

## Louisiana Fugitive Emission Program Consolidation Guidelines

**Workpractice Terms and Conditions.** These terms and conditions are to be used in conjunction with the Stringency Table. Of the applicable equipment leak programs being consolidated, the program highest in the table hierarchy is to be considered the overall most stringent program under the Guidelines. The Guidelines may be used only in accordance with a Source Notice and Agreement or a Title V permit.

### Applicability and Exemptions

- The consolidated program will apply to the combined universe of components subject to any of the programs being consolidated.
- The consolidation of fugitive programs must be conducted at a minimum of the process unit level, and may also be on a facility-wide basis.
- Consolidation of RCRA programs must first be approved by LDEQ's Hazardous Waste Section.
- Component types which do not require periodic monitoring under the overall most stringent program, must be monitored as required by the most stringent requirements of any other program being consolidated and will not be exempted.
- The consolidated program will include any exemptions based on size of component available in any of the programs being consolidated.
- The consolidated program cannot be used to replace requirements for area monitoring under the vinyl chloride NESHAP.
- For any compressor subject to a federal rule requiring a seal system including barrier fluid, sensor, and alarm, periodic monitoring of compressors may not be used in lieu of the seal system requirements, regardless of the overall most stringent program.

### Leak Definitions

- Leak definitions are based on the overall most stringent program as determined from the Stringency Table.
- Phase-in periods allowed under federal regulations are not eliminated as long as there is no backsliding of existing monitoring programs.

### Monitoring Frequency

- Monitoring frequency will be based on the overall most stringent program as determined from the Stringency Table.
- Annual monitoring shall be defined as once every 4 quarters, regardless of the overall most stringent program. Some allowance may be made in the first year of the consolidation in order to allow for transition from existing monitoring schedules.

### Calibration

- Use of dilution device for calibration, as defined in Method 21, is acceptable.

### Identification of Components

- All leaking components must be tagged.
- If the Benzene NESHAP and a more stringent program are applicable, the overall most stringent program prevails and physical tagging of components is therefore not required. Identification, either by list or location (area or group) of affected components is acceptable.

### Leak Performance

- The determination of leak performance is based on the overall most stringent program as determined from the Stringency Table.

### Repair

- Repair period requirements are always first attempt within 5 days of detecting the leak and final repair within 15 days of detecting the leak, regardless of the overall most stringent program.

### Post Repair

- Post repair inspection consists of remonitoring once within 3 months after repair of leaks, regardless of the overall most stringent program.

### Record keeping and Reporting

- Record keeping and reporting information requirements will be based on the overall most stringent program as determined from the Stringency Table.
- Reporting frequency will be semi-annual regardless of the overall most stringent program.
- Reports will include records for any monitoring performed within the semi-annual reporting period.