

## Impacts of AQ300 on 2011 Reporting Year

The Department has permanently extended the annual reporting deadline which is effective for the upcoming reporting cycle. Per LAC 33:III.919.F.1.C and LAC 33:III.5107.A.1, the deadline for submitting calendar year 2011 criteria and/or toxic emissions inventories is April 30, 2012.

Minor source facilities, including those holding Standard Oil and Gas Air Permits should pay close attention to the emissions inventory reporting requirements in their air permits:

Minor source facilities that meet any of the applicability requirements of LAC 33: III.919.A.1 must report.

Minor source facilities that do not otherwise meet the applicability requirements of LAC 33: III.919.A.1 but that hold air permits with specific requirements to submit annual emissions inventories must report. This is consistent with LAC 33: III.919.A.1.f.

Per Section X of the Minor Source Air General Permit for Crude Oil & Natural Gas Production, facilities holding a Minor Source Air General Permit for Crude Oil & Natural Gas Production and which are located in Ascension, Assumption, East Baton Rouge, East Feliciana, Iberia, Iberville, Livingston, Pointe Coupee, St. Helena, St. James, St. John the Baptist, St. Martin, Tangipahoa, West Feliciana, or West Baton Rouge Parish are required to submit inventories for their 2011 emissions.

Facilities that do not meet any of the applicability requirements of Subparagraph A.1, and whose air permits do not contain discreet requirements for them to submit an inventory, are not required to report to the emissions inventory.

EPA will redesignate the Baton Rouge ozone nonattainment area to attainment on December 29, 2011; therefore, all facilities located within the 5-Parish Baton Rouge Ozone Nonattainment Area or one of the adjoining parishes must still complete their 2011 reporting year emission inventory. Pursuant to LAC 33: III.919.C, these facilities **shall** continue to be subject to the applicability requirements until otherwise directed by the department. Because this area is likely to be designated as nonattainment under the 2008 ozone standard during 2012, applicability for the facilities will likely continue into the future.