on a case by case basis.

Where notification of the FLM is required, a pre-application meeting between the applicant, the FLM, and LDEQ is recommended, though not required. The FLM can advise the applicant of any data and analyses that may be required to show no adverse impact. For more information, see <http://deq.louisiana.gov/page/notification-of-the-federal-land-manager>.

The points of contact for the two Federal Land Managers that manage Class I areas near Louisiana are as follows:

|  |
| --- |
| Breton National Wildlife Refuge |
|  |
| Jill WebsterU.S. Fish and Wildlife ServiceAir Quality Branch7333 West Jefferson Avenue, Suite 375Lakewood, Colorado 80235-2034P: (303) 914-3804E: Jill\_Webster@fws.gov |

|  |
| --- |
| Caney Creek Wilderness Area |
|  |
| Judith LoganWestern Zone Air Resource Specialist, R8U.S. Department of Agriculture Forest ServiceP.O. Box 1270Hot Springs, Arkansas 71902P: 501-321-5341E: jlogan@fs.fed.us |

**25 Environmental Assessment Statement**

This section is required for the following sources:

* All new major sources;
* All permit modifications that trigger NSR; and
* All existing minor sources that seek to become a major source.

Answer each of the five questions provided. Use complete sentences. Expand the answer blanks as necessary in order to give a full and complete answer to each question.

The answers to these questions must also be provided by the applicant to the local governmental authority and to the designated public library at no cost to the local governmental authority or the designated public library. For purposes of this application, “local governmental authority” is defined as the Office of the Mayor, if the facility is located in, or within one mile of, a municipality; or the office of the parish governing body (i.e., Police Jury, Parish Council), if the facility is located more than one mile away from a municipality. “Designated public library” is defined as the branch of the parish library that is physically located closest to the facility. In the spaces provided, indicate the name and address of both the local governmental authority and the designated public library to which the answers to these questions were provided.

A copy of Louisiana Revised Statutes 30:2018 (La. R.S. 30:2018), which require answers for these questions to be provided, can be found at the following web address:

[http://www.deq.louisiana.gov/portal/Portals/0/planning/regs/eqa.pdf](http://deq.louisiana.gov/assets/docs/Legal_Affairs/Title30SubtitleIIJAN2016MERGED.pdf).

**CONTROL EQUIPMENT CODES**

000 No control equipment

001 Wet scrubber above 95% efficiency

002 Wet scrubber 80-95% efficiency

003 Wet scrubber below 80% efficiency

004 Gravity collector above 95% efficiency

005 Gravity collector 80-95% efficiency

006 Gravity collector below 80% efficiency

007 Centrifugal collector above 95% efficiency

008 Centrifugal collector 80-95% efficiency

009 Centrifugal collector below 80% efficiency

010 Electrostatic precipitator above 95% efficiency

011 Electrostatic precipitator 80-95% efficiency

012 Electrostatic precipitator below 80% efficiency

013 Gas scrubber, general

014 Mist eliminator, high velocity > 250 ft/min

015 Mist eliminator, low velocity < 250 ft/min

016 Fabric filter, high temperature > 250 oF

017 Fabric filter, medium temperature 180-250 oF

018 Fabric filter, low temperature, < 180 oF

019 Catalytic afterburner

020 Catalytic afterburner with heat exchanger

021 Direct flame afterburner

022 Direct flame afterburner with heat exchanger

023 Flare

024 Modified furnace or burner design

025 Staged combustion

026 Flue gas recirculation

027 Reduced combustion - air preheating

028 Steam or water injection

029 Low-excess - air firing

030 Use of fuel with low nitrogen content

031 Air injection

032 Ammonia injection

033 Control of % O2 in combustion air (off- stoichiometric firing)

034 Wellman-Lord/sodium sulfite scrubbing

035 Magnesium oxide scrubbing

036 Dual alkali scrubbing

037 Citrate process scrubbing

038 Ammonia scrubbing

039 Catalytic oxidation - flue gas desulfurization

040 Alkalized alumina

041 Dry limestone injection

042 Wet limestone injection

043 Sulfuric acid plant, contact process

044 Sulfuric acid plant, double contact process

045 Sulfur recovery plant

046 Process change

047 Vapor recovery system

048 Activated carbon adsorption

049 Liquid filtration system

050 Gas absorption column, packed

051 Gas absorption column, tray type

052 Spray tower for gases

053 Venturi scrubber for gases

054 Process enclosed

055 Impingement plate scrubber

056 Dynamic separator (dry)

057 Dynamic separator (wet)

058 Mat or panel filter

059 Metal fabric filter screen

060 Process gas recovery

061 Dust suppression by water sprays

062 Dust suppression by chemical stabilizers or

wetting agents

063 Gravel bed filter

064 Annular ring filter

065 Catalytic reduction

066 Molecular sieve

067 Wet lime slurry scrubbing

068 Alkaline fly ash scrubbing

069 Sodium carbonate scrubbing

070 Sodium-alkali scrubbing

071 Fluid bed dry scrubber

072 Tube and shell condenser

073 Refrigerated condenser

074 Barometric condenser

075 Single cyclone

076 Multiple cyclone w/o fly ash reinjection

077 Multiple cyclone w/ fly ash reinjection

080 Chemical oxidation

081 Chemical reduction

082 Ozonation

083 Chemical neutralization

084 Activated clay absorption

085 Wet cyclonic separator

086 Water curtain

087 Nitrogen blanket

088 Conservation vent

089 Bottom filling

090 Conversion to variable vapor space tank

091 Conversion to floating vapor space tank

092 Conversion to pressurized tank

093 Submerged filling

094 Underground tank

095 White paint

096 Vapor lock balance recovery system

099 Miscellaneous control device