



Audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions about this checklist, or your obligations regarding evaluation of your business operations, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 1-800-657-3938.

### Answer each question unless specifically directed otherwise.

1. Are your only emissions indirect heating units (boilers), reciprocating internal combustion engines, emissions from use of Volatile Organic Compounds (VOCs)-containing materials (e.g., paints, stains), insignificant activities (Minn. R. 7007.1300, subp. 2 and 3) or conditionally insignificant activities meeting the requirements of Minn. R. 7008.400 and 7008.4110?

- ☐ Yes  
☐ No You do not qualify for the Registration Option C permit.

2. Do you only burn the following fuels in your indirect heating unit (boiler): anthracite coal, bituminous coal, sub bituminous coal, lignite A coal, petroleum coke, untreated domestic wood and bark, kerosene, No. 1 and No. 2 distillate, No. 4 distillate, No. 5 and No. 6 residual, liquefied petroleum gas, dry or commercial pipeline natural gas (see Minn. R. 7007.1125, subp. 4 for definition).

- ☐ Yes  
☐ No You do not qualify for the Registration Option C permit.  
☐ N/A Do not have any indirect heating units (boilers).

3. Do you burn one of the following: bituminous coal or sub bituminous coal in a hand-fed boiler?

- ☐ No  
☐ Yes You do not qualify for the Registration Option C permit.

4. Do you only burn the following fuels in your reciprocating internal combustion engine: No. 1 and No. 2 diesel and kerosene, liquefied petroleum gas, dry or commercial pipeline natural gas (see Minn. R. 7007.1125, subp. 4 for definitions)?

- ☐ Yes  
☐ No You do not qualify for the Registration Option C permit.  
☐ N/A Do not have any reciprocating internal combustion engines.

5. For each batch of fuel do you record the sulfur content, and retain either vendor certification or test results by an independent laboratory (if a sulfur threshold is stated) which ensures sulfur content below the limits listed below? Do you only burn the fuel which is below the sulfur limit?

- ☐ Yes  
☐ No You do not qualify for the Registration Option C permit.  
☐ N/A Do not have any indirect heating units (boilers) or reciprocating internal combustion engines.

Fuel Type	Sulfur Limit
anthracite coal	2.38%
bituminous coal	2.10%
sub bituminous coal	1.66%
lignite A coal	1.26%
petroleum coke	2.33%
untreated domestic wood and bark	n/a
kerosene	0.50%
No. 1 and No. 2 distillate	0.50%
No. 4 distillate	1.80%
No. 5 and No. 6 residual	1.80%
Liquefied Petroleum Gas (LPG)	n/a
dry or commercial pipeline nat. gas	n/a

6. Do you keep records, either once per month or once per year, of the amount of each VOC-containing material (e.g., paints, stains) purchased or used (whichever was stated in application), then recalculate and record a 12 month rolling sum? Do you record the date the calculation was done?  
**Note:** You may do this annually instead of monthly if you qualify as a low-emitting Option C source; see end of checklist for details.
- ☐ Yes  
☐ No You must meet this requirement.  
☐ N/A Do not have non-combustion VOC emissions.
7. Do you maintain material safety data sheet (MSDS) or a signed statement from the supplier stating the maximum VOC content for each VOC-containing material (e.g., paints, stains)?
- ☐ Yes  
☐ No You must meet this requirement.  
☐ N/A Do not have non-combustion VOC emissions.
8. Do you keep records for each unit type, either once per month or once a year, the amount of each fuel purchased or used (whichever was stated in application), or the hours operated, and then recalculate and record a 12-month rolling sum? Do you record the date the calculation was done?  
**Note:** You may do this annually instead of monthly if you qualify as a low-emitting Option C source; see the end of checklist for details.
- ☐ Yes  
☐ No You must meet this requirement.  
☐ N/A Do not have indirect heating units (boilers) or reciprocating internal combustion engines.
9. Do you maintain the following records on your site for each indirect heating unit that burns coal, coke, wood, bark, number 5 or 6 residual oil, or number 4 distillate oil:
- (1) Location of the emission points;  
(2) potential emissions (as defined in Minn. R. 7007.0150, subp. 4, item A) in lbs/hr of sulfur dioxide (SO<sub>2</sub>) and Particulate Matter less than 10 um in size (PM<sub>10</sub>); and  
(3) gas flow rate and temperature, stack height, and diameter?
- ☐ Yes  
☐ No You must meet this requirement.  
☐ N/A Do not have indirect heating units that burn coal, coke, wood, bark, number 5 or 6 residual oil, or number 4 distillate oil.
10. Either once per month or once a year, do you calculate and record the eligibility number based on the sum of the Minn. R. 7007.1125, subp. 4 calculations for each boiler unit, engine unit, and VOC emissions for the previous 12 months? Do you record the date the calculation was done?  
**Note:** You may do this annually instead of monthly if you qualify as a low-emitting Option C source; see the end of checklist for details.
- ☐ Yes  
☐ No You must meet this requirement.
11. Is your eligibility number less than 50?
- ☐ Yes  
☐ No You do not qualify for the Option C permit. If you became ineligible on or after January 1, 2007, you have until December 31, 2008, to apply for a different permit.
12. Do you maintain the previous 5 years records, calculations and any receipts, invoices, or similar documents used in your calculations?  
**Note:** The current calendar year records must be kept on-site.
- ☐ Yes  
☐ No You must meet this requirement.
13. Do complete and return the Emissions Inventory Report by April 1<sup>st</sup> (the form is sent to you each December)?
- ☐ Yes  
☐ No You must meet this requirement.
14. Do you pay the annual Air Emission Fee within 60 days of the invoice date (sent to you each March)?
- ☐ Yes  
☐ No You must meet this requirement.

**15. Do you meet all appropriate requirements of any New Source Performance Standard (NSPS) that applies to your facility?**

**Note:** Facilities subject only to the notification and record-keeping requirements of a NSPS, or NSPS specifically listed in Minn. R. 7007.1110, subp. 2. C. are eligible to receive a Registration Permit. Facilities that are subject to a NSPS not listed and are required to do more than notification and record-keeping must receive another type of air emissions permit.

- ☐ **Yes**  
☐ **No** You must meet NSPS requirements.  
☐ **N/A** Your facility is not subject to a NSPS.

**16. Do you meet all appropriate requirements of any National Emission Standard for Hazardous Air Pollutants (NESHAP) that applies to your facility?**

**Note:** A list of NESHAP may be found on U.S. Environmental Protection Agency's Web site at [www.epa.gov/ttn/atw/mactfnlalph.html](http://www.epa.gov/ttn/atw/mactfnlalph.html).

- ☐ **Yes**  
☐ **No** You must meet NESHAP requirements.  
☐ **N/A** Your facility is not subject to a NESHAP.

**You have completed the questions for this checklist.**

**Low-Emitting Option C Sources-** If your eligibility number is less than 25 for the previous calendar year, your facility is a low-emitting source and qualifies for reduced recordkeeping. However if your eligibility number exceeds 25, then you no longer qualify as a low-emitting source and thus do not qualify for reduced recordkeeping. You may qualify again if you demonstrate an eligibility number of less than 25 for two consecutive calendar years.

**Option C Calculation Spreadsheet-** SBEAP has developed an Option C Calculation Spreadsheet to help you with your calculations and recordkeeping requirements. The spreadsheet may be found on Minnesota Pollution Control Agency's Web site at [www.pca.state.mn.us/industry/sbeg/index.html#spreadsheets](http://www.pca.state.mn.us/industry/sbeg/index.html#spreadsheets).

Minnesota Rules may be found at <http://vos.6g.mn/arule/index.numeric>.