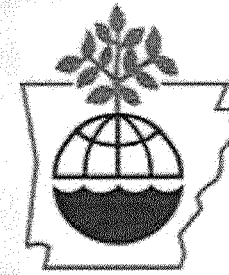




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Arkansas
Environmental
Federation

Industries for the Environment

Reporting and Recordkeeping 101

Amy McGraw

**Arkansas Environmental Federation
April 12, 2016 Air Workshop**

You have a new permit!

ADEQ MINOR SOURCE AIR PERMIT

Permit No.: 0000-AR-02

IS ISSUED TO:

Your Company, Inc.

Your Address

City, ST ZIP

Your County

AFIN: 00-00000

So...what now?

Permit Requirements

- > Recordkeeping
 - ❖ Daily, weekly, monthly, 12-month rolling totals
 - ❖ Averages: hourly, 3-hour rolling
 - ❖ Recordkeeping storage: Five years
- > Testing
 - ❖ You may have testing requirements for ADEQ, EPA, or both
- > Reporting
 - ❖ ADEQ
 - ◆ Upset Conditions
 - ◆ Title V: Semi-Annual Monitoring Reports (SAMR)
 - ◆ Title V: Annual Compliance Certifications (ACC)
 - ◆ Title V: Emissions Inventory (annually or tri-annually)
 - ◆ Other reporting
 - ❖ EPA Region VI
 - ◆ Initial Notifications
 - ◆ Notifications of Compliance Status
 - ◆ Semi-Annual Reports (SAR)
 - ◆ Other Reporting: Greenhouse Gases
- > Inspections
 - ❖ ADEQ
 - ◆ Generally conducted annually

Educate Yourself

1. Understand your process
2. Read your permit
3. Look for action items

Educate Yourself

- > Understand your process
 - ❖ Equipment
 - ◆ Location
 - ADEQ uses UTM coordinates
 - Plot plans are helpful (and sometimes necessary!)
 - Process flow diagrams: not just physical location, but also location of equipment in the process
 - ◆ Fuel usage
 - ◆ Control devices
 - ❖ Material throughputs
 - ❖ Heat inputs
 - ❖ Facility changes

Educate Yourself

> Read your permit and look for action items

❖ Specific Conditions

- ◆ “The permittee shall maintain daily/monthly records to demonstrate compliance”
 - This usually references another Specific Condition that has the actual emissions or throughput limits

15. The permittee shall not operate the emergency generator SN-12 in excess of 500 total hours (emergency and non-emergency) per calendar year in order to demonstrate compliance with the annual emission rate limits. Emergency operation in excess of these hours may be allowable but shall be reported and will be evaluated in accordance with Regulation 19 §19.602 and other applicable regulations. [Regulation 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
16. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition 15. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The calendar year totals and each individual month's data shall be maintained on-site, made available to Department personnel upon request, and submitted in accordance with General Provision 7. [Regulation 19 §19.705 and 40 CFR Part 52, Subpart E]

Educate Yourself

- > Other action item examples
 - ❖ “The permittee shall maintain records of MSDS”
 - ❖ “The permittee shall operate and maintain SN-## in accordance with the manufacturer’s written instructions or develop your own maintenance plan”
 - ❖ “The permittee shall maintain records of the following”
 - ❖ “Performance tests are required within X days”

Educate Yourself

> Other action item examples

❖ General Condition #3 (Minor Source)

3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Reg. 19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

❖ Plantwide Condition #1 (Title V)

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

> Four notifications per emissions source!

Educate Yourself

> Take advantage of ADEQ's website!

<https://www.adeq.state.ar.us/air>

FAQs

Air Division

[Regulations](#)

[Permits](#)

[Compliance Monitoring](#)

[Planning & Air Quality Analysis](#)

[Program Support](#)

[Air Staff Directory](#)

[Related Links & Documents](#)

[Asbestos Section](#)

[Air Inspectors](#)

[Air Permit Change of Ownership](#)

[Air Emission Inventory Forms](#)

[Reduce Emissions from Diesels Go RED!](#)

[Monitoring Site Map](#)

[Air Online Databases](#)

[Ozone Action Days](#)

[SLEIS](#)

[Smoke School](#)

[Yard Waste Burning Regulations](#)

Air Division

Ambient air monitoring throughout the state of Arkansas speaks to the effectiveness of the ADEQ's Air Division program -- Arkansas is only one of a handful of states in the country that currently and consistently meets all federal air quality standards for criteria pollutants such as sulfur dioxide, particulates, nitrogen oxides, hydrocarbons and lead.

The Air Division also has received all delegable air programs, including the Title V program for major sources of pollutants, from Region 6 of the US Environmental Protection Agency. These programs include the New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), Prevention of Significant Deterioration (PSD) and the State Implementation Plan (SIP).

By working closely with businesses and industries, the Air Division issues permits that help maintain and improve the air quality for all citizens in the state. The Air Division has four branches, [Program Support](#), [Planning and Air Quality Analysis](#), [Permits](#), and [Compliance Monitoring](#). Staff in these branches are available to answer questions and help with any technical problems that arise.

Carbon Emission Standards for the Power Sector under the Clean Power Plan

On August 3, 2015, the US Environmental Protection Agency (EPA) released final rules for the New Source Performance Standards (NSPS) for new power plants as well as carbon dioxide emission standards for existing power plants—commonly referred to as the Clean Power Plan (CPP). EPA also proposed model plans as well as a federal plan that would be implemented if a state or states fail to submit an approvable State plan to comply with the carbon emission standards for existing power plants. EPA will be taking comments on both the proposed federal plan and the proposed model plans for a period of 90 days after publication in the Federal Register.

REPORT A COMPLAINT

[Online Complaint Reporting Form](#)

Air Division Contacts

Chief

[Stuart Spencer](#)
501-683-0873

Assistant Chief

Vacant

Compliance Monitoring Branch

[Heinz Braun](#)
501-682-0756

Permits Branch

[Thomas Rheume](#)
501-682-0762

Planning & Air Quality Analysis Branch

[Tony Davis](#)
501-682-0728

Asbestos Licensing and Certification

[Torrence Thrower](#)
501-682-0740

Acting Program Support Branch

[Stuart Spencer](#)
501-683-0873

ADEQ Helpline

501-682-0923
Toll-Free: 888-233-0326

[Questions or Comments?](#)

Educate Yourself

> ADEQ's website: Facility and Permit Summary

ADEQ Facility and Permit Summary (PDS)

To find information about a specific facility or permit, you can search our database by using the form below. For assistance with the searchable database, contact [Patrick Stair](#), 501-682-0673. You may also find our [Search Tips](#) to be useful.

ADEQ Facility and Permit Summary (PDS)

Make your selection(s), then click the Search button. Scroll below search fields to view results. [Search Tips](#)

Note: If you have the AFIN or Permit Number, you only need to enter one of these two items.

Facility Information	
AFIN:	<input type="text" value="Must enter dash, XX-XXXXX"/>
Facility Name:	<input type="text"/>
Facility County:	<input type="text" value="No Restrictions"/>
Facility City:	<input type="text"/>
SIC Code:	<input type="text"/> Table of SIC Codes
NAICS Code:	<input type="text"/> Table of NAICS Codes

Permit Information	
Permit Number:	<input type="text"/>
Name/Address:	<input type="text"/>
Media/Type:	<input type="text" value="No Restrictions"/>
Permit Status:	<input type="text" value="No Restrictions"/>

Copy of Permit Online

[Reset](#)

> Current Permit

> Prior Permits

> Statement of Basis

Educate Yourself

> Other options

- ❖ Other EH&S staff
- ❖ Networking within industry
 - ◆ Arkansas Environmental Federation
- ❖ Industry groups
 - ◆ NCASI: National Council for Air and Stream Improvement
- ❖ Consultants

Recordkeeping

> Compliance Binders

- ❖ Develop according to action items and facility setup
 - ◆ Facilitywide
 - ◆ Per process
 - ◆ Per emission source
 - ◆ Or per applicable regulation
- ❖ Examples:
 - ◆ Emergency Generator Binder
 - All emergency generators at the facility
 - ◆ Natural Gas Combustion Sources Binder
 - All natural gas combustion equipment at the facility
 - ◆ Continuous Emissions Monitoring System (CEMS) Binder
 - All information and recordkeeping for a CEMS device
 - ◆ Boiler MACT Binder
 - All required notifications, maintenance plan and records, and throughputs for one boiler

Recordkeeping

> Compliance Binders

- ❖ Copy of your permit
 - ◆ Facility history: If your permit has gone through multiple iterations, you may want to keep a binder with previous permits available for reference
- ❖ Notifications
 - ◆ Initial Notifications
 - ◆ Notifications of Compliance Status
 - ◆ General Condition #3/Plantwide Condition #1 letters
 - ◆ Upset Condition Notifications
- ❖ Maintenance/Operating manuals as required by your permit

Recordkeeping

> Compliance Binders

- ❖ Testing
 - ◆ Copy of the test
 - ◆ Copy of notifications to the EPA/ADEQ
- ❖ Recordkeeping: tracking spreadsheets
 - ◆ Throughput daily, monthly, rolling 12-month totals
 - ◆ Emissions daily, monthly, rolling 12-month totals
 - ◆ Averages for control equipment
- ❖ Recordkeeping: other records
 - ◆ MSDS
 - ◆ Fuel purchases
 - ◆ Work orders
 - ◆ Monitoring reports

Recordkeeping

- > Use Excel to create tracking spreadsheets
 - ❖ Develop per throughput, emission source or limit
 - ◆ List of action items requiring tracking
 - ❖ Develop daily, monthly and 12-month rolling totals columns as needed
 - ◆ April 2016 12-month rolling total = May 2015 through April 2016
 - ❖ List limits for comparison. Example:
 - ◆ 130 MBf lumber/year
 - ◆ 700 MMscf natural gas throughput/year
 - ◆ 9.5 tpy HAP emissions
 - ❖ Reference Specific Conditions
 - ❖ Don't leave cells blank for individual monthly data—use zeroes!
 - ❖ Be sure to include units
 - ❖ All monthly and 12-month rolling totals due by the 15th of the next month!

Recordkeeping

> Sample tracking spreadsheet

Date	SC #3 Facility Throughput 12- month Rolling Total Limit 50,000 tpy	SC #4 SN-01 Widget Maker #1 tons	SC #5 SN-02 Widget Maker #2 tons	SC #6 Total Facility Natural Gas Usage Limit 2000 MMscf	SC #11 SN-03 Boiler #1 Natural Gas Usage MMscf	SC #15 SN-04 Process Water Heater MMscf	Notes
Jan-15		1256	60		65.6	56	Boiler #1 down 6/12/15 - 6/20/15
Feb-15		4585	45		66	52	
Mar-15		3245	55		65.3	53	
Apr-15		1289	53		62.2	52	
May-15		1255	28		49	53	
Jun-15		1246	79		5	53.2	
Jul-15		3002	65		56	51	
Aug-15		2956	45		60.3	50	
Sep-15		2222	59		61.2	59.3	
Oct-15		2760	56		59	50.5	
Nov-15		1590	58		45	54	
Dec-15	26009	4600	61	1312.6	80	54	
Jan-16	29354	3885	57	1302.2	56	55.2	
Feb-16	28666	3760	57	1308.2	62.9	61.1	
Mar-16	29183	2987	51	1306.9	61	56	
Apr-16	30879	2559	61	1303.7	59	52	

Reporting

> ACC/SAMR Reporting (Title V)

❖ ACC - EPA and ADEQ

- ◆ Due date determined by the date of your permit issuance - check ADEQ's website and your permit
- ◆ Includes all permit requirements by condition and compliance status

❖ SAMR - ADEQ only

- ◆ Due date determined by the date of your permit issuance - check ADEQ's website and your permit
- ◆ Includes all recordkeeping information required to be reported by General Provision #7 and facility compliance status

> Upset Conditions

- ❖ Title V: call ADEQ, then send report in writing within five business days
- ❖ Minor source: send in ADEQ's Upset Condition form via mail or email by end of following business day

> Testing

❖ ADEQ

- ◆ 15-day notification prior to testing source
- ◆ 30-day deadline to submit report once source is tested

❖ EPA

- ◆ Notification and reporting deadlines dependent on regulation

Reporting

> Greenhouse Gas Reporting (Title V)

- ❖ EPA's e-GGRT website: <https://ghgreporting.epa.gov/ghg>
 - ◆ Due March 31st annually
 - ◆ Includes all greenhouse gas emissions for the facility

> SLEIS Reporting (Title V)

- ❖ ADEQ's SLEIS website: <https://sleis.adeq.state.ar.us>
- ❖ Type A facilities: one report due every three years
- ❖ Type B facilities: report is due annually

> Other Reporting

- ❖ Initial Notifications: EPA sets deadlines, dependent on the regulation
- ❖ Notifications of Compliance Status: EPA sets deadlines, dependent on the regulation
- ❖ Semi-annual reports as required by EPA regulations
- ❖ Plantwide Condition #1/General Condition #3 Reporting to ADEQ: 30 days of commencement of construction, completion of construction, first operation and target operation

Inspections

- > SPOILER ALERT!!!
- > Make this as easy for yourself and the inspector as possible
 - ❖ Be organized
 - ❖ Know your permit's requirements for the facility
 - ❖ Know your facility processes
 - ❖ Have all records easily available
- > The “hit by a bus/win the lottery” scenario
 - ❖ What happens if you're not available when the inspector arrives?
 - ◆ Where are your compliance binders?
 - ◆ Avoid being a single point of failure

For More Information:

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501-225-6400

**Upcoming *Air Quality Permitting in Arkansas*
courses:**
August 11, 2016 - Little Rock

ADEQ Air Division:
<https://www.adeg.state.ar.us/air>
501-682-0959

EPA Region VI:
<https://www.epa.gov/aboutepa/epa-region-6-south-central>
800-887-6063