

Your Option B Registration Permit

Now that you have your Option B Registration Permit, it is important for you to know how to comply with it. This fact sheet is a reference for you to use whenever you have questions about how to comply with your Option B Registration Permit. (See also Minn. R. 7007.1110 – 7007.1130.)

What are you required to do?

1. Each year, record actual amount of Volatile Organic Compounds (VOC) containing materials purchased or used.

Each calendar year, you must calculate and record the amount of VOC-containing material purchased or used during that calendar year by April 1 of the following year. Records can include invoices, summaries of materials purchased from your suppliers or logs of materials used. Be careful to make sure you are calculating and reporting the total gallons of VOC-containing material, and not the total amount of actual VOCs. For example: If a gallon of paint contains 50 percent VOCs, for this permit you will need to report the full gallon instead of the half-gallon of actual VOCs.

When you applied for your Option B Registration Permit, you indicated on your application how you will track your VOC-containing materials. If you are not sure whether you should be tracking your VOC-containing materials according to purchase or use of those materials, check your application.

Typical VOC-containing materials you should be tracking are paints, thinners, and cleaning solvents. If you are not sure about other materials, check your material data safety sheets (MSDS) to see if they contain VOCs. If they do, include them in your yearly tracking.

2. If you ship it off-site for recycling, VOC-containing materials (including hazardous air pollutant-containing VOCs) may be subtracted from the amount used.

“Recycling” means the reclamation or reuse (as defined in Minn. R. 7045.0020) of a VOC. (Burning, fuel blending, treatment, or disposal of the waste solvents (VOCs) would not be considered as a credit for handling VOCs. The Minnesota Pollution Control Agency (MPCA) is attempting to promote recycling over these methods.)

You will need to keep records of the amount of material shipped off-site for recycling and the calculations done to determine the amount to subtract. Records may be MSDS, invoices, shipping papers, or hazardous waste manifests.

3. Keep records for five years.

All records associated with your Option B Registration Permit must be kept for five years. You must keep all records on-site for the current calendar year and have the option of keeping the records on-site or at an office for the previous years.

4. Submit an emissions inventory and payment of emissions fees.

The submission of an Emissions Inventory Report and the payment of emissions fees are two separate requirements. You will need to comply with both requirements.

Once per year, you will need to submit a report to the MPCA that shows how many gallons of VOC-containing materials you purchased or used the previous year. This is called an Emissions Inventory Report.

The MPCA will send you an emissions inventory report form in December requesting this information. The Emission Inventory Form is due back to the MPCA no later than April 1.

You will also be assessed an annual air emissions fee for your Option B Registration Permit. This fee is based on how many gallons of VOC-containing materials you report to the MPCA. An invoice will be mailed to you in March and must be paid within 60 days of the invoice date. **Comply with any applicable New Source Performance Standards (NSPS) requirements.**

After your facility is issued a Registration Permit under Option B, if your facility is subject to one of the allowed National Society for New Source Performance Standards (NSPS), you have to be sure that you follow all of the requirements of the applicable NSPS. (A list of the NSPS is found on Form RP-03; Subpart Kb Standards of Performance for Storage Vessels for Petroleum Liquids is the most likely NSPS to be subject to while qualifying for an Option B Registration Permit.)

If you add any equipment that is subject to one of the allowed NSPS while you hold a Registration Permit, you must also follow all of the requirements, which may include notifications to the MPCA and performance testing. It is unlikely that a source could add equipment subject to a NSPS other than Subpart Kb and still qualify for an Option B Registration Permit.

6. Comply with applicable federal National Emission Standards for Hazardous Air Pollutants (NESHAP) standards.

If you are subject to a NESHAP standard, then you may need to comply with the provisions of the applicable NESHAP, including any notifications and record keeping. Some examples are spray coating of metal or plastic products including automobiles, adding a degreaser that uses halogenated solvents, or adding a chromium electroplating tank. For more information about these NESHAPs and others, you can visit the U.S. Environmental Protection Agency website: <http://www.epa.gov/ttn/atw/eparules.html>.

How do you stay in compliance?

To comply with your Option B Registration Permit, you must always purchase or use less than 2,000 gallons of VOC-containing materials in a calendar year. Therefore, you must always keep a yearly total of your purchase or use of VOC-containing materials.

Your coating and solvent suppliers may be able to provide you with yearly summaries. Please note that you will still need to comply with provisions listed in steps 3 to 6 on this fact sheet.

What do you do if you purchase or use more than 2,000 gallons of VOC-containing materials?

If this does occur, you will need to submit an application for a different kind of Registration Permit.

Need More Information?

For additional formation about air emissions facility permits, including application forms, you can contact the MPCA 651-296-6300 or 1-800-657-3864. All application forms are available for download at <http://www.pca.state.mn.us/nwqh472>.

The MPCA also offers technical assistance to independently owned businesses with fewer than 100 employees through its Small Business Environmental Assistance Program by calling 651- 282-6143 or 800- 657-3938.

MPCA's website: <http://www.pca.state.mn.us/>.