

Your Option D Registration Permit

Now that you have your Option D 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 D Registration Permit. (Also, refer to Minn. R. 7007.1110 to 7007.1130.)

What are you required to do?

1. Each month, record actual emissions for the previous 12 months.

To calculate your actual emissions, you will need to collect information on a monthly basis from your operations.

Whatever data you used to apply for the permit must be used to demonstrate, monthly, that you qualify for your Option D registration permit.

For example, if you used hours of operation to determine how much fuel was burned in your generator, each month you must record the hours of operation of the generator. If you used gallons of paint to determine Volatile Organic Compounds (VOC) emissions from a paint booth, each month you must keep records of the gallons of paint used, its density, and its VOC content.

Remember, you do not need to calculate:

- Emissions from insignificant activities.
- Monthly hazardous air pollutant (HAP) emissions if:
 - the HAP emissions are VOC emissions and actual VOC emissions are less than five tons per year; and
 - the facility is not located in one of the seven metropolitan counties (Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington).

Information and records you may need to calculate monthly actual emissions include:

- The amount of each VOC- or HAP- containing material purchased or used each month. Use the method you indicated on Form RP-D1 in your permit application.
- For each VOC- or HAP- containing material purchased or used at your facility, maintain a record of the safety data sheets or a signed certification from the supplier stating what the maximum VOC or HAP content is.
- The total amount of each fuel purchased or used each month.
- The hours each emission unit was operated each month.

Use the collected data to calculate and record the actual emissions for the current month. You must also calculate a 12-month rolling sum (current month's emissions plus the previous 11 months) each month. The calculations must be performed no later than the last day of the following month.

Be sure to keep records of the calculations, including the date they were done. To remain eligible for an Option D Registration Permit, actual emissions during any 12-month rolling period may not exceed the Option D thresholds listed in Table 1.

You may find it easier to set up a spreadsheet to do the calculations on a monthly basis. The Small Business Environmental Assistance Program (SBEAP) has developed spreadsheets to help track emissions that can be accessed at <https://www.pca.state.mn.us/business-with-us/small-business-environmental-assistance>. If your business has fewer than 100 employees, call SBEAP at 651-282-6143 or 800-657-3938 for more information.

2. Reduced record keeping option.

If your actual emissions are below the reduced record keeping levels in Table 1, you will only have to calculate your actual emissions on an annual basis. The calculations must be performed no later than April 1 of the following year. However, you will still need to track and document the data and material usage information that would be used to calculate your actual emissions. For example, you will need to track the volume of paints used, safety data sheets of materials used, fuel used or number of hours a unit is operated.

If your actual emissions exceed the reduced record keeping levels, you must begin to calculate your emissions on a monthly basis again. Only if you can demonstrate for two consecutive calendar years that your emissions have returned and remained below the reduced record keeping levels, can you return to tracking emissions on an annual basis.

Table 1: Permit Thresholds

Pollutant	Reduced Record Keeping (tons per year)	Option D Limits (tons per year)
Particulate Matter (PM)	25	50
Fine Particulate Matter (PM ₁₀)	25	50
Sulfur Dioxide (SO ₂)	25	50
Nitrogen Oxides	25	50
VOC	25	50
Carbon Monoxide	25	50
Lead	0.05	0.5
Individual HAPs	2.5	5
Combined HAPs	6.25	12.5
Carbon Dioxide Equivalent (CO ₂ e)	25,000	50,000

3. Using control equipment to calculate actual emissions.

If you consider pollution control equipment when calculating the actual emissions, you must follow the operation and maintenance requirements described at the end of this fact sheet. This information may serve as a guide to developing a record keeping form that is useful to you.

See Minnesota Pollution Control Agency's (MPCA) form RP-D2: Option D control equipment, available on the MPCA Air Permit Forms website, for a list of control equipment that you may consider. You may also receive credit for unlisted control equipment if an MPCA approved performance test is done and the verification or approval letter and required operating parameters are submitted with the application. Refer to Minn. R. 7007.1130, subp. 4.

4. Making changes or modifications at your facility.

You may add and remove any emission units at the facility as long as you stay below the Option D registration permit thresholds and comply with any additional rules that apply to you.

For example, if you add a boiler that is subject to New Source Performance Standard (NSPS) subp. Dc, you must comply with the applicable subp. Dc requirements. Be sure to add in the actual emissions resulting from any additional emission unit when you do your calculations.

The MPCA requires no notice from you of the changes at your facility unless it is specifically required by a rule. It is your responsibility to keep the records and calculations on site and to follow any other rules that apply as a result of the changes. However, if you are installing a new non-emergency engine, you are required to complete modeling as described in form EC-03: IC engine screen modeling, 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 you will be making a change to your facility, whereby your facility will no longer be eligible for your Option D Registration Permit, you may be required to obtain a new permit before beginning construction. See Minn. R. 7007.1110, subps. 10-13, for more information. For additional assistance, call the MPCA at 651-296-6300 or 800-657-3864, or if your business has fewer than 100 employees, the SBEAP at 651-282-6143 or 800-657-3938.

5. Keep records for five years.

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

6. Submit an emission inventory and pay emission fees.

Once per year, you will need to submit an Emission Inventory Report to the MPCA. This report will require you to report your actual emissions for the previous calendar year.

If your facility is located in Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington County, you must also submit an Air Toxics Emission Inventory Report each year. This report will require you to report your actual emissions of air toxics for the previous calendar year.

The MPCA will send you an Emission Inventory Report form in December. The Emission Inventory Report form is due electronically to the MPCA no later than April 1.

You will also be assessed an annual air emissions fee for your Option D Registration Permit. This fee is based on tons of pollutants you report to the MPCA. An invoice will be mailed to you between February and April and must be paid within 30 days of the invoice date.

The following requirements may or may not apply to you:

7. If actual emissions of sulfur dioxide (SO₂) or particulate matter smaller than 10 microns (PM₁₀) are more than five tons per year, keep stack information on site.

If actual emissions from the total facility exceed five tons per year of SO₂ or PM₁₀, you must keep records of the following information and must be prepared to submit these records within 45 days of a request by the agency:

- The location of the emission points
- The potential emissions in pounds per hour of SO₂ and PM₁₀
- The height and diameter of the stack the emission units exhaust to
- The exhaust gas flow rate and temperature

8. If you use continuous emission monitoring system (CEMS) data to calculate actual emissions, keep records.

If you use data from a CEMS data for the calculations, the following records must be kept:

- The total operating hours of the CEMS and the monitored emission unit(s) for the previous 12 months.
- An explanation of how the emissions were calculated based on the CEMS data.
- Calculations must be based on the rated capacity of the fan, unless the CEMS provides data on the actual air flow rate.

9. Comply with any applicable NSPS requirements.

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

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 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: Registration and capped permits notification.

10. Comply with any 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 HAP emissions. If you are subject to a NESHAP that requires a Title V permit, you are no longer eligible for an Option D registration permit.

There are also NESHAPs that do not require area sources to obtain the Title V permit. Some examples include spray coating of metal or plastics, adding a degreaser that uses halogenated solvents, or adding a chromium electroplating tank. These facilities can continue to operate with an Option D registration 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 NESHAPs can be found on the EPA website: <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-8>

If you have additional questions, you can contact the MPCA's SBEAP at 800-657-3938 or 651-282-6143 for more information.

Option D registration permit requirements for all facilities using control equipment to reduce reported actual emissions

Daily requirements:

1. Record each monitored parameter once every 24 hours when in operation, unless otherwise specified.
2. Record any corrective actions taken as a result of daily checks.
3. Keep all records for five years. Store these on-site for the current calendar year. You may store records from previous calendar years at an off-site location.

Control Device	Daily Requirements
Centrifugal collectors:	Record pressure drop
Fabric filters (Baghouse): High temperature (T>250°F) and Medium temp. (180°F>T<250°F)	Record pressure drop
Fabric filters: Low temperature (T<180°F)	Record pressure drop; or Record whether visible emissions are observed from filter outlet during the entire cleaning cycle (yes/no) and the time period of the observation <i>You can choose, unless specified by the MPCA.</i>
Scrubbers, spray towers:	Record pressure drop Record liquid flow rate
Venturi or Impingement Plate Scrubber:	Record pressure drop Record liquid flow rate

Condensation scrubber:	Record pressure drop Record steam supply rate or blowdown rate
Wet cyclone separators:	Record pressure drop Record water pressure
Mechanically aided separator:	Record pressure drop
Control Device (cont.)	Daily Requirements
Electrostatic precipitators:	Record the continuous readout of voltage and secondary current If used, record the flow rate of conditioning agent
HEPA and other wall filters:	Record condition of the filters including, but not limited to, alignment; saturation; and tears/holes
Thermal afterburner:	Record combustion temperature or inlet and outlet temperatures at least once every 15 minutes
Catalytic afterburner:	Record inlet and outlet temperatures at least once every 15 minutes. Check catalyst bed reactivity as per manufacturer specification (not necessarily daily)
Flares:	Record temperature indicating presence of flame at least once every 15 minutes

Monthly, quarterly, and annual requirements:

1. Record the date and activities performed for the monthly, quarterly, and annual checks.
2. Record any corrective actions taken as a result of the monthly, quarterly, or annual checks.
3. Keep all records for five years. Store these at the plant site for the current calendar year. You may store records from previous years at an off-site office.

Monthly (or as required by manufacturer's specifications)	<ul style="list-style-type: none"> • Check components subject to wear/plugging such as bearings, belts, hoses, fans, nozzles, orifices, and ducts
Quarterly (or as required by manufacturer's specifications)	<ul style="list-style-type: none"> • Inspect components not subject to wear including structural components, housing, ducts, and hoods
Annually (or as required by manufacturer's specifications)	<ul style="list-style-type: none"> • Thoroughly inspect all control equipment and structural components • Calibrate all instruments used to monitor control equipment • For control devices with inlet emissions captured by hood(s), maintain a record of fan rotation speed, fan power draw or face velocity of each hood, or other comparable airflow indicator

Requirements to be followed at all times

1. Maintain an inventory of spare parts that are subject to frequent replacement, as recommended by manufacturer of control equipment.
2. Train staff on how to operate/maintain control equipment and respond to indicators of malfunction.
3. Maintain records of control equipment parts replaced, repaired, or modified for the previous five years.
4. Operate the control equipment whenever the process equipment is operating.
5. If there is a shutdown or breakdown of control equipment that results in any increase of emissions of any regulated air pollutant and lasts more than one hour, report it by calling 651-296-6300. (Refer to Minn. R. 7019.1000 or the air quality fact sheet about shutdowns and breakdowns for more detail: <https://www.pca.state.mn.us/sites/default/files/aq2-09.pdf>)
6. Submit semi-annual reports if a deviation occurred during the reporting period. Examples of deviations for a baghouse could be a reading of a monitored parameter (such as pressure drop) that is outside the range recommended by the manufacturer or observation of visible emissions. To propose an alternative pressure drop range for fabric filters, you need to submit two years of compliant monitoring data with your request to the MPCA. Call the MPCA at 651-296-6300 or 800-657-3864 for more information.
7. For control devices where inlet emissions are captured by certified hoods, you must maintain at the facility the evaluation that shows the hood conforms to the design and operating practices recommended in

“Industrial Ventilation - a Manual of Recommended Practice” by the American Conference of Governmental Industrial Hygienists.

Additional information

MPCA air quality permit fact sheets:

<https://www.pca.state.mn.us/air/air-fact-sheets>

MPCA air quality permit forms:

<https://www.pca.state.mn.us/air/air-permit-forms-and-online-submittals>

MPCA air quality regulations:

<https://www.pca.state.mn.us/air/air-rules-and-rulemaking-business>

MPCA Small Business Environmental Assistance Program:

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

MPCA Air Emission Inventory:

<https://www.pca.state.mn.us/business-with-us/air-emissions-inventory-reporting-and-fees>