

# The Modeling Process

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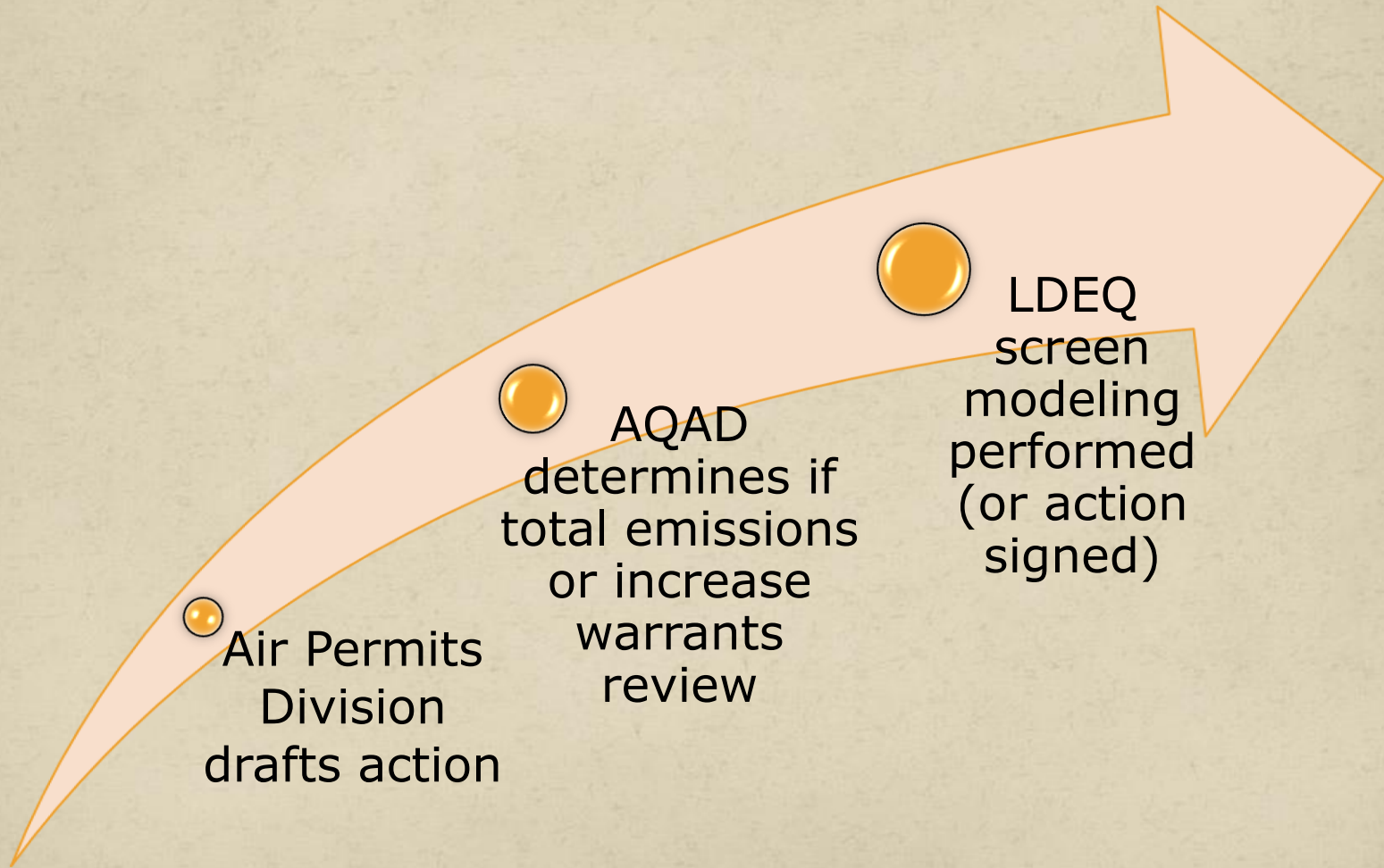


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# LDEQ's Process

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# Step 1



# Screening Permit Actions

- AERMOD or ISCST3
- Representative met data
- Onsite sources only
- No BPIP file
- Conservative default options
- 3 km grid, 100 m spacing



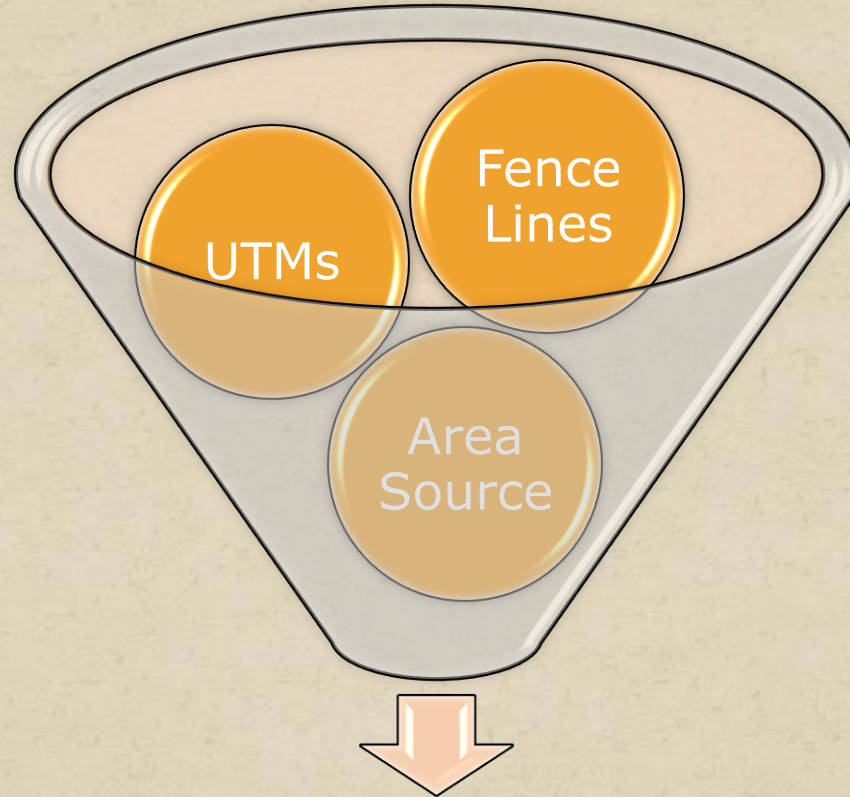
If model demonstrates compliance with applicable standard, action is signed.

# Word to the Wise



EIQs in permit applications must contain all stack information. Missing stack parameters cause **VERY HIGH** modeling results.

# Step 2

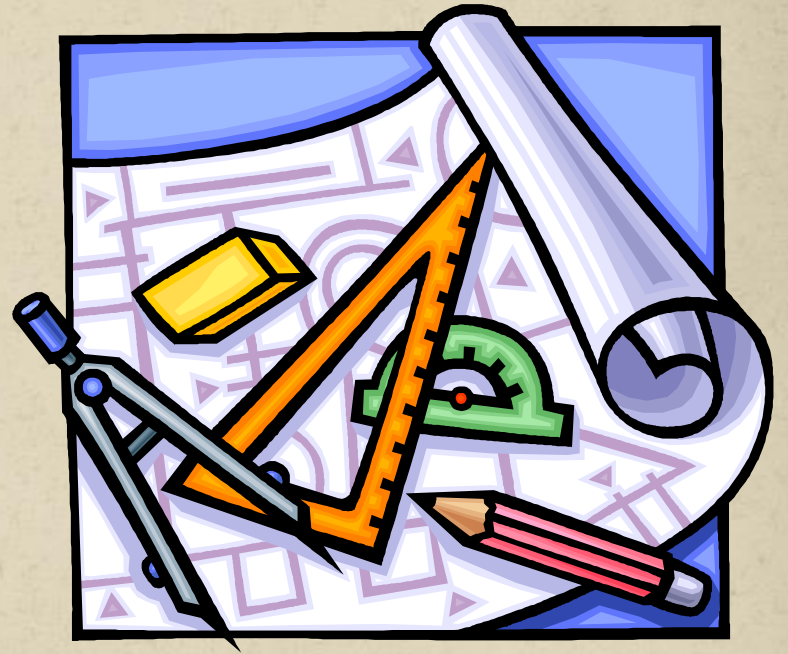


Gather Additional Information

# Area and Volume Sources

Providing a sketched diagram of the size and location of area sources saves time in the review process.

Sources inside of buildings should be specially noted.



# Step 3

Engineering Support  
Recommends Modeling



Air Permits Issues Letter  
for Additional Information



Company Performs  
Screen/Refined Modeling



# What about minor sources?

- Must comply with NAAQS and AAS
  - Maintain Louisiana's air resources
  - Attainment/maintenance of NAAQS
- LAC 33:III.103.A


“These regulations and air quality standards and emissions limitations apply to any source of emissions existing partially or wholly within the state of Louisiana.”
- LAC 33:III.517.D.15

“At the request of the permitting authority, a detailed analysis of ambient air impacts shall be provided.”
- TAPs – Not regulating the source under Chapter 51; ensuring compliance with AAS

# The Facility's Process

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# When should I model?



LDEQ screening analysis doesn't pass

PSD requires it

Interim limits request

Unplanned release

# I'm required to model...now what?

Prepare  
and submit  
protocol

Protocol  
approved

Submit  
results  
within 2  
months

Reviewed  
by  
Engineering  
Support



# LDEQ Guidelines

[www.deq.louisiana.gov](http://www.deq.louisiana.gov)



Divisions = Air Quality Assessment



Air Modeling Resources

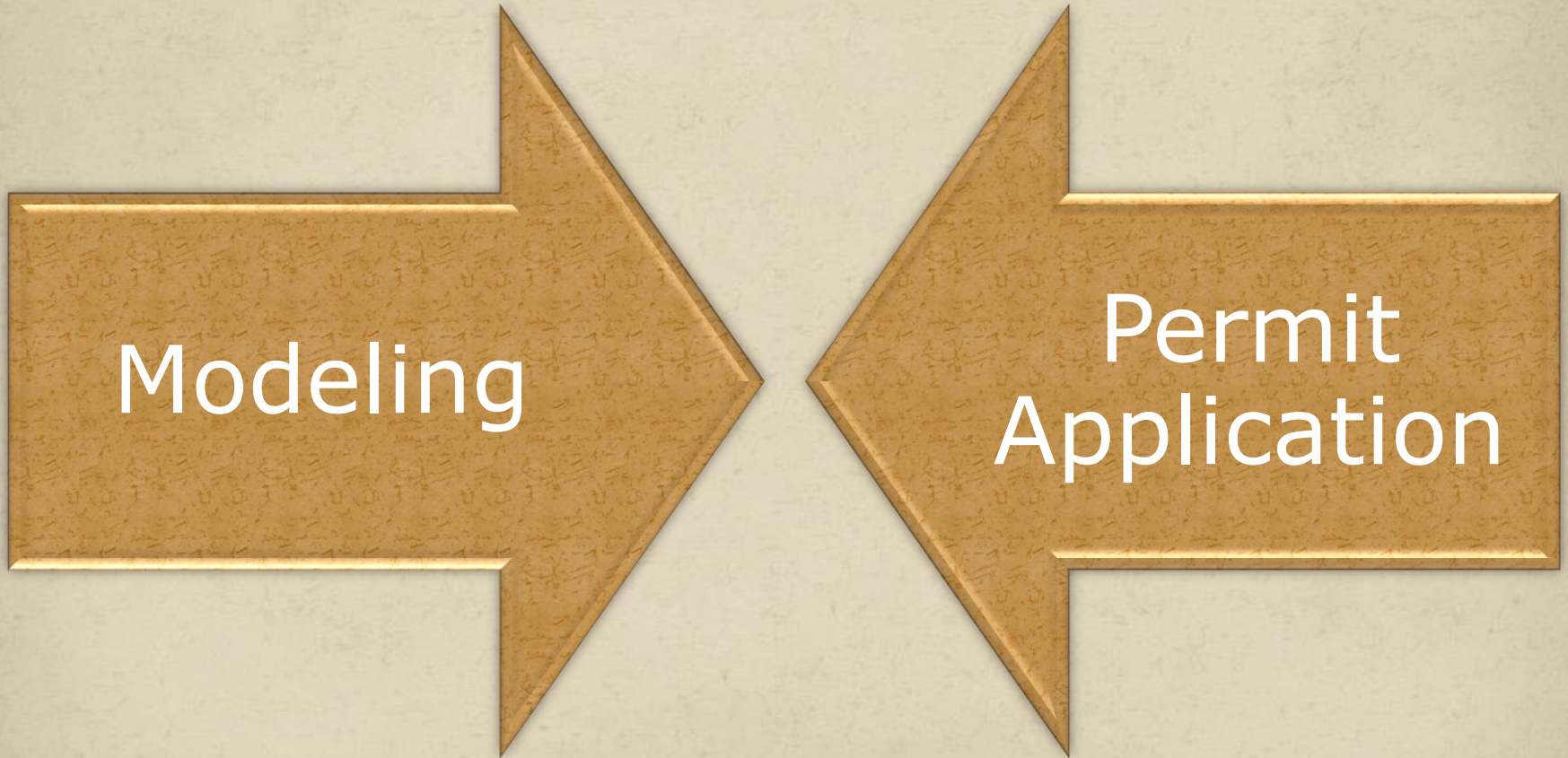
# Protocols

- How the modeling will be performed
  - Pollutants
  - Met Stations and Years
  - Receptor Grid
  - Land Use Analysis
  - Background Concentration
  - Default Parameters
- ANY changes from standard procedures
- Work out problems ahead of time

# The Report

- Plot plan
- Summary of model inputs
- Stack parameters and emissions for each source
- Detailed explanation on assumptions
- Detailed explanation on changes in inventory
- Summary table of results indicating worst year
- Met data files (electronic)
- Input and output files for all years (electronic)
- QA/QC reports (if not using primary met station)

Modeling must match application!





If they don't match...



Modeling

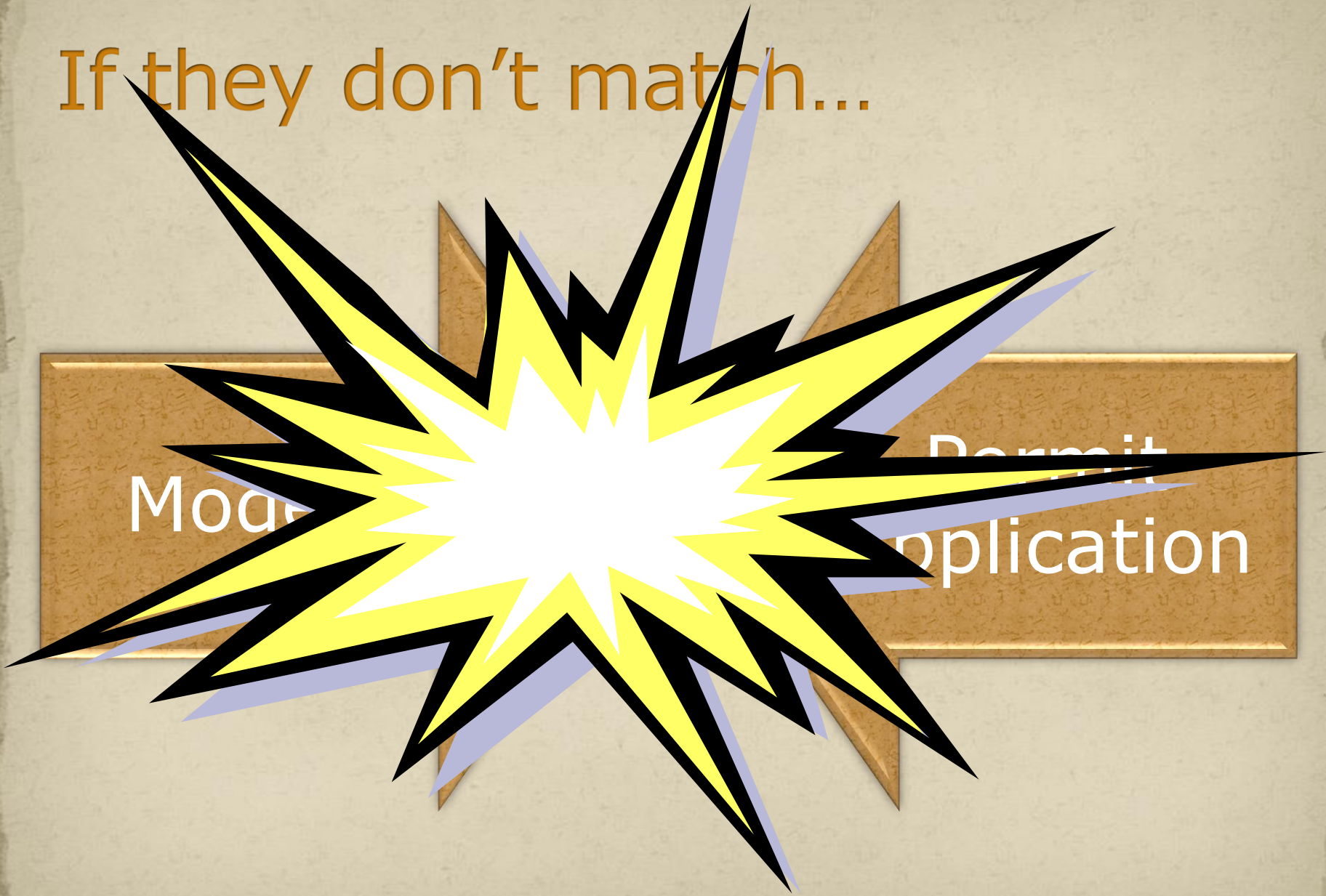


Permit  
Application

If they don't match...

Model

Permit  
Application

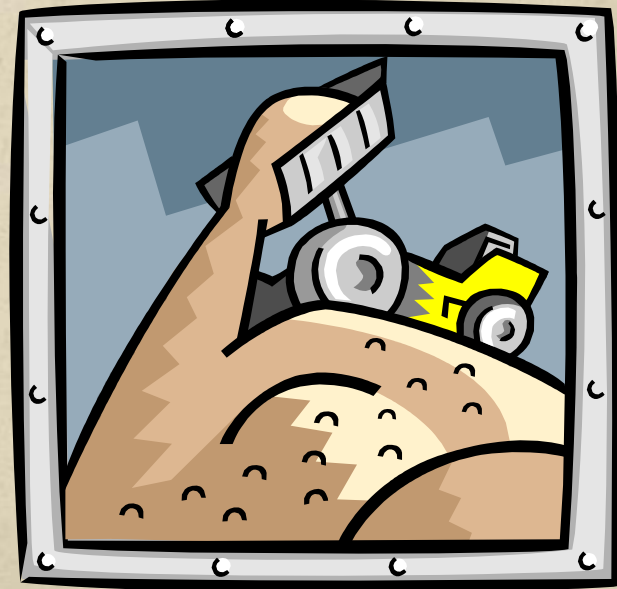


# Recent Changes

- Lead -  $0.15 \mu\text{g}/\text{m}^3$  standard
- Ozone impact - VOC or NO<sub>x</sub> > 100 tpy
- Class I needs to be considered for anything within 400 km range (not 100)
- Don't use default met variables
- Use AERSURFACE and AERMAP
- Do not adjust background
- Considerations for other industrial property

# More Recent Changes

- PM
  - PM<sub>10</sub> fugitives – storage piles and roads
  - PM<sub>2.5</sub>
- Inventory Data
  - ERIC
  - TEMPO



Air Quality Assessment  
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