



Air Permits Update: A Brutally Honest Assessment of Air Permitting in 2022 and Beyond

Air & Waste Management Association
Louisiana Section

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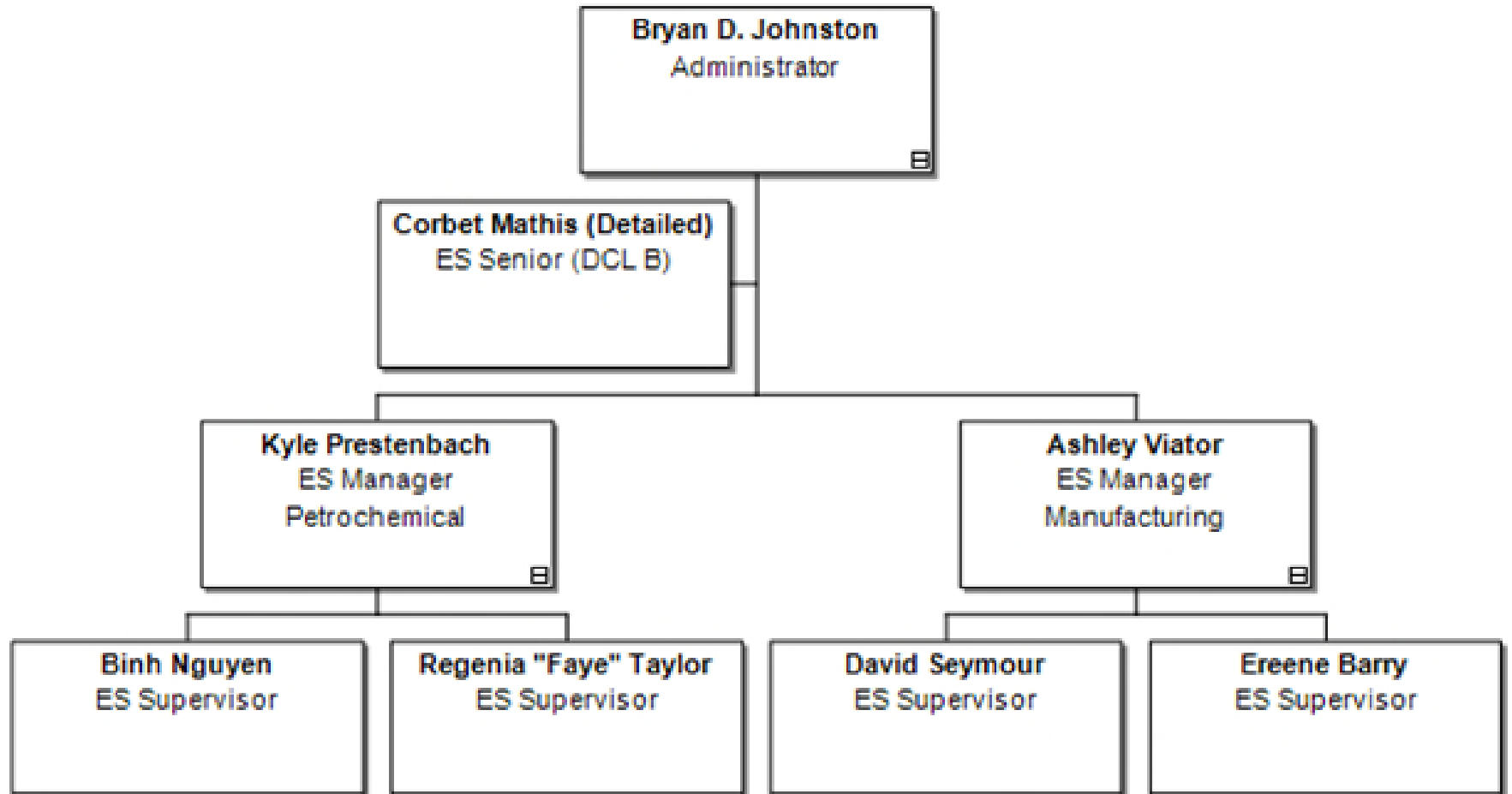




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Personnel





Contact Numbers

Kyle: **219-3457**

Ashley: **219-3459**

Corbet: **219-3437**



Delegation



Delegation

On September 9, 2022, LDEQ requested that EPA update our delegation of NSPS and NESHAP standards.

- Currently, LDEQ is delegated to implement and enforce most standards promulgated under 40 CFR parts 60, 61, and 63, but only as amended through **July 1, 2013**.
 - EDMS Doc ID 13463903



Public Comments



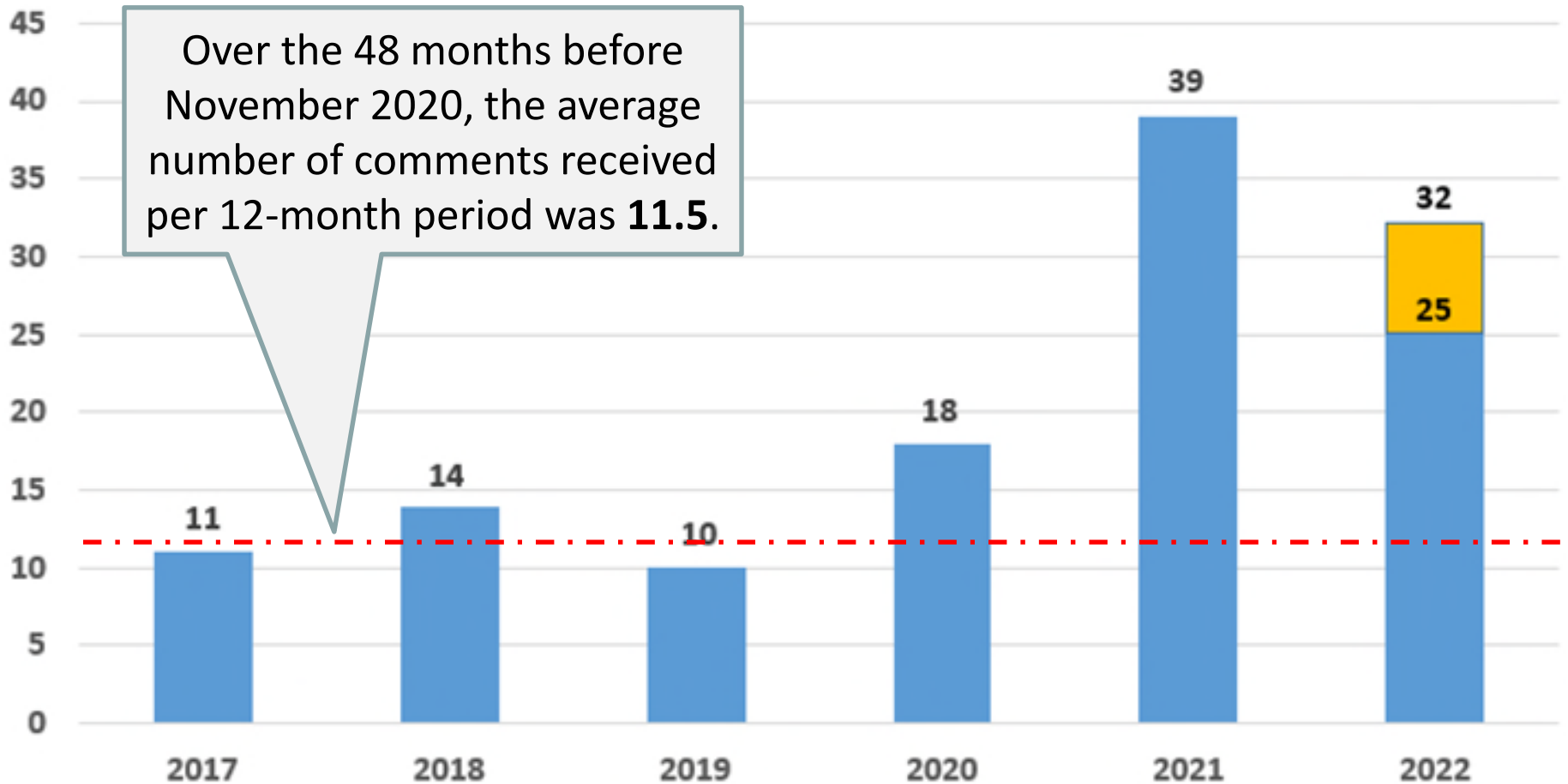
Public Comments

The onslaught of public comments has continued into 2022.

Comments have been received on proposed permits:

- where no modifications have been proposed;
- where there are no changes in permitted emissions;
- where permitted emissions are decreasing (sometimes significantly); and
- for the oil and gas industry.

Number of Proposed Permit Actions Receiving Comments





Public Comments

Parishes (since November 2020):

- Calcasieu (40)
- Cameron (8)
- St. James (7)
- EBR (4)
- Iberville (3)
- Ascension, Beauregard, St. Bernard (2 each)
- Concordia, DeSoto, Plaquemines, St. John the Baptist (1 each)



PM_{2.5}



PM_{2.5} NAAQS

On June 10, 2021, EPA announced that it would reconsider the previous administration's decision to retain the PM_{2.5} NAAQS.

- 12 µg/m³ (annual average)
- 35 µg/m³ (24-hour average)

EPA originally expected to issue a proposed rulemaking in summer 2022 and a final rule in spring 2023.



PM_{2.5} Design Values (2019 – 2021)

| Monitor | Parish | DV |
|-----------------------------|------------------|-----|
| Shreveport-Calumet | Caddo | 9.9 |
| Port Allen | West Baton Rouge | 8.8 |
| Baton Rouge-Capitol | East Baton Rouge | 8.6 |
| Geismar | Iberville | 7.9 |
| Lafayette-USGS | Lafayette | 7.9 |
| Chalmette-Vista | St. Bernard | 7.7 |
| I-610 New Orleans Near Road | Orleans | 7.7 |
| Marrero | Jefferson | 7.6 |
| Hammond | Tangipahoa | 7.5 |
| Alexandria | Rapides | 7.4 |
| Kenner | Jefferson | 7.3 |
| Monroe | Ouachita | 7.3 |
| Houma | Terrebonne | 7.2 |
| Vinton | Calcasieu | 7.1 |



PM_{2.5} NSR

PSD: Modeling would become exceedingly difficult in many areas of the state.

NNSR: Major source threshold = 100 tons per year

Significant emission rates:

- PM_{2.5}: 10 tons per year
- SO₂: 40 tons per year
- NO_x: 40 tons per year
- VOC: 40 tons per year
- NH₃: TBD by SIP if regulated as precursor.

Offset ratio: > 1.00 to 1



Ozone



Ozone NAAQS

On October 29, 2021, EPA announced that it would reconsider the previous administration's decision to retain the ozone NAAQS.

- 70 parts per billion (8-hour average)

EPA is targeting the end of 2023 to complete this reconsideration.



Ozone Design Values*

| Monitor | Parish | DV |
|------------------|------------------|------|
| Carville | Iberville | 68 |
| Bayou Plaquemine | Iberville | 67 |
| Port Allen | West Baton Rouge | 66 |
| Capitol | East Baton Rouge | 65 |
| Dutchtown | Ascension | 64 |
| New Roads | Pointe Coupee | 63 |
| LSU | East Baton Rouge | 63 |
| All Others | — | ≤ 62 |

* As of September 27, 2022

Yellowstone

Yosemite

Washington, DC



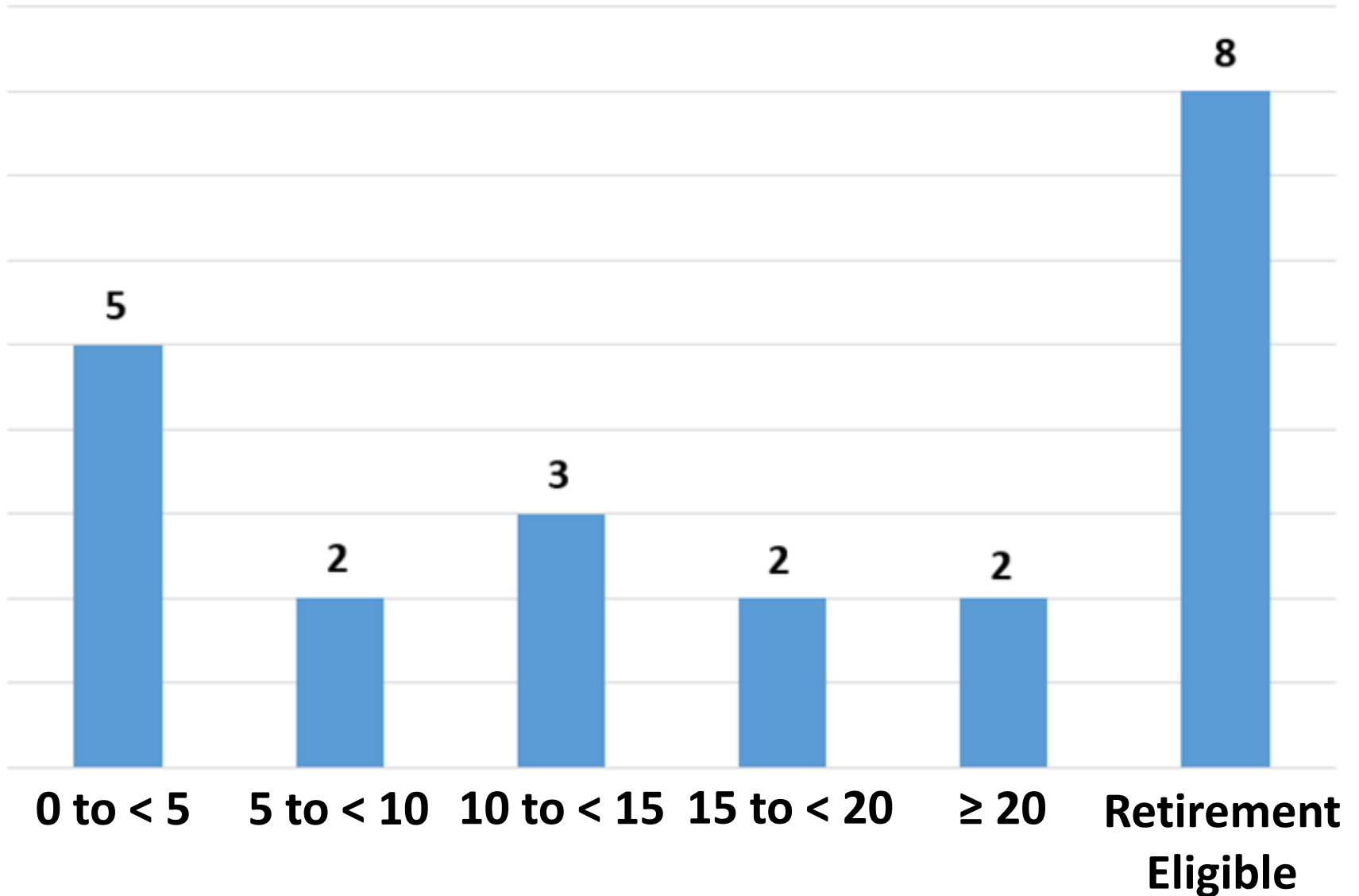
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Permit Writers

LDEQ Experience of Current ECS Permit Writers (Years)





Permit Writers

\$47,986

\$75,598

2%



Questions / Comments?

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