Louisiana Environmental Results Program

Field Guide to Environmental Compliance for Oil and Gas Exploration and Production Operations

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Table of Contents

Acknowledgments ……3

Disclaimer……..5

Chapter

1. If you have a Spill……6
2. Environmental Requirements by Activity……...8
3. General Questions and Answers for All Media……..19
4. Questions and Answers for Air Issues……21
5. Questions and Answers for Water Issues……32
6. Questions and Answers for NORM Issues…….....37
7. Questions and Answers for Waste Issues……...40
8. Environmental Leadership Program…….....48
9. List of Important Regulatory Contacts…….. …....51
10. Site Inspection Checklists ……..54
    A. Waste/NORM Inspection Checklist……..……55
    B. Air Inspection Checklist……58
    C. Water/SPC Inspection Checklist……65

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Effective program development demanded a broadly collaborative effort. The DEQ believes that the complexity of environmental regulation and clear understanding of its applicability contributes to a majority of non-compliant findings. Therefore, an effort to produce plain-language clarification on applicable industry requirements that promotes voluntary reporting of environmental successes was deemed to be a valuable approach by regulators and industry alike. Many members of the oil and gas exploration and production industry participated in meetings held state-wide to suggest and create the outline and format for this document. The following entities are hereby acknowledged for their participation in the Louisiana ERP:

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DISCLAIMER

This document is intended to serve as a high level, awareness guide for environmental requirements for oil and gas exploration and production operations in Louisiana. Every attempt has been made to remain consistent with existing regulations and underlying standards. It is the intent of the Louisiana Department of Environmental Quality, with the assistance and input from the oil and natural gas exploration and production industry, to revise this document periodically to account for new and changing regulatory requirements. However, this document is not intended to be an official statement of policy and standards and does not establish binding regulatory requirements. If instructions, guidance or references to regulatory language are in conflict with a state or federal regulation or standard, then the regulatory language or standard shall prevail.

Chapter 1
If you have a Spill

a. When am I required to notify of a spill and/or unauthorized release? How do I do that?

If a spill or unauthorized release results in an **emergency condition**, verbal notification to the Louisiana State Police (LSP) by telephone at (225) 925-6595 is required immediately, but in no case more than one hour after learning of the event (LAC 33:I.3915).

If the spill or release results in a **non-emergency condition** and exceeds the reportable quantity (LAC 33:I.3927 et seq,), verbal notification to the DEQ is required within 24 hours after learning of the event by telephone at (225) 219-3640. (LAC 33:I.3917).

An **emergency condition** is any condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe property damage.

If a spill results in the contamination of ground water, written notification is required to the DEQ within seven days after learning of the contamination (LAC 33:I.3919).

If a spill requires notification under LAC 33:I.3915.A or 3917, a written report describing key elements of the spill or release event must be submitted to the DEQ within seven calendar days after the notification required by LAC 33:I.3915.A, or 3917, unless otherwise provided for in a valid permit or other department regulation.

Notification to federal response agencies when an applicable spill occurs is a federal requirement (40 CFR 110 and 40 CFR 112). The required notification to EPA and to the USCG is accomplished by calling the National Response Center (NRC) at 1-800-424-8802.

Spill Response and Cleanup

The DEQ requires an immediate remedial response on the part of a responsible person/company when a spill occurs (LRS 30:2077 and LAC 33:IX.708.C.1.b.iv). LAC 33:IX.708.C.1.b.iv requires the immediate removal of the discharged materials and, to the extent practicable, decontamination of any water, soil, sediment or vegetation adversely impacted. Any alternative remediation plan requires prior approval by the DEQ Office of Environmental Compliance, Inspection Division.

Exploration and Production (E&P) sites may be cleaned to DNR standards provided that storm water runoff from the E&P site meets the effluent standards set forth in LAC 33:IX.708.C.4. Releases impacting ground water will be addressed using DNR authority when the release occurs from an E&P site, underground injection wells, or other activities primarily regulated by DNR. Releases impacting ground water that occur from sources other than those directly regulated by DNR will be addressed by DEQ using the Risk Evaluation/Corrective Action Program (RECAP) available at http://cms/portal/DIVISIONS/UndergroundStorageTankandRemediationDivision/RemediationServices/RECAP.aspx.

Methods of cleanup may fall into several general categories:

1. **Mechanical cleanup** involves the physical pick up and removal of contaminants. This is the most commonly used method and is often accomplished using tools such as vacuum trucks and sorbent materials. A cleanup plan using this method does not require prior approval of the DEQ.
2. **Chemical application,** such as dispersants, detergents, surface washing agents, etc., for addressing spills, requires prior approval by the DEQ and the multi-agency Region 6 Regional Response Team (RRT6). For activation of the RRT6, the request will be to the attending Federal On-scene Coordinator (FOSC) for the incident or the State On-scene Coordinator (SOSC) if an FOSC is not present. Materials subject to approval must be listed in the National Contingency Plan Product Schedule.
3. **Burning** spilled oil can be an effective tool for mitigating a spill under certain circumstances, but also requires prior approval by the DEQ and the RRT6. This is typically allowed in remote areas where mechanical means are not feasible or in areas where other cleanup types would not be as effective or feasible.
4. **Bioremediation** involves the addition of materials (either chemical or biological, or both) to promote degradation of oil over time through bacterial action, reducing the level of contaminants in soil to acceptable levels. Inorganic contaminants, such as salt in produced water, are not affected by bioremediation. Bioremediation actions may include a form of "land farming" which generally involves the mixing of oil contaminated soils with other native soils (sometimes with the addition of fertilizers) and maintaining an aerated condition in the mix, usually by tillage. This option also requires prior approval by the DEQ and the RRT6. Because bioremediation takes time (i.e., weeks or months) to reach the desired end points, storm water runoff from bioremediation sites requires control to address the migration of pollutants off the site.
5. **Natural attenuation** is, in essence, nature's form of bioremediation. Typically this is used when contamination levels have already been reduced using one of the other methods of cleanup and further use of those methods would not be effective, not be feasible or may cause more environmental harm than allowing the remaining contamination to remain in place while it degrades. Because natural attenuation takes time (i.e., weeks or months) to reach the desired end points, storm water runoff from bioremediation sites requires control to address the migration of pollutants off the site.

Contaminated soils that result from spills that are "downstream" of the producing operations (i.e., being transported away from E&P sites by pipeline or truck) are not considered E&P wastes. These wastes are handled as industrial solid waste and are regulated by the DEQ.

Waste from a spill that is classified as E&P waste must be disposed of in DNR regulated facilities or DEQ regulated landfills specifically permitted to accept E&P waste or hazardous waste. Waste classified as solid waste and subject to DEQ regulation must be disposed of in facilities permitted by the DEQ to accept industrial solid waste.

Waste classified as hazardous waste must be disposed of in facilities authorized by the DEQ to accept hazardous waste.

Chapter 2
Environmental Requirements by Activity

The typical sequence for oil and gas exploration and production (E&P) sites starts with site selection and ends with facility closure. Steps in the process that an operator should consider regarding environmental regulation requirements include:

1. Selection of facility site location
2. Exploration operations
3. Production operations
4. Plugging and abandonment and facility closure of well

Below are possible requirements for the operator to consider regarding the steps listed above.

1. Selection of facility site location

When assessing environmental issues associated with the location selected for a new E&P facility, consider the following:

a. Past use and present condition of the property regarding potential contamination and discharges of hazardous materials.

The past use of a property resulting in contamination by oil, hazardous materials or other regulated pollutants is a consideration prior to drilling a well. Locations with ongoing unauthorized releases of pollutants are also a consideration.

Consider conducting an "All Appropriate Inquiry" in evaluating a property's environmental conditions and assessing potential liability for any contamination discovered. The "All Appropriate Inquiries" process can be used to claim protection from CERCLA liability as an innocent landowner, a bona fide prospective purchaser, or a contiguous property owner. Companies can conduct a Phase 1 Environmental Site Assessment (ESA) according to ASTM E1527 - 05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

b. Proximity to an Interstate Highway.

Applicants that receive a drilling permit from the LDNR/Office of Conservation for a well located within 1000 feet of an Interstate Highway shall furnish a copy of the approved drilling permit and the certified location plan to the appropriate state and local authorities, including emergency responders (LAC 43:XIX.103.1)

1. Proximity to environmentally sensitive areas such as residences, urban areas, wetlands, rivers, streams, lakes, endangered and threatened species habitat, wildlife management areas, etc.

Locations near environmentally sensitive areas may require specific permits prior to starting any type of action. Regulatory issues must be addressed and needed permits obtained for activities that will impact or potentially impact the following:

1. *Impaired waters*. Effluent limitations may be adjusted within an individual permit to ensure it is protective and/or restoring of waters listed as "impaired" by Clean Water Act Sections 303d/305b. The Louisiana Water Quality Inventory: Integrated Report is issued by the DEQ

every two years and contains the most recent assessments of the states waters. The Integrated reports are available at http://www.deq.louisiana.gov/portal/DIVISIONS/WaterPermits/WaterQualityAssessment/WaterQualityInventorySection305b.aspx.

2. *Seismic Exploration Activity Program*. The Seismic program was created to protect oysters, fish, shrimp, and other wildlife from injury due to seismic exploration. The Louisiana Department of Wildlife and Fisheries (LDWF) requires applications be submitted to permit seismic exploration activity in the state of Louisiana. LDWF regulations pertaining to seismic exploration are contained in LAC 76:I.301 of the Louisiana Administrative Code (LAC). The permitting process includes:

    a. The company must first request a permit in writing from the LDWF Seismic Section.

    b. The seismic company must provide proof of liability insurance.

    c. The seismic company must furnish the LDWF with a surety bond.

    d. The seismic company must also sign a "Conditions of Letter of Permission to Conduct Seismic Activity in the State of Louisiana" form which will be provided to the company by the LDWF.

    If the LDWF grants a permit, there are other steps that must be taken before seismic activity can begin. The seismic company must request a Natural Heritage review from the Department as indicated in LAC 76:I.301.B.4, and complete a Notification of Beginning of Seismic Exploration form. The seismic company is also required to hold a public meeting prior to beginning work. If the project impacts a Louisiana Natural or Scenic Rivers area or Wildlife Management Area, the LDWF will supply contact names for the affected area.

3. *Wetlands located in the Louisiana coastal zone*. Obtain any required Coastal Use Permit (CUP) from the Louisiana Department of Natural Resources (LDNR), Office of Coastal Restoration and Management. Online guidance resources and instructions for applying for a CUP are found at: http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=93

    The DNR administers the CUP program within the jurisdiction of their coastal zone. The coastal zone boundary for Louisiana begins at the state line of Texas and Louisiana, easterly through the parishes of Calcasieu and Cameron, then south through Vermilion, Iberia, St. Mary, St. Martin, Terrebonne, and Lafourche parishes. The boundary then turns to the north to include the parishes of St. Charles, St. John the Baptist, St. James, and east through Livingston, Tangipahoa, and St. Tammany parishes. The parishes of Orleans, Jefferson, St. Bernard, and Plaquemines are also within the boundary. The seaward boundary of the Coastal Zone is the outer limit of the United States territorial sea. A Coastal Zone Map can be found at: (www.mvn.usace.army.mil/ops/regulatory/czm.jpg).

    For proposed projects in the Louisiana Coastal Zone, the application and drawings should be mailed directly to the Coastal Management Division of the DNR. The Coastal Management Division will forward application data to the U. S. Army Corps of Engineers for processing of the required wetlands permit.

    The U. S. Army Corps of Engineers cannot issue a wetlands permit in the coastal zone without Coastal Management Division approval. Issuance of a Coastal Use Permit does not replace or guarantee approval of a wetlands permit. The company must comply with the Coastal Zone Management regulations in order to obtain a Coastal Use Permit. Online guidance resources and instructions for applying for U. S. Army Corps of Engineers permits are found at http://www.mvn.usace.army.mil/ops/regulatory/permover.asp.

4. *Wetlands located outside of the Louisiana coastal zone*. Obtain any required U.S. Army Corps of Engineers wetland permits for any project that impacts wetlands located outside the boundaries of the coastal zone (33 U.S.C. 401, 33 U.S.C. 403, 33 U.S.C. 1344). The completed application should be sent directly to the U. S. Army Corps of Engineers Office in New Orleans, Louisiana.

    a. Pre-application consultation (optional)
    b. Applicant submits ENG Form 4345 to district regulatory office
    c. Application received and assigned identification number
    d. Public notice issued (within 15 days of receiving all information)
    e. 30 day comment period depending upon nature of activity
    f. Proposal is reviewed by U. S. Army Corps of Engineers and
        - Public
        - Federally Recognized Tribes
        - Special interest groups
        - Local agencies
        - State agencies
        - Federal agencies
    g. Corps of Engineers considers all comments
    h. Other Federal agencies consulted, if appropriate
    i. District engineer may ask applicant to provide additional information
    j. Public hearing held, if needed
    k. District engineer makes decision
    l. Permit issued or Permit denied and applicant advised of reason

    Online guidance resources and instructions for applying for U. S. Army Corps of Engineers permits are found at http://www.mvn.usace.army.mil/ops/regulatory/permover.asp

5. *Non-wetland Coastal Zone*. Activities within the Coastal Zone of Louisiana that are not exempt do require a permit. If your project is in the Coastal Zone, you need to submit an application to Office of Coastal Management and receive approval for your project before you commence work. While the Office of Coastal Management's program is heavily weighted towards minimization of impacts to vegetated wetlands, other aspects of your project might also be regulated.

    The company should contact the Office of Coastal Management to determine if the activity is exempt from permitting.

    A Consistency Review may be required. A Consistency Review is to ensure that activities in the coastal zone are consistent with the Louisiana Coastal Resources Program (LCRP). Activities in the coastal zone may require a Coastal Use Permit. Some types of coastal activities are exempt from Coastal Use Permits yet still must be consistent with the LCRP. For example, Federal agencies are not required to obtain a CUP for their activities. Other examples include deep-water ports and projects such as oil and gas exploration on Federal property. Although not requiring a CUP, these activities still are required to be consistent with the State's coastal management program.

6. *Louisiana Wildlife Management Areas*. For projects in Wildlife Management Areas, contact the Louisiana Department of Wildlife and Fisheries (LDWF Habitat Section, 225-765-2819). This is required for projects in wetland areas and non-wetland areas. For projects in Wildlife Management Areas that impact wetlands, the LDWF should be contacted first to obtain a

permit for the project. There is no formal application form used for these permits. The permitting process includes:

a. Contact LDWF to request a permit for a specific project.

b. Send project plats and description of project to LDWF. The LDWF will review the projects and determine mitigations needed for the permit.

c. If the project in the Wildlife Management Area impacts a wetland, the approval paperwork can be sent to the U.S. Army Corps of Engineers and/or Louisiana Department of Natural Resources for the required wetlands permit.

7. *Federal Wildlife Management Areas, Refuges or Parks*. Consult the Louisiana Department of Wildlife and Fisheries regarding permits and/or restrictions for wildlife management areas (http://www.wlf.louisiana.gov/wildlife/statewide-environmental-investigations).

8. *Projects that impact and/or have discharges to areas near an active oyster lease, live natural oyster or other molluscan reef, designated oyster seed bed or sea grass bed*.

   a. Determine if the location is within 1300 feet of such an area. The DEQ can help with the determination (_deq-wwwwaterpermits@la.gov).

   b. If the project is within 1300 feet of such an area, discharges are prohibited within 1,300 feet (via water) of an active oyster lease, live natural oyster or other molluscan reef, designated oyster seed bed or sea grass bed. These restrictions are contained in the water permits LAG260000 and LAG33000, or in an individual permit.

   c. For more information see *Chapter 5 Questions and Answers on Water Issues* or contact the DEQ Water Permits Division at 866-896-5337.

9. *Projects and discharges to lakes, rivers, streams, bayous or other navigable waters*.

   a. Obtain any required U. S. Army Corps of Engineers wetlands or Louisiana Department of Natural Resources Coastal Use Permit (CUP) permits.

   b. Obtain any required water permits prior to drilling or production operations.

   c. For more information see *Chapter 5 Questions and Answers on Water Issues* or contact the DEQ Water Permits Division at 866-896-5337.

10. *Projects and discharges to Louisiana coastal areas and territorial seas.*

    a. Obtain any required U. S. Army Corps of Engineers wetlands or Louisiana Department of Natural Resources Coastal Use Permit (CUP) permits.

    b. Obtain any required water permits prior to drilling or production operations.

11. *Endangered or threatened species and their critical habitat.*

    Ensure the operations will comply with the Endangered Species Act (ESA). The ESA protects and promotes recovery of imperiled species and the ecosystems upon which they depend. The ESA protects threatened and endangered species by working with regulatory agencies to minimize the adverse effects of a project on federally protected species and their habitats. A main objective is to minimize the number of "takes" of an endangered or threatened species.

    The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. The term "harass" mean actions that create the likelihood of injury to listed species by annoying it to such an extent as to

significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding or sheltering. The term "harm" means an action which kills or injures wildlife including significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

Companies are urged to consult with the local U.S. Fish and Wildlife Service (FWS) office (www.FWS.gov/Lafayette) well in advance of beginning a project. Typical steps in the process include:

a. Operator can request a species list from the FWS or download it from the web at (www.fws.gov/Lafayette).

b. The operator will display on a map the impact area for the project. If the project is located in an area or parish with Threatened and Endangered species, in order to avoid a taking project modifications may be necessary. The U. S. Fish and Wildlife Service will assist you in determining whether or not such modifications would be necessary. This consultation is a part of the process for obtaining a coastal use permit from the Louisiana Department of Natural Resources or U. S. Army Corps of Engineers wetlands permit. The ESA rule applies to all areas in Louisiana even if no Coastal Use Permit or U. S. Army Corps of Engineers permits are required. Early coordination with the U.S. Fish and Wildlife Service will help to expedite any other permit processes.

12. *Bald eagle habitat*. The Bald and Golden Eagle Protection Act prohibits anyone from "taking" bald eagles. The Bald Eagle Management Guidelines and Conservation Measures (found at http://www.fws.gov/midwest/Eagle/guidelines/index.html) ensures compliance with limitations on drilling and production operations for locations near bald eagles nests. The local FWS office can be consulted if you have any additional questions regarding Bald Eagles.

13. *Louisiana Natural and Scenic Rivers System*. The Louisiana Natural and Scenic Rivers System is administered by the Louisiana Department of Wildlife and Fisheries (LDWF). Certain activities are prohibited on designated Natural and Scenic Rivers. These include channelization, clearing and snagging, channel realignment, reservoir construction, and the commercial cutting of trees within 100 feet of the ordinary low water mark. Scenic River Permits are required for all activities on or near System Rivers that may harm the ecological integrity, scenic beauty or wilderness qualities of those rivers.

    The operator would be required to submit a complete permit application to the LDWF for approval and pay required fees for the permit application and site visits/field evaluations.

    A list of Louisiana Natural and Scenic Rivers System can be found at www.wlf.louisiana.gov/wildlife/louisiana-natural-and-scenic-rivers.

14. *Culturally and historically sensitive areas*. Culturally and historically sensitive areas that are protected as required by Section 106 of the National Historic Preservation Act (NHPA) of 1966. In Louisiana, the State historic preservation office (SHPO) administers the regulations. Section 106 requires federal agencies or their applicants to take into account the effects of their undertakings on historic structural and archaeological properties. The Section 106 process must be completed prior to the spending of federal funds or issue of a federal license or permit for the undertaking. Contact the Louisiana State Historic Preservation Officer of the Louisiana Office of Cultural Development (www.crt.state.la.us/hp) for more information.

2. Exploration Operations

Permit to Drill
A permit to drill a well for the purposes of oil or natural gas extraction is required by the DNR Office of Conservation (OC). An application for a permit to drill a well is available at http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=166.

To obtain a permit to drill a well, follow these steps:

1) Submit the dated, completed application (Form MD-10-R) signed by a company official which includes:
    a. Parish and its code number.
    b. Field name and code number.
    c. Company name, address and code number.
    d. Unique well name and number.
    e. Indicate whether drilling for gas, oil or other.
    f. Well's location description.
    g. Proposed total depth of the well and true vertical depth, if applicable.
    h. Proposed zone of completion.
    i. Applicable Conservation Orders, if any.
    j. Address to where the permit is to be sent.
    k. Name and phone number of a contact person.
2) Operators, who are subject to the Financial Security Requirements, must secure wells by pledging a Certificate of Deposit, securing a Performance Bond or obtaining a Letter of Credit.
3) The Well Plat must be prepared by a Louisiana Land Surveyor with seal, signature, scale and dated less than a year old.
4) The Well Plat will show the proposed well location in detail.
    a. The location of the well must be in reference to a government sectional line or an established and accepted monument, and the well location proximity to the lease line.
5) If the proposed well is to be drilled to 10,000 ft or more, the permit must bear one of the following statements:
    a. "No commercial or residential structures not owned by the applicant, his lessor, or other predecessor in interest are located within a 500 foot radius of the well site."
    b. "The only structure(s) not owned by the applicant, his lessor, or other predecessor in interest within a 500 foot radius of this well site are as shown."
6) Each structure shown on the plat must be identified by the name of the owner(s).
7) The application fee must be paid. This fee is determined by depth of the well.

Water Discharge Permits associated with Exploration Operations

Water permits are required for activities that result in the discharge of pollutants from any point source to waters of the state of Louisiana, including some storm water runoff. Facilities that require permitting

must obtain one (**and only one**) of the following permit types: MSGP, LAG330000, LAG260000, or an individual permit.

The discharge of oilfield pollutants in upland areas is not allowed and, therefore, a water discharge permit is not generally required. However, under some circumstances a Multi-Sector General Permit (MSGP) may be needed. The following guidance describes the applicability of the MSGP to E&P sites in the "Onshore" category:

- MSGPs are applicable to the "Onshore" Category of Oil and Gas Sites only
- Key to the applicability of the MSGP is whether storm water is contaminated with oil or hazardous waste (e.g., visual observation, samples, photographs, self-reporting that describes contamination of storm water, etc.). A storm water permit (MSGP) is required (LAC 33:IX.2511.C.1):
    - If storm water leaving the E&P site contains a sheen (contaminated by an oil spill or hazardous waste), or
    - If storm water leaving the E&P site resulted in a violation of water quality standards (sheen in receiving waters, fish kill, exceedances of numerical criteria, exceedance of narrative criteria, etc.), or
    - If there has been a release to storm water of a reportable quantity of oil or hazardous waste. (see 40 CFR 110.6, 117.21, or 302.6).
- An MSGP is NOT required:
    - If no reportable quantity releases have occurred at the site since November 16, 1987, or
    - If spills have occurred, but were cleaned up and not allowed to contaminate storm water, or
    - If a spill occurred that led to waters of the state, but was cleaned up prior to rainfall events that would result in storm water contamination.

Both exploration and production activities in the coastal areas (between the state's gulf coast and the "Chapman" line) and in wetland (or "over-water" areas) of Louisiana are subject to the Louisiana General Permit for Coastal Waters, LAG330000. Exploration and production activities in the territorial seas (between the state's gulf coast and the three-mile limit of state territory) of Louisiana are subject to the either the Louisiana General Permit for Territorial Seas, LAG260000, or an individual water permit. Activities not eligible for these general permits may be required to obtain an Individual Water Permit. The following guidance describes the applicability of the LAG330000 and the LAG260000 permits to E&P sites not located in the "Onshore" category:

- LAG330000 is required of facilities or wells located south of the line frequently referred to as the "Chapman" line and north of the gulf shoreline that have a discharge of deck drainage or have any one of other regulated discharges such as domestic waste, sanitary, etc. (see the LAG 330000 permit or 40CFR 435 Subpart D).
- LAG260000 applies to facilities or wells gulf-ward of the gulf shoreline and within Louisiana's Territorial Seas that do not discharge produced water.
- Individual permits are required for facilities or wells within Louisiana's Territorial Seas that discharge produced water.

LAG330000 may be required of any E&P facility north of the "Chapman" line if that facility or well is over waters of the state, or over wetlands and has a discharge of deck drainage or any one of other regulated discharges such as domestic waste, sanitary, etc.

- **WETLANDS** are historically determined through persons certified by USACE wetland determination procedures; however, there is a definition of wetland in the Louisiana Environmental Regulatory Code (LAC 33:IX.2313.A).
- **WETLANDS** delineation occurs consistently with the USACE Wetlands Delineation Manual (http://el.erdc.usace.army.mil/elpubs/pdf/wlman87.pdf) and involves all three of the following criteria:
    - Hydrophilic plant species
    - Hydric soils
    - Periodic inundation
- **WETLANDS** are fairly obvious most of the time; however, borderline cases may be cleared up by determining if the access to and placement of the E&P site or well site required a USACE 404 permit.

Air Quality Permits associated with Exploration Operations

No air permits are required for a drilling rig that operates at one location continuously for less than one year (LAC33:III.501.B.5.Table 1.B.4). For facilities and activities exempt from air permitting, it is a good idea to prepare a potential emissions calculation and process description and keep it on file to demonstrate how the facility meets the exemption criteria. Exemptions from air permitting can be found in LAC33:III.501.B.

A. Production Operations

Water Discharge Permits associated with Production Operations

Discharges from oil and gas production operations in the coastal areas of Louisiana are subject to the Louisiana General Permit for Coastal Waters: LAG330000. Discharges from oil and gas production operations in the territorial seas of Louisiana are subject to the Louisiana General Permit for Territorial Seas: LAG260000. Discharges of produced water in the territorial seas of Louisiana require coverage by an individual water permit. Also, activities not eligible for the general permits may be required to obtain an individual water permit.

The discharge of oilfield pollutants in upland areas is not allowed. However, under some circumstances an LAG330000 or Multi-Sector General Permit (MSGP) may be needed. More information on water issues can be found in *Chapter 5 Questions and Answers on Water Issues.*

Air Permits associated with Production Operations

No air permits are required for a drilling rig that operates at one location continuously for less than one year. Reference: LAC33:III.501.B.5.Table 1.B.4. More information on air issues can be found in *Chapter 4 Questions and Answers on Air Issues.*

An air permit is required prior to beginning construction of a non-exempt oil and gas production facility. To ensure that the future oil and gas production facility has the required air permit prior to beginning construction, gather data early to prepare and submit the air permit application to the DEQ. This is

suggested because construction of a non-exempt permanent oil and gas production facility cannot begin until an air permit for the facility is processed and granted by the DEQ.

The data needed to prepare an air permit application for a possible oil and gas production facility includes the following:

1. Equipment list with design capacities, fuel usage, operating hours and rates, manufacture date, etc.
2. Emission control devices expected
3. Oil and gas production rates
4. Simplified process flow and plot plan for production facility

Submitting the air permit application early helps ensure the air permit can be obtained with minimal delays before the start of production operations.

Oil and gas production facilities can be exempt from obtaining an air permit provided certain requirements are met as specified in LAC 33:III.501.B. The exemptions include facilities that emit below certain regulatory specified levels when no enforceable permit conditions are needed to ensure compliance with any applicable requirement and no public notice is required for any permitting or other activity at the source.

Generally, oil and gas production facilities that emit less than the following may be exempt from obtaining a permit:

- 5 tons per year of any one criteria pollutant
- 15 tons per year of any combination of criteria pollutants
- Minimum emission rate (MER) for each toxic air pollutant established by Tables 51.1 and 51.3 of LAC 33:III.Chapter 51
- No enforceable permit conditions are necessary to ensure compliance with any applicable requirement; and
- No public notice is required by the DEQ for any permitting or other activity at the source

Requirements for permitting and exemptions from permitting are given in LAC 33:III.Chapter 5. Facilities not meeting exemption criteria in LAC 33:III.501.B are required to have an air permit prior to beginning construction and operation. This applies to new facilities and modifications to existing facilities already operating under a site specific minor source or major source permit.

Contractors or facilities that perform abrasive blasting activities are required to implement a Best Management Practices (BMP) Plan according to LAC 33:III.1331.

For more information consult *Chapter 4 Questions and Answers on Air Issues*.

Spill Prevention and Control (SPC) plan or Spill Prevention Control and Countermeasures (SPCC) Plan

A Louisiana Spill Prevention and Control (SPC, LAC 33:IX.901 *et seq*) regulations apply to a facility if the aggregate aboveground storage capacity of oil, or other petroleum products such as fuels, equals or exceeds 1,320 U.S. gallons. For the purposes of this aggregate quantity determination, only containers with a capacity of 55 U.S. gallons or greater are counted. Additional spill prevention regulations associated with oil and gas exploration and production are found in LAC 33:IX.708C.1.b.

In addition to the state SPC rule, facilities must comply with the federal (USEPA) Spill Prevention Control and Countermeasures (SPCC) rules. A facility is covered by the SPCC rule if it has an aggregate aboveground oil storage capacity greater than 1,320 U.S. gallons or a completely buried storage capacity greater than 42,000 U.S. gallons and there is a reasonable expectation of an oil discharge into or upon navigable waters of the U.S. or adjoining shorelines. Covered facilities must prepare a SPCC Plan according to EPA SPCC regulations.

Oil and gas exploration and production facilities subject to the SPC rule must:

1. Prepare, implement and maintain an SPC plan (LAC 33:IX.905 and 907.A-C, G-J);
2. Provide adequate secondary containment of above-ground storage tanks, separators, and related production and transfer equipment (LAC 33:IX.907.D and 907.F.1 and LAC 33:IX.708.C.1.b.ii) and/or an alternative spill containment system capable of retaining oil, produced water, flowing solids, or any other product or waste material (LAC 33:IX.907.E);
3. Control drainage from containment areas (LAC 33:IX.907.F.2 and LAC 33:IX.708.C.1.b.iii);
4. Provide "fail-safe" devices to prevent overflows (LAC 33:IX.907.F.3);
5. Conduct and keep records of inspections for integrity of all storage tanks, separators and related production and transfer equipment (LAC 33:IX.708.C.1.b and LAC 33:IX.907.F.4);
6. Conduct annual flow line integrity testing and maintain records of those tests (LAC 33:IX.907.F.5 and LAC 33:IX.708.C.1.b);
7. Isolate pipelines removed from service (LAC 33:IX.907.F.6);
8. Design pipe supports that minimize abrasion potential of the piping (LAC 33:IX.907.F.7);
9. Conduct and keep records of inspections of valves and piping (LAC 33:IX.907.F.8);
10. Construct catch basins for potential spills in tank car loading/unloading areas (LAC 33:IX.907.F.9);
11. Install warning lights, signs or physical barriers in loading/unloading areas to prevent drive-off while still attached to loading/unloading equipment (LAC 33:IX.907.F.10); and
12. Conduct inspections of transport vehicles for leaking valves, etc. prior to leaving the facility (LAC 33:IX.907.F.11).

This list of requirements is specific to DEQ regulations. Depending upon the location of the facility or other factors, other requirements may exist, such as those imposed by local fire fighting authorities in populated areas.

The U.S. EPA's SPCC rules (40 CFR 112) are similar to the state SPC rule. While similar, there may be some differences between how the two rules apply to your specific facility, and if the rules are applicable, compliance with both are required.

Operators of facilities required to prepare a plan must do so within 180 days after the facility begins operation and must fully implement the plan as soon as possible, but not later than one year after such facility begins operation.

The SPC plan does not need to be submitted to the DEQ unless requested by an authorized representative of the Department. Keep a complete copy of the plan at the facility if the facility is normally attended at least eight hours per day or at the nearest office within the state if the facility is not so attended.

Upon review of the plan by the DEQ and/or upon receiving notice of a spill pursuant to the notification requirements of R.S. 30:2025(J), the Department may require the facility operator to amend the plan if it does not meet the requirements of this Chapter.

Facility operators must review the plan every five years and amend the plan within 90 days of the review to include more effective prevention and control technology if such technology will significantly reduce the likelihood of a spill event and if such technology has been field proven at the time of the review.

Facility owners or operators must amend the plan whenever there is a modification in facility design, construction, storage capacity, operation or maintenance which renders the existing plan inadequate. The amendment must be implemented prior to or concurrent with the facility modification.

B. Plugging and Abandonment; Facility Closure

Ensure that all wells are plugged and abandoned according to LDNR regulations. The DNR uses Statewide Order 29-B to guide the proper closure of reserve pits.

Remove all surface equipment and clean up any contamination from facility operations if the facility will be released for uses other than oil and gas production operations. For release of the site for other operations, cleanup levels can be obtained through the RECAP process.

Ensure that all Naturally Occurring Radioactive Material (NORM) is removed from equipment and the location prior to closure if released for uses other than oil and gas production operations. More information on NORM issues can be found in *Chapter 6 Questions and Answers on NORM Issues.*

Consider conducting an "All Appropriate Inquiry" in evaluating a property's environmental conditions and assessing potential liability for any contamination. The "All Appropriate Inquiries" process can be used to claim protection from CERCLA liability as an innocent landowner, a bona fide prospective purchaser, or a contiguous property owner. Companies can conduct a Phase 1 Environmental Site Assessment (ESA) according to ASTM E1527 - 05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

To terminate a facility's air permit, notify the DEQ using a completed "Application for Approval of Miscellaneous Permitting Actions" form. This form is used to notify the DEQ that a facility will permanently cease operations covered by the permit.

To terminate a facility's water permit (Non-Stormwater General Permit Coverage and Individual LPDES Permits) submit a Request for Termination (RFT) form to the DEQ within sixty (60) calendar days after the permanent termination of all discharges from the facility. Include in the RFT the date the discharges were terminated.

Facility owners/operators who do not terminate their permit will continue to be assessed fees by the Department.

Chapter 3
General Questions and Answers for all Media

A. What does AI number mean? Agency Interest (AI) number for a facility?

An Agency Interest (AI) number is the identification number assigned to every facility regulated by the DEQ. The AI number is used to store and retrieve information and documents on specific facilities.

B. What is required when a permitted facility's name or ownership/operator changes?

Written notifications of a change in ownership or operator must be submitted to the DEQ for facilities holding any air permits, Louisiana Pollutant Discharge Elimination System (LPDES) permits, hazardous waste permits, and solid waste permits.

Changes in the name only of a facility or of its owner/operator shall be made with written notification to the DEQ/Office of Environmental Services. The owner or operator shall submit a complete Name/Ownership/Operator Change Form (NOC-1 Form) prior to or no later than 45 days after the change. This form may be found online at the DEQ's website: http://www.deq.louisiana.gov/portal/Default.aspx?tabid=1837

The new owner or operator must submit the appropriate fees with the completed notification form NOC-1. Contact the DEQ or consult the referenced notification regulation for fees required.

The previous owner or operator retains responsibility for compliance with all permit terms and conditions until the permit has been transferred in accordance with the rule.

Reference: LAC 33:I.Chapter 19. Facility Name and Ownership/Operator Changes Process

C. How do I terminate permit coverage?

Permitting fees are assessed until permit coverage is terminated! To terminate a facility's air, water or other permit, notify the DEQ using a completed "Application for Approval of Miscellaneous Permitting Actions" form. This is used if the facility will permanently cease operations covered by the permit. Any annual maintenance fees also remain in force.

D. **What sources of laboratory data will be accepted by the DEQ?**

Laboratory data submitted to the DEQ must be from laboratories accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) for the methods used. The laboratory used must be accredited for the sampling and/or chemical analysis to be conducted. This includes data submitted to the DEQ for compliance with air and water permits, stack testing and soil analysis.

The Louisiana Environmental Laboratory Accreditation Program is designed to ensure the accuracy, precision, and reliability of the data generated, as well as the use of department-approved methodologies in generating data. Contact the DEQ regarding laboratories accredited under LELAP (http://www.deq.louisiana.gov/portal/tabid/2925/Default.aspx).

Reference: LAC 33:I.4501.A.2 and LAC 33:I.5307.D.

E. What are the air and water permit recordkeeping requirements?

Records of monitoring, testing and other reports must be kept onsite or at a location accessible to a DEQ inspector.

Consult the facility's air or water permit and/or applicable regulation regarding the length of time that records must be maintained on location.

F. Where can data and reports submitted to the DEQ be obtained online?

The DEQ's Electronic Document Management System (EDMS) contains official records (permit applications, permits, reports, etc.) that have been created by or received by DEQ. All such records as of July 1, 2005, should be found in EDMS. To access EDMS go to www.deq.louisiana.gov and click on the button labeled EDMS on the far right hand column.

Documents not on EDMS may be accessed from the main office or regional offices. To obtain copies contact the DEQ Public Records Center at (225) 219-3168 or email publicrecords@la.gov.

G. How can I check on the status of a permit application?

You can check the status of permit applications using the DEQ's online Check Permit Status tool at: www.deq.louisiana.gov/portal/ONLINESERVICES/CheckPermitStatus.aspx.

Chapter 4
Questions and Answers for Air Issues

A. What is the reporting requirement for unauthorized discharges that cause an emergency condition?

Immediately call (225) 925-6595 to report unauthorized discharges that cause an emergency condition within one hour after taking prompt measures to determine nature, quantity, and potential off-site impact of a release. Verbal phone reports are made to the Louisiana Department of Public Safety (DPS). The DPS will notify the DEQ.

Submit written reports of unauthorized discharge requiring notification to the DEQ/Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) within seven calendar days after the expiration of the time allowed for the notification.
Reference: LAC 33:III.3915.A.1. and LAC 33:III.3925

B. What is the reporting requirement for unauthorized discharges that do not cause an emergency condition?

Promptly call (225) 925-6595 to report an unauthorized discharge that exceeds a reportable quantity (RQ) of a pollutant that does not cause an emergency condition. The phone notification is required within 24 hours after learning of the discharge.

Submit written reports of unauthorized discharges requiring notification to the DEQ/Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) within seven calendar days after the expiration of the time allowed for the notification.
Reference: LAC 33:III.3917 and LAC 33:III.3925

Report any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, where the emission control bypass was not the result of an upset. This reporting requirement only applies if your facility is a major source of toxic air pollutants.

As specified in General Condition XI of air permits, if for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in the permit, the permittee shall provide the DEQ/Office of Environmental Compliance with a written report. Submit a written report for emissions in excess of permit emission limitations, regardless of the amount, where such emissions occur over a period of seven days or longer. Submit the report no later than 14 days from the initial occurrence of the release event.

Reference: Air Permit General Condition XI, Title V/Part 70 General Condition R, LAC 33:III.3917.A. and LAC 33:III.5107.B.

C. Who regulates air quality in Louisiana?
Louisiana Department of Environmental Quality (DEQ)
602 N. Fifth Street
Baton Rouge, LA 70802

Phone: 225-219-5337 or Toll Free 1-866-896-5337
www.deq.louisiana.gov

D. Does the DEQ have a guidance document for air permitting?

The DEQ published the Louisiana Guidance for Air Permitting Actions, Revision 2 dated 06/30/11. A copy of the guidance document is available from the DEQ's web page at: http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits.aspx

E. What facilities and activities require an air permit?

If a facility is not excused from air permitting as described in "Do I Need an Air Permit? (http://www.deq.louisiana.gov/portal/tabid/2619/Default.aspx)" or otherwise does not qualify for a small source exemption under LAC 33:III.501.B.4, but is not a Part 70 source subject to Title V permitting requirements under 40 CFR 70 and LAC 33:III.507, then the minor source permitting provisions under LAC 33:III.503 apply.

As with major sources, no construction, modification, or operation of a facility which ultimately may result in an initiation or increase in emissions of air contaminants as defined in LAC 33:III.111 shall commence until the appropriate permit fee has been paid (in accordance with LAC 33:III.Chapter 2) and a permit has been issued by the DEQ.

A synthetic minor source is a facility which can operate as a major source, but for which the applicant is voluntarily requesting a federally enforceable limit on one or more parameters (e.g., throughput, operating time, etc.) such that the potential to emit of the facility remains below major source thresholds. Consult with the Air Permits Division if you are unsure whether or not your facility is a synthetic minor source. Synthetic minor sources are subject to public notice under LAC 33:III.531.A.1.

All oil and gas production facilities and equipment (Standard Industrial Classification, or SIC =1311; North American Industry Classification System, or NAICS =21111) require an air permit prior to beginning construction except for some exempted facilities/equipment.

Call DEQ Office of Environmental Services, Air Permits Division at (225) 219-3417 or consult permitting regulations to determine if an air permit is required.
Reference: LAC 33:III.Chapter 5. Permit Procedures

Small source exemptions from a permit are allowed for facilities and equipment that emit minimal amounts of air pollutants provided certain regulatory requirements are met.
Reference: LAC33:III.501.B.4.

F. Do drilling rigs require an air permit?

Drilling rigs operating at one location for less than 1 year are not required to obtain an air permit.
Reference: LAC33:III.501.B.5. Table 1.B.4.

G. What are the typical types of air permits issued for oil and gas production facilities?

The types of air permits that the DEQ issues include the following:

- *Minor Source Air General Permit for Crude Oil and Natural Gas Production.* These facilities emit minor source levels of greenhouse gases, criteria pollutants and toxic air pollutants (TAPs) as specified in the general permit.
  Reference: LAC33:III.503 and
  www.ldeq.org/portal/DIVISIONS/AirPermits/MinorSourceGeneralPermits.aspx.

- *Site Specific Minor Source Permits*. These permits are for oil and gas facilities that cannot meet the requirements of the "Minor Source Air General Permit for Crude Oil and Natural Gas Production" and emit at minor source levels of greenhouse gases, criteria pollutants and toxic air pollutants (TAPs) as specified in the general permit.
  Reference: LAC33:III.503 and http://ldeq.org/portal/Default.aspx?tabid=2627.

- *Title V/Part 70 Operating Permits*. These permits are for facilities with emissions at major source levels.
  Reference: LAC 33:III.507 and http://ldeq.org/portal/tabid/2548/Default.aspx.

- *Nonattainment New Source Review for major sources located in nonattainment areas of Louisiana.*
  Reference: LAC 33:III.504.

- *Prevention of Significant Deterioration (PSD) permits for major source of criteria pollutants*.
  Reference: LAC 33:III.509 and http://ldeq.org/portal/Default.aspx?tabid=2629.

- *Regulatory permit for Oil and Gas Well Testing*
  Reference: LAC 33:III.307.

- *Regulatory permit for Release of Natural Gas from Pipelines and Associated Equipment.*
  Reference: LAC 33:III.309.

- *Regulatory Permit for Emergency Engines*. This permit can be used to permit the use of an engine for generators, compressors, pumps due to an emergency situation such as power outages due to storms. Reference: LAC 33:III.311.

H. What types of facilities are exempt from permitting?

Small Source Exemptions exist for owners or operators of any source which is not a major source. They may apply for an exemption from permitting requirements provided each of the following criteria is met:

- The source emits or has the potential to emit no more than 5 TPY of any regulated pollutant;
- The source emits or has the potential to emit less than the minimum emission rate (MER) listed in LAC 33:III.5112, table 51.1, for each Louisiana toxic air pollutant;
- No enforceable permit conditions are necessary to ensure compliance with any applicable requirement; and
- No public notice is required for any permitting or other activity at the source.

Reference: LAC 33:III.501.B.4.

The LDEQ has also developed a list of insignificant activities (by size, type of pollutant, and activity) which are exempt from permitting (LAC 33:III.501.B.5). To obtain a copy of the case by case insignificant activities exemption, complete and submit to the DEQ the "Notification of Case-By-

Case Insignificant Activity Form." available online from the DEQ webpage at http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2270
Reference: LAC 33:III.501.B.5 - Table D

I. What are types of permits based on size and emission controls installed?

a. Oil and Gas Production Facilities That Use Emission Controls to Minimize Emissions to Below Minor Source Levels.

Using adequate emission controls, smaller to larger, more complex oil and gas production facilities can reduce emission to below minor source levels. Production equipment may include line heaters, separators, storage tanks, heater treaters, natural gas pneumatic devices, internal combustion engines, fugitive leak sources, glycol dehydrators, gas sweetening units, etc. Typical emission controls can include catalytic converters on engines, vapor recovery systems and flares for vented natural gas and condensers and/or flares for glycol dehydrators.

The types of minor source air permits available for oil and gas production facilities include:

- Minor Source Air General Permit for Crude Oil and Natural Gas Production www.ldeq.org/portal/DIVISIONS/AirPermits/MinorSourceGeneralPermits.aspx
- Site Specific Minor Source Permits

Calculate potential emissions and review permit requirements to determine if the facility meets the minor source permit limitations. The specific minor source permit emission limits and requirements are found in the Minor Source Air General Permit for Crude Oil and Natural Gas Production.

If the facility meets the criteria for a minor source permit, complete the application form and submit one original and two copies of the application to the DEQ. Consult the Louisiana Guidance for Air Permitting Actions Manual for details (www.deq.state.la.us/portal/DIVISIONS/AirPermits.aspx).

The appropriate air permit application fee must accompany the application sent to the DEQ. No application processing will begin until DEQ receives the fee. Reference: LAC 33:III.223.Fee Schedule Listing.

b. Oil and Gas Production Facilities with Lesser Amounts of Emission Control and are Part 70/Title V Major Sources of Air Pollutants.

Oil and gas production facilities that have the potential to emit at Title V major source levels must obtain a Title V air permit.

The way to determine if a facility qualifies for this permit is to calculate potential emissions and review permit requirements.

If the facility is required to have a Part 70/Title V permit, complete the application form and submit one original and two copies of the application to the DEQ. Submit one copy to the EPA Region VI, Chief, Air Permits Section. Consult the Louisiana Guidance for Air Permitting Actions Manual for details (www.deq.state.la.us/portal/DIVISIONS/AirPermits.aspx).

The appropriate air permit application fee must accompany the application sent to the DEQ. No processing of the application will begin until DEQ receives the fee. Reference: LAC 33:III.223.Fee Schedule Listing

c. Larger Facilities such as Compressor Stations with Few Emission Controls and are Major Sources of Air Pollutants

- Title V/Part 70 Operating Permits for larger facilities emitting at major source levels. Reference: LAC 33:III.507.

- Prevention of Significant Deterioration (PSD) permits for major sources of criteria pollutants. Reference: LAC 33:III.509.

If the facility is required to have a Part 70/Title V permit or PSD permit, complete the application form and submit one original and two copies of the application to the DEQ. Submit one copy to the EPA Region VI, Chief, Air Permits Section. Consult the Louisiana Guidance for Air Permitting Actions Manual for details on permit application preparation (www.deq.state.la.us/portal/DIVISIONS/AirPermits.aspx).

The appropriate air permit application fee must accompany the application sent to the DEQ. No processing of the application will begin until DEQ receives the fee. Reference: LAC 33:III.223.Fee Schedule Listing

d. Facilities located in Ozone Nonattainment Areas.

- Nonattainment New Source Review for major sources located in nonattainment areas of Louisiana. Reference: LAC 33:III.504.

If the facility is required to have a Nonattainment New Source Review permit, complete the application form and submit one original and two copies of the application to the DEQ. Submit one copy to the EPA Region VI, Chief, Air Permits Section. Consult the Louisiana Guidance for Air Permitting Actions Manual for details on permit application preparation (www.deq.state.la.us/portal/DIVISIONS/AirPermits.aspx).

The appropriate air permit application fee must accompany the application sent to the DEQ. No processing of the application will begin until DEQ receives the fee. Reference: LAC 33:III.223. Fee Schedule Listing

e. Temporary Activities such as venting and flaring of natural gas

- Regulatory permit for Oil and Gas Well Testing and for Release of Natural Gas from Pipelines and Associated Equipment.
  Reference: LAC 33:III.307 and LAC 33:III.309.

Complete the DEQ's "Application for Approval of Miscellaneous Permitting Actions" form and submit to the LDEQ.

The appropriate air permit application fee must accompany the application sent to the DEQ. No processing of the application will begin until DEQ receives the fee. Fees 2010 (other than small businesses) or 2015 (small businesses only) apply to this permit. Reference: LAC 33:III.223.

J. What is the definition of construction?

Construction means any physical change or change in the method of operation (including fabrication, erection, installation, demolition, or modification of an emissions unit) that would result in a change in actual emissions. Clearing land and drilling a well is not considered construction.

K. What is the definition of reconstruction?

Reconstruction means the replacement of components of an existing major source to such an extent that:

- the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable, entirely new source; and
- is technologically and economically feasible for the reconstructed source to meet the relevant emission standards. Upon reconstruction, an affected source is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

L. What is the definition of modification?

Modification (to Modify) means any change in a facility including, but not limited to, a physical change, a change in the method of operation, or a change in the raw materials or feedstocks used for products manufactured that increases or decreases the emission rate of any toxic air pollutant by an amount that is greater than the minimum emission rate (MER) listed for that pollutant in LAC 33:III.5112, Table 51.1, or that results in the emission, at a rate greater than the MER listed in LAC 33:III.5112, Table 51.1, of any toxic air pollutant not previously emitted. A change in production rates (up to capacity) or hours of operation shall not be considered a change in the method of operation.

M. What is the guidance on aggregating oil and gas production facilities for permitting purposes?

Oil and gas production facilities that are contiguous or adjacent and under common control and separated by a distance less than or equal to 0.25 mile must be aggregated to determine if the group of facilities are a major source for permitting. Facilities separated by a distance of greater than 0.25 mile are considered separate facilities for permitting purposes.

Facilities greater than 0.25 miles apart are issued separate air permits. Facilities may be aggregated and can then be issued one permit or a separate permit can be issued for each facility.

However, given the particular circumstances for a given case (e.g., interdependency), the DEQ may consider sites separated by a distance greater than 0.25 mile to be contiguous.

N. What can I do expedite approval of a permit, modification or variance?

The DEQ has a program to expedite the processing of permits, modifications, registrations, or variances for environmental permit applicants.

The Expedited Permit Processing Program allows interested applicants to reimburse DEQ for overtime costs incurred by employees that work outside of normal business hours to expedite a permit, modification, license, registration, or variance. This program shortens the time between application receipt and a final permit decision. This is currently available for air and water permit applications.

To request expedited processing, complete the Request for Expedited Permit Processing form. The DEQ will invoice the applicant for the overtime costs for expediting the permit application. The applicant will still pay the standard permit application fee at the time of application submittal. Reference: LAC:33.I.Chapter 18.

O. What flaring and venting of natural gas during well testing requires a permit authorization?

The DEQ's Regulatory Permit for Oil and Gas Well Testing can be used to permit flaring and venting from well testing and operation of temporary production equipment and to establish the proper design of a permanent fluid-handling facility. Operations can begin after notification from the DEQ that the notification form submitted has been determined by the DEQ to be complete.

P. What volumes of natural gas releases require authorization by the DEQ?

Releases of natural gas greater than or equal to 1.0 million standard cubic feet, but less than 2.5 million standard cubic feet, must be reported to the DEQ and no emission controls are required.

Releases of natural gas greater than or equal to 2.5 MM cubic feet in volume must be reported to the DEQ and controlled by flaring (burning). Flaring must continue until less than 0.25 million standard cubic feet of gas remains to be released, at which time flaring is no longer required.

Flaring is also required for releases of any volume of gas that will result in

- Total VOC emissions of 5,000 pounds or more
- Benzene emissions equal to or exceeding 260 lbs
- Total benzene, toluene, ethylbenzene, and xylene isomer(s) (BTEX) emissions of 2,000 pounds or more.

Natural gas releases covered by this regulatory permit and venting policy shall have a hydrogen sulfide (H_2S) content of less than or equal to 24 ppmv. This volume is based on a per event basis and not per day basis. Reference: LAC33:III.307.

Q. What volume of natural gas releases is exempt from permitting and authorization?

The DEQ's venting of natural gas policy allows releases of less than or equal to 1.0 million standard cubic feet of natural gas from oil and gas well testing without approval of DEQ, and the owner/operator is not required to notify the Air Permits Division or DEQ Regional Office. This volume is based on a per event basis and not per day basis. Reference: http://www.deq.louisiana.gov/portal/tabid/2348/Default.aspx

R. What is DNR/Office of Conservation's position on venting of natural gas?

The venting of natural gas from any well producing in the state of Louisiana is prohibited except where the Office of Conservation finds, upon written application, that such

prohibition would result in an economic hardship on the operator of the well, lease or production facility from which the gas is proposed to be vented; provided, however, that no such economic hardship can be found in the case where the current market value, at the point of delivery, of the gas proposed to be vented exceeds the cost involved in making such gas available to a market. Such applications shall be filed with the district office and approval thereof will be at the discretion of the district manager. Reference: LAC 43:XIX.3507.A.

S. What releases of natural gas from pipelines and associated equipment require DEQ permit authorization?

Release of natural gas from pipelines and associated equipment resulting from metering, purging, and maintenance operations is authorized after the DEQ notifies the operator that the notification form submitted in accordance with LAC 33:III.309 has been determined by the DEQ to be complete.
Reference:
http://www.deq.louisiana.gov/portal/LinkClick.aspx?fileticket=lWR0SsrTiAk%3d&tabid=2945

T. What volume of natural gas releases from pipelines and associated production equipment are exempt from permitting and authorization?

Release of less than 1.0 million standard cubic feet of natural gas from pipelines and associated equipment does not require approval of DEQ, nor is the owner/operator required to notify the Air Permits Division or DEQ Regional Office. Natural gas releases shall have a hydrogen sulfide (H2S) content of less than or equal to 24 ppmv. The release volume is based on per event basis.
Reference: Reference: http://www.deq.louisiana.gov/portal/tabid/2348/Default.aspx

U. What are the requirements regarding air permitting fees?

The permittee must pay all required air permit application fees, air permit modification fees, annual maintenance fees and other specified fees. Submit permit application/modification fees and other required fees at time of submittal. Operators will be sent invoices by the DEQ for annual maintenance and pollutant fees. The DEQ will not process or approve applications until required fees are received. Reference: LAC 33:III.Chapter 2.

W. What is the requirement for compliance with air quality regulations and air permits?

Facilities must continuously comply with all air permit and regulatory requirements. Always consult the facility's air permit and the DEQ air quality regulations for definitive guidance on facility air quality compliance requirements.

If the facility cannot comply with applicable air quality regulations and/or permit limits, then the facility must take corrective actions to meet the requirements. Also, the facility must submit a report to the DEQ regarding a description of the noncompliance, duration, and corrective actions taken to bring the facility into compliance. Generally, this report is due within 14 days of becoming aware of the noncompliance.

X. What engines and turbines are required to conduct stack testing?

The following listed policy and federal rules require stack testing of engines and turbines:

a. DEQ policy for testing engines rated at greater than or equal to 500 horsepower and expected to operate more than 720 hours in a semiannual period – initial and routine (annual or semiannual) testing

http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermitsEngineeringandPlanning/EngineeringNotificationsStackTestingTools/EngineTurbineTesting.aspx

b. Federal New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart JJJJ for spark ignition engines
c. Federal NSPS 40 CFR Part 60 Subpart IIII for compression ignition (diesel) engines
d. Federal NSPS 40 CFR Part 63 Subpart ZZZZ for spark ignition and compression ignition engines

Stay current with new regulations as the regulations become applicable to oil and gas operations. Operators are responsible for complying will all environmental regulations.

Review each federal regulation cited for details on stack testing requirements based on engine type, date of manufacture, installation date and engine horsepower.

Y. Who is authorized to perform stack testing?

Stack testing must be conducted by a firm accredited by the DEQ's Louisiana Environmental Laboratory Accreditation Program (LELAP).

Z. What are DEQ's requirements for engine and turbine testing?

Initial stack test for NOx, O_2 and CO must be conducted on engines and turbines with a maximum rated power equal to or greater than 500 horsepower. Initial testing must be performed within 180 days of beginning engine operation. An initial test is also required after each major engine overhaul.

No testing is required if an engine or turbine is expected to operate for less than or equal to 720 hours in a semiannual period.

The stack testing protocol must be submitted to DEQ for approval 30 days prior to the initial stack test date. Online submittal of the testing protocol and stack test scheduling notification can be completed online with the DEQ's automated stack test scheduling tool. The DEQ can elect to send a representative to witness the testing.

A report of test results must be submitted to the DEQ within 60 days of conducting the test. Maintain copies of testing reports on site at a location accessible to the DEQ inspector. If test results are not within permitted emission limits, then notify DEQ of proposed corrective actions.

AA. What are DEQ's requirements for engine routine periodic engine testing?

Conduct annual and semiannual stack testing of engines not equipped with a catalytic converter that have a maximum rated power equal to or greater than 500 horsepower. Test for NOx, O2 and CO. Testing is not required if the engine operates for less than or equal to 720 hours in an annual or semiannual period, respectively.

Notification or submittal of test results to DEQ is not required for semiannual and annual tests that meet permit limits. Testing reports must be kept on site at a location accessible to the DEQ inspector. If test results are not within permitted emission limits, notify DEQ of proposed corrective actions. There is no requirement to routinely test turbines according to DEQ testing policy.

BB. What facilities are required to submit an annual air emission inventory report to the DEQ?

Facility requirements are based in part on the air quality attainment status of the parish in which the facility is located. Current information on attainments status may be found at: http://www.deq.louisiana.gov/portal/DIVISIONS/LegalAffairs/RulesandRegulations/EmergencyRules.aspx. Below are facilities required to submit an Annual Air Emission Inventory using DEQ's online Emissions Reporting and Inventory Center (ERIC) system on or by April 30 of each year for the previous calendar year:

Facilities located in the nonattainment parishes of Ascension, East Baton Rouge, Iberville, Livingston, or West Baton Rouge that emit or have the potential to emit at least:

- 10 tons per year (TPY) of volatile organic compounds (VOC), or
- 25 TPY of nitrogen oxides (NOx), or
- 100 TPY of carbon monoxide (CO), sulfur dioxide (SO2), particulate matter of less than 10 microns (PM10), or particulate matter of less than 2.5 microns (PM2.5), or
- 5 TPY of lead (Pb).

Facilities located in the parishes adjoining nonattainment area of Assumption, East Feliciana, Iberia, Pointe Coupee, Saint Helena, Saint James, Saint John the Baptist, Saint Martin, Tangipahoa, or West Feliciana that emit or have the potential to emit at least:

- 50 TPY of VOC, or
- 100 TPY of NOx, CO, SO2, PM10, or PM2.5, or
- 5 TPY of Pb.

Facilities located in an attainment parish that emit or have the potential to emit at least:

- 100 TPY of VOC, NOx, CO, SO2, PM10, or PM2.5, or
- 5 TPY of Pb.

Any facility in Louisiana defined as a major stationary source of hazardous air pollutants in Section 112(a)(1) of the Federal Clean Air Act (FCAA) or of toxic air pollutants in LAC 33:III.Chapter 51 is required to submit ERIC reports.

If your facility has an individual permit, that permit may specify emission reporting as a specific condition at thresholds below those listed above. Reference: LAC 33:III.919.

CC. What are the reporting requirements for facilities authorized under Title V/Part 70 permits?

Facilities with Title V/Part 70 air permits must submit the following reports:

- Title V Semiannual Monitoring Report due September 30 (covering January – June of current year) and March 31 each year (covering July to December of previous calendar year).

- Title V Annual Compliance Certification Report due March 31 each year (covering January to December of previous calendar year)

DD. What notifications must be made to the DEQ regarding air permit compliance?

a. The DEQ/Office of Environmental Services and the appropriate regional office must be notified of construction completion, within ten calendar days from the date that construction/modification of facility is complete, and provide the estimated date of start-up operation.

b. The DEQ must be notified that the facility is, or has, an affected source covered by the USEPA's New Source Performance Standards (NSPS). This includes such emission sources as gas sweetening units, turbine engines, and reciprocating internal combustion engines (RICE).

c. Notify DEQ for name or ownership/operator changes.

d. If the permittee does not comply with, or will not be able to comply with, the emission limitations specified in the permit, the permittee shall provide the Office of Environmental Compliance with a written report as specified below. Reference: LAC 33:III.737 Louisiana General Conditions.

   i. A written report shall be submitted within seven days of any emission exceeding permit requirements by an amount greater than the reportable quantity established for that pollutant in LAC 33.I.Chapter 39.

   ii. A written report shall be submitted for any emission exceeding permit emission limitations, regardless of the amount, where such emission occurs over a period of seven days or longer. The report shall be submitted no later than 14 days from the initial occurrence of the release event.

   iii. A written report shall be submitted semiannually to address all emission limitation exceedances not included in the reports listed in d.i and d.ii. above (i.e., Louisiana General Condition XI, Paragraphs A and B of the air permit). The semiannual report shall be submitted by March 31 for the preceding period encompassing July through December, and by September 30 for the preceding period encompassing January through June.

   iv. Each report submitted in accordance with this Condition shall contain the following information:

      - Description of non-complying emissions;
      - Cause of noncompliance;
      - anticipated time the noncompliance is expected to continue or, if it has been corrected, the duration of the period of noncompliance;
      - Steps taken by the permittee to reduce and eliminate the non-complying emissions; and
      - Steps taken by the permittee to prevent recurrences of the non-complying emissions.

Chapter 5
Questions and Answers for Water Issues

A. When is a LPDES water permit required?

In accordance with LAC 33:IX.2311.A.1, an LPDES discharge permit is required for the discharge of pollutants from any point source into waters of the state of Louisiana.

A point source is any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, landfill leachate collection system, vessel, or other floating craft from which pollutants are or may be discharged.

In addition, discharges of storm water from oil and gas production facilities may be required to obtain a LPDES water permit in accordance with LAC 33:IX.2511.C.1.c.

The operator of an existing or new discharge composed entirely of storm water from an oil or gas exploration, production, processing, or treatment operation or transmission facility is required to submit a permit application for a facility if the following occur:

- Facility has had a discharge of storm water resulting in the discharge of a reportable quantity for which notification is or was required pursuant to 40 CFR 117.21 or 40 CFR 302.6 at anytime since November 16, 1987; or
- Facility has had a discharge of storm water resulting in the discharge of a reportable quantity for which notification is or was required pursuant to 40 CFR 110.6 at any time since November 16, 1987; or
- Facility contributes to a violation of a water quality standard.

Examples of discharges from oil and gas include deck drainage, produced water, drilling fluids, sewage, storm water etc. Water permits require periodic observations and/or samples be taken of discharges to demonstrate compliance with the permit discharge limitations. These data will be reported to the DEQ in the Discharge Monitoring Reports (DMRs).

B. Who regulates water quality in Louisiana?

Louisiana Department of Environmental Quality (DEQ)
602 N. Fifth Street
Baton Rouge, LA 70802
Phone: 225-219-5337 or Toll Free 1-866-896-5337
www.deq.louisiana.gov

C. Where are the water quality regulations governing discharges found?

Louisiana's Water Quality Regulations are found in LAC 33:XI. Chapters 7 and 23.
This surface water discharge permitting system is administered under the Louisiana Pollutant Discharge Elimination System (LPDES) program.

D. Does the DEQ have online guidance for water permitting?

The DEQ's web page has guidance documents on its web page at: www.deq.louisiana.gov. Follow links to "Water" then to "LPDES Permits, Information, and Applications".

The Louisiana Pollutant Discharge Elimination System (LPDES) Program regulates discharges of pollutants (e.g., waste water) from any point source (e.g. facility) to the waters of Louisiana. For onshore and offshore oil and gas drilling and production operations, general LPDES permits are available.

The Environmental Results Program (ERP) produced an online permit application for water permitting (http://www.deq.louisiana.gov/portal/ONLINESERVICES/OnlinePermitApplications.aspx). Also, the DEQ has an online system for submittal of electronic discharge monitoring reports (DMR) called "NetDMR". The web address is: http://www.deq.louisiana.gov/portal/ONLINESERVICES/NetDMR.aspx.

E. What types of water permits apply to oil and gas exploration and production facilities?

Oil and gas exploration and production (E&P) facilities that require permitting must obtain one (and only one) of the following permit types:

- Multi-Sector General Permits (MSGP). MSGPs are applicable to the "Onshore" Category of Oil and Gas Sites only: MSGP LAR050000
- Louisiana General Permit for Coastal Waters: LAG330000
- Louisiana General Permit for Territorial Seas: LAG260000
- Individual Water Permit

Sanitary waste that is discharged to any water body (sub-segment) that has "Oyster Propagation" as a designated use (see LAC 33:IX.1123.Table 3) has a Fecal coliform daily maximum concentration limit of 43 colonies / 100ml. Sanitary waste that is discharged to water bodies that do NOT have "Oyster Propagation" as a designated use has a Fecal coliform daily maximum concentration limit of 400 colonies / 100ml.

The discharge of produced water is prohibited except in the Territorial Seas. The discharge of produced water within the Territorial Seas requires an individual permit. Produced water can no longer be discharged under the General Permit for Territorial Seas (LAG260000).

Produced water shall not be discharged within 1,300 feet (via water) of an active oyster lease, live natural oyster or other molluscan reef, designated oyster seed bed, or sea grass bed. No produced water shall be discharged in a manner that, at any time, facilitates the incorporation of significant quantities of hydrocarbons or radionuclides into sediment or biota. (LAC 33:IX.708.C.2.c.v)

F. How do I determine if the Multi-Sector General Permit (LAR050000) is required for my onshore oil and gas facility?

The MSGP applies to discharges of storm water from industrial facilities and can be required for certain oil and gas production facilities. A storm water permit (MSGP) is required (LAC 33:IX.2511.C.1) if:

- Storm water leaving the site contained a sheen (contaminated by an oil spill or hazardous waste), or
- Storm water leaving the site resulted in a violation of water quality standards (sheen in receiving waters, fish kill, exceedances of numerical criteria, exceedance of narrative criteria, etc.), or
- There has been a release to storm water of a reportable quantity (RQ) of oil or hazardous waste. (40 CFR 110.6, 117.21, or 302.6).

An MSGP is NOT required if:

- No reportable quantity (RQ) releases have occurred since November 16, 1987, or
- Spills have occurred within the facility, but were cleaned up and not allowed to contaminate storm water, or
- Spills occurred onto ground or conveyances that led to waters of the state, but did not discharge to waters of the state. No contamination of storm water occurred.

G. How do I determine if the Louisiana General Permit for Coastal Waters (LAG330000) is required for my oil and gas exploration and production operation?

The Louisiana General Permit for Coastal Waters (LAG330000) applies to discharges from oil and gas exploration, development and production facilities located within coastal areas of Louisiana. This general permit includes discharges from oil and gas drilling and production operations.

LAG330000 is required for facilities or wells located south of the line frequently, but erroneously referred to as the Chapman line and north of the gulf shoreline that have a discharge of deck drainage or have any one of other regulated discharges such as domestic waste, sanitary, etc. (see the LAG 330000 permit or 40CFR 435 Subpart D). A map showing the boundary of the coastal area can be found at the link below:
(http://map.DEQ.org/map_inventory_files/data_files/map_numbers/2006/jpegs/200601140.jpg)

LAG330000 may be required of any E&P facility or well north of the Chapman line if that facility or well is over waters of the state (e.g., lakes, rivers, streams, bayous), or over **wetlands** and has a discharge of deck drainage or have any one of other regulated discharges such as domestic waste, sanitary, etc. (see the LAG 330000 permit or 40CFR 435 Subpart D).

Facilities consisting of only a wellhead ("Christmas tree") with no associated deck drainage (i.e., decking and equipment) or other discharge sources may not be required to have a water discharge permit. However, a permit will be required prior to initiating any discharge associated with that wellhead such as workover or P&A operations.

LAG330000 does not apply to facilities gulfward (south) of the gulf shoreline (grey area adjacent to the coast in the above referenced map link).

H. How do I determine if the Louisiana General Permit for Territorial Seas (LAG260000) is required for my oil and gas exploration and production operation?

The Louisiana General permit Territorial Seas (LAG260000) applies to discharges from oil and gas exploration, development and production facilities located within territorial seas of Louisiana. This general permit includes discharges from oil and gas drilling and production operations. It does not cover discharges of produced water.

A map showing the boundary of the Louisiana territorial seas can be found at the link below:
http://map.DEQ.org/map_inventory_files/data_files/map_numbers/2010/jpegs/201001033.jpg

LAG260000 is required for oil and drilling and production facilities located in the territorial seas that have a discharge of deck drainage or have any one of other regulated discharges such as domestic waste, sanitary waste, etc.

Facilities consisting of only a wellhead ("Christmas tree") with no associated deck drainage (i.e., decking and equipment) or other discharge sources may not be required to have a water discharge permit. However, a permit will be required prior to initiating any discharge associated with that wellhead such as workover or P&A operations.

I. How do I terminate an LPDES permit or LPDES general permit coverage?

LPDES permits can be terminated by utilizing the appropriate termination form available on the LPDES Water Permits Division web page. Please be sure that you are using the correct termination form. Facilities that do not properly terminate permit coverage will continue to be invoiced for permit fees.

J. **How do I apply for the general water permits**?

Complete the appropriate Notice of Intent (NOI) form for the permit needed. For questions regarding this NOI please contact the Water Permits Division at (225) 219-3181. NOI forms used to apply for water permits can be found at the following link to DEQ's web page. http://www.deq.louisiana.gov/portal/Default.aspx?tabid=1837.

A permit application fee does not accompany the NOI for a water permit. However, the LDEQ Fiscal Services Division will send invoice for the application once it is received and deemed administratively complete. Permit holders will also receive invoices annually.

Also, the ERP produced an online permit application for water permits, which can be found at: http://www.deq.louisiana.gov/portal/ONLINESERVICES/OnlinePermitApplications.aspx.

For questions regarding water permitting you can contact the DEQ Water Permits Division at (225) 219-9371 or send mail to DEQ-WWWWaterPermits@la.gov.

K. What reports are required by the water permits?

Water permits require periodic observations and/or samples be taken of discharges to demonstrate compliance with the permit discharge limitations. These data will be reported to the DEQ in Discharge Monitoring Reports (DMRs).

The General Permits LAG260000 and LAG330000 require annual submittal of Discharge Monitoring Reports (DMR) as specified in each permit. The DMRs are summarized for each calendar quarter and submitted annually to the DEQ. Individual permits may have different reporting requirements.

The DEQ accepts hardcopies of the completed DMRs. Instructions and forms for completing the DMRs for the LAG260000 and LAG330000 general permits and individual permits can be obtained from the DEQ's web site at: http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2276.

The DEQ also has an online system for submittal of electronic DMRs called "NetDMR". The web address is http://www.deq.louisiana.gov/portal/ONLINESERVICES/NetDMR.aspx.

For the MSGP general permit for onshore oil and gas facilities, consult the EPA's document, "Guidance Manual for the Monitoring and Reporting Requirements of the NPDES Storm Water Multi-Sector General Permit" for reporting requirements and reporting forms. This document can be down loaded from the EPA Web Site at http://www.epa.gov/npdes/pubs/dmr-fin.pdf.

L. What are the requirements regarding water permitting fees?

The fees for water permits are found in LAC33:IX.Chapter 13.Louisiana Water Pollution Control Fee System Regulation.
http://www.deq.louisiana.gov/portal/DIVISIONS/LegalAffairs/RulesandRegulations/Title33.aspx

Fees are required for new permit issuance, permit modifications, and reissued permits. Annual fees are also required for water permits for funding operations and activities of the DEQ. Operators with general permits are required to pay new permit fees, reissue fees and annual fees based on the DEQ's fee system. The annual fees for the General permits LAG260000 and LAG330000 are found in LAC33:IX.1309. N. Other Fees. Operators with individual water permits are required to pay new permit fees, modified, reissued and annual fees according to the fee system.

Chapter 6
Questions and Answers for NORM Issues

A. What agency regulates NORM?

Louisiana Department of Environmental Quality (DEQ)
602 N. Fifth Street
Baton Rouge, LA 70802
Phone: 225-219-5337 or Toll Free 1-866-896-5337
www.deq.louisiana.gov

B. What is NORM?

NORM is Naturally Occurring Radioactive Material. NORM is defined as any nuclide that is radioactive in its natural physical state (i.e., not man-made), but not including source, byproduct, or special nuclear material. NORM is generated when a well begins producing water and scale builds up in process equipment and piping.

C. Where is NORM found?

NORM can be found in equipment such as tubing, piping, oil, and produced water handling equipment, separators, heaters, tanks, dehydrators, piping, etc.

Materials from processing equipment that can contain NORM include tank sludges, production sands, pipe scale, etc.

Land can become NORM contaminated from NORM containing equipment and materials.

D. What DEQ regulations apply to NORM?

NORM regulations are found in the Louisiana Administrative Code LAC 33:XV.Chapter 14, Regulation and Licensing of Naturally Occurring Radioactive Material (NORM).

These regulations apply to any material, equipment, or land which has been contaminated with NORM. Oilfield equipment that may contain NORM includes, but is not limited to, tubular goods, piping, vessels, wellheads, separators, and condensers. These regulations address exemptions, radiation surveys, general licenses, worker protection, inspections, storage, transfer and disposal, financial responsibility and training requirements.

If an "orphaned" well site (as defined by DNR regulation) is not exempt according to LAC 33:XV.1404 and requires remedial action, DNR will oversee the remediation work using a company specifically licensed by DEQ to do NORM remediation. DEQ would then review the data and the site. If remediation is adequate according to LAC 33:XV.1417, DEQ would release the property to unrestricted use.

Approval of certain alternative methods of NORM disposal (i.e., down-hole disposal) is required of both DEQ and DNR (LAC 33:XV.1412.B.2). Regulation of NORM at commercial oilfield waste treatment facilities will be conducted pursuant to the Memorandum of Understanding between DNR and DEQ as found in Appendix C of LAC 33:XV.1401 et seq.

E. To what do NORM regulations apply?

NORM, NORM waste, and NORM contaminated material are exempt from the requirements of these regulations if they contain, or are contaminated at, concentrations of:

1. 5 picocuries per gram or less of radium-226 or radium-228, above background; or
2. 150 picocuries per gram of any other NORM radionuclide provided that these concentrations are not exceeded at any time.

Equipment which contains NORM is exempt from the requirements of these regulations, except LAC 33:XV.1410, if the maximum radiation exposure level does not exceed 50 micro roentgens per hour at any accessible point.

Except as provided in LAC 33:XV.1408, 1410, and 1417, land is exempt from the requirements of this Chapter if it contains material at concentrations less than the limits specified below, in samples averaged over any 100 square meters with no single non-composited sample to exceed 60 picocuries per gram of soil:

1. 5 picocuries per gram or less of radium-226 or radium-228, above background, averaged over the first 15 centimeters, and 15 picocuries per gram above background averaged over each subsequent 15-centimeter-thick layer of soil; or
2. 30 picocuries per gram or less of radium-226 or radium-228, averaged over 15-centimeter-depth increments, provided the total effective dose equivalent (from the contaminated land) to individual members of the public (continually present) does not exceed 0.1 rem (1mSv) in a year.

The department may on a case by case basis approve alternate limits or measurement procedures for an exemption under LAC 33:XV.1404.A, B, or C.

Produced waters from crude oil and natural gas production are exempt from the requirements of NORM regulations.

For more information in NORM regulations, see LAC 33:XV.1401 *et seq.*

F. Is there a requirement to decontaminate equipment/or land contaminated with NORM?

There is no requirement to decontaminate NORM contaminated oil and gas production equipment that is used for its intended purpose. Any NORM material removed from equipment or land released for unrestricted use must be properly stored and disposed of according to regulations in LAC33:XV.Chapter 14.

G. Are there any licenses or permits required for facilities containing NORM?

DEQ requires general NORM licenses for facilities contaminated with NORM above the exemption levels given in LAC33:XV.1404. The General License in LAC33:XV.1408. is issued to mine, extract, receive, possess, own, use, store, and transfer NORM not exempt in LAC 33:XV.1404 without regard to quantity.

H. What are the steps needed to obtain a NORM license?

Facilities subject to the general license must notify the Office of Environmental Compliance by filing the Notification of NORM Form (Form RPD-36) with the DEQ. A confirmatory radiation survey using the required radiation survey instruments that show the presence of NORM in excess of exempt levels provided in LAC 33:XV.1404 shall be submitted to the Office of Environmental Compliance.

Each general licensee performing on-site maintenance on contaminated facilities, sites, or equipment or the excavation of land shall establish and submit to the Office of Environmental Compliance for approval written procedures as outlined in LAC 33:XV.1499.Appendix B to ensure worker protection and for the survey (or screening) of sites and equipment.

Each general licensee shall establish and submit to the Office of Environmental Compliance for approval written procedures for the survey (or screening) of sites and equipment to ensure that NORM is not released for unrestricted use except under the provisions of LAC 33:XV.1417.

Review the regulations in LAC33:XV.Chapter 14 for additional requirements for NORM licensees.

I. Are there any guidance documents regarding NORM sampling, handling and disposal?

The DEQ developed an Implementation Manual for Management of NORM in Louisiana - Draft 1995 document for guidance. A copy of the document can be downloaded from the DEQ website at: http://www.deq.louisiana.gov/portal/Portals/0/permits/Radiation/Implementation%20Manual%20for%20Management%20of%20NORM%20in%20Louisiana.pdf. Note that the regulations in LAC33:XV. Chapter 14 contains the current NORM regulations regardless of information in the draft NORM manual.

Also, consult the DEQ link at: http://www.deq.louisiana.gov/portal/DIVISIONS/WastePermits/ExplorationandProductionEPWaste.aspx

Chapter 7
Questions and Answers for Waste Issues

A. What agency regulates Exploration and Production (E&P) Waste?

Louisiana Department of Natural Resources (LDNR)
Office of Conservation
Environmental Division, Exploration & Production Waste Management Section
617 N. 3rd Street
Baton Rouge, Louisiana 70802
(225) 342-8244
http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=135&pnid=27&nid=86

B. Where are the regulations found regarding E&P waste?

E&P waste regulations can be found in the Louisiana Administrative Code: LAC 43: XIX. Subpart 1. Statewide Order No. 29-B.
http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=62&pnid=0&nid=37

Consult these rules for proper handling, testing, transport, disposal and reporting for E&P waste.

C. What is the definition of Exploration and Production (E&P) Waste?

E&P Waste – drilling wastes, salt water, and other wastes associated with the exploration, development, or production of crude oil or natural gas and which is not a hazardous waste or regulated by the provisions of, and, therefore, exempt from the Louisiana Hazardous Waste Regulations and the Federal Resource Conservation and Recovery Act. Some specific waste descriptions may be found in LAC 43:XIX.501.

E&P waste was formerly called Nonhazardous Oilfield Waste (NOW).

For more information regarding Exploration and Production (E&P) Waste go to DEQ link at:
http://www.deq.louisiana.gov/portal/DIVISIONS/WastePermits/ExplorationandProductionEPWaste.aspx

D. What are examples of Exploration and Production (E&P) Waste?

Examples of E&P wastes include:

- Salt water - produced brine or produced water (not regulated as a Solid Waste by DEQ),
- Oil-base drilling wastes (mud, fluids and cuttings),
- Water-base drilling wastes (mud, fluids and cuttings),
- Completion, workover and stimulation fluids,
- Production pit sludges,
- Storage tank sludge from production operations,
- Produced oily sands and solids,
- Produced formation fresh water,
- Rainwater from firewalls, ring levees and pits at drilling and production facilities,

- Washout water and residual solids generated from the cleaning of containers that transport E&P Waste and are not contaminated by hazardous waste or material,
- Nonhazardous natural gas plant processing waste solids,
- Pipeline test water which does not meet discharge limitations established by the appropriate state agency, or pipeline pigging waste, i.e., waste fluids/solids generated from the cleaning of a pipeline,
- Crude oil spill clean-up waste,
- Salvageable hydrocarbons bound for permitted salvage oil operators,
- Other E&P Waste not described above. A description of these wastes and written approval from the Office of Conservation is required and must be attached to the manifest prior to transport.

For a list of exploration and production waste go to:
http://dnr.louisiana.gov/assets/OC/env_div/ep_waste_sec/20110803_EP_TYPECODES.pdf

Information regarding E&P Waste can be found on the LDNR web page at:
http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=135&pnid=27&nid=86

E. What are non-exempt wastes?

Non-exempt wastes are wastes that do not meet the definition of E&P waste. These wastes cannot be handled or disposed of as E&P wastes. Examples of non-exempt wastes include:

- Unused fracturing fluids or acids,
- Gas plant cooling tower cleaning wastes,
- Painting wastes,
- Waste solvents,
- Oil and gas service company wastes such as empty drums, drum rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids,
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste,
- Refinery wastes,
- Liquid and solid wastes generated by crude oil and tank bottom reclaimers,
- Used equipment lubricating oils,
- Waste compressor oil, filters,
- Used hydraulic fluids,
- Waste in transportation pipeline related pits,
- Caustic or acid cleaners,
- Boiler cleaning wastes,
- Boiler refractory bricks,
- Boiler scrubber fluids, sludges, and ash,
- Incinerator ash,
- Laboratory wastes,
- Sanitary wastes,
- Pesticide wastes,
- Radioactive tracer wastes,
- Drums, insulation, and miscellaneous solids,

- Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons,
- Materials ejected from a producing well during blowdown,
- Waste crude oil from primary field operations,
- Light organics volatilized from exempt wastes in reserve pits, impoundments, or production equipment,
- Produced sand,
- Oil contaminated debris and soils off the E&P site,
- Molecular sieve for Gas dehydrator,
- Used batteries.

For more information regarding E&P wastes and non-exempt wastes consult: "Exemption of Oil and Gas Exploration and Production Wastes from Federal Hazardous Waste Regulations, January 1, 2002. EPA530-K-01-004." Obtain copy from EPA at: http://www.epa.gov/epawaste/nonhaz/industrial/special/oil/oil-gas.pdf

F. What agency regulates nonhazardous industrial solid wastes?

Louisiana Department of Environmental Quality (DEQ)
602 N. Fifth Street
Baton Rouge, LA 70802
Phone: 225-219-5337 or Toll Free 1-866-896-5337
www.deq.louisiana.gov

G. Where are the regulations found regarding nonhazardous industrial waste?

Solid waste regulations can be found in the Louisiana Administrative Code: LAC 33:VII. Solid Waste

H. What is the definition of nonhazardous industrial solid waste?

Industrial solid waste is defined as solid waste generated by a manufacturing, industrial, or mining process, or a waste that is contaminated by solid waste generated by such a process that is not a hazardous waste regulated under the USEPA federal hazardous waste rules in Subtitle C of RCRA.

This term does not include hazardous waste regulated under the Louisiana hazardous waste regulations or waste that is subject to regulation under the Louisiana Department of Natural Resources' Office of Conservation's Statewide Order No. 29-B or by other agencies.

I. What types of solid wastes are of concern for oil and gas operations?

Wastes regulated by the Louisiana Department of Natural Resources:
- Exploration and Production (E&P) Waste (also known as nonhazardous oilfield waste – NOW)

Wastes regulated by the Louisiana Department of Environmental Quality:
- Hazardous waste
- Nonhazardous Industrial solid waste

- Municipal solid waste – trash and garbage from household, commercial and institutional sources

J. What are examples of nonhazardous industrial waste?

Waste that do not meet the definition of a hazardous waste such as the following:

- Absorbent pads
- Blasting media
- Spent catalyst
- Scrap used tires
- Used oil that does not meet the definition of a hazardous waste
- Insulation/non-asbestos
- Asbestos Contaminated Material/Asbestos
- Other materials that meet the definition of nonhazardous industrial waste. For a complete list of DEQ codes for these waste types, go to: www.deq.louisiana.gov/portal/Portals/0/permits/sw/INDUSTRIAL%20WASTE%20CODE%20LIST.pdf

K. Are there any permits required for generators of nonhazardous industrial solid waste?

No DEQ permits are required for generators of nonhazardous industrial solid waste.

L. What are the generator notification requirements?

Prior to the initial transport of an industrial solid waste off-site, submit to the DEQ/Office of Environmental Services a generator notification form, obtained from the website or by contacting the DEQ/Office of Environmental Services,

Chemical analysis, analytical data and/or process knowledge is required to demonstrate the waste meets the definition of a nonhazardous industrial solid waste. This is needed to confirm that the waste is not a characteristic or listed hazardous waste as defined in LAC 33:V or by federal regulations.

Also obtain an industrial waste code number from the disposal facility.

M. What are the recordkeeping and reporting requirements for nonhazardous industrial solid waste?

Generators of industrial solid waste must maintain, for two years, all records concerning the types and quantities of industrial solid waste disposed of off-site.

Generators of industrial solid waste, within 30 days after they become subject to these regulations, notify the Office of Environmental Services in writing of such activity. Use the "Solid Waste Notification Form" available from the DEQ Office of Environmental Services or through the department's website (http://www.deq.louisiana.gov/portal/Portals/0/assistance/SW%20Comb%20Notification%20Form.pdf)

Annual reports of nonhazardous industrial solid waste must use the "Industrial Solid Waste Generator Annual Report Form." The Solid Waste Generator Annual Report covers generation of waste for the period beginning July 1 and ending June 30 of each year. This is to be submitted by August 1 following the end of each year. Questions regarding the form may be directed to the DEQ Financial Services Division at 225-219-3863.

N. Where can a facility dispose of nonhazardous industrial solid waste?

Dispose of nonhazardous industrial solid waste at a permitted Class 1 industrial solid waste facility.

O. What agency regulates hazardous wastes?

Louisiana Department of Environmental Quality (DEQ)
602 N. Fifth Street
Baton Rouge, LA 70802
Phone: 225-219-5337 or Toll Free 1-866-896-5337
www.deq.louisiana.gov

P. Where are the regulations governing hazardous waste?

Hazardous waste regulations can be found in the Louisiana Administrative Code: LAC 33:V. Hazardous Waste.

Q. What is the definition of hazardous wastes?

Consult the regulations in LAC33:V.109.Definitions for the definition of a hazardous waste.

A solid waste is considered a hazardous waste if

- It is not excluded from regulation as a hazardous waste under LAC 33:V.105.D; and
- It is specifically listed as a hazardous waste or meets certain regulatory specified characteristics of a hazardous waste.

R. What are examples of hazardous waste?

Wastes that could meet the definition of hazardous waste include:

- Listed Wastes, which are wastes that EPA has determined as hazardous. The lists include the F-list (wastes from common manufacturing and industrial processes), K-list (wastes from specific industries), and P- and U-lists (wastes from commercial chemical products)
- Characteristic Wastes which are wastes that do not meet any of the listings above but that exhibit ignitability, corrosivity, reactivity, or toxicity.

Wastes that meet the definition of hazardous waste include waste paints, paint associated wastes, waste solvents, used blasting material contaminated with hazardous metals or chemicals and wastes contaminated with listed and/or characteristic hazardous wastes.

Proper product knowledge and/or chemical analysis is needed to determine if a waste is considered a hazardous waste.

S. Are there any permits required for generators of hazardous wastes?

DEQ permits are not required for generators of hazardous wastes provided that the generator does not dispose of hazardous waste onsite and storage time is less than the allowable accumulation time limits.

T. What is a generator of hazardous waste?

A hazardous waste generator is any person or site whose processes and actions create hazardous waste. Generators are divided into three categories based upon the quantity of waste they produce:

1. Large Quantity Generators (LQGs) generate 1,000 kilograms per month or more of hazardous waste, more than 1 kilogram per month of acutely hazardous waste, or more than 100 kilograms per month of acute spill residue or soil.
2. Small Quantity Generators (SQGs) generate more than 100 kilograms, but less than 1,000 kilograms, of hazardous waste per month.
3. Conditionally Exempt Small Quantity Generators (CESQGs) generate 100 kilograms or less per month of hazardous waste, or 1 kilogram or less per month of acutely hazardous waste, or less than 100 kilograms per month of acute spill residue or soil.

U. What is a Hazardous Waste Generator ID number and how do know if I need one?

A generator must obtain an EPA ID number before treating, storing, disposing, or transporting (or offering for transport) hazardous waste. EPA ID numbers are site-specific numbers assigned to generators, transporters, and treatment, storage, or disposal facilities (TSD), and need only be obtained once, although the generator should update the DEQ if waste activities change.

A generator is forbidden from offering hazardous waste to any transporter or treatment, storage, and disposal facility (TSDF) that does not also have an EPA ID number.

In the State of Louisiana, Conditionally Exempt Small Quantity Generators (CESQGs), are required to notify the DEQ of it's hazardous waste generation activity and obtain EPA ID number, but are otherwise not subject to the Louisiana Hazardous Waste Regulations. Reference: LAC 33:V.108.

You can obtain a copy of the DEQ"s "HAZARDOUS WASTE NOTIFICATION FORM (HW-1)" form to request an EPA hazardous waste generator ID number from the link below: http://www.deq.state.la.us/portal/tabid/91/Default.aspx

V. What are some of the requirements for generators of hazardous waste?

The table below summarizes some of the requirements for generators of hazardous waste.

	CESQGs	SQGs	LQGs
Quantity Limits	≤100 kg/month ≤1 kg/month of acute hazardous waste ≤100 kg/month of acute spill residue or soil	Between 100 - 1,000 kg/month	≥1,000 kg/month >1 kg/month of acute hazardous waste >100 kg/month of acute spill residue or soil
EPA ID Number	Not required	Required	Required
On-Site Accumulation Quantity	≤1,000 kg ≤1 kg acute ≤100 kg of acute spill residue or soil	≤6,000 kg	No limit
Accumulation Time Limits	None	≤180 days or ≤270 days (if greater than 200 miles)	≤90 days
Storage Requirements	None	Basic requirements with technical standards for tanks or containers)	Full compliance for management of tanks, containers, drip pads, or containment buildings
Manifest	Not required	Required	Required
Biennial Report	Not required	Not required	Required
Personnel Training	Not required	Basic training required	Required
Contingency Plan	Not required	Basic plan	Full plan required
Emergency Procedures	Not required	Required	Full plan required

W. Where can a facility dispose of hazardous waste?

Dispose of hazardous waste at a permitted hazardous waste treatment, storage and disposal facility (TSDF). Use only transporters that have received an EPA identification number.

X. What shipping documentation is required for hazardous waste transportation?

A generator who transports or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a Uniform Hazardous Waste Manifest using Forms 8700–22 and 22a. Uniform Hazardous Waste Manifest forms must be obtained only from a source that has been approved by the EPA Manifest Registry to print and distribute the form.

Uniform Hazardous Waste Manifest forms can be obtained from the following EPA link. http://www.epa.gov/wastes/hazard/transportation/manifest/registry/index.htm

Y. What are the recordkeeping and reporting requirements for generators of hazardous wastes?

The following are a list of records to be kept by generators of hazardous waste. The recordkeeping requirements may vary due to the generator status (LQG, SQG, CESQG, etc.).

Records	Generator Applicability
Generators must maintain records associated with hazardous waste disposal for three years.-	All Generators
Waste determinations either by laboratory analysis or process knowledge demonstration.	All Generators
Annual reports for hazardous waste disposal are required to be submitted to the DEQ Office of Environmental Services by March 1 of each year.	LQG only
Signed generator and destination copies of hazardous waste manifests. Land disposal restriction forms which accompany the manifests are to be kept with the manifests.	LQG, SQG – required CESQG-dependent on disposal site
Universal waste and used oil manifests	All generators
Exception reports must be submitted to the DEQ if copies of the hazardous waste manifest are not sent to the generator from the owner or operator of the designated facility within the timeframe specified by DEQ regulations.	All Generators
1. Contingency plans 2. Written emergency procedures	1. LQG 2. SQG
1. Full Personnel Training program with job titles, description, & required training. 2. Basic hazardous waste training received 3. Annual refresher trainings	1. LQG 2. SQG 3. LQG & SQG
LQG Waste Minimization Plan signed by registered LA Professional Engineer	LQG only
Applicable store unit, such as containers and tanks, inspection records	LQG and SQG

For more information on recordkeeping and reporting requirements, refer to: Reference: LAC33:V.1111.

Chapter 8
Environmental Leadership Program

The Louisiana Environmental Leadership Program (ELP) is a voluntary program led by the Louisiana Department of Environmental Quality (DEQ) in partnership with businesses, federal entities, municipalities, academic and community organizations to promote a cleaner and better environment for Louisiana. Any organization committed to improving the quality of Louisiana's environment through pollution prevention, waste reduction and/or other environmental improvements is eligible to join the program as a participating member.

The Louisiana DEQ will encourage oil and gas exploration and production industry participation in the ELP through alignment of the Environmental Results Program. Participating businesses can benefit from membership in the ELP by:

- Receiving public recognition of their efforts;
- Providing opportunity for networking with businesses and agencies for resource sharing; and
- Participating in the development of regulatory and administrative incentives.

By joining the program businesses are recognized by the public as an organization committed to maintaining and improving the quality of Louisiana's environment. The secretary of the LDEQ acknowledges participation by letter and each new member is awarded a membership certificate at the annual awards ceremony.

Members of the ELP can participate in periodic meetings, conferences, and seminars/workshops sponsored by the Program. Members will be able to obtain information and resources on various pollution prevention opportunities and other environmental management and conservation topics as well as hear from other leaders around the state that are implementing projects.

One of the highlights of the ELP is that members can participate and be recognized in the annual Environmental Leadership Awards for outstanding achievement in Pollution Prevention, Community Environmental Outreach, Outstanding Environmental Ordinance & Enforcement and Environmental Management Systems. Awardees in these categories are recognized annually by the LDEQ secretary at a highly publicized ceremony.

Participants in this program must commit to supporting the ELP core principles outlined below:

- Participants should minimize adverse impacts on human health and the environment; this should be reflected in their policies and procedures, regulatory and business decisions;
- Participants should work towards implementing internal management systems which lead to continuous improvement in their environmental performance;
- Participants should use the waste management hierarchy, (source reduction, recycling, treatment, and disposal) as guidance for managing environmental issues and set goals to help improve the state's air, water, and land;
- Participants should be proactive in communicating with stakeholders regarding environmental matters and concerns
- Submit a completed ELP Enrollment Form.

To become a member of the Louisiana Environmental Leadership Program, follow these steps:

- Submit a brief plan that highlights and describes your pollution prevention and waste reduction goals.
- Participating members must provide yearly updates so the ELP can track progress towards goals.
- Membership is renewed every three years upon demonstrated measurable results.

Membership Certification includes acceptance of this statement: "I commit to the above guiding principles set forth by the Environmental Leadership Program and will develop and work towards goals to improve and preserve Louisiana's environment."

This is strictly a voluntary program. Plans and goals may be modified at any time, and not meeting the goals will not be used by the LDEQ in any judgmental manner whatsoever. Details of the Louisiana Environmental Leadership Program can be found at the following website:

http://www.deq.louisiana.gov/portal/PROGRAMS/EnvironmentalLeadershipProgramELP.aspx

Examples of eligible project could include:

1. Implementing air emission control projects not required by facility air permit or not required by regulation or enforcement action/agreement. This can include:
    a. Implement best practices in EPA Gas STAR program (www.epa.gov/gasstar).
    b. Installing vapor recovery systems to recover natural gas from storage tanks or other vessels.
    c. Installing flares to control VOC emissions from storage tanks and other venting systems.
    d. Replacing existing natural gas pneumatic devices with low bleed devices.
    e. Using new technology that is lower emitting than conventional technology.
    f. Reducing emissions at a facility to below Title V major source levels (would be based on emission controls, emission source elimination or process changes and NOT due to a reduction in facility throughput).
    g. Installing catalytic converters on engines.
    h. Using combined heat and power technology.
    i. Recycling/reusing waste heat.
2. Converting to and/or constructing low energy use buildings according to EPA Energy STAR (www.energystar.gov)
3. Implementing a beneficial environmental type project that is NOT related to a compliance issue.
4. Participating in annual Beach Sweep in Louisiana
5. Cleaning up trash from a beach, stream shore or lake shore not associated with Beach Sweep
6. Adopting a road for cleanup of trash and debris. Document amount of trash/debris recovered annually and number of hours spent to recover trash/debris.
7. Modifying a coastal or territorial seas oil and gas production facility to be a zero water discharge facility.

8. Hosting a compliance seminar to help oil and gas operators comply with environmental regulations.
9. Developing new technology that results in lower amounts of air or water pollution or results in less solid waste generation.
10. Modifying operations such that the processes generate less waste.
11. Implementing and documenting the use of an office waste recycling plan to increase the recycling of following:
    a. Paper
    b. Plastics
    c. Metal cans
    d. Obsolete electronic gear (computers, printers, etc.)
    e. Lead-acid batteries
    f. Universal wastes
    g. E-wastes
12. Implementing projects for water and waste water recycling/reuse.
13. Recycling and/or reusing water and/or chemicals
    a. Process/Cooling Water
    b. Fracturing Water
    c. Coolant media

Chapter 9
List of Important Regulatory Contacts

Important Regulatory Contact List

Louisiana Department of Environmental Quality (DEQ)
Address: 602 N. Fifth Street, Baton Rouge, LA 70802
Main Line: (225) 219-5337
Emergency Line: (225) 342-1234
Water Pollution Control: (225)765-0634
Single Point of Contact (SPOC): (225) 219-3640
Website: www.deq.louisiana.gov/portal
Email: webmaster-deq@la.gov
Online Reporting: http://www.deq.louisiana.gov/apps/forms/irf/forms/

Louisiana State Police (LSP)
Address: 7919 Independence Blvd. Baton Rouge, LA 70806
Headquarters Main Line: (225) 925-6006
HazMat Hotline: (877) 925-6595
Website: www.lsp.org
Email: lspweb@dps.la.gov
Local Emergency Planning Committees Contacts: http://www.lsp.org/pdf/rtk_lepcphone.pdf

National Response Center (NRC)
Address: 2100 2nd Street, SW, Washington, DC 20593-0001
Emergency Line: (800) 424-8802
Direct Line: (202) 267-2675
Website: www.nrc.uscg.mil
Email: HQS-DG-lst-nrcweb@uscg.mil
Online Reporting: http://www.nrc.uscg.mil/apex/f?p=201:2:4493796461326066::NO:::

Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP)
Main Line: (225) 925-7500
Website: http://gohsep.la.gov/
Key Contact List: http://gohsep.la.gov/contact.aspx
Parish Homeland Security & Emergency Preparedness Contact Numbers:
http://gohsep.la.gov/parishoepnumbers.aspx
Emergency Response Website: http://www.emergency.louisiana.gov/

Louisiana Department of Natural Resources (LDNR) – Office of Conservation
Address: 617 North Third Street, Baton Rouge, LA 70802
Main Line: (225) 342-8244
Hazardous Material: (225) 925-6595
Oilfield Incident: (225) 342-5540
Oilfield Waste/Injection Wells: (225) 342-5515
Pipelines: (225) 342-5505
Website: http://dnr.louisiana.gov/
SONRIS Website: http://sonris.com/

Email: oocinfo@la.gov
Online Reporting:
http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=84&pnid=0&nid=32#Pipeline Division-Forms

Louisiana Department of Natural Resources – Coastal Management Division
Address: Post Office Box 44487, Baton Rouge, Louisiana 70804-4487
Main Phone Line: (225) 342-7591
Web site: http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=85&ngid=5
Email: ocminfo@la.gov

Environmental Protection Agency (EPA) – General Contact
Region VI Address: 1445 Ross Avenue, Suite 1200, Dallas, TX 75202
Region VI Main Line: (214) 665-2200
Website: http://www.epa.gov/
Online Reporting: http://www.epa.gov/compliance/complaints/index.html

Environmental Protection Agency (EPA) – Region VI Air Permit Contact
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Louisiana Department of Public Safety and Corrections (LDPS)
Oil Spill Coordinator's Office
Address: 290 E. Airport Drive, Suite C, Baton Rouge, LA 70806
Main Line: (225) 925-6606
Website: http://www.losco.state.la.us/

Louisiana Department of Transportation (LDOT)
Address: 1201 Capitol Access Road, Baton Rouge, LA 70802
Customer Service: (877) 452-3683
Environmental Section: (225) 242-4502
Website: www.deq.louisiana.gov/portal
Email: dotdcs@la.gov

Louisiana Department of Wildlife and Fisheries (LDWF)
Address: 2000 Quail Drive, Baton Rouge, LA 70808
Main Line: (225) 765-2800
Violation Reporting: (800) 442-2511
Oiled Wildlife Reporting: (866) 557-1401
Well site development on WMAs: (225) 765-2819
Website: http://www.wlf.louisiana.gov/

LDWF Seismic Exploration Activity Program
Contact: Joe Maryman (jmaryman@wlf.la.gov)
Phone: 225-765-2380

Louisiana Poison Control Center (LPCC)
Address: 1455 Wilkinson Street, Shreveport, LA 71130

Emergency Line: (800) 222-1222
Website: www.aapc.org
Email: info@aapcc.org

U.S. Department of Labor - Occupational Safety & Health Administration (OSHA)
Region VI Address: 525 Griffin Street, Suite 602, Dallas, Texas 75202
Emergency Line: (800) 321-6742
Region VI Main Line: (972) 850-4145
Website: www.osha.gov/index.html
Email Link: http://www.osha.gov/ecor_form.html
Online Reporting: http://www.osha.gov/pls/osha7/eComplaintForm.html

Louisiana Office of Cultural Development
Division of Historic Preservation
P.O. Box 44247
Baton Rouge, LA 70804-44247
Main line: (225) 219-4596
Website: www.crt.state.la.us/hp/Section106.aspx
Email: mvarnado@crt.la.gov

Louisiana Office of Cultural Development
Louisiana Division of Archaeology
P.O. Box 44247
Baton Rouge, LA 70804
Main Line: (225) 342-8170
Website: www.crt.state.la.us/archaeology/index.aspx
Email at archaeology@crt.la.gov

U.S. Army Corps of Engineers,
New Orleans District, Operations Division, Regulatory Branch,
P.O. Box 60267
New Orleans, Louisiana 70160
Main Line: (504) 862-2201
Website: www.mvn.usace.army.mil/index.asp

Chapter 10
Site Inspection Checklists

The following pages are designed to step a facility operator through questions to ensure an understanding of the environmental requirements of a particular site. These checklists will also be made available on the DEQ website for use in an electronic format at the following web site:
http://www.deq.louisiana.gov/portal/PROGRAMS/EnvironmentalResultsProgram.aspx

Oil and Gas Production Facility Solid Waste Compliance Checklist

Company Name: **Facility Name:** **Current Permit Number:** **AI Number:**	

1	Nonhazardous Industrial Solid Waste	Yes	No	N/A	Comments
1.a	Does the facility generate nonhazardous industrial solid waste?				
1.b	Is the facility submitting required annual waste disposal reports?				
1.c	Is the nonhazardous industrial solid waste properly segregated and stored?				
1.d	Is the solid waste stored such that no nuisance, health hazard, or detriment to the environment has occurred or is occurring?				
1.e	Do the containers used for solid waste storage prevent access by rodents and insects; minimize the escape of odors to the maximum extent possible; and keep out water and prevent leakage?				
1.f	If solid waste is stored in tanks, are the tanks designed, constructed, and operated to prevent release of their solid waste contents into the surrounding environment?				
2	**Nonhazardous Industrial Solid Waste Corrective Actions**	**Yes**	**No**	**N/A**	**Comments**
2.a	Are there any corrective actions needed to comply with nonhazardous industrial solid waste regulations? Use separate sheet if necessary to document corrective actions needed.				
3	**Naturally Occurring Radioactive Material (NORM)**	**Yes**	**No**	**N/A**	**Comments**
3.a	Has a NORM confirmatory survey been conducted for the facility?				
3.b	Does the facility contain any NORM?				
3.c	Is any process operating equipment contaminated with NORM?				
3.d	Is any land or ground area contaminated with NORM?				
3.e	Are NORM contaminated equipment or land properly surveyed?				
3.f	Is a General NORM license required for the facility?				
3.g	Does the facility have a General NORM license?				Permit No.
3.h	Are there any containers storing NORM waste on location?				
3.i	If NORM containers on location, what is the date of generation of the oldest container?				
3.j	Any NORM waste in a container being stored for more than 90 days from the date of generation?				

3.k	If any NORM waste stored for more than 90 days from generation, has licensee submitted a written NORM waste management plan and received authorization from DEQ to store waste longer?				
3.l	Any NORM waste in a container being stored for more than 365 days from the date of generation?				
3.m	Any NORM contaminated surface equipment removed from service and not used for its designated function (excluding wellheads)?				
3.n	If have NORM contaminated equipment in 3.m, was the equipment decontaminated of NORM within 1 year of being removed from service?				
4	**NORM Corrective Actions**	**Yes**	**No**	**N/A**	**Comments**
4.a	Are there any corrective actions needed to comply with NORM regulations? Use separate sheet if necessary to document corrective actions needed.				
5	**Hazardous Waste**	**Yes**	**No**	**N/A**	**Comments**
5.a	Does the facility generate hazardous waste?				
5.b	Does the facility have an EPA Hazardous Waste Generator Identification Number?				
5.c	Is the facility considered a Conditionally Exempt Small Quantity Generator, Small Quantity Generator or Large Quantity Generator?				
5.d	What types of hazardous waste generated at the facility?				
5.e	If hazardous waste on location, what is the date of generation of the oldest container?				
5.f	If the facility is a Large Quantity Generator, are wastes stored for less than or equal to 90 days?				
5.g	If the facility is a Small Quantity Generator, are wastes stored for less than or equal to 180 days or less than or equal to 270 days (if greater than 200 miles)?				
5.h	Are containers of hazardous waste properly marked as Hazardous Waste and the start accumulation date clearly visible?				
5.i	Is there adequate containment for storage area for hazardous waste? (Containment must have capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination.)				
5.j	Are there any leaking containers storing hazardous waste?				
5.k	Are weekly inspections of hazardous waste storage areas conducted and documented?				
5.l	Are containers holding hazardous waste closed during storage, except when it is necessary to add or remove waste?				
5.m	Are containers of hazardous waste stacked in such a manner that each container identification label can be read from the access aisle?				

5.n	Are copies of completed Hazardous Waste Manifests for past three years available for inspection?				
5.o	Are copies of Land Disposal Restriction notifications available for inspection?				
5.p	Are records available of any test results, waste analyses, or other determinations for at least three years from the date that the waste was last sent to an on-site or off-site treatment, storage, or disposal facility?				
5.q	Is a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report available for inspection?				
5.r	If the facility is a LQG, does the facility have a Waste Minimization Plan certified by a LA registered PE?				
5.s	Does the facility have a Contingency Plan or written Emergency Procedures which describe actions facility will take if hazardous waste is spilled, catches fire, or explodes?				
5.t	Does the facility have hazardous waste management training program for its employees who handle hazardous waste? If so, are the records available for inspection?				
6	**Hazardous Waste Corrective Actions**	**Yes**	**No**	**N/A**	**Comments**
6.a	Are there any corrective actions needed to comply with hazardous waste regulations? Use separate sheet if necessary to document corrective actions needed.				
7	**Universal Waste**	**Yes**	**No**	**N/A**	**Comments**
7.a	Does the facility generate any of the following universal waste: fluorescent lamps, batteries, electronics, or antifreeze?				
7.b	Are the universal waste stored in an environmental sound manner (closed structurally sound containers, etc)?				
7.c	Are the containers labeled to describe the universal waste (Used fluorescent bulb, used batteries, etc.)?				
7.d	Do the universal waste containers have an accumulation date of less than one year?				
7.e	Does the facility have copies of universal waste shipping documents and are these documents available for review?				

Oil and Gas Production Facility Air Quality Compliance Checklist

Company Name: **Facility Name:** **Current Permit Number:** **AI Number:**	

1	General	Yes	No	N/A	Comments
1.a	Does the facility have an air permit?				
1.b	Is the air permit current (not expired)?				Expiration date:
1.c	List type of permit. (SOGA, Minor Source, Minor Source General, Title V, Other)				
1.d	Does the facility have a hard copy of the current air permit on-site?				
1.e	Does the process description match the permit (or application)? If no, list differences or changes.				
1.f	Are all the emission sources located onsite listed in the air permit?				
1.g	List any emission sources at the facility that are not listed in the permit.				
1.h	Have there been any unauthorized emissions from the facility in the past twelve months?				
1.i	If yes to question 1.i., is there a copy of documentation proving that the unauthorized emissions were reported to the Department of Public Safety (DPS)?				
1.j	Are oil and natural gas throughput rates and equipment runtime hours below the limits listed in the permit?				
1.k	If no to any of the questions above, has a modification or notification been submitted to LDEQ? List date of submittal in comment section.				
1.l	Is the facility required to submit annual emissions inventory reports (ERIC reports)? If yes, list most recent submittal date.				
1.m	Is the facility required to submit Title V Annual Certifications and Semiannual Monitoring Reports? If yes, list most recent submittal date.				
1.n	Is there any smoke being emitted from fuel burning equipment at the facility?				
1.o	Does the facility process sweet or sour gas (sour gas has a concentration greater than 24 ppmv of H2S)?				
1.p	Does the facility have a written housekeeping plan that addresses all the elements of LAC 33.III.2113?				
1.q	Is facility complying with the housekeeping plan?				
2	**Engines**	**Yes**	**No**	**N/A**	**Comments**
2.a	Are there any engines at the facility over 500 HP?				

2.b	Is stack testing (initial and semiannual) being performed for engines over 500 HP as required by LDEQ policy?				
2.c	Are any engines equipped with catalytic converter control devices? If yes, list these engines in the comment section.				
2.d	Is stack testing (initial and annual) being performed for engines over 500 HP equipped with catalytic converters as required by LDEQ policy? Review current stack test report.				
2.e	If stack test results are not within permit limits as per LDEQ policy, has a modification or notification been submitted to LDEQ?				
2.f	Are any natural gas engines located at the facility applicable to 40 CFR Part 60 Subpart JJJJ?				
2.g	If yes to question 2.f., are sources applicable to 40 CFR Part 60 Subpart JJJJ certified engines operating in a certified manner?				
2.h	If no to question 2.g., is testing being performed on applicable engines?				
2.i	Are any diesel-fired engines located at the facility applicable to 40 CFR Part 60 Subpart IIII?				
2.j	If yes to question 2.i., are sources applicable to 40 CFR Part 60 Subpart IIII certified engines operating in a certified manner?				
2.k	If no to question 2.j., is testing being performed on applicable engines?				
2.l	Are engines compliant with requirements of 40 CFR Part 63 Subpart ZZZZ, if applicable?				
	For engines applicable to 40 CFR Part 63 Subpart ZZZZ, are appropriate emission controls in place?				
2.m	For engines applicable to 40 CFR Part 63 Subpart ZZZZ, is the appropriate testing being performed?				
2.n	Are the stack test results (whether state or federal testing is required) within permitted limits?				
2.o	Is the testing company LELAP accredited?				
3	**Glycol Dehydration Units**	**Yes**	**No**	**N/A**	**Comments**
3.a	Are there any glycol dehydrators located at the facility? If yes, specify type. (TEG, DEG, EG)				
3.b	If yes to 3.a., are uncontrolled emissions from each still column vent(s) less than 9 tons per year (tpy)?				
3.c	If uncontrolled emissions are greater than 9 tpy, is a condenser control device being used on the unit?				
3.d	Does the control efficiency of the condenser meet the requirements of LAC 33.III.2116? (70% or greater for units constructed before October 20, 1994 and 85% or greater for units constructed on or after October 20, 1994)				

3.e	If the glycol dehydrator was constructed prior to October 20, 1994, are records of condenser exit temperatures being kept?				
3.f	Does the type of emission control installed and operating correspond to how it is listed in the permit? (controlled by a condenser or uncontrolled, emissions from the unit piped to burner/reboiler or flare, etc.)				
3.g	Does the design capacity (MMBTU/HR) of the burner/reboiler for the unit correspond to what is listed in the permit?				
3.h	Are records of the daily gas processing rate and glycol circulation rate being kept?				
3.i	Are the actual gas processing rates and glycol circulation rates below the permitted rates used in a GLYCalc or other simulation program?				
3.j	If the amount of gas processed by the unit is greater than 3 MMSCFD, are benzene emissions from the unit below 1 TPY as per 40 CFR Part 63 Subpart HH?				
3.k	Is the dehydrator compliant with all of the requirements of 40 CFR Part 63 Subpart HH?				
4	**Storage Tanks**	**Yes**	**No**		**Comments**
4.a	Are there any crude oil/condensate and/or water storage tanks located at the facility?				
4.b	Does the capacity of each storage tank correspond to its permitted capacity?				
4.c	Are records of the oil and/or water throughputs being processed being kept?				
4.d	Are the actual oil and/or water throughput rates below the limits listed in the permit?				
4.e	If the storage tanks are permitted with emission controls, are the control devices in operation? List type of control device used.				
4.f	Are records of control device downtime being kept? List reasons for downtime.				
4.g	Are the storage tanks store crude oil/condensate considered to be "prior to custody lease transfer" as referenced in LAC 33.III.2103?				
4.h	Are the storage tanks equipped with a submerged fill pipe if required by LAC 33.III.2103?				
4.i	Are the sizes of the storage tanks less than 10,000 BBLs?				
4.j	Are all storage tanks exempt from 40 CFR Part 60 Subparts K, Ka and Kb? If no, list applicable tanks.				
	If storage tanks required to meet 40 CFR Part 60, Subparts K, Ka or Kb, what method is used for compliance?				

4.k	Does flash gas from the storage tanks exceed the VOC limits of LAC 33.III.2104 causing the storage tanks to require controls?				
5	**Crude Oil/Condensate Loading Operations**	**Yes**	**No**	**N/A**	**Comments**
5.a	Specify the type of volatile organic compounds (VOCs) are loaded (crude oil, condensate, diesel, methanol, other - specify).				
5.b	What is the vapor pressure in psia of the product loaded?				
5.c	For crude oil/condensate loading operations used by the facility specify the method used: (pipeline, tank truck, barge, ship, other - specify)				
5.d	Is the type of loading listed in the air permit the actual type of loading used for the facility?				
5.e	Is the amount of crude oil/condensate loaded annually below the limits listed in the air permit?				
5.f	If required by the air permit, are annual crude oil/condensate loadout reports being prepared and submitted?				
5.g	Does the facility load volatile organic compounds (VOCs) that are not exempt from VOC loading rules in LAC 33:2107.				
5.h	Are loading operations for nonexempt VOCs in compliance with LAC33:2107?				
5.i	Are there any marine loading operations on location?				
5.j	If yes to Item 5.c is the facility required to comply with control requirements in LAC 33:III.2108.Marine Vapor Recovery?				
5.k	If yes to Item 5.d, is the facility complying with control requirements in LAC 33:III.2108.Marine Vapor Recovery?				
5.l	Are any emission control methods being used for loading operations? Specify methods used. (flare, vapor balance, other - specify)				
6	**Flares**	**Yes**	**No**	**N/A**	**Comments**
6.a	Is there a flare operating at the facility that is designed to combust natural gas from the facility?				
6.b	Is the flare being used for emergency upsets or is it routinely combusting gas? List emission sources routed to the flare.				
6.c	Is the amount of gas that is routed to the flare being metered?				
6.d	Are the sources that are permitted as being routed to the flare actually piped to the flare? List sources piped to flare.				
6.e	Is the flare being monitored for the presence of a flame? Specify method used to detect the presence of a flame. (automatic re-ignition device, heat sensing device or visual check)				

6.f	Has a corrective action plan for re-lighting the flare been developed and is it ready for immediate implementation in the event the flare needs to be re-lit?				
6.g	Is smoke being emitted from the flare?				
	Is the flare required to meet the New Source Performance Standard (NSPS) requirements in 40 CFR 60.18?				
6.h	Has an annual gas analysis been performed to ensure that the heat content of the flare is greater than 300 BTU/scf?				
7	**Gas Sweetening Units**	**Yes**	**No**	**N/A**	**Comments**
7.a	Are there any gas sweetening units located at the facility?				
7.b	Is the facility located an onshore at a gas processing plant?				
7.c	Is the gas sweetening unit located at an onshore gas processing plant with a design capacity of the unit less than 2 long tons per day (1016 kgs per day) of H2S expressed as sulfur as per 40 CFR Part 60 Subpart LLL?				
7.d	Does the gas sweetenting unit qualify as a new source under 40 CFR Part 60 Subpart LLL?				
7.e	Does the design of the unit correspond to how it is permitted? (e.g., inlet gas H2S content, emission controls, operating parameters)				
7.f	Describe the type of emission control (if any) used to reduce emissions from the gas sweetening unit regenerator. (sulfur recovery unit, flare, thermal oxidizer, other - specify)				
8	**Natural Gas Processing Plants**	**Yes**	**No**	**N/A**	**Comments**
8.a	Is the facility considered a gas processing plant (SIC Code = 1321; NAICS Code = 211112)?				
8.b	Are there any Joule-Thomson (JT units) or refrigeration units used for natural gas liquids extraction operating at the facility?				
8.c	Does 40 CFR Part 60 Subpart KKK apply to the facility?				
8.d	If yes to 8.c, is facility compliant with monitoring requirements in 40 CFR Part 60 Subpart KKK?				
8.e	Does LAC 33:III.2121 Fugitive Emission Control apply to the facility?				
8.f	If yes to 8.e, is facility compliant with monitoring requirements in LAC 33:III.2121?				
9	**Turbines**	**Yes**	**No**	**N/A**	**Comments**
9.a	Are there any turbines operating at the facility?				
9.b	What type of fuel is being used by each turbine operating at the facility? (natural gas, diesel, dual-fuel)				
9.c	Has an initial stack test been performed on the turbine(s) according to LDEQ policy?				

9.d	If yes, does the turbine have a heat input at peak load greater than or equal to 10 MMBTU/HR?				
9.e	Was the turbine constructed, modified or reconstructed after October 3, 1977, which would make it subject to the requirements of 40 CFR Part 60 Subpart GG?				
9.f	If applicable to the requirements of 40 CFR Part 60 Subpart GG, are the turbines compliant with the operational standards, emissions testing and fuel gas monitoring of this subpart?				
9.g	Was the turbine constructed, modified or reconstructed after February 18, 2005, which would make it subject to the requirements of 40 CFR Part 60 Subpart KKKK?				
9.h	If applicable to the requirements of 40 CFR Part 60 Subpart KKKK, are the turbines compliant with the operational standards, emissions testing and fuel gas monitoring of this subpart?				
10	**Flash Gas Sources**	**Yes**	**No**	**N/A**	**Comments**
10.a	List all flash gas sources at the facility that are venting to atmosphere. (heater treaters, separators, tanks, other - specify)				
10.b	Do any flash gas sources require controls according to LAC 33.III.2104.Crude Oil and Condensate?				
10.c	Are all flash gas sources that are permitted as controlled operating with permitted controls?				
11	**Fugitive Emissions**	**Yes**	**No**	**N/A**	**Comments**
11.a	For facilities applicable to 40 CFR Part 60 Subparts VV or KKK, are pumps, compressors, pressure relief devices, valves and sampling systems being monitored for leaks as specified in 40 CFR 60.882-2?				
11.b	Are there any visible signs or sounds of leaks of oil and/or gas at the facility? If yes, specify the source(s) of the leak(s).				
12	**Compressor Seals**	**Yes**	**No**	**N/A**	**Comments**
12.a	Are there compressors located at the facility? If yes, specify type. (centrifugal or reciprocating)				
12.b	For reciprocating engines, are the rod packing systems being replaced after every 26,000 hours of operation?				
12.c	Are any centrifugal compressors equipped with dry seal systems?				
13	**Pneumatic Devices**	**Yes**	**No**	**N/A**	**Comments**
13.a	Are there any pneumatic pumps or controllers that use natural gas on site?				
13.b	Are these pneumatic devices accounted for in the permit as fugitive emissions or as specific sources?				

14	Atmospheric Vents	Yes	No	N/A	Comments
14.a	Are there any atmospheric vents located at the facility that release directly to atmosphere? If yes, specify whether the vents are used for emergency or routine releases.				
14.b	List equipment routed to the atmospheric vent.				
14.c	Are vent volumes released being tracked? If so, specify tracking method. (meter, calculation based on throughput, other - specify)				
15	**Line Heaters, Heater Treaters, Reboilers**	**Yes**	**No**	**N/A**	**Comments**
15.a	Is there any smoke or visual soot emitted from onsite line heaters, heater treaters or reboilers?				
15.b	Is heater treater flash gas vented to atmosphere, burned in flare or routed back to system? Specify.				
15.c	If heater treater flash gas is vented to atmosphere or flare, is this reflected in the air permit?				
16	**Corrective Actions**	**Yes**	**No**	**N/A**	**Comments**
16.a	Are there any corrective actions needed to comply with air quality regulations? Use separate sheet if necessary to document corrective actions needed.				

Oil and Gas Production Facility Water Quality and Spill Prevention Compliance Checklist

Company Name: **Facility Name:** **Current Permit Number:** **AI Number:**	

1	Water Permitting	Yes	No	N/A	Comments
1.a	Is the facility required to have a water discharge permit?				
1.b	Does the facility have a current water discharge permit?				Expiration date:
1.c	Is a facility representative familiar with provisions of its wastewater discharge permit, including any other conditions or limitations, available either by phone or in person at the facility during all hours of operation?				
1.d	Are there any outfalls or discharges at the facility that are not authorized by the permit?				
1.e	Has the facility had a discharge of storm water (or via a storm water outfall) resulting in a discharge of a reportable quantity under 40 CFR 117.21 or 40 CFR 302.6 since November 16, 1987?				
1.f	Has the facility had a discharge of storm water (or via a storm water outfall) resulting in a discharge of a reportable quantity under 40 CFR 110.6 since November 16, 1987?				
1.g	If yes to question 1.e or 1.f and the facility is not covered by LAG330000 or LAG260000, has operator applied for and/or obtained a LPDES Multi-Sector General Permit (MSGP) for the facility?				
1.h	If yes to 1.e or 1.f, has the facility prepared and implemented a Storm Water Pollution Prevention Plan?				
1.i	Is the permittee monitoring all discharges as required by the water permit?				
1.j	Is all sampling and sample analysis conducted according to EPA approved methods (40 CFR 136)?				
1.k	Are all records required by the permit maintained for a period of at least 3 years?				
1.l	Is the permittee properly operating and maintaining all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit?				
1.m	Is there a visible sheen or residual oil deposits or stains in the drainage area downstream of any discharge point?				

1.n	Is there oil on soil, equipment or decking that could cause a sheen on receiving water during next rain event?				
1.o	Does stormwater runoff or deck drainage exceed 100 mg/L chemical oxygen demand, 50 mg/L total organic carbon, or 15 mg/L oil and grease?				
1.p	Does the maximum chloride concentration of any stormwater discharge exceed two times the ambient concentration of the receiving water in brackish marsh areas or 500 mg/L in freshwater or intermediate marsh areas and upland areas?				
1.q	Have any of the discharges from the facility exceeded the limits specifed by the permit?				
1.r	Has the facility submitted the required Discharge Monitoring Reports (DMRs) to the LDEQ?				
1.s	Has the facility notified the LDEQ Regional Office prior to hydrostatic test discharges, drilling a well, or moving a drilling rig to a new location?				
1.t	Is the facility in compliance with the water permit?				
2	**Spill Prevention**	**Yes**	**No**	**N/A**	**Comments**
2.a	Is a Spill Prevention and Control (SPC) Plan required to be prepared and implemented in accordance with requirements in LAC 33 :IX.901-907?				
2.b	Is a copy of the SPC Plan available for inspection?				
2.c	Has the operator of the facility reviewed the plan within the last five years?				
2.d	Has there been a modification in facility design, construction, storage capacity, operation or maintenance which renders the existing SPC Plan inadequate?				
2.e	Does the SPC Plan establish a program for regular inspection of all storage tanks, separators, and related production and transfer equipment?				
2.f	Does the SPC Plan include provisions for, at a minimum, annual monitoring of flow line integrity through a combination of visual inspection and pressure testing or through the use of an approved alternate methodology?				
2.g	Does the SPC plan have written procedures for inspections developed for the facility by the operator?				
2.h	Does the SPC plan have written procedures for flow line integrity tests?				
2.i	Are required inspections, integrity tests, and training conducted?				

2.j	Are inspection, test, and training records maintained for a minimum of three years?				
2.k	Are inspection and test records signed or initialed by the inspector, appropriate supervisor or facility designee?				
2.l	Are visible leaks from tanks and appurtenances promptly corrected?				
2.m	Does the SPC Plan establish provisions for ready access to, and rapid deployment of, containment booms and ancillary spill containment and cleanup equipment?				
2.n	Are all workover and drilling barges, and production facilities equipped with pollution containment devices that under normal operating conditions prevent unauthorized discharges?				
2.o	Are all storage tanks, separators, and related production and transfer equipment located in open water or wetland areas, where building dikes is impossible or impracticable, installed on impervious decking provided with a system of curbs, gutters, and/or sumps capable of retaining spills of oil, produced water, or any other product or waste material?				
2.p	Are all drains from diked areas equipped with valves that are kept in the closed position except during periods of supervised discharge?				
2.q	Do all earthen pits have at least 2 feet of freeboard?				
2.r	Are pipe supports properly designed to minimize abrasion and corrosion; to allow for expansion and contraction, and to adequately support thrust loadings at bends?				
2.s	Does all tank car and tank truck loading/unloading area drainage flow into a catchment basin, treatment system or other containment system designed to hold at least the maximum capacity of any single compartment of a tank car or truck loaded or unloaded at the facility?				
2.t	Does the facility have an interlocked warning light, physical barrier system, or warning signs in loading/unloading areas to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines?				
3	**Corrective Actions**	**Yes**	**No**	**N/A**	**Comments**
3a.	Are there any corrective actions needed to comply with water quality regulations? Use separate sheet if necessary to document corrective actions needed.				