Capped Permit Compliance Plan Example

November 3, 2004

This is a sample compliance plan created by the MPCA for a fictitious facility. You are not required to follow this format, but your compliance plan is required to list the state and federal requirements that apply to your stationary source. The compliance plan must also list the actions, including monitoring, record keeping, and reporting requirements, on a daily, monthly, and yearly basis that your stationary source must do to be in compliance with its capped permit option. Information for this plan can be taken from the previously completed GI-09 forms. The Compliance Plan is required to be kept at the facility at all times and available for MPCA inspection as necessary. It must be updated within 15 working days of making a change that would affect the compliance plan.

Facility Name: ABC Coatings
Facility Address: 12345 Main Street, Minneapolis, Minnesota 55424
Date Created: January 30, 2005
Date(s) Revised: _____

Emission Unit: Whole Facility

Applicable Requirements:
Minn. R. 7007.1140 – 7007.1148

Actions to Demonstrate Compliance:

Calculations

1. Recalculate and record by the last day of each month the 12-month rolling sum for the previous month for all criteria pollutants and HAPs using the attached spreadsheet. The spreadsheet uses the following basic methods and assumptions:

   For fuel oil and natural gas combustion emissions, AP-42 emissions factors, and fuel usage records are used to calculate emissions for all criteria pollutants as well as individual and total HAPs (method in Minn. R. 7007.1147, subp. 4 – general calculation using an emissions factor).

   For coating and clean up materials, the content of materials and purchase records as well as the spray gun transfer efficiency and control efficiency for the wall filters are used to calculate emissions of VOC, PM10, individual and total HAPs (method in Minn. R. 7007.1147, subp. 5 – material balance).

For each paint booth, the overall control efficiency of the wall filter is 74% and the spray gun transfer efficiency is 30% for all current spray guns. No waste credit is being taken in any of the calculations at this time.

2. Check to ensure each sum calculated in #1 is below appropriate threshold.
3. Each January check to ensure that the actual NO_x emissions for the previous calendar year are less than the amount modeled in the ambient assessment.
4. Each January (once per year), verify that the AP-42 factors for fuel and are still current.

Record Keeping

1. Keep all required records for 5 years from date made.
2. Keep required records on-site for calendar year.
3. Materials Usage Record Keeping.

Fuel Content: Sulfur content of distillate fuel will be determined from fuel supplier certifications received with each shipment.

Fuel usage Records: Daily usage of natural gas and distillate fuel oil will be determined with fuel meters and recorded each day that the fuel is used.

Content of Coating and Clean-Up Materials: VOC and HAP content of VOC- and HAP-containing materials will be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range will be used in all calculations.

Daily: record purchase of VOC- and HAP-containing materials

4. Prechange analysis.

Prior to making a physical or operational change which increases emissions, demonstrate that the estimated actual annual emissions after the change is made are less than the applicable pollutant threshold in part 7007.1141. If the change results in increased SO_2, NO_x, or PM_{10} emissions, demonstrate that the ambient air quality standards will continue to be met after the change is made and keep records of the prechange analysis.

Submittals/Notifications

1. Emissions inventory by April 1, of each year including updated equipment list.
2. Compliance certification by January 31, of each year.
3. Semi-annual deviation report for period from January 1 – June 30 is due by July 30 of each year, and for period from July 1 – December 31 is due by January 30 of each year **only if** a deviation occurred in the reporting period.
4. If a deviation is found that endangers human health or the environment, as soon as possible after discovery, notify the MPCA, either orally or by facsimile, of the deviation by calling the Minnesota Duty Officer at (651)649-5451 or toll-free at 800-422-0798. TTY users can call (651)297-5353 or 800-627-3529. Then, within 2 working days of the discovery, notify the MPCA in writing of the deviation.

Emission Unit # 001: Boiler

Applicable Requirements:
Minn. R. 7011.0515, subp. 1

Actions to Demonstrate Compliance:
Monthly fuel records on file at facility.

Emission Units #002, #003, #004: Paint Booths

Applicable Requirements:
Minn. R. 7011.0700 – 7011.0735

Actions to Demonstrate Compliance:
Monthly usage records and calculations for Whole Facility and Control Equipment records can be used to show emissions are less than the limit in this rule.

Control Equipment #001, #002, #003: Wall Filters

Applicable Requirements:
Minn. R. 7011.0060 – 7011.0080

Actions to Demonstrate Compliance:

Inspections:

Daily Inspections: Once each operating day, visually inspect the condition of each wall filter with respect to alignment, saturation, tears, holes and any other condition that may affect the filter's performance. Maintain a daily record of the filter inspections. If the filters are found during the inspection to need repair, take corrective action as soon as possible. Corrective actions will include completion of necessary repairs identified during the inspection. Keep a record of the type and date of any corrective action taken for each filter.

Monthly Inspections: During the last 5 days of each month, inspect components that are subject to wear which include belts and fans. Maintain a record of the inspection including what the inspection included, the date it was completed and any corrective action taken.

Quarterly Inspections: During the last two weeks of March, June, September, and December, inspect components that are not subject to wear which include structural components, housings, ducts, and hoods. Maintain a record of the inspection including what the inspection included, the date it was completed and any corrective action taken.

Annual Inspections: Thoroughly inspect all the wall filters each December (annual requirement per the manufacturing specifications). Maintain a record of the inspection including what the inspection included, the date it was completed and any corrective action taken.

Spare Parts and Training:

Maintain an inventory of spare parts for the wall filters, as required by the manufacturing specifications.

Train staff every December to meet the requirement of Minn. R. 7011.0075, subp. 2(B). Keep records of the training materials and which staff completed the training for the previous 5 years.

Maintain a record of parts replaced, repaired, or modified for the previous five years.

Hood Records:

Initial Hood Certification and Evaluation: Keep a record of the hood evaluation and certification required by Minn. R. 7011.0070, subps. 1 and 3 on site.

Annual Hood Evaluation: Every December, measure and record the face velocity of each hood and maintain a copy on site.

Submittals or Notifications
For shutdowns or breakdowns of the control equipment, submit or make the appropriate notification required by Minn. R. 7019.1000.