



# Air Permits

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- With solid products, the material can be gathered and transported.
- With liquids, the material can be collected, treated, sampled & discharged.
- With air, after emissions come out they disperse and some times can't even be seen.



- Many discharges go through stacks.
- Some of these stacks can be monitored.
- Some stacks can have control devices.
- Some discharges are from piping or ventilation ducts.
- Some are so hot, monitoring or control devices cannot be installed.



- Thick black smoke is not the only indication that pollution is entering the air.
- Thick white “smoke” is often only water vapor.
- “No visible emissions” does not mean no emissions. Some emissions can not be seen.



# Criteria Pollutants

- Carbon Monoxide (CO)
- Nitrogen Dioxide (NO<sub>2</sub>)
- Particulate Matter
  - Less than 10 microns in diameter (PM<sub>10</sub>)
  - Less than 2.5 microns (PM<sub>2.5</sub>)
- Sulfur Dioxide (SO<sub>2</sub>)
- Ozone (O<sub>3</sub>)
  - Since ozone is typically not directly emitted, Volatile Organic Compounds (VOC's) are regulated because they interact with NO<sub>x</sub> to form ozone
- Lead



# Criteria Pollutants

**EPA has established National Ambient Air Quality Standards or NAAQS for these pollutants**

- Concentrations of these pollutants are monitored at ambient air monitoring sites
- If an area does not meet the standard, it may be classified as a non-attainment area.

# Hazardous Air Pollutants



EPA regulates 187 Hazardous Air Pollutants through the National Emission Standards for Hazardous Air Pollutants (NESHAP)

LDEQ regulates 14 additional hazardous compounds in addition to those regulated by EPA. We call these Toxic Air Pollutants (TAPs).

LDEQ has developed Ambient Air Standards for 100 TAP and or HAP pollutants.



# Who needs a Permit?

Any facility that emits less than five tons per year (TPY) of each of the pollutants listed above and less than 15 TPY total does not need to submit an application.

They are exempt from requiring an air permit.



# Minor Source Permits

- If the facility located in an attainment area emits 5 TPY but less than 100 TPY of any pollutant, they may be issued a minor source permit.



# Title V Permits (Part 70)

Any facility that emits more than 100 TPY of any pollutant is considered a major source and is issued a Title V permit.

Title V is the name of the section of the 1990 Amendments to the Clean Air Act.



- The 100 TPY limit is lowered if the facility is located in a Non-Attainment parish.
- East Baton Rouge Parish and several surrounding parishes are designated non-attainment for Ozone. Therefore, the major source limit becomes 50 TPY instead of 100 TPY for NO<sub>x</sub> and VOC.



# Where does the process start?

- A company must submit a permit application and receive an air permit to build and operate the proposed facility.
- The application consists of several parts and can be found on the LDEQ public web site.
- The Environmental Assistance Division posts a weekly list of permit applications received.



# What are some items required in the Permit Application?

- A description of the facility location
- The type of operation or process
- The equipment and expected types and rate of emissions
- A list of the regulations that apply to the facility



# Administrative Completeness

- When a permit application is received, it is administratively reviewed by the Environmental Assistance Division.
- If all required portions of the application are received, the application is deemed administratively complete.



# Preparation of a Proposed Permit

- Once the permit is deemed administratively complete, it is routed to the Air Permits group and assigned to a permit writer.
- The permit writer reviews the application for technical completeness and accuracy. Additional technical information may be requested.



- Once the technical review is completed, a proposed permit is prepared and routed for internal review.
- After the LDEQ internal review, a minor source permit may be issued or denied.
- A Title V permit is public noticed and sent to EPA for review.



# What does a permit contain?

- Title V permits include all applicable Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP).
- Title V permits are accompanied by a Statement of Basis, which includes the legal and factual basis of the permit.



# What does a permit contain?

- Emission limitations permitted on an annual ton per year (TPY) basis.
- Other measures designed to control emissions, such as work practices; limits on production or operating hours.
- Monitoring, recordkeeping and reporting requirements.



# Permit Review Periods

- Title V permits and minor source that are public noticed have a 30 day comment period.
- Title V permits are sent to EPA for a 45 day review period at the time of public notice.



# Are other factors considered?

The Louisiana constitution does not establish environmental protection as an exclusive goal, but requires a balancing process in which environmental costs and benefits must be given full and careful consideration along with economic, social, and other factors.



# What does that mean?

In order to meet the requirements set forth in the constitution, certain permit applicants must address the “IT” questions as part of the permit application process.

The department reviews this information as part of the decision-making process.



# The “IT” questions

1. Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?



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- A silver and black microphone is positioned on the left side of the slide, angled towards the right. It has a mesh grille on the head and a black handle. The background is a soft, out-of-focus white surface.
2. Does a cost benefit analysis of the environment impact costs balanced against the social and economic benefits of the project demonstrate that the latter outweighs the former?



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- A silver and black microphone is positioned on the left side of the slide, angled towards the right. It has a mesh grille at the top and a black handle. The background is a soft, out-of-focus white.
3. Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing nonenvironmental benefits?



4. Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing nonenvironmental benefits?



5. Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing nonenvironmental benefits?



**Compliance with all state and federal regulations and permit limits, for the allowed pollution levels, has been determined to be acceptable to be protective of the environment and human health.**



**Any Questions?**

**DEQ ENVIRONMENTAL JUSTICE  
LISTENING SESSION**

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**