

*An electronic record keeping and reporting system can minimize time requirements and maximize accuracy for complying with the conditions of a Title V permit.*

By P.H. Haroz

**T**hose who have needed a Clean Air Act Amendments Title V Operating Permit understand that the record keeping and reporting is a labor-intensive process. It places significant pressure on the environmental staff responsible for daily record keeping and preparation of the quarterly and semiannual 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, a facility will have to provide a compliance certification covering this period.

### KEEPING RECORDS

Record keeping requirements typically are a labor-intensive



part of the process to maintain compliance, and the information required varies depending on the devices in question.

Boilers, for example, require records on the average hourly nitrogen oxides emission rates, as well as the 30-day average nitrogen oxides emission rates. In addition to noting daily steam usage, results of daily CEMS drift tests and oxygen monitoring system measurements of daily oxides at the boiler exit, the following must be identified:

- Steam-generating unit operating days when the calculated 30-day average nitrogen oxide emissions exceed standards, reasons for the excess and corrective actions taken;
- Steam-operating unit days for which pollution data have not been obtained, as well as the reason such data was not recorded and a description of corrective actions;
- Times when emission data have been excluded from the calculation of average emission rates and the reasons for

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exclusion;

- The "F" factor used for calculations, the method of determination and the type of fuel combusted;
- Times when pollutant concentration exceeded full span of the continuous monitoring system; and
- Modifications made to the continuous monitoring system that could affect its ability to comply with performance specification.

At the baghouse, one should check to see if visible emissions are present. This test should be performed at least once for each day of operation or for a portion of each day of operation. If tests determine that the baghouse is emitting visible emissions, the permittee should determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The permittee should note in the maintenance log the cause of the visible emissions, the pressure drop and other pertinent operating parameters, as well as the corrective action taken. The permittee should install a continuous temperature monitor on the inlet of all baghouses and

record the time and date of each incident when the temperature exceeds the filter bag design temperature.

Each week or portion of each week cyclones or multi-cyclones operate, the permittee should inspect for exterior holes or for evidence of interior malfunction. Any adverse condition discovered by the inspection should be corrected in the most expedient manner possible. In addition, for each one-hour period of operation of combustion turbines, the permittee should correct the emissions of nitrogen oxides to 15 percent oxygen.

Records pertaining to fuel include maintaining data on the amount of used oil received from off site and an analysis indicating its concentration of arsenic, cadmium, chromium, lead and total halogens. The analysis also should indicate the fuel-bound nitrogen content and flashpoint. The permittee should verify that each shipment of fuel oil received is distillate oil by obtaining fuel oil supplier certifications. Supplier certifications should contain the name of the supplier and state that the oil is distillate oil with a fuel sulfur content of 0.5 percent (by

weight) or less. The permittee should maintain records on the amounts of fuel oil and natural gas combusted each month in fuel burning sources.

The permittee should maintain a record of all actions taken to suppress fugitive dust from roads, storage piles or any other sources. These records should include the date and time of occurrence and a description of the actions taken.

**REPORTING**

Title V reporting requirements include quarterly and/or semiannual reports, annual compliance certification, annual emission fees and notices of exceeded emissions limits.

"Out of Compliance Notification Reports," must be submitted to the State within seven days of any malfunction or breakdown of process, fuel burning or emissions control equipment for a period of four hours or more that results in excessive emissions. The permittee also has to submit a written report that contains the probable cause and duration of the deviations(s) and any corrective actions or preventive measures taken.

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## Environmental Compliance

In terms of semiannual reports, the permittee has to 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 otherwise not reported in accordance with conditions. Such failures are determined through observation, from any monitoring protocol data or by any other monitoring required by the permit. The reports should cover each semiannual period ending June 30 and December 31 of each year and should be postmarked by the 30<sup>th</sup> day following the end of each reporting period, July 30 and January 30, respectively. They should contain the probable cause and duration of the failure(s) and corrective actions or preventive measures taken.

Also, the permittee should 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 each year. All reports should be post-

marked by the 30<sup>th</sup> day following the end of each reporting period, July 30 and January 30, respectively.

If there have been no excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report should be as specified by the regulatory procedures for testing and monitoring sources of air pollutants and should contain the following:

- A summary report of excess emissions, exceedances and excursions, as well as monitor downtime, including any failure to follow required work practice procedures;
- Total process operating time;
- The magnitude of all excess emissions, exceedances and excursions computed according to the state's applicable definitions, any conversion factors used, the date and time of the commencement and the completion of each time period of occurrence;
- Specific identification of each period

The complexity of the record keeping and reporting requirements of most Title V permits is considerable.

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; and

- 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. The report also should state when the monitoring system or device has not been inoperative, repaired or adjusted. The permittee should submit a semi-

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## Environmental Compliance

annual report for the 12 consecutive month totals of the product produced that is causing emissions with an annual limit by July 30 of the calendar year of record and by January 30 of the year following the calendar year of record, unless otherwise approved by the State.

Annual Compliance Certification by a Responsible Official also is required. The certification states that the Responsible Official believes the information and statements made in the report are true, accurate and complete. Additionally, annual emission fees that the permittee calculates may be due.

### FILING RECORDS

The permittee must keep records on a variety of matters for five years. Records concerning sampling or measurements must include the date, place and time of the sampling or measurement; the operating conditions at the time of sampling or measurement; the date(s) of the analyses; the company who performed the analyses; the analytical techniques or methods used; and the results from the analyses.

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Additional data that must be kept for five years are records describing the routine maintenance performed on all air pollution control equipment; monthly records indicating the amount of products processed through some emission units 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 and any adjustments and maintenance performed; and dust suppression records.

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

**PLUGGING IN TO AN ELECTRONIC SYSTEM**

One potential solution for maintaining compliance with a facility's Title V permit is an electronic record keeping and reporting system. Systems can be cus-

tomized to address a facility's specific Title V permit conditions, generating all required reports and enabling the Responsible Official to review the data electronically.

The Single-Click™ Title V electronic record keeping and reporting system developed by Conversion Technology Inc., Norcross, Ga., provides access to all record keeping and reporting requirements. A variety of screens help to walk permit holders through the updating process. An "Emission Units" button opens the emission units that have conditions, while clicking on the "Baghouses" button opens a screen with all of the facility's baghouses. Each baghouse has buttons for the required record keeping, such as visible emissions, shut down and startup time, preventive maintenance, etc. The "Scrubbers" button opens a screen with all scrubbers and the buttons for their required conditions, while the "Reports" button provides access to all the reporting requirements.

In the Single-Click system, all the required reports retrieve the information from the record-keeping database.

An "Out of Compliance Warning" is provided when entries indicate, for instance, that during any one-hour period the average emissions from any source were equal to or greater than the limits. Also, a compliance schedule provides compliance due dates and a list of actions to be performed on an hourly, daily and weekly basis.

The complexity of the record keeping and reporting requirements of most Title V permits are considerable. An electronic record keeping and reporting system can ease the operator's task of inputting the data, can help environmental managers with reports and provide alarms when emission limits are approached or exceeded. Ideally, a custom software reporting system can prepare the required reports and make Responsible Officials more comfortable with the data prior to compliance certification of the annual reports. **RT**

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