



AIR & WASTE MANAGEMENT
ASSOCIATION
Louisiana Section

Louisiana Section of Air & Waste Management Association

Chair Perspective

MOVING FORWARD! Happy May! As I have said the past couple of years I can't believe how fast this year is going by. It's hard to focus when there are so many activities both in our personal and professional lives. As I sit and discuss aspects of safety with our contract partners here at the plant, I am amazed at the management of systems that must occur to keep things like Environmental, Health and Safety in check. For success in our industry a collaborative effort must be of utmost importance. The same is true for organizations like the Air & Waste Management Association.

When looking at the past success of our organization the collaboration of the membership has yielded some very successful achievements. As I reflect on the past couple of years, our Young Professionals (YP) organization has grown to be one of the most successful aspects of our Louisiana Section. The collaboration of so many individuals has helped to enhance the growth of the YP group, special emphasis at our Fall Conferences for YP's, career development guidance for our YP's and of course the golf tournament which seems to get better every year. We can ask ourselves for what purpose? As many organizations note, giving back is a huge element of functionality and sustainability, sort of the "Pay It Forward" concept. For example, some of the proceeds for the YP events go into sponsoring YP to ACE (A&WMA Annual Conference and Exhibition) for YP applicants who qualify for assistance to be able to attend. This gives opportunity to our YP's to understand the organization and hopefully facilitate increased volunteerism in the future and "Pay It Forward".

Another concept of "Pay It Forward" is the Scholarships that the Louisiana Section awards. Interestingly enough I was attending a luncheon today and was speaking to my former boss whose daughter was the recipient of the Gus Von-Bodungen award. I was so excited to hear that she is graduating with her Master's Degree and utilized the proceeds

Special points of interest:

- New A&WMA Interim Director
- Recent A&WMA Changes
- Improvement in Louisiana's Air Quality
- March Dinner Meeting Summary

Inside this issue:

Recent A&WMA Changes	2
2010 State Science & Engineering fair	3
A&WMA Welcomes new interim Director	3
LA Section YP Events	4
Special Thanks to our corporate Sponsors	4
Improvement in Louisiana's Air Quality	5
March Dinner Meeting Summary	5
Important Dates	7

For more information on the LA section, [click here](#)

Don't forget about:

The Air & Waste Management Association Annual Conference & Exhibition, June 19-22, in San Antonio, TX

Continued on page 2...

Chair Perspective Continued...

from the award to get her through the last stages of her coursework. This is quite an accomplishment for her as she had considered not completing her coursework at some point. There is a strong accomplishment for our organization when we see success and knowing we helped drive success. I am hoping to get input from the recipient to tell her story in a future newsletter. I am also hoping she will become involved in the organization more if her career path takes her further into the EHS world.

So many aspects of "Pay It Forward" can be part of our everyday lives. I certainly appreciate the opportunities I have had in the EHS world and look forward to giving back as much as possible. I remember being in my last semester at LSU and Richard Metcalf came to speak to our class regarding the regulations. Not knowing Richard at the time, I was amazed how he took the opportunity to come and speak to a group of young people (I was the old person in the class) and talk about the EHS world and what the regulations were about. Now that I have known Richard for quite some time now I realize how he has worked to "Pay It Forward" for our organization by assisting with our initiatives and providing valuable information as a guest speaker. Our May lunch meeting scheduled for May 17th is no exception. Richard and Henry Graham (who has also worked hard to "Pay It Forward") will be providing valuable information on recent regulatory developments. Please make every effort to attend.

So my challenge to you for moving forward into 2012 is to think about how to "Pay It Forward" and help others to MOVE FORWARD!

Section Chair
Julie Roussel

Best Wishes, Julie!

A&WMA Recent Organizational Changes

In accordance with the Louisiana Section Bylaws, the Section's annual election will taking place shortly. The Nominating Committee encourages you to submit nominations of qualified members for consideration by the committee. Of course, you may certainly submit your own name, if you have interest in any of the positions that will be coming open. This year, the office of Vice-Chair, one Director position, and the office of Treasurer will be filled by the election. All candidates for these positions must have been individual members of the Association for at least two consecutive years prior to taking office. In addition, candidates for the office of Vice-Chair shall have served as an Officer or Director of the Section, or a Standing Committee Chair, for a period of at least two years prior to taking office. The newly elected officials' terms of office will commence on January 1, 2013.

The Nominating Committee will announce the candidates at the membership meeting that will be held on July 19, 2012. The full details of the election, including the credentials of the candidates will be announced to the membership through an email message that will be sent to all members at the member's email address as reflected in the Association's membership database. Now

Continued on page 3...

Continued from page 2...

would be a good time for every member to review his or her email address in the database and make any corrections that may be required.

S & C Council Rep.
Bill Palermo

2012 State Science and Engineering Fair

Each year the Louisiana Section awards students who exhibit exceptional projects in the environmental fields at the State Level of the Science and Engineer fair in the Senior Division. This year was no exception and on March 27, 2012, out of approximately 24 projects, we awarded three winners. Our first place



award which included a check for \$400 was received by 9th Graders, Ms. Lily Aguiard and Ms. Andree Laville, from St. Joseph's Academy for their project titled "Larvae Eat Your Garbage: Vermicomposting with *Hermetia illucense*". Our second place award and a check for \$300 was received by 10th graders, Ms. Sarah Grand and Ms. Claire Babin, also from St. Joseph's Academy for their project titled "Persistence of Oil and Dispersant Following a Spill". Finishing up, our third place award and a check for \$200 was received by 9th grader, Ms. Grace

Sexton, from Hope Christian School for her project titled "Is Grass Greener than you Think?" We would like to congratulate all our winners and encourage them to continue their environmental studies.

I would also like to take the time to thank my volunteers who helped judge this year. A big thank you goes out to Meghan Gallinaro, Benjamin Aucoin, Veronica Crow and Jason Bradford!

Education Committee Vice Chair
Allyson Morales

A&WMA Welcomes New Interim Executive Director

A&WMA is pleased to welcome Robert E. Hall as our Interim Executive Director while the search committee, chaired by Peter Hess, is looking for a permanent Executive Director.

Mr. Hall was a Charter Member of the U.S. Environmental Protection Agency having started with the National Air Pollution Control Administration in June 1970. He retired from EPA in January 2009. He served as the Interim Executive Director of A&WMA from August 2009 to January 2010, until Mike Kelly was hired.

He works part time for AMEC in Research Triangle Park, NC and is a Visiting Professor at Zhejiang University in Hangzhou, China. Mr. Hall has been a member of A&WMA for 42 years, having joined as a student member in 1970, served as President from 1999 – 2000 and has served on the Board of Directors, chaired Technical Council, and is currently Chair of the RTP Chapter, having also served in that role in the early 1990's.



LA Section YP Events

The 2nd Annual LA Section Golf Tournament was hosted by the YP Group on April 19th! The tournament was open to YPs and non-YPs, members and non-members, and drew almost 80 registered players. Almost \$300 were raised through mulligan purchases to fund a Louisiana teacher's classroom science project



to be chosen from DonorsChoose.org. Revenue generated from the Golf Tournament will help support the future growth of the YP Group and provide new opportunities for YP members to be involved in A&WMA. In 2011, the LA Section started the "YP to ACE" program with profits generated from the Inaugural Golf Tournament. The success of the 2012 tournament supports the

"YP to ACE" program to continue in 2012, awarding scholarships for deserving YPs within the LA Section to attend ACE. Attending ACE offers the premier opportunity for networking, professional development, learning more about A&WMA, and getting more involved with A&WMA.

Many thanks to all of the players, sponsors, and volunteers that helped make the tournament a great success. Special thanks to Platinum Sponsors C-K Associates, LLC, and Sage Environmental Consulting, L.P., Gold Sponsors Conestoga-Rovers & Associates (CRA), and Shaw Environmental & Infrastructure, and to Silver Sponsors EMSI, Syngenta and Trinity Consultants. Many thanks to on course food sponsor Gulf Engineering Company, LLC, on course food and drink sponsor Shaw Environmental & Infrastructure, and awards reception food sponsor Buffalo Wild Wings.



Young Professionals Co-Chair
Jennifer Tullier

Special THANK YOU to our Corporate Sponsors:

- E.I. DuPont de Nemours – Pontchartrain Works
- Valero St. Charles Refinery
- E.I. DuPont de Nemours – Burnside
- Sage Environmental Consulting
- Ultra Consulting, LLC
- Emission Testing Services, Inc.
- Compliance Solutions Group, LLC
- Placid Refining Company, LLC
- Shaw Environmental & Infrastructure
- Environmental Resources Management (ERM)
- US Risk Management, LLC
- ExxonMobil Chemical Company
- RTP Environmental Associates, Inc.
- Williams Olefins, LLC
- Cornerstone Chemical Company
- Trinity Consultants
- METCO Environmental
- Alon Refining – Krotz Springs, Inc.
- Syngenta Crop Protection LLC
- TOTAL Petrochemicals & Refining USA, Inc.
- Allied Waste Services
- Union Carbide Corporation
- Liskow & Lewis
- Marathon Petroleum Company LP
- Entergy Services Inc.
- Matrix New World Engineering
- Matrix New World Engineering
- C-K Associates, LLC
- Kean, Miller, Hawthorne, D'Armand, McCowan & Jarman, L.L.P.
- Taylor Porter Law Firm

Improvement in Louisiana's Air Quality

Recently, Louisiana's air quality has been a hot topic in the environmental world. The state was recognized by EPA in 2011 for having the best air quality since the Clean Air Act was implemented.

According to the American Lung Association's State of the Air report, there were no parishes in Louisiana listed in the top 25 for most polluted for PM 2.5. In fact, the Monroe-Bastrop area was listed as one of the top seven cleanest cities in the nation for PM 2.5 and ozone combined. Louisiana is doing very well in reducing particulate pollution; however, there is still room for improvement with ozone pollution. The Baton Rouge Metropolitan area was listed 24th for highest ozone pollution. In December 2011, EPA redesignated parishes in the Baton Rouge area including Ascension, East Baton Rouge, Iberville, Livingston and West Baton Rouge as being in attainment for the 1-hour standard and the 8-hour ozone standard according to the 1997 ozone NAAQS. With Louisiana now being in attainment for these standards, it is clear that the ozone pollution problem is improving.

The month of May is traditionally known as the start of ozone season. With the start of summer, high temperatures will lead to favorable conditions for ozone formation. Everyone can take steps to preventing ozone such as walking, biking and carpooling. Take the initiative to continue improving Louisiana's air quality this summer!

Mary Claire Lambert
Newsletter Co-Chair

March 2012 Dinner Meeting Summary

The March Meeting of the Louisiana Section the Air and Waste Management Association was held on March 15th, 2012 at Mike Anderson's in Gonzales, Louisiana. Maureen Harbourt, a partner with Kean Miller Law Firm, presented on the Top Ten Mistakes in Title V Deviation and Certification Reports.

Failure to Assert Upset Defense

Upset defense provisions are defined in LAC 33:III.507.J as "any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator, including acts of God". An upset, as specified in LAC 33:III.Chapter 5 does not include noncompliance "to the extent" caused by improper design, lack of maintenance, operator error, careless or improper operation. Asserting an upset defense would require the owner or operator to have reported the event per LAC 33:III.Chapter 39. Ms. Harbourt stressed that on any Chapter 39 report (both 7 day and semiannual deviation reports) where one claims such event as "not preventable", one should also state that the event qualifies as an upset per LAC 33:III.507.J.

Incorporating By Reference When Underlying Report Does Not Meet Deviation Reporting Requirements

When the underlying report does not meet deviation reporting requirements, the owner or operator can incorporate by reference. Examples of these events are required reports, such as NSPS/NESHAP Excess Emissions Reports or LDAR Reports, in which a probable cause of deviation or preventative/corrective measures.

Failure to Identify As Deviations Matters Included in Underlying Reports Not Incorporated By Reference

The owner or operator should review all other required reports specified in Title V permits *Continued on page 6...*

Continued from page 5...

to ensure there are no instances in which could be defined as a deviation to include in Title V Deviation and Certification Reports. In this instance, a deviation is not always a violation. Excused excursions are deviations, but should be clearly defined as such. For instance, HON allows 1 excursion from an operating parameter limit per semiannual period for each control device.

Improperly Using the “Reconciliation Defense”

As specified in LAC 33:III.501.C.12, “Changes in reported emission levels as required by LAC 33:III.919.B.2.a due solely to revised AP-42 emission factors or other department-accepted estimation methods do not constitute violations of the air permit”. This only applies to changes in AP-42 factors or other LDEQ approved estimation methods, and not to calculation error reconciliation.

Imprecise Reporting of Emission Limit Deviations

Annual emission limits are generally stated in tons per year (tpy), with average and maximum emission rates in pounds per hour (lbs/hr). When a permitted pounds per hour emission limit deviation occurs, the owner or operator should specify whether it was an average or maximum rate that was exceeded. Additionally, if an annual (tpy) emission limit was exceeded, there is usually an average emission limit (lbs/hr) exceedance that also occurs. To avoid “double counting”, this should be stated as an exceedance of annual emission limit (tpy) and corresponding average emission limit (lbs/hr).

Identification of Duration of Deviation

Although guidance indicates the duration of a deviation should be stated, the LAC 33:III.70.6 rule does not clarify this requirement. It is however necessary to fulfill Chapter 39 reporting requirements. Overestimating the duration of deviations is an often mistake in reporting. A suggested improved approach to reporting durations of deviations is to state the date of discovery of such event and the date of cessation, as opposed to reporting the entire duration of the reporting period when a deviation’s duration is unknown.

Not Adequately Describing Corrective Action

Stating a corrective action for each deviation reported is a basic requirement and must be stated for the report to be considered as complete. Leaving this portion of the report blank or stating “no information provided” is insufficient. These descriptions should be detailed and comprehensive. These corrective actions will be used by the agency when evaluating enforcement actions for such deviations. It is also considered a good practice in reporting since these reports are public documents and publicly accessible through LDEQ’s Electronic Document Management System (EDMS).

Not Covering RMP and Part 82 (Refrigerants)

For Risk Management Plans, 40 CFR Part 68 requirements generally assume all requirements are incorpo-

Continued on page 7...

Continued from page 6...

rated. However, some Title V permits only specify certain sections of Part 68. In these cases, it is only necessary for the owner or operator to certify what is required by the permit itself.

For Stratospheric ozone rules, almost all facilities have at least comfort cooling units for control rooms that are subject to 40 CFR Part 82, and many facilities have larger industrial units that are applicable to this part. Although services applicable to

this rule are usually contracted, this does not eliminate the need for deviation reporting and certification.

Common failures include failure to have all technicians who may open equipment certified, failure to use certified recycling/recovery equipment, and not determining leak rate appropriately.

Including State-Only Requirements Not Requiring Deviation Reporting/Certification

The only state-only requirements subject to deviation reporting are emission limits. State-only conditions include any marked footnote in Table 1 of permits identified as state-only and limitations in the State General Conditions, including General Condition 17 items. By law, all conditions of a Title V permit are presumed to be federally applicable unless they are specifically identified in the permit as being state only. Hazardous Air Pollutants (HAP) and Toxic Air Pollutants (TAP) limits in the emission rate sheets that are not clearly marked as state-only are considered federal emission limits and do not require self-reporting.

Not Identifying Means by Which Compliance Status Determined Where MRR Is Missing

It is required to identify a means by which compliance status is determined when monitoring, recordkeeping, and reporting (MRR) requirements are not specified. In these cases, the owner or operator must indicate who compliance was determined to be continuous for each reporting period. If MRR is not specified for requirements such as emission limitations, one should describe how it was determined that the emission limitation was met.

Summary provided by Morgan Verrette
Newsletter Co-Chair



Board members enjoy dinner at the March meeting with guest speaker, Maureen Harbourt.



June 19-22, 2012 ~ San Antonio, TX

The Air & Waste Management Association' Annual Conference & Exhibition, June 19-22, in San Antonio, TX, brings together more than 2,000 environmental industry professionals for three days of the most distinguished technical program in the industry. Conference information can be found at <http://ace2012.awma.org/>.

LIMITLESS opportunities are available at the 105th Annual Conference & Exhibition to get optimal visibility as an exhibitor and/or sponsor. Exhibition and/or sponsorship are the ideal way to show your company's commitment to the environment, and to get your organization's name in front of the industry's leading professionals.

View the **Preliminary Program!**

A Special WELCOME to our New Members:

- Ryan Coleman, PPM Consultants, Inc.
- Matthew Colvin, PPM Consultants, Inc.
- Kathryn Falterman
- Lance Green, PPM Consultants, Inc.
- Kristen Kraus, PPM Consultants, Inc.
- Michael Lockett, PPM Consultants, Inc.
- Matt Mixon, PPM Consultants, Inc.
- Laura Picou, Providence Engineering
- Tyler Teague, CF Industries, Inc.

Important Dates

May 12, 2012	Household Hazardous Materials Collection Day (Ascension Parish, LA)
March 13, 2012	Southwest Louisiana Quarterly Luncheon at Cajun Café in Lake Charles, LA
May 15, 2012	Southwest Louisiana Chapter Quarterly Luncheon (Pat's of Henderson, Lake Charles, LA)
May 17, 2012	Louisiana Section May Lunch Meeting (Drusilla's, Baton Rouge, LA)
June 19-22, 2012	A&WMA Annual Conference and Exhibition (San Antonio, TX)
July 19, 2012	Louisiana Section July Dinner Meeting (Messina's, Kenner, LA)
September 20, 2012	Louisiana Section September Meeting (Mike Anderson's, Clarion Inn and Conference Center, Gonzales, LA)

[Click here for more important dates](#)

Board of Directors and Committee Chairs

Chair – Julie Roussel	225-353-8956	Speaker Chair – Shane Sandefer	225-389-3728
Vice Chair – Karen Brignac	225-245-2656	Corporate Relations Chair – Doug Melancon	985-536-5202
Past Chair – Michael Vince	225-219-3485	Awards Chair – Jason Midgett	225-346-7454
Treasurer – Raquel Murphy	504-561-6639	Education Committee Chair – Kevin Calhoun	225-766-7400
Secretary – Jennifer Tullier	225-755-1000	Education Vice Chair – Allyson Morales	225-746-5889
Director (2010-12) - Diane Leche	225-977-1549	Communications Chair – Kelly Bradberry	225-927-2258
Director (2011-13) – Greg Johnson	504-556-4115	Website Chair – Diane Leche	225-977-1549
Director (2012-14) - Doris B. Grego	985-536-5437	LSU Student Chapter Chair – Gray Melancon	
S & C Council Rep. – Bill Palermo	504-472-9993	Young Professionals Chair – Jennifer Tullier	225-755-1000
SW Chapter Chair – Drew Cagnolatti	337-436-3248	Young Professionals Vice Chair – Jason Midgett	225-346-7454
Facilities Chair – Carol Murphy	504-472-9993	Newsletter Co-Chair – Morgan Verrette	337-802-6263
Membership Chair – Veronica Crow	225-642-9787	Newsletter Co-Chair – Mary Claire Lambert	225-603-5782

Southwest Chapter Officers

Chair – Drew Cagnolatti	337-436-3248	Past Chair – Chuck Zukor	337-493-3301
Vice Chair – Sarah Doucet	337-494-5239	Membership Committee Chair – Phyllis Holifield	337-708-8431
Secretary – Bruce Hubbard	337-882-5375	Program Committee Chair – Mike Dever	337-842-3858
Treasurer – David Monfore	337-558-5961	Nominating Committee Chair – Don G. Johnson	337-708-4789

Share your ideas with us!

Have an idea for the Monitor?

Send it to one of the editors to see your thoughts in action!

Contact [Morgan Verrette](#) or [Mary Claire Lambert](#)!

The Louisiana Section of the
Air and Waste Management Association
will hold its May 2012 Luncheon Meeting at Drusilla Catering



3482 Drusilla Lane
Baton Rouge, LA
225-927-8844

Date: Thursday, May 17, 2012

Registration 11:30 AM – Meeting Begins 12:00 Noon

Speakers: Richard Metcalf, LMOGA & Henry Graham, LCA

Richard Metcalf of the Louisiana Mid-Continent Oil & Gas Association and Henry Graham of the Louisiana Chemical Association will present an update of current regulatory issues.

Reservations: You may now make your reservations and pay by credit card online. [Click here](#) to register using this preferred method of payment. Reservations may also be made by faxing this form to (504) 472-9963 or calling Carol Murphy at (504) 472-9993.

In order to complete your registration, we must receive your full name, company, and credit card information. If you do not attend, your credit card will be charged for the number of people for whom you made a reservation. If you wish to use email to indicate your intent to attend the meeting, you are welcome to do so, however, please remember that your reservation will not be confirmed until your credit card information is received via telephone, fax, or mail. Please note: The Section cannot accept email messages containing credit card information and any such messages received will be deleted immediately for your protection!

Name/Company _____

Email _____ Phone (_____) _____

Please indicate your choice of entrée: Seafood Feast Breast of Chicken Vegetarian

Credit Card Information Visa MasterCard American Express

Expiration Date /

Meeting Registration Fee:

\$40 Members/Corporate Sponsors \$45 Nonmembers \$50 at the door \$15 LDEQ/Students
