

# Compliance Assistance

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# Compliance Unit Activities

- Implementing the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos. Includes notifications, inspections, and educational outreach.
- Tracking compliance and reviewing reports for facilities subject to federal New Source Performance Standards (NSPS) and NESHAP requirements.
- Coordinating the enforcement of regulations by the Linn and Polk County Air Pollution Control programs.
- Assisting the Air Quality permitting and planning sections on permit and rule development.
- Responding to public inquiries regarding open burning, fugitive dust rules, and training fires.

# Compliance Unit Activities

- Working closely with the regional field offices to ensure consistent enforcement of air quality regulations.
- Review Title V Annual and Semi-Annual Compliance Certifications.
- Processing requests for variances from state air quality rules.
- Coordinating with EPA on a routine basis, and ensuring that the Bureau's enforcement agreement with EPA is fulfilled.
- Determine whether facilities are in compliance with their permit limits through auditing on-site emission testing procedures, post-test review of final test reports submitted by the regulated community, and analysis of continuous emission monitor data.

# Compliance Assistance Overview

- Timely Topics
  - Title V Annual and Semi-Annual Compliance Certification Reports
  - General Reminders
    - » Excess Emissions Reporting
    - » Small Unit Exemption Documentation
  - Update on Development of Stack Test Database

# Title V Reporting Requirements

What are the Annual Compliance Certification and Semi-Annual Monitoring Report?

- The Title V Annual Compliance Certification and the Semi-Annual Monitoring Report are the basic, minimum reporting requirements under Iowa's Title V Operating Permit program.
- You are required to begin submitting these reports once your facility has been issued a final Title V Operating Permit.

# Title V Reporting Requirements

- Every six months, you must provide a report describing any deviations from your Title V Permit.
- A deviation is any failure to meet a Title V Permit term, condition, or applicable requirement.
- Even if your facility had no deviations during the reporting period, and is currently in compliance with all Permit requirements, you must still submit a report.

# Title V Reporting Requirements

- Facilities need to certify compliance with the requirements they're currently subject to, regardless of whether those requirements have been incorporated into the Title V permit.
  - Sources should indicate somewhere in their report or cover letter that the current requirements differ from those in the latest Title V permit.



# Title V Reporting Requirements

- The Monitoring Report is due every September 30 and every March 31. The Monitoring Report for the period covering the first half of the calendar year (January 1 – June 30) is due by **September 30**. The Monitoring Report for the period covering the second half of the previous calendar year (July 1 – December 31) is due by **March 31**.
- The Compliance Certification is due every **March 31**, and covers the previous calendar year (January 1 – December 31).
  - On **Part 1C**, the question is asked – Are you submitting this Annual Compliance Certification to also fulfill the reporting requirements for the Title V Semi-Annual Monitoring Report? **Yes**  **No**  *[If "No," by March 31, you must submit a separate Semi-Annual Monitoring Report. Remember that a Semi-Annual Monitoring Report is also due by September 30 of each year]*



# Semi-Annual Monitoring Report

- On the Monitoring Report, you must describe any monitoring deviations that took place during the reporting period. Monitoring required under a Title V Permit typically includes, but is not limited to, *recordkeeping, stack testing, visible emissions observations, and operation and maintenance (O&M) plans.*

# Annual Compliance Certification

- On the Compliance Certification, you must report all deviations occurring over the previous calendar year.
  - EMISSION LIMITS
  - OPERATIONAL LIMITS AND REQUIREMENTS
  - REPORTING REQUIREMENTS
  - GENERAL CONDITIONS
  - SOURCE (STACK) TESTING
  - CONTINUOUS EMISSIONS MONITORING SYSTEMS (CEMS)
  - CONTINUOUS OPACITY MONITORING SYSTEMS (COMS)
  - OBSERVATIONS FOR NO VISIBLE EMISSIONS
  - VISUAL EMISSIONS (OPACITY) OBSERVATIONS
  - OPERATION AND MAINTENANCE (O&M) PLANS
  - OPACITY LIMITS
  - MONITORING REQUIREMENTS
  - PLANT-WIDE CONDITIONS
  - RECORDKEEPING

# Title V Reporting Requirements

- Main issues
  - Failure to submit reports in a timely manner.
    - DNR provides 3 months to complete reports. If not postmarked by due date, an NOV will typically be issued.
    - Be sure to send mail certified for proof of delivery.
  - Failure to note all deviations.
    - Check for any DNR inspection reports or NOVs which may have noted a deviation in addition to all applicable recordkeeping, CEMS/COMS reports, etc.

# Title V Fees and Emissions Inventory

- Title V fees and emissions inventory (EIQ) are due annually on July 1 and March 31, respectively.
- The fees and EIQ are to be submitted once a facility becomes subject to Title V, regardless of whether a Title V permit has been issued or not.

# Excess Emissions

- 24.1(4) Excess Emissions
  - Violation – other than startup, shutdown, or cleaning control equipment. (Soot blowing is NOT exempt).
  - Malfunction? Not preventable.
  - Repaired expeditious manner or Shutdown in a reasonable period of time.

# Excess Emissions

- 24.1 (2) Oral Report of excess emissions
  - Reported to Field Office [other than 24.1(1)]
    - Within 8 hours or start of first working day.
    - In person or telephone.
    - Not required if source has operational CEM.
      - <30 minutes & doesn't exceed emissions standard by more than 10% or the applicable visible emission standard by more than 10%
- 24.1(3) Written Report of excess emissions
  - Submitted as a follow-up to all required oral reports.
    - Within 7 days

# Small Unit Exemption Documentation

- “Small unit” means any emission unit and associated control (if applicable) that emits less than the following:
- 40 pounds per year of lead and lead compounds expressed as lead;
- 5 tons per year of sulfur dioxide;
- 5 tons per year of nitrogen oxides;
- 5 tons per year of volatile organic compounds;
- 5 tons per year of carbon monoxide;
- 5 tons per year of particulate matter (particulate matter as defined in 40 CFR Part 51.100(pp));
- 2.5 tons per year of PM10; or
- 5 tons per year of hazardous air pollutants (as defined in rule 567—22.100(455B)).



# Small Unit Exemption Documentation

- Must maintain on site an “exemption justification document.”
- The exemption justification document must document conformance and compliance with the emission rate limits contained in the definition of “small unit” for the particular emission unit or group of similar emission units obtaining the exemption.
- Emission control devices are included.
- The exemption justification document must be made available for review during normal business hours and for state or EPA on-site inspections, and shall be provided to the director or the director’s representative upon request.
- If an exemption justification document does not exist, the applicability of the small unit exemption **is voided** for that particular emission unit or group of similar emission units. A permit application will be required.

# Small Unit Exemption Documentation

An exemption justification document shall include the following for each applicable emission unit or group of similar emission units:

- A description of how the emissions were determined and maintained at or below the annual small unit exemption levels.
- A description of air pollution equipment used and statement saying that it will be used at all times.
- Manufacturer's testing results of any emissions test on control equipment used.
- A description of all production limits required for the unit/s to comply with the exemption levels.
- Detailed calculations of emissions reflecting the use of any air pollution control devices or production or throughput limitations, or both.
- Records of actual operation that demonstrate that the annual emissions were maintained below the exemption levels.
- A certification from the responsible official.

# Stack Test Data Management System

- **Kaizen in August 2008**
  - Mapped old process (steps, handoffs, critical steps, loops, etc.)
  - Outlined new process (reduce handoffs, loops)
- **New Management System Features**
  - Track overdue tests
  - Track required tests
  - Track permit notifications
  - Standard Reports (by facility, SCC, emission point, past due and failed tests)
  - Ad-hoc reporting capability

# Stack Test Data Management System

- Currently Status:
  - System in final stage of rollout
    - Testing system and correcting any “bugs”
    - Set to go live in approximately one week

Questions?