

## Naming of Files when Electronically Transmitting Air Permit Related Documents to EPA Region 6 for Louisiana Sources

Transmittal by electronic means (not hard copy) is the preferred way of sending permit related documents for sources operating in Louisiana to EPA Region 6. Such documents may include permit applications, application updates, modeling reports, etc. Documents sent as an attachment to an email is the preferred means of transmittal and the email address to use is:

**R6AirPermitsLa@epa.gov**

The file format used to transmit such files is typically but not exclusively a searchable portable document format (\*.pdf). Other file formats may also be used, e.g., \*.xls, \*.docx, etc. Modeling files are a special category as are documents with a filesize exceeding about 20 MB and may be transmitted electronically, but not by email. Contact Brad Toups at 214 665-7258 (email [toups.brad@epa.gov](mailto:toups.brad@epa.gov)) for alternative means of transmittal in such cases. Documents successfully transmitted to Region 6 electronically suffice: there is no need to send a physical hard copy of the same file to the EPA unless a specific request is made or unless otherwise required to do so by law.

The Subject Line of the email transmitting a copy of the file may simply be a copy of the filename. If the subject line is a copy of the filename, and the filename follows the guidance below, then the only other text that needs to be in the email is contact information so that we communicate with the appropriate person in the event that we have questions about the document or the email itself. Of course, don't forget to attach a copy of the referenced document properly named!

### **How to name the document file for purposes of emailing it to the EPA**

The permit application or application update, or final permit file name is a string of characters that should be readable enough to allow a reasonably familiar person to understand which company, site, unit, permit, and type of permit action is contained in the file. Therefore, use of abbreviations and shortcuts are encouraged, but not at the expense of intelligibility. The file name will be longer than most, and it is recommended that the following filename naming convention be observed. Certain characters, such as any type of slash (/,\, /) or brackets ({,[]), or the pound sign (#) or an exclamation point (!) cannot be used due to computer related limits. However, the ampersand symbol (&), spaces, dashes, open and close parentheses (“(” or “)”) can be used, but refrain from using commas (,). A period should only be used immediately preceding the filename extension. A filename should not exceed about a hundred characters in length. An example of a file named using this naming convention is as follows:

19933 PCA Deridder Mill MiM F PSD-LA-77(M-4) May 29 2015 EiD 9782771.pdf

1    2    3    4 5    6    7    8    9

- 1) AI Number: just the number, not any preceding characters.
- 2) Company Name- abbreviation of the permittee company name is fine but include enough to get the idea of the actual name across. So, for example, “PCA” might be ok for Packaging Corporation of America, but ExxonMobil (or ExxMo, as an even shorter abbreviation might be clear enough to work) would not be enough to distinguish ExxonMobil Refining from ExxonMobil Pipeline, in that case the Refining might be abbreviated “ExxMo Refining” and “ExxMo Pipeline”.
- 3) Site Name and Area name if relevant- same convention as the company name. So, for example:

ExxonMobil Chemical Co's site and area name for the Baton Rouge Chemical Plant, Aromatics Production Unit might be abbreviated as “BR Chem AroPU”.

**Note:** in some cases, the combination of company name, site name, and process unit(s) involved would be too complex to follow this guidance on naming your files. In that case, do provide more detail in the body of the email to describe the scope of the permit project, but attempt to include all the other features in the filename.

- 4) Nature of Action: The use of the following abbreviations is recommended (you may add to the list as needed). For example, a minor mod of a permit would be a MiM, while a renewal and minor mod would be a RenMiM, as follows:

**Permit Action Types and their Abbreviations**

Abbreviation	Description	Abbreviation	Description
Admin	Administrative Amendment	RenMaM	Renewal and Significant Modification
In	Initial Permit	RenMiM	Renewal and Minor Modification
MaM	Major or Significant Modification	ReOpen	Reopen the permit
MiM	Minor Modification	Rescind	Recind the permit
Ren	Renewal	SOC Ext	Start of Construction Extension

- 5) An indication that the file is the Permit Application (A). It is also possible to use a (U) to reference an application update when naming files that are application related. Use (F) to reference a final permit file.
- 6) The issued authorization or permit’s number itself. For Initial permit applications, ‘TBD’ may be used. Adding a “+” at the end of the permit number indicates that it is a modification of the numbered permit.
- 7) The date of the action itself, e.g., the date on the file or application cover letter. You should use a 3 letter month, a space, the day, a space, the year. Commas are not allowed in filenames, hence the use of spaces.
- 8) If the file has an EDMS Document ID number, then the string “EiD:” followed by the actual EDMS Document ID number.
- 9) the filename extension. Typically, but not exclusively, it would be a portable document format file type (\*.pdf).

**Example 1.** Proctor and Gamble Alexandria plant submitted an application for a minor modification of their Title V permit that was dated December 5, 2016. Prior to sending file (they elected to send it as an acrobat type) to EPA, they obtained an EDMS Document ID number for the application. Here is the filename (and the transmitting email subject line text) for that permit application sent to EPA:

872 P&G Alex MiM A 2360-00051-V21+ Dec 5 2016 EiD 10431586.pdf

**Example 2.** A consulting company, on behalf of the Packaging Corporation of America DeRidder Mill applied for a minor modification of their PSD-LA-77(M-3) permit and their -V3 version of their Title V permit on March 20, 2015. At the time the application was sent by the consultant to the EPA, the company did not have an EDMS Document number for the application. After review, the LDEQ issued the final modified permits on May 29 2015 and the permits were given EDMS Document ID numbers 2132453 and 9782778, respectively. The application file name and the transmitting email subject line text sent to the EPA would be:

19933 PCA Deridder A MiM 0320-00002-V3+ MiM PSD 77M-3+ Mar 20 2015.pdf

Those final permit files would be named as follows:

19933 PCA Deridder Mill MiM F PSD-LA-77(M-4) May 29 2015 EiD 9782771.pdf

19933 PCA Deridder Mill MiM F 0320-00002-V4 May 29 2015 EiD 9782778.pdf

**Example 3.** ExxonMobil Refining and Supply Co requested a minor modification to their title v pemit for the pipestill complex at their Baton Rouge Refinery. That Minor modification was issued April 25, 2017. In this case, the company name, the site name and the unit name are all quite long. An acceptable filename for the final permit might be:

2638 ExxMo Ref &Sup BR Refi PipeStill MiM F 2755-V7 Apr 25 2017 EiD 10591514.pdf