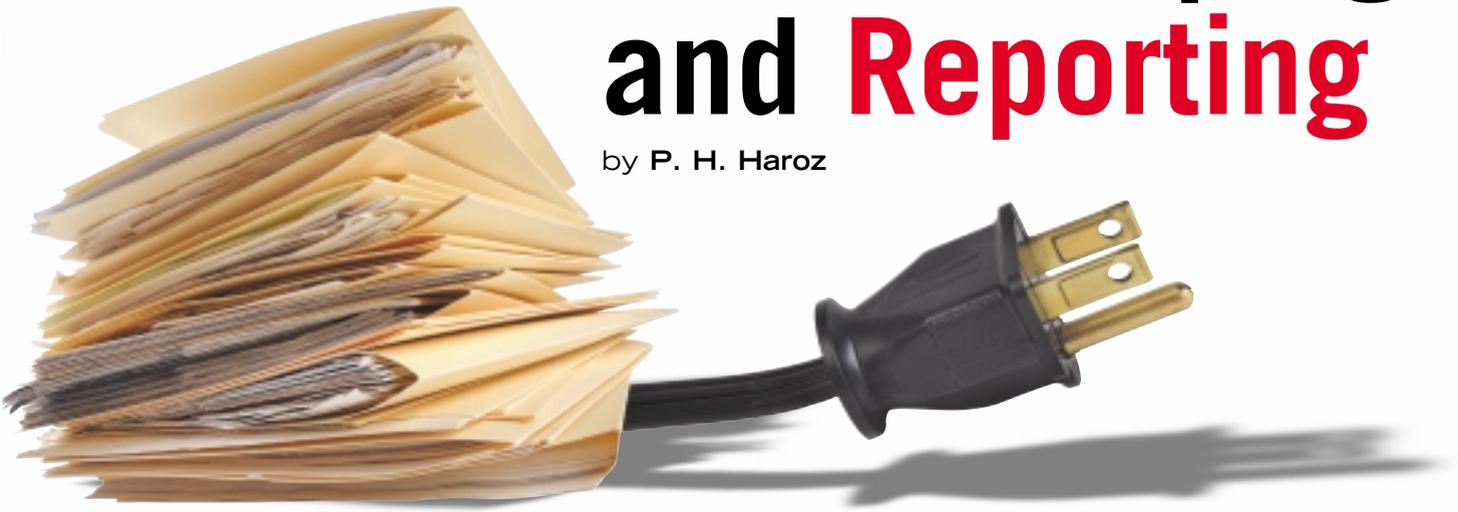


# Electronic Recordkeeping and Reporting

by P. H. Haroz



An electronic recordkeeping and reporting system can minimize time requirements and maximize accuracy for complying with the conditions of a Title V Operating Permit.

**A**ny plant that operates under a Clean Air Act Amendment Title V Operating Permit has undoubtedly been frustrated by the permit's labor-intensive recordkeeping and reporting requirements. These requirements place significant pressure on the environmental staff responsible for recording information and preparing the reports, as well as on the "responsible official"—the signing authority for the Title V permit application. The first Title V certification can be especially difficult for many facilities—for the year the Title V permit is issued, the facility must complete a compliance certification for the period from the date the permit is issued through December 31. Even if a permit is issued in December, a facility will have to provide a compliance certification covering this period. This often means spending a great deal of time scrambling for information and then hoping that the submitted reports won't raise any red flags with state officials.

Further complicating the situation is the fact that recordkeeping and reporting requirements vary for each facility,

depending on the type and amount of emissions, as well as on the control equipment used. Meeting these requirements through manual tracking and reporting efforts can be costly and time-consuming and presents numerous chances for human error.

The optimal solution for maintaining compliance with a facility's Title V permit is an electronic recordkeeping and reporting system. With an electronic system, manufacturers can focus more time on producing high quality products and less time pushing paperwork.

## Beneficial Features

A successful system should be user-friendly, so that all employees responsible for upkeep of the Title V permit can easily use it. It should be customized to address the facility's specific Title V permit conditions, and it must allow for user input of the data to be recorded as required by the facility's permit, such as pressure drops, visible emissions, etc. The system should also generate all required reports and enable the responsible official to review the data electronically in a very friendly

mode. It should alert the user to any non-compliance issues, prevent the facility from being in non-compliance, minimize the recordkeeping time requirements and maximize the accuracy of the reports. Finally, it should also be affordable.

One such system\* meets these criteria and also provides other beneficial features. The main screen provides buttons to access all recordkeeping and reporting requirements. A "Permit" button opens the Title V Permit, and an "Emission Units" button opens the emission units that have operating conditions. Clicking on the "Baghouses" button, for example, opens a screen that shows all of the facility's baghouse systems, and each baghouse has its own buttons for the required recordkeeping, such as visible emissions, shut down and startup times, and preventive maintenance. The "Scrubbers" button opens a screen with all scrubbers and the buttons for their required conditions, while the "Reports" button provides access to all of the reporting requirements. All of the required reports automatically retrieve information from a recordkeeping database.

\*The SingleClick™ Title V electronic recordkeeping and reporting system developed by Conversion Technology Inc., Norcross, Ga.

## Electronic Recordkeeping

The system also features extensive drop-down menus that enable the selection of entries from a pre-selected list, including details regarding the proper operation of equipment, the cause of excursions and other pertinent operating parameters and the corrective actions taken, operating conditions existing at the time of sampling or measurements, adjustments and maintenance performed on the various systems and devices, descriptions of routine maintenance performed on all air pollution control equipment, and descriptions of actions taken to suppress fugitive dust.

Out of compliance warnings are automatically activated for 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, and any period during which the sulfur content of the fuel fired in any source exceeds 0.5 wt %.

All electronic records are stored in an easily accessible database, and another database shows the location of all paper records required for Title V permitting. Additionally, a compliance schedule automatically keeps track of compliance due dates, as well as a list of actions that need to be done on an hourly, daily, weekly, etc., basis for the facility to stay in compliance with the Title V operating conditions, and it also calculates the annual emission fees.

Instead of spending hours filling out piles of paperwork and writing numerous reports, plants with an electronic system can record their data with a few simple clicks of a computer mouse. The system then uses that data to automatically generate the necessary reports within the required timeframes while minimizing errors.

### Stress-Free Compliance

The complexity of the recordkeeping and reporting requirements of most Title V Operating Permits is overwhelming.

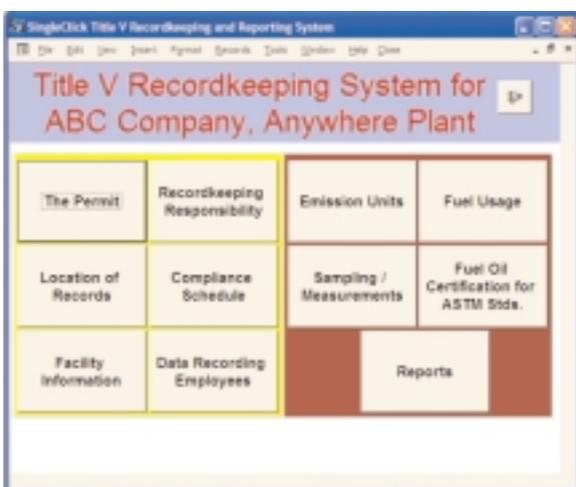
While an electronic recordkeeping and reporting system can't perform the required monitoring, testing and inspections, it can ease the operator's task of inputting the data, help environmental managers report the necessary information, and provide alarms when emission limit exceedances are approached. It will also prepare the required reports and provide responsible officials a better comfort level prior to compliance certification of the annual reports. With electronic recordkeeping and reporting, manufacturers can successfully meet Title V operating conditions while minimizing labor requirements. 🌐

For more information about electronic recordkeeping and reporting, contact Conversion Technology Inc., 2190 Norcross Tucker Road, Suite 202, Norcross, GA 30071; (770) 263-6330; fax (770) 263-8348; e-mail [pharoz@conversiontechnology.com](mailto:pharoz@conversiontechnology.com); or visit [www.singleclickco.com](http://www.singleclickco.com) or [www.conversiontechnology.com](http://www.conversiontechnology.com).

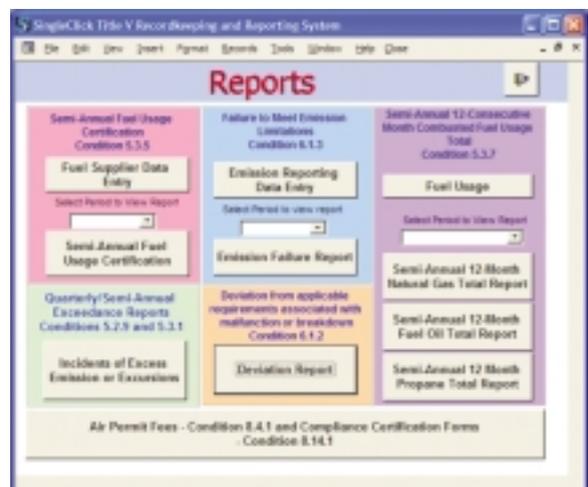
Editor's note: An overview of some of the Title V Operating Permit requirements can be found with this article online at [www.ceramicindustry.com](http://www.ceramicindustry.com).

### About the Author

P. H. Haroz is senior partner at Conversion Technology Inc. (CTI), Norcross, Ga., an environmental, health, and safety (EHS) consulting firm. He is a specialist in air quality permitting; air pollution systems; wastewater treatment systems; hazardous waste handling; and environmental, health, and safety auditing and management, and he is currently involved in the development and installation of CTI's SingleClick™ Electronic Title V Recordkeeping and Environmental Management Systems.



The main screen provides buttons to access all recordkeeping & reporting requirements



The Reports screen provides access to all reporting requirements



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