

Your Option C Registration Permit

Now that you have your Option C 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 C Registration Permit. The rules governing Option C registration permits can be found in Minn. R. 7007.1110 and 7007.1125.

The Option C Registration Permit is intended for facilities with indirect heating units (boilers), reciprocating internal combustion engines, and/or emissions from using Volatile Organic Compound (VOC)-containing materials. It also allows for activities that qualify as insignificant found in Minn. R. 7007.1300, or conditionally insignificant referenced in Minn. R. 7008.4000. Specifically excluded from eligibility for Option B is any source that uses or generates nitrous oxide (N₂O) other than from combustion units and insignificant activities, and any source that uses or generates hydrofluorocarbons, perfluorocarbons, or sulfur hexafluoride other than from insignificant activities. If you find that you will not be able to comply with the requirements listed below, or if you intend to install equipment that is different from those listed above, you will need to apply for a different permit.

Remember, if you are burning bituminous or sub-bituminous coal in a hand fed boiler, you do not qualify for an Option C Registration Permit.

A unique component of the Option C permit is the “eligibility number”. This number is calculated monthly based on the amount of VOCs purchased or used, the amount and type of fuel used in indirect heating units, and the operation of reciprocating internal combustion engines. More information about calculating the eligibility number can be found in item 4 below.

What are you required to do?

1. If you have VOC emission sources that need to be included in your permit calculations, you must:

- a) Every month, record the amount of each VOC-containing material that was used or purchased. Whether you are tracking by usage or by purchase depends on what was stated in your permit application. Maintain a 12-month rolling sum of these amounts.
- b) Every month, calculate the total amount of VOCs used or purchased in each material for the last 12-month period. To do this, you will need the weight percent content of VOC and density of each material. These calculations need to be completed by the last day of the following month.
- c) Maintain a record of the material data safety sheet or a signed statement from the supplier stating the maximum VOC content, for each VOC-containing material.

2. If your facility's emissions are from burning fuel in any boiler, paint curing oven or generator that does not qualify as an insignificant activity, you must:

- a) Record the type and total quantity of fuel used or purchased, every month, for each emission unit type. Use the record keeping method listed in your permit application.
- b) Meet the fuel sulfur content limits listed in Table A on Page 3 of this fact sheet. If you are using a fuel that has a sulfur limit, you must:
 - Record the sulfur content for each fuel.
 - Maintain for each batch of fuel a record of the vendor certifications of sulfur content or test results by an independent laboratory using the American Society for Testing Materials method listed in Minn. R. 7007.1125.

3. If you choose to calculate the emissions for your generator based on hours of operation, you must:

Record the hours operated rounded to the nearest hour. Make this entry by the last day of the following month.

4. Each month, you must determine if your facility continues to be eligible for the Option C Registration Permit.

To make this determination, every month complete the calculations outlined in Form RP-C1 (Option C Calculation Form). The total of all the calculations is considered the "eligibility number" and must be less than 50. The date the calculations were made should also be recorded. An electronic version of the calculation form is available from the Minnesota Pollution Control Agency (MPCA) Small Business Environmental Assistance Program at: <http://www.pca.state.mn.us/oxpg7d5>.

Reduced record keeping

For facilities whose eligibility number the previous year was less than 25, you will need to:

- Maintain records of fuel usage and VOC containing materials used or purchased throughout the year.
- Maintain material safety data sheets and fuel sulfur content records.
- Every year by April 1, calculate your eligibility number for the previous year.

If your eligibility number exceeds 25, you must return to keeping all records and calculating your eligibility on a monthly basis. You can return to the reduced record keeping if you demonstrate for two consecutive years that your eligibility number has dropped below 25.

5. Making changes or modifications at your facility.

You may add or remove any emission units at the facility as long as you continue to be eligible (stay below 50 using the calculations on Form RP-C1) and comply with any rules that apply to you. For example, if you add a boiler that is subject to New Source Performance Standards (NSPS) subp. Dc, you must comply with the notifications, etc. included in the rule and general provisions of the NSPS. You must also maintain fuel records from this boiler and include the boiler in the eligibility calculations.

The MPCA requires no notice from you of the changes at your facility. It is your responsibility to keep the records and calculations on site and to follow any other rules that apply to you.

An example of a change at your facility could be an increase in the hours of operation, a change in fuel usage, production increases, etc. A modification at your facility could be physically modifying the facility or method of operation.

If a change occurs that makes you ineligible for an Option C Registration Permit, but you are eligible for an Option D, you must submit a written notice and application within 30 days of making the change. If you intend to make a modification that makes you ineligible for an Option C Registration Permit, but eligible for an Option D, you must submit the application for the new Registration Permit before you begin construction on the modification. You may begin construction of the modification seven working days after the application is received by the MPCA. After beginning construction, you must meet the requirements of the new registration permit that you have applied for.

If at some point you plan to make a change or modification to your facility that makes the facility ineligible to have any registration permit option, you must apply for the permit type (Part 70, state, or general permit) that will be required after the change or modification. You must obtain the new permit before beginning construction on the modification.

6. Keep records for five years.

All records associated with your Option C Registration Permit must be kept for five years. You must keep all records on site for the current calendar year, but you have the option of keeping the records on site or at a different location for the previous years.

7. Submit an emissions inventory and pay emissions fees.

Once per year, you will need to submit an Emissions Inventory Report to the MPCA. On this report, you will be required to provide the actual emissions for your facility for the previous calendar year. We will send you an Emissions Inventory Report form in December.

The Emission Inventory Report 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 C Registration Permit. This fee is based on tons of pollutants you report to the MPCA (the fee rate is different each year, but is generally about \$30 per ton per pollutant). An invoice will be mailed to you and must be paid within 60 days of the invoice date.

8. Comply with any applicable New Source Performance Standards requirements.

If your facility is subject to one of the allowed NSPSs, you have to be sure that you follow all of the requirements of the applicable NSPS. The NSPSs allowed with a Registration Permit are listed in Minn. R. 7007.1110, subp. 2(C) and found on MPCA Form RP-03.

The requirements for some of these federal NSPSs are summarized in a checklist format, available on the MPCA's website at <http://www.pca.state.mn.us/nwqh472>. If you add any equipment that is subject to one of the allowed NSPSs while you hold a registration permit, you must also follow all of the NSPS requirements, which may include notifications to the MPCA and performance testing.

9. Comply with applicable National Emission Standards for Hazardous Air Pollutants standards.

The U.S. Environmental Protection Agency (EPA) issues standards affecting certain industries or activities to help control emissions of hazardous air pollutants. These regulations, known as National Emission Standards for Hazardous Air Pollutants (NESHAP), may require a facility to obtain a Title V operating permit, even if they are not a major source of hazardous air pollutant emissions. If you are subject to a NESHAP that requires a Title V permit, you are no longer eligible for an Option C permit, even if you are an area (non-major) source.

There are also NESHAP that do not require area sources to obtain the Title V permit. Some examples include spray coating of metal or plastics including automobiles, adding a degreaser that uses halogenated solvents, or adding a chromium electroplating tank. These facilities can continue to operate with an Option C permit provided they do not need a Title V permit for other reasons. They must also comply with the provisions of the NESHAP, including any notifications and record keeping.

A list of NESHAP can be found on the EPA website: <http://www.epa.gov/ttn/atw/mactfnlalph.html>.

Need help?

If you need additional assistance with this registration permit, contact the MPCA's Small Business Environmental Assistance Program at 651-282-6143 or 800-657-3938 or <http://www.pca.state.mn.us/aj0r7d7>.

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

Table A: Fuel Sulfur Content Limits

Fuel Type	Sulfur Limit	Fuel Type	Sulfur Limit
Anthracite coal (ASTM D 388 [Vol 05.05])	2.38%	Kerosene (ASTM D 3699 [Vol 05.03])	0.50%
Bituminous coal (ASTM D 388 [Vol 05.05])	2.10%	Nos. 1 and 2 distillate oil (ASTM D 396 [Vol 05.01])	0.50%
Sub bituminous coal (ASTM D 388 [Vol 05.05])	1.66%	No. 4 distillate oil (ASTM D 396 [Vol 05.01])	1.80%
Lignite A coal (ASTM D 388 [Vol 05.05])	1.26%	Nos. 5 and 6 residual oil (ASTM D 396 [Vol 05.01])	1.80%
Petroleum coke (ASTM C 1160 [Vol 04.05])	2.33%	Liquified petroleum gas (LPG) (ASTM D 1835 [Vol 05.01 and 05.05])	n/a
Untreated domestic wood & bark (ASTM D 1165 [Vol 04.09])	n/a	Dry or commercial pipeline natural gas (must be a mixture of ethane, methane, not more than 5% propane, and not more than 1% butane)	n/a