

ELECTRONIC RECORD KEEPING CAN MAXIMIZE TITLE V COMPLIANCE

An electronic recordkeeping and reporting system is said to minimize time requirements and maximize accuracy for complying with the conditions of Title V permit.

BY P.H. HAROZ

Those of you that received your Clean Air Act Amendments Title V Operating Permit understand that the recordkeeping and reporting is a very labor-intensive process. It places significant pressure on the environmental staff with daily responsibility for recordkeeping and the environmental professionals responsible for preparation of the reports. It also places pressure on the Responsible Official, the signing authority for the Title V permit application. The first Title V certification can be a problem for many facilities. For the year of issuance of a Title V permit, the facility is required to complete a compliance certification for the period from permit issuance through December 31. Even if a permit is issued in December, your facility will have to provide a compliance certification covering this period.

THE PROBLEM

The problem is the labor-intensive process to maintain compliance with recordkeeping requirements. Examples of typical recordkeeping requirements for emission units include:

- Boilers burning wood waste: quantity of wood waste or other fuel; oxygen value at the boiler exit recorded daily; any time that the oxygen level is outside

of the established range in the most recent test; the steam usage shall be recorded daily; any time that the steam usage is greater than the 110% of the average steam usage established in the most recent test; shutdown/startup time.

- Venturi scrubbers to control particulate matter emissions from the boiler: any three hour average measurement of the scrubber pressure drop that is less than or equal to 90% of the average value established during performance testing; any three hour average measurement of the scrubbant flow rate that is outside the range of 80% to 120% of the average value established during performance testing; routine maintenance; shutdown/startup time.

- Electrostatic precipitator to control particulate matter emissions from the boiler: any three hour average measurement of the secondary voltage of each field that is less than 70% of the value established during performance testing; any three hour average measurement of the secondary amperage of each field that is less than 70% of the value established during performance testing; routine maintenance; shutdown/startup time.

- Baghouses: perform a check to determine if visible emissions are present. The check shall be performed at least once for each day or portion of each day of operation of the process. If the baghouse is determined to be emitting visi-

ble emissions, the permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The permittee shall note the cause of the visible emissions, pressure drop, any other pertinent operating parameters and the corrective action taken in the maintenance log; pressure drop across the baghouse and ensure that it is within the appropriate range; routine maintenance; shutdown/startup time.

- Cyclones and/or multiclones: The permittee shall, for each week or portion of each week of operation of the process, inspect the exterior of cyclones and/or multiclones for holes in the body or evidence of malfunction in the interior of the cyclones and/or multiclones. Any adverse condition discovered by the inspection shall be corrected in the most expedient manner possible; pressure drop across the multiclone; shutdown/startup time.

- Dryers: record on an hourly basis the number of wet safer bin bottom belts that are moving as they relate to the dryers; routine maintenance.

- RTOs: eight hour average of combustion zone temperatures; 12 hour average of gas stream pressure in the plenum; 12 hour average of ID fan motor speed; 24 hour average ID fan static pressure; routine maintenance; shutdown/startup time.





- Thermal Oil Heater: routine maintenance performed.
- Presses: daily production rate from the press as finished product.
- Fugitive Dust: The permittee shall maintain a record of all actions taken to suppress fugitive dust from roads, storage piles or any other source of fugitive dust. Such records shall include the date and time of occurrence and a description of the actions taken.
- Reporting: reporting required by the Title V includes quarterly and/or semiannual reports, annual compliance certification, annual emission fees and notices of emission limit exceedances.
- Out of Compliance Notification Reports: In addition to any other reporting requirements of the permit, the permittee shall report to the state in writing, within seven days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emissions control equipment for a period for four hours or more which results in excessive emissions. The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s) and any corrective actions or preventive measures taken.

ations(s) and any corrective actions or preventive measures taken.

- Semiannual Reports: The permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in the permit and/or any failure to comply with or complete a work practice standard or requirement contained in the permit which are not otherwise reported in accordance with conditions. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by the permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by the 30th day following the end of each reporting period, July 30 and January 30, respectively, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

The permittee shall submit a report containing any excess emissions, exceedances, and/or excursions as described in the permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of

Single-Click Title V Recordkeeping System - [building main : Form]

Title V Recordkeeping System for Building Products Plant, Anywhere USA

The Permit	Recordkeeping Responsibility	Sampling / Measurements	Emission Units
Wood Waste Usage	Location of Records	Compliance Schedule	
Facility Information	Data Recording Employees	Reports	

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Single-Click Title V Recordkeeping System - [building emission units : Form]

Emission Units

Boilers	Cyclones/Multicyclones	Fugitive Dust
Electrostatic Precipitators	Dryers	RTO's
Baghouses	Thermal Oil Heater	Scrubbers

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Single-Click Title V Recordkeeping System - [scrubbers : Form]

Scrubber Recordkeeping

Scrubber No. 1	Scrubber No. 2
Pressure Loss	Pressure Loss
Liquid Flow Rate	Liquid Flow Rate
Shutdown/ Startup Time	Shutdown/ Startup Time

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Single-Click Title V Recordkeeping System - [ReportsMain : Form]

Reports

Semi Annual Fuel Usage Certification Condition 5.3.5	Failure to Meet Emission Limitations Condition 6.1.3	Semi-Annual 12-Consecutive Month Combustion Fuel Usage Total Condition 5.3.7
Fuel Supplier Data Entry	Emission Reporting Data Entry	Fuel Usage
Select Period to View Report	Select Period to view report	Select Period to View Report
Semi-Annual Fuel Usage Certification	Emission Failure Report	Semi Annual 12 Month Natural Gas Total Report
Quarterly Semi-Annual Exceedance Reports Conditions 5.2.9 and 5.3.1	Deviation from applicable requirements associated with malfunction or breakdown Condition 6.1.2	Semi Annual 12 Month Fuel Oil Total Report
Incidents of Excess Emission or Excursions	Deviation Report	Semi-Annual 12 Month Propane Total Report
Air Permit Fees - Condition 8.4.1 and Compliance Certification Forms - Condition 8.14.1		

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each year. All reports shall be post-marked by the 30th day following the end of each reporting period, July 30 and January 30, respectively. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the regulatory procedures for testing and monitoring sources of air pollutants and shall contain the following: a summary report of

excess emissions, exceedances and excursions, and monitor downtime, including any failure to follow required work practice procedures; total process operating time during each reporting period; the magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the state, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence; specific

identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility, including the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted; the date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments or replacement.

- Annual Compliance Certification: certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.

- Annual Emission Fees: The permittee shall calculate the annual emissions of criteria pollutants and multiply it by the fee rates.

- Maintaining records: The permittee needs to keep records such as those described below for five years.


- Sampling of measurements: the date, place and time of sampling or measurement; the date(s) analyses were performed; the company or entity that performed the analyses; the analytical techniques or methods used; the results of such analyses; and the operating conditions as existing at the time of sampling or measurement; records describing the routine maintenance performed on all air pollution control equipment; monthly records of the amount of products processed through some emission units necessary to confirm compliance with the production limit; files of all measurements, including continuous monitoring systems, monitoring devices and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; maintain records of all actions taken to suppress fugitive dust from roads, storage piles or any other sources of fugitive dust.

Those are only a few examples of many different Title V permit conditions for maintaining compliance with emission operating limits, testing, monitoring, recordkeeping and reporting requirements.

It seems impossible for one person to handle it all. In addition, the responsible person for the Title V at the facility is dependant on operator and maintenance personnel to conduct periodical activities.

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THE SOLUTION

The optimal solution for maintaining compliance with a facility's Title V Permit is an electronic recordkeeping and reporting system. A successful system should have the following characteristics: user friendly; customized to address the facility's specific Title V permit conditions; must allow for user input of the data to be recorded as required by the facility's permit such as pressure drops, visible emission, etc.; should generate all required reports and enable the responsible official to review the data electronically in a very friendly mode; alert the user of any non-compliance issues; prevent the facility from being in non-compliance; minimize the recordkeeping time requirement; maximize the accuracy of the reports; be affordable.

The Single-Click Title V electronic recordkeeping and reporting system developed by Conversion Technology Inc. provides the following features: the main screen provides buttons to access all recordkeeping and reporting requirements; permit button will open the Title V Permit; emission units button will open the emission units that have conditions;

baghouses button will open a screen with all the baghouses of the facility. Each baghouse will have buttons for the required recordkeeping such as visible emissions, shutdown and startup time, preventive maintenance, etc.; scrubbers button will open a screen with all scrubbers and the buttons for their required conditions; reports button will provide access to all the reporting requirements; All the required reports retrieve the information from the recordkeeping database.

Other features provided by the systems are:

- Drop Down Menus: provide drop down menus that will enable the selection of entries from a pre-selected list, such as: documenting proper operation of equipment; cause of excursions and other pertinent operating parameters and the corrective actions taken; operating conditions existing at the time of sampling or measurements; adjustment and maintenance performed on the various systems and devices; description of routine maintenance performed on all air pollution control equipment; description of actions taken to suppress fugitive dust.
- Out of Compliance Warning: A warning will be provided for such entries

as: any 12 consecutive month total emissions from sources; any one hour period during which the average emissions from any source are equal to or greater than the limits; any period during which the sulfur content of the fuel fired in any source exceeds 0.5 weight percent.

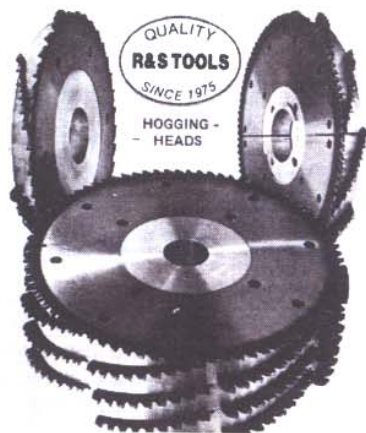
- Location of Records: a database showing the location of paper records.

- Compliance Schedule: provide compliance due dates, list of actions to be done on hourly, daily, weekly, etc. basis for the facility to stay in compliance with the Title V conditions.

The complexity of the recordkeeping and reporting requirements of most Title Vs is overwhelming. An electronic recordkeeping and reporting system will ease the operator's task to input the data, will help environmental managers to report, and will provide alarms when emission limit exceedances are approached. It will prepare the required reports and provide responsible officials a better comfort level prior to compliance certification of the annual reports. **PW**

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