

# **Compliance Reporting and Record Keeping Pitfalls**

**Presentation by:**

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# **Main Topics**

- **On-Site Compliance Stumbling Blocks**
- **Common MACT Compliance Issues**
- **Compliance Reminders**
- **Title V Annual Compliance Certifications**
- **Conclusion**

Established Range(s) for Unit ID: 0.4-5.0" WC

March 18

Equipment ID	Date	1st shift	2nd Shift	Reason if Outside Range	Corrective Action	Observer's Names
BH01	3/1	3.0"	—			B. [unclear]
	3/2	2.8"	2.8"			BU
	3/3	3.0"	—			[unclear]
	3/4	3.0"	2.8"			BT
	3/5	3.2"	3.2"			Juan
	3/6	3.0"	0			B. [unclear]
	3/7	—	4.8"			BT
	3/8	0	—	Down		B. [unclear]
	3/9	3.0"	3.0"			BT
	3/10	3.0"	5.2"	Boys Blown		B. [unclear]
	3/11	5.4"	—	Boys Blown		BT
	3/12	0	4.8"	Boys Blown	New Boy	BT
	3/13	4.0"	—			[unclear]
	3/14	3.8"	3.6"			Juan
	3/15	3.0"	—			BT
	3/16	—	—			B. [unclear]
	3/17	—	2.7			BT
	3/18	2.8	3.0			BT
	3/19	2.4	0			CB
	3/20	0	0			CB
	3/21	0	3.0"	Hole in line		CB
	3/22	3.2"	3.2"			CB
	3/23	3.2"	3.2"			CB
	3/24	3.2"	3.2"			CB
	3/25	3.2"	3.2"			CB
	3/26	3.2"	3.2"			CB
	3/27	0	N/A	Down		B. [unclear]
	3/28	3.0"	3.0"			B. [unclear]
	3/29	3.4"	—			B. [unclear]
	3/30	—	—			BT

# On-Site Compliance Stumbling Blocks

- **Read. Your. Permit.**
- **Permit Flexibility Condition**
- **Record Keeping**
- **Monitoring**
- **Data Collection Frequency**

# Common MACT Compliance Issues

- **Applicability is a tricky thing**
- **E-report to the EPA; paper reports to state (or local) agency**
- **Always address MACT reports to the Manager of Air Toxics Section (SC DHEC) or Regional Office (NC DAQ)**
- **Read the rules and stay up to date**
- **Notice Of Compliance Status (NOCS)**
- **Changes in environmental staff at facilities**

# Compliance Reminders

- **Timeliness**
- **Completeness**
- **Compliance Status**
- **Some features often omitted from periodic report submittals**

# **Title V Annual Compliance Certifications**

- **What activities to certify**
- **“Not applicable” (N/A)**
- **Records Review**

March 18

Established Range(s) for Unit ID: 0.4-5.0" wc

Equipment ID	Date	1st shift	2nd Shift	Reason if Outside Range	Corrective Action	Observer's Names
BH01	3/1	3.0"	—			B. E. M.
	3/2	2.8"	2.8"			BJ
	3/3	3.0"	—			JB
	3/4	3.0"	2.8"			JB
	3/5	3.2"	3.2"			J. M. S.
	3/6	3.0"	0			B. J. M.
	3/7	—	4.8"			BJ
	3/8	0	—	Down		B. J. M.
	3/9	3.0"	3.0"			BJ
	3/10	3.0"	5.2"	Bag Blown		B. J. M.
	3/11	5.4"	—	Bag Blown		BJ
	3/12	0	4.8"	Bag Blown	New Bag	BJ
	3/13	4.0"	—			BJ
	3/14	3.8"	3.6"			J. M. S.
	3/15	3.0"	—			BJ
	3/16	—	—			B. J. M.
	3/17	—	2.7			BJ
	3/18	2.8	3.0			BJ
	3/19	2.4	0			CB
	3/20	0	0			CB
	3/21	0	3.0"	Hold in line		TR
	3/22	3.2"	3.2"			
	3/23	3.2"	3.2"			
	3/24	3.2"	3.2"			
	3/25	3.2"	3.2"			
	3/26	3.2"	3.2"			
	3/27	0	N/A	Down		
	3/28	3.0"	3.0"			
	3/29	3.4"	—			
	3/30	—	—			

C4. **Emission Unit ID:** 01  
**Control Device ID:** BH01

All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted semiannually. If no incidences occurred during the reporting period then a letter shall indicate such.

Any alternative method for monitoring control device performance must be preapproved by the Bureau and shall be incorporated into the permit as set forth in SC Regulation 61-62.70.7.

C.18 **Emission Unit ID:** 01  
**Control Device ID:** BH01

**Monitoring:** The owner/operator shall continue to operate and maintain pressure drop gauge(s) on each baghouse (BH01). Pressure drop readings for each baghouse shall be recorded daily during source operation. Operation and maintenance checks shall be made on at least a weekly basis for baghouse cleaning systems, dust collection hoppers and conveying systems for proper operation. Each baghouse shall be in place and operational whenever processes controlled by it are running, except during periods of baghouse malfunction or mechanical failure.

Operational ranges for the monitored parameters have been established to ensure proper operation of the pollution control equipment. These operational ranges for the monitored parameters were derived from stack test data, vendor certification, and/or operational history and visual inspections, which demonstrate the proper operation of the equipment. The facility shall maintain the established ranges and supporting documentation for these monitored parameters. Operating ranges may be updated following submittal to the Director of Engineering Services.



# Questions ??????

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# Title V Annual Compliance Certification Form (SC DHEC BAQ)

## C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION & METHODS USED TO DETERMINE COMPLIANCE

Use the table below to indicate the compliance status of each permit term or condition and the methods used to determine compliance. Copy this page as many times as needed to cover all permit terms or conditions.

Identify the Permit Term or Condition.  <b>Identify the Permit Term or Condition</b>	Emissions Unit ID #  <b>EU ID #</b>	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.  <b>Methods or means used to determine compliance</b>
		Intermittent Compliance	Continuous Compliance	
		<b>Intermittent or Continuous Compliance?</b>		

## D. DEVIATIONS FROM PERMIT TERMS OR CONDITIONS

Use the table below to report deviations from permit terms or conditions. Copy this page as many times as needed to include all deviations. Periodic reports previously submitted to the Department identifying deviations may be cross-referenced provided the report includes all the information listed in the table below.

Specific Permit Condition #	Emissions Unit ID #	Description of each deviation from the conditions of the permit AND the submittal date of any report being cross-referenced	Basis for the determination of the deviation	All dates and times of deviations	Identification of the probable cause for the deviation AND any corrective action or preventative measures taken
		<b>Description of deviation &amp; date of cross-referenced report</b>	<b>Basis for determination of deviation</b>	<b>Dates &amp; times of deviations</b>	<b>Probably cause of deviation &amp; corrective action or preventive measures</b>

# TVACC Form (NC DAQ)

Emission Source Description	Source or Control Device ID Number(s)	Terms and Conditions		Deviations?( Yes / No)	Records Maintained? (Yes/No/NA)	Was Deviation a non-compliance issue? (Yes / No)	Method(s) of Determining Compliance Status	Comments <b>Comments</b>
		Permit Condition Number	Condition Summary					
<b>Emission Source &amp; ID</b>				<b>Deviation? Yes or No?</b>		<b>Non-Compliance? Yes or No?</b>		
		<b>Permit Condition # &amp; Summary</b>			<b>Records Maintained? Yes or No?</b>		<b>Method for determining status</b>	

Terms and Conditions		Deviations?	Records Maintained?	Was Deviation a non-compliance issue?	Method(s) of Determining Compliance Status	Comments
Permit Condition Number	Condition Summary	(Yes / No)	(Yes/No/NA)	(Yes / No)		
3.A	General provisions					
3.B	Permit available at facility					
3.D	Submissions of reports to regional office					
3.G	Permit modifications and applications					
3.H	Changes not requiring permit modifications					
3.I.A, 3.I.B	Reporting requirements for excess emissions and permit deviations					
3.K	Permit renewal every five year					
3.M	Duty to submit any information requested by director					
3.N	Duty to comply with					

# TVACC Form (NC DAQ) (continued)

Page \_\_\_\_ of \_\_\_\_

Emission Source Description	Source or Control Device ID Number(s)	Pollutant	Deviation Description	Deviation Date(s)	Deviation Duration	Suspected Cause of Deviation	Corrective Action Taken

## EXAMPLE COMPLIANCE SUMMARY REPORT For Calendar Year 2017

Page 1 of 2

Emission Source Description	Source or Control Device ID Number(s)	Terms and Conditions		Deviations (Yes / No)	Records Maintained? (Yes/No/NA)	Was Deviation a non-compliance issue (Yes/No)	Method(s) of Determining Compliance Status	Comments
		Permit Condition Number	Condition Summary					
One wood-fired boiler.	ES-1	2.1.A.1	PM particulate emissions shall not exceed 0.50 lb/mmBtu [2D .0504]	Yes	NA	Yes	Annual EPA Method 5 Test to determine compliance	Failed stack test. NOV issued on 11/03/17. See Deviation Summary Report.
One wood-fired boiler.	ES-1	2.1.A.1(b)	PM particulate testing required [2D .0501]	No	Yes	No	Annual testing report turned into DAQ	
One wood-fired boiler.	CD-1 multicyclone	2.1.A.1(c)	PM particulate testing required [2D .0501]	Yes	No	Yes	Inspections scheduled and completed.	NOV issued 10/01/17. See Deviation Summary Report.

Revision 3.0

## EXAMPLE DEVIATION SUMMARY REPORT For Calendar Year 2017

Page 1 of 1

Emission Source Description	Source or Control Device ID Number(s)	Pollutant	Deviation Description	Deviation Date(s)	Deviation Duration	Suspected Cause of Deviation	Corrective Action Taken
One wood-fired boiler.	ES-1	PM	Failed stack test, PM emission 0.55 lb/mmBtu	3/10/2017	Approx. 3 weeks	Burning of greenwood	Stopped burning greenwood. Retested on 4/1/17 and in compliance.
One wood-fired boiler.	CD-1 multicyclone	PM	Failed to take monthly observations	7/1/2017	3 months	New staff not trained	Implemented training procedures



S.C. Department of Health and Environmental Control

<http://www.scdhec.gov/Environment/docs/12MonthRollingSum.pdf>

**12-Month Rolling Sums  
Report Frequency - Data needed**

Monthly	12 months
Quarterly	14 months
Semiannual	17 months
Annual	23 months

A 12-Month Rolling Sum is to be calculated for each month in the reporting period

There would never be two of the same month in the 12-Month Rolling Sum total

As another month is added, another month is dropped from the 12-Month Rolling Sum total

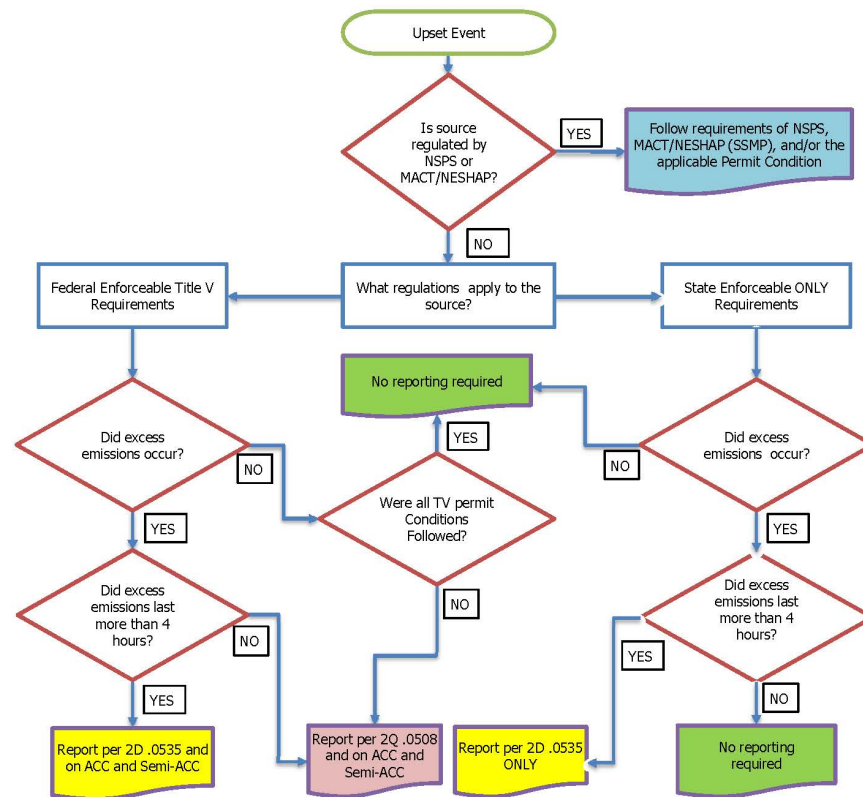
**Fuel Oil: 12-Month Rolling Sum (4<sup>th</sup> Quarter)**

Month/Year	Usage (Gallons)	Rolling Sum (Gallons)
1 November '05	300	300
2 December '05	350	650
3 January '06	400	1050
4 February '06	300	1350
5 March '06	250	1600
6 April '06	200	1800
7 May '06	190	1990
8 June '06	170	2160
9 July '06	150	2310
10 August '06	150	2460
11 September '06	160	2620
12 October '06	300	2920
13 November '06	325	2945
14 December '06	310	2905



EXAMPLE FACILITY						
STATE OPERATING PERMIT NO. 0000-0000						
Dates		Exemption Basis				Brief Description
Document-ation	Start Operation	SCDHEC Reg. 61-62.1, Section II	BAQ Published Exemption List	Non-PSD Like-for-Like Replacement	PSD Like-for-Like Replacement	
11/1/17	11/1/17		B.6.xii			Machining, grinding, sanding
12/20/17	12/15/17		B.3.i			0.5-MMBTU/hr cure oven for powder coat
12/30/17	1/4/18		A.25			600-gal AST (diesel)
1/15/18	1/19/18		B.6.i			Sandblasting
2/15/18	3/1/18		A.24 & B.6.i			New refrigerant system

EXAMPLE FACILITY					
STATE OPERATING PERMIT NO. 0000R2					
Dates		Exemption Basis			Brief Description
Document-ation	Start Operation	15A NCAC 02Q .0102 Paragraph	Key Paragraph Language		
11/1/17	11/1/17	(g)(14)(A)	equipment that does not emit any regulated air pollutants		Machining, grinding, sanding
12/20/17	12/15/17	(h)(1)(B)	fuel combustion equipment firing exclusively natural gas, that only emit regulated pollutants from fuel combustion		0.5-MMBTU/hr cure oven for powder coat
12/30/17	1/4/18	(g)(4)	storage tanks with no applicable requirements		600-gal AST (diesel)
1/15/18	1/19/18	(h)(5)	any source whose potential uncontrolled emissions of particulate matter (PM10) shall be no more than 5 tpy		Sandblasting
2/15/18	3/1/18	(g)(14)(I)	refrigeration equipment that complies with the regulations set forth in Sections 601 through 618 of Title VI of the CAA, 40 CFR 82, and any other regulations promulgated by EPA pursuant to Title VI for stratospheric ozone protection		New refrigerant system
		(h)(5)	any source whose potential uncontrolled emissions of VOC shall be no more than 5 tpy		



- 15 NCAC 2D .0535**
  - Report by 9 am next business day, notify DAQ immediately when corrective measures have been accomplished, and submit written report within 15 days upon request
- 15 NCAC 2Q .0508**
  - Report all deviations from TV permit requirements quarterly
- ACC**
  - Annual Compliance Certification
- Semi-ACC**
  - Semi-Annual Compliance Report
- SSMP**
  - Start-up, Shutdown, and Malfunction Plan. The conservative approach would be to report these events in the ACC and Semi-ACC, indicating that they were covered under the applicable regulation's SSMP.

This flowchart is intended to provide an overview of the reporting requirements in the event of a malfunction event. Any excess emissions that do not occur during start-up or shutdown shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction.