



Air Permits 101

Understanding the Types of Permits and their Components

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Air Permits Division

Louisiana Department of Environmental Quality



Office Organizational Chart



ENVIRONMENTAL SERVICES

WATER PERMITS

WASTE PERMITS

AIR PERMITS

PERMITS SUPPORT DIVISION

ENVIRONMENTAL COMPLIANCE

SURVEILLANCE

ENFORCEMENT

EMERGENCY RESPONSE & RADIOLOGICAL SERVICES

ENVIRONMENTAL ASSESSMENT

AIR QUALITY ASSESSMENT

WATER QUALITY ASSESSMENT

TECHNOLOGY

REMEDATION

LABORATORY SERVICES

UNDERGROUND STORAGE TANK

MANAGEMENT & FINANCE

FINANCIAL SERVICES

INFORMATION SERVICES

GENERAL SERVICES

HUMAN RESOURCES



Organization



Office of Environmental Services

- Assistant Secretary: Cheryl Nolan

Air Permits Division

- Administrator: Bryan Johnston

Petrochem

petroleum facilities, chemical manufacturing facilities, Oil and Gas

- Manager: Victor Chu

Manufacturing

power plants, saw mills, painting and sandblasting, asphalt plants, and miscellaneous

- Manager: Tegan Treadaway



Department of Environmental Quality



Mission Statement

The Department's mission is to provide service to the people of Louisiana through comprehensive environmental protection in order to promote and protect health, safety and welfare while considering sound policies regarding employment and economic development.

Vision

To be a respected steward of the State's environment.



DEQ's Role and EPA



EPA provides oversight of LDEQ's air quality program.

LDEQ is federally authorized to administer the federal Part 70 (Title V) and New Source Review (NSR) programs.



Permitting Terms



- **Potential to Emit (PTE)** - the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.
- **Criteria Pollutants** – particulate matter (PM10), carbon monoxide (CO), sulfur oxides (SO₂), nitrogen oxides (NO_x), and volatile organic compounds (VOC).
- **TAP/HAP** – Toxic/Hazardous Air Pollutants. Usually carcinogens. *State* are **TAP** and *Federal* are **HAP**. Usually are VOCs. However, some are non-VOC.

Permitting Terms



- **Attainment Parishes** – areas of the state that are not listed as nonattainment areas by the U.S. Environmental Protection Agency. In this discussion, we are referring to non-attainment for Ozone standards.
- **Non-attainment Parishes** - Per the Clean Air 8-hour Ground-level Ozone rule, an area which violates the national ambient air quality standard for ground level ozone.
- **Part 70 Sources** – Typically a “major source” required to receive a federally authorized permit. LDEQ is authorized to issue Part 70 Source permits.





PERMIT TYPES





Permit Types

Facilities not required to receive an air permit:

- 1) Those that meet the exemptions listed in LAC 33:III.501.B
- 2) Those that qualify for ACT 547





Permit Types

LDEQ Divides Permits into two basic types:

- 1) Minor Source Permits
- 2) Major Source Permits





Permit Types – Minor Source

Minor Source Permits:

How does LDEQ determine if the facility is a minor source?

- 1) Type of Emissions
 - a) Criteria Pollutants
 - b) Hazardous Air Pollutants (HAP) and Toxic Air Pollutants (TAP)
- 2) Parish
 - a) Attainment Parish
 - b) Non-attainment Parish
- 3) Potential to Emit (PTE)





Permit Types – Minor Source

What Qualifies for a Minor Source Permit?

Criteria Pollutants (CO, NO_x, SO₂, VOC, PM₁₀)

- 1) Attainment Parish < 100 tpy
- 2) Non-Attainment Parish
< 50 tpy of NO_x or VOC
< 100 tpy CO, SO₂, and PM₁₀

HAP (Federal) and TAP (State)

- 1) All Parishes < 10 tpy for any single HAP or TAP
- 2) All Parishes < 25 tpy for aggregated emissions of HAP or TAP

Federally enforceable Specific condition limiting PTE below one or more of the above listed thresholds.



Permit Types – Minor Source



Types of Minor Source Permits Include:

- Portable Source
- Small Source
- Standard Oil and Gas
- Synthetic Minor Source
- State Permit
- Regulatory Permit



Permit Types – Minor Source



Portable Source

- Allow for facility to move locations
- Must comply with all other regulations and zoning at new location
- Must notify the Department when moving locations
- Part 70 Sources are not allowed to have a portable source permit
- Permit No. begins with 7777

[LAC 33:III.513.C]



Permit Types – Minor Source



Small Source

- Emissions of any pollutant < 25 tpy
- Written the same as a Minor Source Permit
- Fee is often less

[LAC 33:III.211.B.13.e]





Permit Types – Minor Source

Standard Oil and Gas

- 1) Only Minor Oil and Gas Facilities with a 1311 SIC code
- 2) **Non-Attainment** Parishes: EBR, WBR, Livingston, Ascension, & Iberville

< 47.5 tpy each: NO_x & VOC

Attainment Parishes:

< 95 tpy each: NO_x and VOC

All Parishes:

< 95 tpy CO

< 25 tpy each: PM₁₀, SO₂

< 8 tpy each: BTEX, n-C₆, Formaldehyde, & H₂S

< 20 tpy Total TAPs

- 3) No Applicable Federal Requirements





Permit Types – Minor Source

Standard Oil and Gas - Continued

- 4) Only applicable state requirements allowed are those found in the standard permit.
- 5) May perform modifications prior to sending in a permit modification. Permit modification must be sent in within 7 days of completing the modification.
- 6) Permit expires 10 years from issued date.



Permit Types – Minor Source



Synthetic Minor Permit

- A facility which places an artificial limit on its PTE in order to obtain or maintain minor source status
- A federally enforceable condition to limit the PTE is required
 - Must have a limit, monitoring, recordkeeping, and reporting to be federally enforceable
- Public Notice is required



Permit Types – Minor Source



Synthetic Minor Permit – Continued **Example:**

Limit: Crude oil throughput of the truck loading rack, Emission Point 03, shall be limited to no more than 1,134,000 gal/yr.

Recordkeeping/Monitoring: The total crude oil loaded to the trucks shall be recorded each month, as well as the total crude oil for the last twelve months. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

Reporting: Throughput above the maximum twelve consecutive month period shall be a violation of this permit and reported to Office of Environmental Compliance, Enforcement Division. A report showing the crude oil throughput to the truck loading rack for the preceding calendar year shall be submitted to the Enforcement Division by March 31st.



Permit Types – Minor Source



State Permit

- Most common of the “Permit Types”
- Doesn’t fit into one of the other types of Minor Source Permit categories

Regulatory Permit

- A permit which is defined in the Regulations
- Facility must “fit” the applicable emissions activities
- Currently there are none in Louisiana’s regulations but several have been proposed
- Authorized by R.S. 30:2054(B)(9)
- LAC 33:III.Chapter 3





MINOR SOURCE PERMIT COMPONENTS



Permit Components



What is in a Minor Permit?

- Cover Letter
- Air Permit Briefing Sheet
- General Conditions
- General Information
- Inventories
- Emission Rates for Criteria Pollutants
- Emission Rates for TAP/HAP & Other Pollutants
- Specific Requirements



Permit Components

Cover Letter

- PER Number (Activity No.)
- Agency Interest Number
- Effective Date
- Permit Number
- Assistant Secretary's Signature



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.: 12345 48976 125689

Activity No.: PER20080001
Agency Interest No.: 11111

Mr. John Smith
Vice President
Consumer Products Production
1234 Product Production Drive
Ruston, LA 70000

RE: Permit, Consumer Products Production, Products R Us,
Ruston, Lincoln Parish, Louisiana

Dear Mr. Smith:

This is to inform you that the permit modification request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this 15 day of Aug, 2008.

Permit No.: 1720-00000-00

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl", written over a white background.

Cheryl Sonnier Nolan
Assistant Secretary
CSN:ldg



Permit Components

Briefing Sheet

- Background
- Origin
- Description
- Type of Review
- Public Notice
- Effects on Ambient Air
- General Condition XVII Activities
- Insignificant Activities

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Products R Us
Agency Interest No.: 11111
Consumer Products Production
Ruston, Lincoln Parish, Louisiana



I. BACKGROUND

Products R Us, Consumer Products Production, an existing products production facility began operation in 1999. The Products R Us facility currently operates under Permit No. 1720-00000-00, issued January 5, 1999.

II. ORIGIN

A permit application and Emission Inventory Questionnaire (EIQ) dated December 13, 1998 were received requesting a permit. Additional information dated December 15, 2008 was also received.

III. DESCRIPTION

Products R Us facility makes consumer products. The product is first molded in a press. After the molding process the product is conveyed to the paint booth. The product is painted in the paint booth and transferred to the dryer. Both the dryer and paint booth emissions are routed to a thermal oxidizer with a destruction efficiency of 95%. The products are then packaged and shipped via truck.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	3.75	4.00	+ 0.25
SO ₂	1.10	0.80	- 0.30
NO _x	2.75	2.00	- 0.75
CO	10.50	12.50	+ 2.00
VOC ¹	8.50	9.00	+ 0.50

¹VOC speciation in tons per year:

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year
Xylenes	0.020
Methyl Ethyl Ketone	0.175
n-Hexane	0.005
Total TAP's	0.200
Other VOC's	8.80
Total VOC	9.00



Permit Components

Briefing Sheet

- Background
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- Type of Review
- Public Notice
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- General Condition XII Activities
- Insignificant Activities

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Products R Us
Agency Interest No.: 11111
Consumer Products Production
Ruston, Lincoln Parish, Louisiana



IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs).

V. PUBLIC NOTICE

Public notice is not required to permit a minor source.

VI. EFFECTS ON AMBIENT AIR

Dispersion Model(s) Used: Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VII. GENERAL CONDITION XVII ACTIVITIES

Work Activity	Schedule	PM ₁₀	Emission Rates - tons			VOC
			SO ₂	NO _x	CO	
Port Sampling	2 samples/yr				0.01	

VIII. INSIGNIFICANT ACTIVITIES

ID No.:	Description	Citation
DT-01	500 Gallon Diesel Tank	LAC 33:III.501.B.4.A.3



Permit Components

General Conditions

- These conditions are found in all permits but do not necessarily apply to all projects.
- There are 19 General Conditions labeled I. through XIX.
- General Conditions to be found in ERC LAC 33:III soon.



LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated <...>, 200_, along with supplemental information dated <...>, 200_.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.



Permit Components

Standard Oil and Gas General Conditions

- These conditions are found in all SOGA permits
- There are eight total conditions numbered I. through VIII



AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

AI NO. 32193

I. STANDARD OIL AND GAS AIR PERMIT

This standard oil and gas permit authorizes construction, operation, and modification of crude oil and natural gas production facilities that meet the eligibility requirements outlined herein. Permit eligibility is limited to air emissions from oil and gas facilities for which the primary Standard Industrial Classification (SIC) Code is:

- 1311 - Crude Petroleum and Natural Gas

II. COVERAGE AND ELIGIBILITY

Facilities must maintain eligibility to operate under this standard permit. This permit does not authorize operations that are not compliant with the established eligibility conditions. Prior to initiating any modification to the facility that would prohibit it from being covered under this standard permit, the permittee must request an "individual" site-specific air permit. If a modification rendering the facility ineligible for this standard permit is effected without a site-specific permit in place, the modification would be deemed unauthorized from the date construction commenced and subject to enforcement action.

Conglomerations of contiguous oil and gas sites (groups of facilities under common control separated by 0.25 miles or less) may be covered provided that aggregate emissions from the facilities do not exceed the emissions thresholds listed in Section III; however, a separate application should be submitted for each facility.

Continuation of an Expired Standard Permit

If this permit is not reissued or replaced prior to the expiration date, it will be administratively continued and remain in force and effect, provided a timely and complete renewal application has been submitted six months prior to expiration. Any permittee who was granted permit coverage prior to the expiration date will automatically remain covered by the continued permit until the earlier of:

1. reissuance or replacement of this permit, at which time the permittee must comply with the conditions of the new permit to maintain authorization to operate; or
2. termination of the permit; or
3. issuance of a site-specific permit to the facility; or
4. a formal permit decision by the Department not to reissue this standard permit, at which time the permittee must seek coverage under a site-specific permit.

Requiring a Site-Specific Permit

Eligibility for this standard permit does not confer a vested right to coverage under the permit. The Department may require any person authorized by this permit to apply for and/or obtain a site-specific air permit. If the Department requires a permittee authorized to emit under this permit to apply for a site-specific air permit, the Department will notify the permittee in writing that a permit application is required. This notification will include a brief statement of the reasons for this decision, a statement setting a deadline for the permittee to file the application, and a statement that on the effective date of issuance or denial of the site-specific air permit, coverage under this standard permit will automatically



Permit Components

General Information



General Information

AI ID: 11111 Products R Us - Consumer Products Productions

Activity Number: PER20070001

Permit Number: 1720-0000-00

Air - Minor Source/Small Source Initial

Also Known As:	ID	Name	User Group	Start Date
	1720-00000	Products R Us	CDS Number	12-05-2007

Physical Location: Hwy 44 3 miles north of Hwy 27
Ruston, LA Main Phone: 911-211-3111

Mailing Address: PO Box 7036
Ruston, LA 70000

Location of Front Gate: 29° 43' 36" hundredths latitude 90° 48' 32" hundredths longitude. Coordinate Method: Interpolation - Map, Coordinate Datum: NAD27

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Joe Smith	PO Box 7036 Ruston, LA 7000	9112113111 (WP)	Air Permit Contact For
	Patrick Smith	PO Box 7036 Ruston, LA 7000	9112113111 (WP)	Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Products R Us	PO Box 7036 Ruston, LA 70000	9112113111 (WP)	Air Billing Party for
	Products R Us	PO Box 7036 Ruston, LA 70000	9112113111 (WP)	Operates
	Consumer Products Production	PO Box 7036 Ruston, LA 70000	9112113111 (WP)	Owns

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.



Permit Components

Inventories



INVENTORIES

AI ID: 11111 Products R Us - Consumer Products Productions

Activity Number: PER20070001

Permit Number: 1720-0000-00

Air - Minor Source/Small Source Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Houma Manufacturing Plant						
EQT0001	Hook Burning Oven - Hook Burning Oven		.15 MM BTU/hr	.15 MM BTU/hr		104 hr/yr (All Year)
EQT0002	Boiler (70hp) - Boiler (70hp)		2.94 MM BTU/hr	2.94 MM BTU/hr		3120 hr/yr (All Year)
FUG0001	Fugitive emissions - MCP Shop-Paint Dipping Vats		7500 gallons/yr	7500 gallons/yr	Two side by side 800 gallon vats	8760 hr/yr (All Year)
FUG0002	Fugitive emissions - Paint Booth-Central Machine Shop		651 gallons/yr	651 gallons/yr		1640 hr/yr (All Year)
FUG0003	Fugitive emissions - Paint Booth-Float Shop		2717 gallons/yr	2717 gallons/yr		2912 hr/yr (All Year)
FUG0004	Fugitive emissions - Paint Booth-Houma District		372 gallons/yr	372 gallons/yr		1300 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Houma Manufacturing Plant							
EQT0001	Hook Burning Oven - Hook Burning Oven			1		36	
EQT0002	Boiler (70hp) - Boiler (70hp)			1		36	
FUG0002	Fugitive emissions - Paint Booth-Central Machine Shop			3		36	
FUG0003	Fugitive emissions - Paint Booth-Float Shop			3		36	
FUG0004	Fugitive emissions - Paint Booth-Houma District			3		36	

Relationships:

Subject Item Groups:

ID	Group Type	Group Description
UNF0001	Unit or Facility Wide	Products R Us - Consumer Products Productions

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multipiler	Units Of Measure
1722	Small Source Permit		

SIC Codes:

3533	Oil and gas field machinery	AI 11111
3533	Oil and gas field machinery	UNF001



Permit Components

Criteria Pollutants



EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 11111 Products R Us - Consumer Products Productions

Activity Number: PER20070001

Permit Number: 1720-0000-00

Air - Minor Source/Small Source Initial

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Houma Manufacturing Plant															
EQT 0001 Risk Burning Oven	0.01	0.01	<0.01	0.01	0.01	<0.01									
EQT 0002 Boiler (10hp)	0.24	0.24	0.38	0.29	0.29	0.45	0.02	0.02	0.03	<0.01	<0.01	<0.01	0.02	0.02	0.02
FUG 0001 Fugitive emissions													0.96	0.96	4.20
FUG 0002 Fugitive emissions							0.05	0.24	0.03				3.95	9.57	2.06
FUG 0003 Fugitive emissions							0.06	0.37	0.08				4.76	12.45	6.93
FUG 0004 Fugitive emissions							0.002	0.04	<0.01				1.43	9.57	0.93

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.



Permit Components

TAP/HAP Pollutants



EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID - 11111 - Products R Us - Consumer Products Production

Activity Number: PER20070001

Permit Number: 1720-00000-00

Air - Minor Source/Small Source Initial

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0002 Boiler (70hp)	n-Hexane	0.01	0.01	< 0.01
FUG 0002 Fugitive emissions	Methanol	0.11	0.11	0.06
	Methyl ethyl ketone	0.003	0.95	< 0.01
	Toluene	0.25	0.48	0.13
	Xylene (mixed isomers)	2.49	8.20	1.30
FUG 0003 Fugitive emissions	Ethyl benzene	0.002	0.12	< 0.01
	Methanol	0.13	0.13	0.19
	Toluene	0.35	1.08	0.51
	Xylene (mixed isomers)	3.16	8.20	4.59
FUG 0004 Fugitive emissions	Methanol	0.04	0.04	0.03
	Toluene	0.05	0.36	0.03
	Xylene (mixed isomers)	1.00	8.20	0.65
UNF 0001 Houma Manufacturing	Ethyl benzene			3.11
	Methanol			0.28
	Methyl ethyl ketone			< 0.01
	Toluene			0.67
	Xylene (mixed isomers)			6.54
	n-Hexane			< 0.01

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.



Permit Components

Specific Requirements



SPECIFIC REQUIREMENTS

AI ID: 11111 Products R Us - Consumer Products Productions

Activity Number: PER20070001

Permit Number: 1720-0000-00

Air - Minor Source/Small Source Initial

FUG0001 MCP Shop-Paint Dipping Vats

- 12 [LAC 33:III.2123.F.3] Material Safety Data Sheets shall be kept to verify compliance with or exemption from LAC 33:III.2123. Records shall be kept of the mixing ratios for each paint and solvent coating as applied. Records shall also be kept to ensure total paint usage and the VOC's emitted at any given consecutive 60 minute period and any given consecutive 24 hr period.
- 13 [LAC 33:III.2123.H] Comply with the requirements of LAC 33:III.2123 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2123 as a result of a revision of LAC 33:III.2123.

FUG0002 Paint Booth-Central Machine Shop

- 14 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.
- 15 [LAC 33:III.1311.B] No person shall cause, suffer, allow, or permit the emission of particulate matter to the atmosphere from any process or process equipment in excess of the amount shown in LAC 33:III.1321, Table 3 for the process weight rate allocated to such source. The rate of emission shall be the total of all emission points from the source.
- 16 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
Permittee shall comply with the VOC content limitations of LAC:III.2123.C.11.
- 17 [LAC 33:III.2123.C] Determine compliance by the procedure specified in "Control of Volatile Organic Emissions for Existing Stationary Sources, Vol. 2-Surface Coating of Cans, Coils, Paper, Fabric, Autos and Lt. Duty Trucks", (EPA 450/2-77-008), the procedures specified in "Measurement of Volatile Organic Compounds" (EPA-450/2-78-041), a method approved by DEQ or certification from the paint manufacturer concerning the solvent makeup of the paint. Treat exempt solvents the same as water in calculating the VOC content per gallon of coating.
- 18 [LAC 33:III.2123.D.3] Determine compliance with LAC 33:III.2123.A, C, and D by applying the test methods specified in LAC 33:III.2123.E.1 through E.6, as appropriate.
- 19 [LAC 33:III.2123.E] Material Safety Data Sheets shall be kept to verify compliance with or exemption from LAC 33:III.2123. Records shall be kept of the mixing ratios for each paint and solvent coating as applied. Records shall also be kept to ensure total paint usage and the VOC's emitted at any given consecutive 60 minute period and any given consecutive 24 hr period.
- 20 [LAC 33:III.2123.F.3] Comply with the requirements of LAC 33:III.2123 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2123 as a result of a revision of LAC 33:III.2123.
- 21 [LAC 33:III.2123.H]

FUG0003 Paint Booth-Float Shop

- 22 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.
- 23 [LAC 33:III.1311.B] No person shall cause, suffer, allow, or permit the emission of particulate matter to the atmosphere from any process or process equipment in excess of the amount shown in LAC 33:III.1321, Table 3 for the process weight rate allocated to such source. The rate of emission shall be the total of all emission points from the source.



Major Source Programs



- **Title V Program**
 - Title V of the Clean Air Act (CAA)
 - 40 CFR Part 70 and LAC 33:III.507
- **New Source Review (NSR) Program**
 - **Prevention of Significant Deterioration (PSD) of Air Quality**
 - Title I (Part C) of the CAA
 - 40 CFR Part 52 and LAC 33:III.509
 - **Nonattainment New Source Review (NNSR)**
 - Title I (Part D) of the CAA
 - LAC 33:III.504





WHAT IS A MAJOR SOURCE



What is a Major Source



For Title V, if a stationary source*:

- Emits or has PTE ≥ 100 tpy** of PM₁₀, SO₂, CO, NO_x, or VOC
- Emits or has PTE ≥ 10 tpy** of any single HAP, or 25 tpy of all HAPs
- Any major stationary source as defined in Part D (Nonattainment) of Title I of the CAA, including those defined as major under LAC 33:III.504.K (NNSR)

* *Contiguous stationary sources must aggregate emissions*

** *Fugitive emissions are not included unless sources are listed in Table A or are being regulated under Section 111 (NSPS) or 112 (HAP) of the CAA as of 08/07/1980.*

[LAC 33:III.502.A]





What is a Major Source

For NSR, if a stationary source, which is located in an attainment parish (PSD source):

- Emits or has PTE any regulated NSR pollutant (e.g., PM₁₀, SO₂, CO, NO_x, or VOC) ≥ 250 tpy*, or
- Is listed in Table A found in LAC 33:III.509.B and emits or has PTE ≥ 100 tpy* of any regulated NSR pollutant

* *Fugitive emissions are included if sources are listed in Table A or are being regulated, as of 08/07/1980, under Section 111 or 112 of the CAA.*

[LAC 33:III.509.B]





What is a Major Source

For NSR, if a stationary source*, which is located in a nonattainment parish (NNSR source):

- Emits or has PTE \geq 50 tpy** NO_x or VOC
- PM/PM₁₀, SO₂, and CO treated the same as PSD

* *Contiguous stationary sources must aggregate emissions.*

** *Fugitive emissions are not included unless sources are listed in Table A or are being regulated under Section 111 or 112 of the CAA as of 08/07/1980.*

[LAC 33:III.504.K]



What is a Major Source



All sources defined as major sources under the Title V and NSR programs are required to obtain a Title V permit.

These sources are considered Part 70 Sources.

All Part 70 Sources are required to obtain a Title V permit.

However, Part 70 Sources are not limited to just major sources.



What is a Major Source



Other Part 70 Sources include:

- Any non-major source of HAPs required to obtain a Title V permit under section 112 (HAP) of the CAA
- Any non-major source required to obtain a Title V permit under section 111 (NSPS) of the CAA
- Any affected source under the acid rain provisions (Title IV of the CAA)
- Any solid waste incineration unit required to obtain a Title V permit under Section 129(e) of the CAA
- Any municipal solid waste (MSW) landfill having a design capacity ≥ 2.5 million megagrams and 2.5 million cubic meters and subject to 40 CFR 60.752(b)





TYPES OF PERMITS: MAJOR SOURCES





Major Source Permits

Part 70 Operating (Title V)

- **Regular**
- **General**

New Source Review (NSR)

- **Prevention of Significant Deterioration (PSD)**
- **Nonattainment New Source Review (NNSR)**



What's a General Permit



- Covers numerous similar sources or activities
- Must undergo public notice prior to issuance
- If intended to cover Part 70 source, must be reviewed by affected states and EPA
- Must incorporate terms and conditions applicable to qualifying sources
- Must identify criteria by which a source may qualify

[LAC 33:III.513.A]





MAJOR DIFFERENCES: TITLE V PERMITS





Regular vs. General

Regular Title V Permit

- Requires public notice and EPA review prior to final decision of initial, major modification, and renewal coverage.

General Title V Permit

- Only requires public notice of application process during initial and renewal coverage
- Only allows for certain state and federally regulated sources.





Major Differences: NSR Permits





PSD vs. NNSR

PSD Triggers

- Source located in attainment parish
- Must be an new major stationary source or involve a major modification at an existing major stationary source as defined in LAC 33:III.509.B
 - Major modifications typically involve significant net increases of criteria pollutants:
 - CO - ≥ 100 tpy
 - NO_x , VOC, SO₂ - ≥ 40 tpy
 - PM/PM₁₀ - $\geq 25/15$ tpy



PSD vs. NNSR



NNSR Triggers

- Source located in nonattainment parish
- Currently in nonattainment for 8-hr Ozone (NO_x/VOC) std
 - Ambient concentrations of PM, SO₂, and CO in compliance respective NAAQS; therefore, are evaluated per PSD regulations
- Must be an new major stationary source or involve a major modification at an existing major stationary source, as defined in LAC 33:III.504.K, for the same regulated pollutant for which the area is designated nonattainment
 - Major modifications typically involve significant net increases of criteria pollutants:
 - NO_x , VOC - ≥ 25 tpy
 - Highly reactive VOC - ≥ 10 tpy



PSD vs. NNSR



PSD affected sources subject to:

- Best Available Control Technology (BACT) regulation
- Air Quality Modeling

NNSR affected sources subject to:

- Lowest Achievable Emission Rate (LAER) regulation
- Emission Reduction Credit/ ERC Banking
 - Current or previous reductions of NO_x or VOC may be approved as offsets to NO_x or VOC increases from NNSR affected sources.
- Air Quality Modeling not required





What are the Components of Major Source Permits



Major Source Permit Components



Title V

- **Cover Letter***
- **Air Permit Briefing Sheet***
- **General Conditions***
- General Information
- Inventories
- Emission Rates for Criteria Pollutants
- Emission Rates for TAP/HAP & Other Pollutants
- Specific Requirements



Major Source Permit Components: Title V



Cover Letter

- PER Number (Activity No.)
- Agency Interest Number
- Expiration Date
- Effective Date
- Permit Number
- Assistant Secretary's Signature

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph. D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. : 7006 3450 0001 2837 2289

Activity No.: PER20070002
Agency Interest No. 151188

Mr. David Goodwin
Vice President Compliance & Operations Services
Gulf Crossing Pipeline Company, LLC
9 Greenway Plaza, Suite 2800
Houston, Texas 77046

RE: Part 70 Operating Permit, Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station,
Gulf Crossing Pipeline Company, LLC, Sterlington, Ouachita Parish, Louisiana

Dear Mr. Goodwin:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:111.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 6 of Aug 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this 6 day of Aug, 2008.

Permit No.: 2160-00150-V0

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl", written over a horizontal line.

Cheryl Sommer Nolan
Assistant Secretary

CSN:sbp

c: EPA Region V1



Major Source Permit Components: Title V



Briefing Sheet

- Background
- Origin
- Description
- Type of Review
- **Credible Evidence**
- Public Notice
- Effects on Ambient Air
- General Condition XII Activities
- Insignificant Activities
- **Applicability/Exemption Tables**

V. **Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.



Major Source Permit Components: Title V



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Products R Us
 Agency Interest No.: 11111
 Consumer Products Production
 Ruston, Lincoln Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																			
		5 [▲]	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	22	29*	51*	53*	56	59*	
UNF 1	Sterlington Compressor Station		1	1	1	1			3			1				3	3			1	3
EQT 1	C-1 Compressor Turbine No. 1		1		1	1	3														
EQT 2	C-2 Compressor Turbine No. 2		1		1	1	3														
EQT 3	C-3 Compressor Engine No. 1	1	1		1	1	3														
EQT 4	EG-1 Emergency Backup Generator		1		1	1	3														
EQT 5	T-1 Condensate Storage Tank		1					3													
EQT 6	L-1 Truck Loading		1							3											
EQT 7	V-1 Blowdown Stack		1																		
EQT 8	V-2 Area Releases		1																		
EQT 9	V-3 Turbine Starting Gas Vent		1																		
FUG 1	FUG-1 Piping Components		1								1										
FUG 2	FUG-2 Unpaved Roads					1															

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.



Major Source Permit Components: Title V



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Products R Us

Agency Interest No.: 11111

Consumer Products Production

Ruston, Lincoln Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS									40 CFR 61			40 CFR 63 NESHAP			40 CFR		
		A	K	Ka	Kb	Db	Dc	GG	JJJ	KKKK	A	J	V	A	HHH	ZZZZ	64	68	
UNF 1	Sterlington Compressor Station	1												3	3			3	3
EQT 1	C-1 Compressor Turbine No. 1									1									
EQT 2	C-2 Compressor Turbine No. 2									1									
EQT 3	C-3 Compressor Engine No. 1								1							1			
EQT 4	EG-1 Emergency Backup Generator								3							3			
EQT 5	T-1 Condensate Storage Tank				3														
EQT 6	L-1 Truck Loading																		
EQT 7	V-1 Blowdown Stack																		
EQT 8	V-2 Area Releases																		
EQT 9	V-3 Turbine Starting Gas Vent																		
FUG 1	FUG-1 Piping Components																		
FUG 2	FUG-2 Unpaved Roads																		



Major Source Permit Components: Title V



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Products R Us
Agency Interest No.: 11111
Consumer Products Production
Ruston, Lincoln Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF 1	Compliance Assurance Monitoring (CAM) [40 CFR 64]	DOES NOT APPLY. Emission sources are not equipped with add-on controls or would trigger MACT if uncontrolled.
Facility-wide	General Provision [40 CFR 63 Subpart A]	DOES NOT APPLY. Facility is an area source of hazardous air pollutants. If increases in emissions above current permit limits occur such that major source thresholds are exceeded, the permittee shall submit a permit modification to propose changes to maintain area source status or propose compliance with 40 CFR 63 Subpart A and Subpart HHH.
	National Emission Standards of Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities [40 CFR 63 Subpart HHH]	
	Chemical Accident Prevention Provision [40 CFR 68]	DOES NOT APPLY. Per LAC 33:III.5907, facility does not produce, process, handle, or store any substance listed in paragraph 68.130 or Tables 59.0 and 59.1 of Chapter 59 in an amount greater than the threshold quantity.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III Chapter 59]	
	Odor Regulations [LAC 33:III Chapter 29]	DOES NOT APPLY. Per LAC 33:III.2901.B, facility is not a source of odorous substances emitted into the ambient air.
	Crude Oil and Condensate [LAC 33:III.2104]	DOES NOT APPLY. Per LAC 33:III.2104.A, potential flash emissions are less than 100 tpy of VOC.
EQTs 1, 2, 3 & 4 Turbines & Engines	Emission Standards for Sulfur Dioxide [LAC 33:III.Chapter 15]	DOES NOT APPLY. Per LAC 33:III.1502.A.3, neither unit emits or has the potential to emit SO ₂ equal to or above 5 tpy.
EQT 4 Emergency Engine	NSPS Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230]	DOES NOT APPLY. Engine was manufactured prior to January 1, 2009.
	NESHAP Subpart ZZZZ - National Emission Standards of Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6585]	DOES NOT APPLY. Engine is a new source located at an area source of HAPs but is not subject to NSPS requirements. [40 CFR 63.6590(c)]
EQT 5 Storage Tank	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tank has a total capacity less than 19,813 gallons (75 m ³).
	Control of Emissions of Organic Compounds-Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Per LAC 33:III.2103.G.1, storage tank is used for condensate, has a nominal storage capacity of less than 420,000 gallons, and is not subject to NSPS.
EQT 6 Loading	Control of Emissions of Organic Compounds-Volatile Organic Compounds-Loading [LAC 33:III.2107]	DOES NOT APPLY. Per LAC 33:III.2107.A, throughput is less than 20,000 gallons per day.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.



Major Source Permit Components: Title V



General Conditions

- State Permitting General Condition
- 40 CFR Part 70 General Conditions
- There are 22 Part 70 General Conditions labeled A through V.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]



Major Source Permit Components



PSD

- Cover Sheet
- Authorization Page
- Briefing Sheet
- Preliminary Determination Summary
- Specific Conditions
- General Conditions
- BACT Cost Summary
- Air Quality Analysis Summary




Major Source Permit Components: PSD



Cover Letter

- Activity No.
- AI No.
- Date of Signature
- Permit Number
- Assistant Secretary's Signature


BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

HAROLD LEGGETT, PH.D.
SECRETARY

Certified Mail No. : 111111
Mr. John Smith
Vice President
Consumer Products Production
1234 Product Production Dr.
Ruston, LA Agency Interest (AI) No. PER20070005


RE: Prevention of Significant Deterioration (PSD) Permit, PSD-LA-999
Product R Us Facility
Consumer Products Production, Ruston, Lincoln Parish, Louisiana

Dear Mr. Smith:

Enclosed is your permit, PSD-LA-999. Construction of the proposed project is not allowed until such time as the corresponding Part 70 Operating Permit is issued.

Should you have any questions, contact Mr. Scott B. Pierce of the Air Permits Division at (225) 219-3181.

Sincerely,


Cheryl Sonnier Nolan,
Assistant Secretary

8 Aug 2008
Date

CSN:sbp
c: US EPA Region VI

Post Office Box 4313 • Baton Rouge, Louisiana 70821-4313 • Phone 225-219-3181 • Fax 225-219-3309
www.deq.louisiana.gov



Major Source Permit Components: PSD



Authorization Page

- Company Name
- Project Location
- Deadline for Construction
- Effective Date
- Assistant Secretary's Signature

Agency Interest No. 151188

PSD-LA-999

**AUTHORIZATION TO CONSTRUCT AND OPERATE A NEW FACILITY
PURSUANT TO THE PREVENTION OF SIGNIFICANT DETERIORATION
REGULATIONS IN LOUISIANA ENVIRONMENTAL REGULATORY CODE,
LAC 33:III.509**

In accordance with the provisions of the Louisiana Environmental Regulatory Code, LAC 33:III.509,

Consumer Products Production
1234 Product Production Dr.
Ruston, LA

is authorized to construct the Products R Us Facility
near

123 Product Rd
Ruston, Lincoln Parish, Louisiana

subject to the emissions limitations, monitoring requirements, and other conditions set forth hereinafter.

This permit and authorization to construct shall expire at midnight on 8 Feb, 2009, unless physical on site construction has begun by such date, or binding agreements or contractual obligations to undertake a program of construction of the source are entered into by such date.

Signed this 8 day of Aug, 2008.

A handwritten signature in black ink, appearing to read "Cheryl", is written over the signature line.

Cheryl Sonnier Nolan
Assistant Secretary
Office of Environmental Services
Louisiana Department of Environmental Quality



Major Source Permit Components: PSD



Briefing Sheet

- Purpose
- Recommendation
- Reviewing Agency
- Project Description

BRIEFING SHEET

Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999

PURPOSE

Construct a natural gas transmission station. Gulf Crossing Pipeline Company, LLC, a subsidiary of Boardwalk Pipelines Partnerships, LP, will develop the project.

RECOMMENDATION

Approval of the proposed construction and issuance of a permit.

REVIEWING AGENCY

Louisiana Department of Environmental Quality, Office of Environmental Services, Air Permits Division

PROJECT DESCRIPTION

Natural gas will be transported to the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station via pipeline. To provide for more efficient transportation (compression) of the gas, condensate will be separated from the natural gas and stored in a 100 barrel storage tank and periodically loaded into a tank truck and shipped off-site. Two natural gas-fired compressor turbines rated at 10,311 horsepower each, and one compressor engine equipped with oxidation catalyst controls and rated at 4,735 horsepower will be used to transport the natural gas by pipeline from the compressor station to commerce. Air emissions will consist primarily of combustion products generated from firing natural gas in the turbines and reciprocating engine. Volatile organic compounds will be generated during loading operations from the condensate tank to tank trucks, flashing at the condensate tank, the blowdown vent, area releases of natural gas from possible miscellaneous engine/compressor vents and/or gas controlled valve operators, and fugitive emissions from equipment components. Additionally, minimal fugitive particulate emission will be generated by traveling on unpaved roads. The facility will also consist of a natural gas-fired emergency use backup generator engine rated at 838 horsepower.

The compressor station will be built on property adjacent to Gulf South Pipeline Company, LP's existing Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) permitted under permit no. 2160-00046-V1, issued August 11, 2006. The two compressor stations are contiguous facilities. The estimated emissions for NO_x and CO from the contiguous Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) are 642.77 tpy and 999.87 tpy respectively which are above the PSD Major Source Levels (250 tpy). Therefore, the proposed Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station is considered a major stationary source in accordance with LAC 33:III.509. Any NSR regulated pollutants emitted above the *de minimis* levels as a result of the proposed construction project will be subject to a PSD review.



Major Source Permit Components: PSD



Briefing Sheet (con't)

- Type of Review
- BACT
- Air Quality Impact Analysis

BRIEFING SHEET

Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999

Estimated emissions, in tons per year, are as follows:

Pollutant	Emissions	PSD de minimis	Review required?
PM	6.48	25	No
PM ₁₀	6.48	15	No
SO ₂	2.44	40	No
NO _x	72.65	40	Yes
CO	47.69	100	No
VOC	64.79	40	Yes

TYPE OF REVIEW

Nitrogen oxide (NO_x) and volatile organic compound (VOC) emissions from the proposed facility will be above PSD significance levels. Therefore, the requested permit was reviewed in accordance with PSD regulations for NO_x and VOC emissions. Emissions of LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) have been reviewed pursuant to the requirements of the Louisiana Air Quality Regulations.

BEST AVAILABLE CONTROL TECHNOLOGY

NO_x and VOC emissions are above PSD significance levels and must undergo PSD analyses. The selection of control technology was based on the BACT analysis using a "top down" approach and did not include consideration of control of toxic materials.

All PSD applications must include an emission control technology analysis consistent with federal regulations. The BACT requirements are intended to ensure that a proposed facility will incorporate emission control systems that are consistent with those being utilized on similar projects throughout the United States. The top down approach used in this analysis involves determining the most stringent control available for a similar or identical emission source.

AIR QUALITY IMPACT ANALYSIS

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed facility.

AERMOD modeling indicates maximum ground level concentrations of NO_x are below the ambient significance levels and preconstruction monitoring exemption levels. Therefore, no preconstruction monitoring, increment analysis, or refined modeling is required for these pollutants.



Major Source Permit Components: PSD



Briefing Sheet (con't)

- Additional Impacts
- Processing Time
- Public Notice

BRIEFING SHEET

Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999

ADDITIONAL IMPACTS

Soils, vegetation, and visibility will not be adversely impacted by the proposed facility, nor will any Class I area be affected. The project will not result in any significant secondary growth effects. Approximately 2 new permanent jobs will be created.

PROCESSING TIME

Application Dated:	October 3, 2007
Application Received:	October 5, 2007
Additional Information Dated:	March 26, 2008 (consolidated and certified previous submittals)
Effective Completeness Date:	March 31, 2008

PUBLIC NOTICE

On June 24, 2008, the Louisiana Department of Environmental Quality (LDEQ) issued Prevention of Significant Deterioration (PSD) Permit PSD-LA-7999 to Gulf Crossing Pipeline Company, LLC for its Sterling Compressor Station. After issuance of the permit, it was discovered that the notice seeking public comment on the proposed permit was not published by *The News-Star* of Monroe, despite the fact the representatives of the newspaper confirmed that the notice had been published on May 8, 2008, as requested. Because notice of the proposed permit was not provided in *The News-Star*, reopening of PSD-LA-999 in accordance with LAC 33:III.529.A.1 is warranted to provide notice to the public of an opportunity to review and comment upon the permit.

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on June 28, 2008; and in *The News-Star*, Monroe, on June 27, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on May 7, 2008. The draft permit was also submitted to US EPA Region VI on May 6, 2008. No comments were received.



Major Source Permit Components: PSD



Preliminary Determination Summary

- Applicant
- Location
- Project Description

PRELIMINARY DETERMINATION SUMMARY

Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999
March 31,

I. APPLICANT

Gulf Crossing Pipeline Company, LLC
9 Greenway Plaza, Suite 2800
Houston, Texas 77046

II. LOCATION

Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station will be located on Keystone Road, adjacent to Gulf South Pipeline Co - Sterlington Compressor Station located at 1476 Keystone Rd, Sterlington, Louisiana. Approximate UTM coordinates are 642.117 kilometers East, 3595.74 kilometers North, Zone 15

III. PROJECT DESCRIPTION

Natural gas will be transported to the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station via pipeline. To provide for more efficient transportation (compression) of the gas, condensate will be separated from the natural gas and stored in a 100 barrel storage tank and periodically loaded into a tank truck and shipped off-site. Two natural gas-fired compressor turbines rated at 10,311 horsepower each, and one compressor engine equipped with oxidation catalyst controls and rated at 4,735 horsepower will be used to transport the natural gas by pipeline from the compressor station to commerce. Air emissions will consist primarily of combustion products generated from firing natural gas in the turbines and reciprocating engine. Volatile organic compounds will be generated during loading operations from the condensate tank to tank trucks, flashing at the condensate tank, the blowdown vent, area releases of natural gas from possible miscellaneous engine/compressor vents and/or gas controlled valve operators, and fugitive emissions from equipment components. Additionally, minimal fugitive particulate emission will be generated by traveling on unpaved roads. The facility will also consist of a natural gas-fired emergency use backup generator engine rated at 838 horsepower.

The compressor station will be built on property adjacent to Gulf South Pipeline Company, LP's existing Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) permitted under permit no. 2160-00046-V1, issued August 11, 2006. The two compressor stations are contiguous facilities. The estimated emissions for NO_x and CO from the contiguous Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) are 642.77 tpy and 999.87 tpy respectively which are above the PSD Major Source Levels (250 tpy). Therefore, the proposed Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station is considered a major stationary source in accordance with LAC 33:III.509. Any



Major Source Permit Components: PSD



Preliminary Determination Summary

- Source Impact Analysis

PRELIMINARY DETERMINATION SUMMARY

G
Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999
March 31, 2008

NSR regulated pollutants emitted above the *de minimis* levels as a result of the proposed construction project will be subject to a PSD review.

Estimated emissions, in tons per year, are as follows:

Pollutant	Emissions	PSD de minimis	Review required?
PM	6.48	25	No
PM ₁₀	6.48	15	No
SO ₂	2.44	40	No
NO _x	72.65	40	Yes
CO	47.69	100	No
VOC	64.79	40	Yes

IV. SOURCE IMPACT ANALYSIS

A proposed net increase in the emission rate of a regulated pollutant above *de minimis* levels for new major or modified major stationary sources requires review under Prevention of Significant Deterioration regulations, 40 CFR 52.21. PSD review entails the following analyses:

- A determination of the Best Available Control Technology (BACT);
- An analysis of the existing air quality and a determination of whether or not preconstruction or postconstruction monitoring will be required;
- An analysis of the source's impact on total air quality to ensure compliance with the National Ambient Air Quality Standards (NAAQS);
- An analysis of the PSD increment consumption;
- An analysis of the source related growth impacts;
- An analysis of source related growth impacts on soils, vegetation, and visibility;
- A Class I Area impact analysis; and
- An analysis of the impact of toxic compound emissions.



Major Source Permit Components: PSD



Preliminary Determination Summary

- Source Impact Analysis
- BACT

PRELIMINARY DETERMINATION SUMMARY

Gulf
Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999
March 31, 2008

A. BEST AVAILABLE CONTROL TECHNOLOGY

Under current PSD regulations, an analysis of "top down" BACT is required for the control of each regulated pollutant emitted from a modified major stationary in excess of the specified significant emission rates. The top down approach to the BACT process involves determining the most stringent control technique available for a similar or identical source. If it can be shown that this level of control is infeasible based on technical, environmental, energy, and/or cost considerations, then it is rejected and the next most stringent level of control is determined and similarly evaluated. This process continues until a control level is arrived at which cannot be eliminated for any technical, environmental, or economic reason. A technically feasible control strategy is one that has been demonstrated to function efficiently on identical or similar processes. Additionally, BACT shall not result in emissions of any pollutant which would exceed any applicable standard under 40 CFR Parts 60 and 61.

For this project, BACT analyses are required for NO_x and VOC emissions from the facility.

BACT analysis for NO_x

Compressor Turbines (EQTs 1 and 2): The two 10,311 horsepower compressors are driven by natural gas fired turbines rated at 79.1 MM BTU/hr (maximum), and potential emissions are based on 100% operation for 8,760 hrs/yr. Based on a search of the EPA RACT/BACT/LAER Clearinghouse (RBLC), most current simple cycle gas fired turbines of approximately 10,311 horsepower utilize Dry Low NO_x burners and good combustion practices as BACT. The proposed Solar Taurus 70-10302s turbine units will use Dry Low NO_x burners. Good combustion practices include the use of natural gas as fuel for the turbines. For NO_x emissions from each combustion turbine, the use of Dry Low NO_x burners (vender guaranteed to meet 15 ppmvd NO_x levels at 15% O₂ or 0.057 lb NO_x/MM BTU) and good combustion practices including the use of natural gas as fuel are determined as BACT.

Compressor Engine (EQT 3): The 4,735 horsepower compressor is driven by a natural gas fired lean burn reciprocating internal combustion engine rated at 32.20 MM BTU/hr (maximum), and potential emissions are based on 100% operation for 8,760 hrs/yr. Based on a search of the RBLC, most current gas fired reciprocating internal combustion engines of approximately 4,735 horsepower utilize clean burning fuels and good combustion practices as BACT. The proposed Caterpillar 3616 engine unit employs clean burning fuels. Good combustion practices include the use of clean burning fuels such as natural gas as fuel for the engine. For NO_x emissions from the combustion engine, the use of clean burning fuels and good combustion practices are determined as BACT.



Major Source Permit Components: PSD



Preliminary Determination Summary

- Source Impact Analysis
 - Existing Air Quality
 - NAAQS
 - PSD Increment
 - Source Related Growth Impacts

PRELIMINARY DETERMINATION SUMMARY

C
Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999
March 31, 2008

Truck Loading Rack (EQT 6): The VOC control technologies evaluated for the use on the truck loading rack are submerged loading and dedicated service. Based on a search of the RBLIC, most loading racks of similar size and duty utilize submerged loading, dedicated service, and vapor recovery as BACT. Vapor recovery is not feasible due to the small amount of product transferred at this loading rack. Submerged loading and dedicated service are determined as BACT for VOC emissions.

B. ANALYSIS OF EXISTING AIR QUALITY

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants to be emitted in significant amounts from a proposed facility. NO_x and VOC are pollutants of concern in this case.

AERMOD modeling of NO_x emissions from the proposed project indicates that the maximum offsite ground level concentrations of these pollutants will be below their respective PSD significance levels and preconstruction monitoring levels. Therefore, pre-construction monitoring, refined NAAQS modeling, and increment consumption analyses were not required.

C. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) ANALYSIS

Because AERMOD modeling analyses indicated concentrations of each pollutant would be below its PSD ambient significance level, refined NAAQS modeling was not required.

D. PSD INCREMENT ANALYSIS

Because AERMOD modeling analyses indicated concentrations of each pollutant would be below its PSD ambient significance level, PSD increment modeling was not required.

A summary of the air quality analyses is also presented in Table II.

E. SOURCE RELATED GROWTH IMPACTS

Operation of this facility is not expected to have any significant effect on residential growth or industrial/commercial development in the area of the facility. No significant net change in employment, population, or housing will be associated with the project. As a result, there will not be any significant increases in pollutant emissions indirectly associated with Gulf Crossing Pipeline Co LLC's proposal. Secondary growth effects will include temporary construction related jobs and approximately 2 permanent jobs.



Major Source Permit Components: PSD



Preliminary Determination Summary

- **Source Impact Analysis**
 - Soil, Vegetation, Visibility
 - Class I Area
 - Toxic Emission
- **Conclusion**

PRELIMINARY DETERMINATION SUMMARY

Products R Us Facility
Agency Interest No.: 11111
Consumer Product Production
Ruston, Lincoln Parish, Louisiana
PSD-LA-999
March 31, 2008

F. SOILS, VEGETATION, AND VISIBILITY IMPACTS

There will be no significant impact on area soils, vegetation, or visibility.

G. CLASS I AREA IMPACTS

Arkansas' Caney Creek Wilderness Area, the nearest Class I area, is over 100 kilometers from the site, precluding any significant impact.

H. TOXIC EMISSIONS IMPACT

The selection of control technology based on the BACT analysis did not include consideration of control of toxic emissions.

V. CONCLUSION

The Air Permits Division has made a preliminary determination to approve the construction of the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station near Sterlington, in Ouachita Parish, Louisiana, subject to the attached specific and general conditions. In the event of a discrepancy in the provisions found in the application and those in this Preliminary Determination Summary, the Preliminary Determination Summary shall prevail.



Major Source Permit Components: PSD



Specific Conditions

- Mass Limits
- Concentration Limits
- Operating Time Limits
- Operating Rate Limits

SPECIFIC CONDITIONS
 Products R Us Facility
 Agency Interest No.: 11111
 Consumer Product Production
 Ruston, Lincoln Parish, Louisiana
 PSD-LA-999

- The permittee is authorized to operate in conformity with the specifications submitted to the Louisiana Department of Environmental Quality (LDEQ) as analyzed in LDEQ's document entitled "Preliminary Determination Summary" dated March 31, 2008, and subject to the following emissions limitations and other specified conditions. Specifications submitted are contained in the application and Emission Inventory Questionnaire dated October 3, 2007, along with supplemental information dated March 26, 2008, which consolidated and certified previous additional information submittals.

MAXIMUM ALLOWABLE EMISSIONS RATES							
ID No.	Description		PM ₁₀	SO ₂	NO _x	CO	VOC
EQT 1	C-1 Compressor Turbine No. 1	ppmvd	---	---	15 ¹	---	---
		lb/MM BTU	---	---	0.057	---	---
		lb/hr	0.52	0.27	4.50	4.57	2.62
		TPY	2.29	1.18	19.72	20.01	11.46
EQT 2	C-2 Compressor Turbine No. 2	ppmvd	---	---	15 ¹	---	---
		lb/MM BTU	---	---	0.057	---	---
		lb/hr	0.52	0.27	4.50	4.57	2.62
		TPY	2.29	1.18	19.72	20.01	11.46
EQT 3	C-3 Compressor Engine No. 1	lb/hr	0.32	0.02	7.31	1.57	1.84
		TPY	1.41	0.08	32.01	6.86	8.07
EQT 4	EG-1 Emergency Backup Generator	lb/hr	0.06	< 0.01	4.80	3.23	1.39
		TPY	0.02	< 0.01	1.20	0.81	0.35
EQT 5	T-1 Condensate Storage Tank	lb/hr	---	---	---	---	1.28
		TPY	---	---	---	---	5.62
EQT 6	L-1 Truck Loading	TPY	---	---	---	---	1.31
EQT 7	V-1 Blowdown Stack	TPY	---	---	---	---	6.29
EQT 8	V-2 Area Releases	lb/hr	---	---	---	---	1.22
		TPY	---	---	---	---	5.33
EQT 9	V-3 Turbine Starting Gas Vent	TPY	---	---	---	---	11.63
FUG 1	FUG-1 Piping Components (Fugitives)	lb/hr	---	---	---	---	0.75
		TPY	---	---	---	---	3.27
FUG 2	FUG-2 Unpaved Roads	lb/hr	0.11	---	---	---	---
		TPY	0.47	---	---	---	---

¹@15% O₂



Major Source Permit Components: PSD



A PSD permit also includes the same Louisiana State Air Permitting General Conditions as all other LDEQ issued permits.



Major Source Permit Components: PSD



BACT Cost Summary

- Breakdown of why or why not a BACT was chosen

TABLE I: BACT COST SUMMARY

Sabine Pass LNG LP - Sabine Pass LNG Terminal
 Agency Interest No.: 119267
 Sabine Pass LNG, L.P.
 Johnsons Bayou, Cameron Parish, Louisiana
 PSD-LA-703 (M-2)

Control Alternatives		Availability/ Feasibility	Negative Impacts (a)	Control Efficiency	Emissions Reduction (TPY)	Capital Cost (\$)	Annualized Cost (\$)	Cost Effectiveness (\$/ton)	Notes
<i>Submerged Combustion Vaporizers (SCVs)</i>									
NO _x	Selective Catalytic Reduction (SCR)	No/No	-	-	-	-	-	-	
NO _x	Water Injection and Good Combustion Practices	Yes/Yes	-	-	-	-	-	-	Selected
CO	Catalytic oxidation	No/No	-	-	-	-	-	-	
CO	Good Combustion Practices	Yes/Yes	-	-	-	-	-	-	Selected
PM ₁₀	Good Combustion Practices	Yes/Yes	-	-	-	-	-	-	Selected
VOC	Good Combustion Practices	Yes/Yes	-	-	-	-	-	-	Selected
<i>Turbines</i>									
NO _x	SCONO _x	No/No	-	-	-	-	-	-	
NO _x	Selective Catalytic Reduction (SCR)	Yes/No	1,2	80%	45.5	1,328,000	576,000	12,700	
NO _x	Nonselective Catalytic Reduction (NSCR)	No/No	-	-	-	-	-	-	
NO _x	Dry Low NO _x (DLN) Burners achieving 25 ppmvd @ 15% O ₂ at 50% or greater operating load, and 50 ppmvd @ 15% O ₂ at less than 50% operating load	Yes/Yes	-	-	-	-	-	-	Selected



Major Source Permit Components: PSD



Air Quality Analysis Summary

Breakdown of Air Quality Analysis and Modeling results

TABLE II: AIR QUALITY ANALYSIS SUMMARY

Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station
 Agency Interest No.: 151188
 Gulf Crossing Pipeline Company, LLC
 Sterlington, Ouachita Parish, Louisiana
 PSD-LA-729(R)

Pollutant	Averaging Period	Preliminary Screening Concentration (µg/m³)	Level of Significant Impact (µg/m³)	Significant Monitoring Concentration (µg/m³)	At the Monitoring Station		Background (µg/m³)	Maximum Modeled Concentration (µg/m³)	Modeled + Background Concentration (µg/m³)	NAAQS (µg/m³)	Modeled PSD Increment Consumption (µg/m³)	Allowable Class II PSD Increment (µg/m³)
					Monitored Values (µg/m³)	Modeling results (µg/m³)						
PM ₁₀	24-hour	NR	5	10	NR	NR	NR	NR	NR	150	NR	30
	Annual	NR	1	-	NR	NR	NR	NR	NR	50	NR	17
SO ₂	3-hour	NR	25	-	NR	NR	NR	NR	NR	1300	NR	512
	24-hour	NR	5	13	NR	NR	NR	NR	NR	365	NR	91
	Annual	NR	1	-	NR	NR	NR	NR	NR	80	NR	20
NO _x	Annual	0.87	1	14	NR	NR	NR	NR	NR	100	NR	25
CO	1-hour	NR	2000	-	NR	NR	NR	NR	NR	40,000	NR	-
	8-hour	NR	500	575	NR	NR	NR	NR	NR	10,000	NR	-
Lead	3-month	NR	-	0.1	NR	NR	NR	NR	NR	1.5	-	-

NR = Not required.



Major Source Permit Components



NNSR

- No separate permit documents issued
- Conditions incorporated into Title V Permit





Resources

Louisiana Environmental Regulatory Code (LAC)

Title 33 :Part III.Air

Part I. Office of the Secretary

<http://www.deq.louisiana.gov/portal/tabid/96/Default.aspx>

The Code of Federal Regulation (CFR)

NSPS (40 CFR 60)

NESHAP (40 CFR 61)

<http://www.gpoaccess.gov/cfr/retrieve.html>

The Clean Air Act (CAA)

The Clean Air Act Amendments (CAAA)

<http://www.epa.gov/air/caa/peg/>





Resources

DEQ Website

<http://www.deq.louisiana.gov/portal/tabid/36/Default.aspx>

A weekly list of permit applications received

<http://www.deq.louisiana.gov/portal/tabid/2824/Default.aspx>

A list of permits on public notice

<http://www.deq.louisiana.gov/apps/pubNotice/default.asp>

EDMS – Can be accessed on-line

<http://www.deq.louisiana.gov/portal/tabid/2604/Default.aspx>

Public Participation Group

<http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx>





Definitions and Acronyms

- APD Air Permits Division
- BACT Best Achievable Control Technology
- BART Best Available Retrofit Technology
- BMP Best Management Practices (Plan)
- CAA Clean Air Act
- CAAA Clean Air Act Amendments
- CEMS Continuous Emission Monitoring System
- CFR Code of Federal Regulations
- CMS Continuous Monitoring System
- CO Carbon monoxide
- Criteria Pollutants These are nitrogen oxide (NO_x), sulfur dioxide (SO₂), Particulate Matter (PM), Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Lead (Pb).
- DEQ Department of Environmental Quality
- EPA Environmental Protection Agency
- EDMS Electronic Documents Management System : The repository for all official records created or received by the Department



Definitions and Acronyms



- HAP Hazardous Air Pollutant
- HON Hazardous Organic NESHAPS
- LAC Louisiana Administrative Code
- LAER Lowest Achievable Emission Rate
- Major Source Facilities with emissions of criteria emissions that equal or exceed 100 tons per year (TPY) or emissions of any one federally-regulated HAP that equals or exceeds 10 TPY or if total HAP emissions for the facility equal or exceed 25 TPY. Lower emission thresholds for a criteria pollutant may apply in nonattainment areas. A facility which has emissions of one or more criteria pollutants above 100 tpy.
- MACT Maximum Achievable Control Technology
- MER Minimum Emission Rate
- Minor Source Facilities with emissions of criteria emissions that are less than 100 tons per year (TPY) or emissions of any one federally-regulated HAP is less than 10 TPY or if total HAP emissions for the facility are less than 25 TPY.
- MM Million
- MMBTU Millions of British thermal units



Definitions and Acronyms



- NAA Nonattainment area
- NAAQS National Ambient Air Quality Standards
- PM2.5 Particulate Matter of 2.5 microns or less aerodynamic diameter
- PM-10 Particulate matter, 10 microns or less in size
- NESHAP National Emission Standards for Hazardous Air Pollutants
- NSPS New Source Performance Standards
- NSR New Source Review
- NNSR Non-attainment New Source Review
- Pb Lead
- PPB Parts per Billion
- PPM Parts Per Million
- PSD Prevention of Significant Deterioration
- PTE Potential To Emit is the emissions from a facility if it is run at maximum all year long.
- SCF Standard Cubic Foot
- SCFH Standard Cubic Feet per Hour
- SCFM Standard Cubic Feet per Minute



Definitions and Acronyms



- SCM Standard Cubic Meter
- SIC Standard Industrial Classification
- SIP State Implementation Plan
- SO₂ Sulfur dioxide
- SOCMI Synthetic Organic Chemical Manufacturing Industry
- SOP Standard Operating Procedures
- Synthetic minor source A facility that would be major source except that the emissions are being controlled below the major source emission level. The facility is permitted as a minor source.
- Title V Operating Permit Program authorized by Title V of the Clean Air Act
- TPY Tons per year
- VOC Volatile Organic Compound
- TEMPO Tools for Environmental Management and Protection Organizations.: The Department's official database into which all data for every facility is entered.





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