June 8, 2011

Dear Air Permit Holder:

The Minnesota Pollution Control Agency (MPCA) maintains a longstanding policy of promoting environmentally-friendly practices. Given the advances in technology and the potential for environmental benefit, the MPCA has developed a new submittal format for routine air quality reporting.

At this time, Minn. R. 7017.1120 subp. 4 requires all submittals required under parts 7017.1002 to 7017.1220, except certification test plans and relative test audits notifications, to be accompanied by a certification statement signed by a responsible official, pursuant to Minn. R. 7007.0500, subp. 3. From the date of this letter forward, the MPCA will now accept the following reports by e-mail attachment: excess emission reports, cylinder gas audit (CGA) reports, linearity and leak check test reports, relative accuracy test audits (RATA) reports, calibration error audits (CEA), semiannual deviation reports, annual compliance certifications, quarterly reports, and applicable National Emissions Standards for Hazardous Air Pollutants (NESHAP) reports. For those reports that require it, the MPCA will accept the reports without the separate signed certification statement.

The intention of this new submittal format is to streamline the reporting process. You are encouraged, but not required, to submit these reports through this format.

For the reports to be acceptable as submittals, the following requirements must be met:

1. Reports, in PDF format only, attached to and sent to: AQRRoutineReport.pca@state.mn.us
2. As applicable, reports must be signed and dated.
3. Reports must be submitted using the most recent version of each reporting form, which are available on the MPCA website, unless an alternative format is approved by the MPCA staff.
4. Reports shall be submitted as required in rule or as previously requested by the MPCA. CGA, RATA, and CEA report summaries should be included along with excess emission report submittals at the end of each quarter.
5. Each report must be a separate attachment but can be included within a single e-mail.
6. The e-mail message body must include:
   a. Name of the Regulated Party
   b. Name of facility contact
   c. Permit Number and/or Air Quality File Number
   d. List of reports submitted
   e. Date of submission
   f. County where facility is located
If you elect to submit a report through this method, please be advised of the following:

1. The date of the e-mail sent to ACRoutineReport.pca@state.mn.us will be used to determine the date the report was submitted.

2. All reports must be submitted as a separate report (PDF file) unless previously discussed with MPCA staff.

3. If the MPCA experiences difficulty in document retrieval, such as an error in opening the PDF, reports may not be considered received by the MPCA until the date a working copy is accessible by the MPCA.

4. You must send your e-mail using a verification of receipt tool if you wish to receive confirmation of submittal.

5. All other required notifications and reporting submittals shall continue to be provided as required by rule and MPCA policy. The alternative formats approved by this letter only apply to the above mentioned reports, or those approved by MPCA staff.

6. This action does not preclude any other regulation or requirement that states a hardcopy or another specific reporting format is required. Furthermore, the MPCA reserves the right to request a hard copy of any electronically submitted report.

7. The MPCA may request all or portions of reports as necessary.

In the event that electronic submittals are no longer acceptable, the MPCA reserves the right to terminate this policy. Future guidance and instruction may further specify what will be deemed as an acceptable reporting format.

If you have questions or comments regarding this matter please contact Sean O’Connor at 651-757-2620.

Sincerely,

[Signature]

Jeff T. Connell, Manager
Compliance and Enforcement Section
Industrial Division

JTC/SWO:rrh

cc: Katie Koelfgen, MPCA
Sean O’Connor, MPCA