

## 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. The rules governing Option B Registration permits can be found in Minn. R. 7007.1110 and 7007.1120.

The Option B Registration Permit is intended for facilities with emissions from Volatile Organic Compounds (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 and 7008.4110.

### 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. Purchase or use less than 2,000 gallons of VOC-containing materials in a calendar year

In order to continue to be eligible for the Option B Registration Permit you must purchase or use less than 2,000 gallons of VOC-containing materials each 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.

If you purchase or use more than 2,000 gallons of VOC-containing materials, you will need to submit an application for a different kind of registration permit, detailed in section 4 of this fact sheet.

#### **4. 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 and comply with any rules that apply to you. Note that in order to remain eligible for an Option B Registration Permit, the only emissions allowed are from VOC-containing materials, or activities that qualify as insignificant activities under Minn. R. 7007.1300, subs. 2-3, or conditionally insignificant activities meeting requirements of Minn. R. 7008.4000 and 7008.4110.

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. However, if you are installing a new non-emergency engine, you are required to complete modeling as described in Form EC-03, to demonstrate that the new engine will not cause localized modeled exceedances of National or Minnesota Ambient Air Quality Standards (NAAQS and MAAQS). The form and all supporting information should be submitted to the MPCA as described in the form instructions.

If a change occurs that makes you ineligible for an Option B Registration Permit, but you are eligible for an Option C or Option D, you must submit a written notice and application within 30 days of making the change. 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.

If you intend to make a modification that makes you ineligible for an Option B Registration Permit, but eligible for an Option C or Option D, you must submit the application for the new Registration Permit before you begin construction on the modification. A modification at your facility could be physically modifying the facility or method of operation. 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.

#### **5. 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, but you have the option of keeping the records on site or at a different location for the previous years.

#### **6. 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 amount of VOC-containing materials you purchased or used 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 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 and must be paid within 60 days of the invoice date.

#### **7. 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.

If a new NSPS becomes applicable, you must notify the MPCA using Form CR-06.

#### **8. 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. Some of these regulations, known as National Emission Standards for Hazardous Air Pollutants (NESHAP), require a facility to obtain a Title V operating permit. If you are subject to a NESHAP that requires a Title V permit, you are no longer eligible for an Option B permit.

There are also NESHAP that do not require a 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. If you are subject to a NESHAP that does not require a Title V permit, you can continue to operate with an Option B permit provided you continue to meet all other Option B qualifications. You 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: <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9>.

#### **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 <https://www.pca.state.mn.us/quick-links/small-business-environmental-assistance-program>.

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