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**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**

Cynthia J. Kaleri  
Chief, Air Permits Section (ARPE)  
United States Environmental Protection Agency, Region 6  
1201 Elm Street, Suite 600  
Dallas, Texas 75270

RE: FY2021 Clean Air Act Title V Program Audit

Dear Ms. Kaleri:

On June 23, 2022, the United States Environmental Protection Agency (EPA) transmitted to the Louisiana Department of Environmental Quality (LDEQ) a draft report summarizing the findings and recommendations of its most recent audit of LDEQ's Part 70 operating permits program. At this time, LDEQ wishes to address one concern raised by EPA.

LDEQ's June 4, 2021, response to EPA's Title V Program Evaluation Questionnaire indicated that:

"The Air Permits Division currently has 22 permit writers that review Title V permit applications. In addition, the managers of the Petrochemical Section and the Manufacturing Section, one supervisor in the Petrochemical Section, and the division's Environmental Scientist Senior occasionally process Title V permit applications. Based on the number of Title V actions that these additional staff members completed between 2018 and 2020 and the average number of Title V actions that a permit writer completes in a year, they effectively increase the number of permit writers by one FTE [full-time equivalent]."

\* \* \*

"In 2011, when EPA initiated its "limited scope programmatic oversight audit" of the LDEQ's Title V fee program, it appears that the Air Permits Division had 25 permit writers that reviewed Title V permit applications."

EPA expressed concern that the "decrease in air permit staffing may not be offset by the downward trend in number of active permits [and] raises questions of air permit staffing adequacy and could possibly hinder the effective implementation of the title V program."

LDEQ wishes to clarify that the total number of "permit writers" in the Air Permits Division (APD) (staff whose primary responsibility is to review permit applications and draft permits) has not materially changed since EPA's 2011 "limited scope programmatic oversight audit." At that time, the APD included State Implementation Plan (SIP) and Emissions Inventory staff that are now in the Office of Environmental Assessment. Specifically, one Environmental Chemical Specialist primarily worked with the SIP group, and another was mainly tasked with review of air dispersion modeling results (LDEQ does not label modeling staff as "permit writers," though they directly support Louisiana's Part 70 operating permits program). These two positions were inadvertently identified as permit writers in LDEQ's June 4, 2021, response.

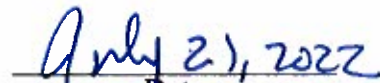
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Thus, between 2011 and 2021, there has been no practical change in the number of FTE s dedicated to the review of Title V permit applications and preparation of Title V permits.

As always, LDEQ remains committed to assuring adequate air permit staffing to effectively implement the Title V program. Should you have any questions, please contact Bryan D. Johnston of the Air Permits Division at (225) 219-3450.

Sincerely,

  
Bliss M. Higgins  
Assistant Secretary

  
Date

BMH:BDJ