

POTPOURRI

Department of Environmental Quality
Office of Air Quality and Radiation Protection
Air Quality Division

Fugitive Emission Program Coordinator

On April 17, 1996, the Department of Environmental Quality and U.S.E.P.A. executed a Memorandum of Understanding concerning the implementation and enforcement of state and federal fugitive emission control programs as they apply to industrial sources in Louisiana. The agreement recognizes guidelines by which a source may comply with multiple equipment leak programs where the applicability of such programs overlaps at a site. The guidelines rely on the overall most stringent program of all applicable programs at the source to form the basis of a consolidated program.

To implement a consolidated program, facilities would apply the overall most stringent program in accordance with a specified set of terms and conditions under the guidelines. The guidelines can be implemented only through a notice and agreement submitted by the source, specifying where the overall most stringent program would be applied at the site. Facilities must submit the Source Notice and Agreement to the address noted below, and must attach the Louisiana Fugitive Emission Program Guidelines, as provided by DEQ.

The guidelines and the notice and agreement forms, as well as an example Source Notice and Agreement, are available on the Air Quality Permits Section Bulletin Board or by request from DEQ. Source information will be maintained in files accessible to the public at the DEQ and EPA Region 6 offices. To assist in informing the public, DEQ will periodically publish a list of sources operating under the guidelines. In addition, terms providing for a consolidated program under the guidelines will be incorporated in the source's air quality permit to be issued under Title V of the Clean Air Act.

Facilities planning to consolidate RCRA Subparts BB and/or CC fugitive programs must first contact the LDEQ Hazardous Waste Division - Permits Section at (504) 765-0272 before submitting the Source Notice and Agreement to the Air Quality Division. Approval by the LDEQ Hazardous Waste Division, as well as a possible permit modification, will be required before the facility can consolidate RCRA Subparts BB and CC.

If you have questions concerning this program, please contact: Bliss Higgins at (504) 765-0114, or Bennett Farrier at (504) 765-0148, or Donna Hathaway at (504) 765-0132. Please direct submittals to: LDEQ, Bennett Farrier, Air Quality Division/Engineering, Box 82135, Baton Rouge, LA 70884-2135.

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Assistant Secretary

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