



Operating Permit Reporting Kit

Instructions and Supporting Materials

A. Purpose

This package provides instructions and forms to facilitate compliance with the Operating Permit reporting requirements pursuant to 310 CMR 7.00: Appendix C(5)(b)(9) [Annual Compliance Certification], Appendix C(10) [Semi-Annual Monitoring Summary], and 310 CMR 7.00: Appendix C(10)(f) [Deviation Reports].

Note: The statements in this document are intended as guidance to aid regulated entities in complying with the regulations. The guidance is not a substitute for reading the regulations and understanding all the requirements as they apply to your facility. Under no circumstance does the Department assume liability for the completeness or accuracy and applicability of the forms and content. The facility retains sole responsibility for information and timely submission of such to the Department and/or EPA.

B. What, When and Where to Submit?

What	When	Where
<ul style="list-style-type: none">Operating Permit Deviation Report	See Attachment A	DEP Regional Office Attn: BWP OP Reporting Program
<ul style="list-style-type: none">Semi-Annual Monitoring Data SummaryOperating Permit Semi-Annual Compliance Certification Form	Postmarked or delivered by January 30 and July 30 unless noted otherwise in your Operating Permit. Verbal notification requirements are specified in your Operating Permit	DEP Regional Office Attn: BWP OP Reporting Program
<ul style="list-style-type: none">Annual Compliance ReportOperating Permit Annual Compliance Certification Form	Postmarked or delivered by January 30 unless noted otherwise in your Operating Permit. Verbal notification requirements are specified in your Operating Permit	DEP Regional Office Attn: BWP OP Reporting Program Air Compliance Clerk U.S. EPA New England 5 Post Office Square Suite 100 (OES04-2) Boston, MA 02109-3912



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D. Operating Permit Deviation Reports

Regulatory Background

The Operating Permit Deviation Report (OPDR) shall be submitted for deviations required to be reported pursuant to 310 CMR 7.00: Appendix C(10)(f) and Operating Permit General Condition No. 25. Verbal and written notification requirements are specified in your Operating Permit. Deviations from the Operating Permit must be submitted on OPDR's from the date of discovery of the deviation by facility personnel as specified in the Operating Permit. Any deviations not reported as prescribed in the Operating Permit will indicate noncompliance with the terms and conditions of the Operating Permit and may warrant enforcement action. All OPDR's must be summarized in the Semi-Annual Monitoring Data Summary Report to comply with 310 CMR 7.00: Appendix C(10)(c).

Instructions

Complete the following background information with each form as it appears on the cover page of your Operating Permit:

- Facility Name** Provide the name of the facility
- Facility Address** Provide the address for the physical location of the facility
- City/Town** Provide the name of the city or town in which the permitted facility is located
- SSEIS I.D. No.** Provide the facility's SSEIS Identification Number
- Transmittal No.** Provide the Transmittal Number
- Application No.** Provide the Application Number
- Facility Contact** Provide the name of the contact person for the facility
- Contact Phone No.** Provide the phone number of the Facility Contact
- Report Type** Check the report type. If any deviation was not reported within the scheduled timeframe of documentation, then the OPDR must be submitted with the Semi-Annual Monitoring Summary Certification form (check Semi-Annual).

In Items 1 through 8, complete the following information on the OPDR Form (See Attachment D) for **each deviation**:

1. All documents submitted to the Department concerning the Operating Permit shall contain certification by the responsible official of truth, accuracy, and completeness. This certification is in compliance with 310 CMR 7.01(2).
2. Enter the Emission Unit number (e.g. EU #2) and Description of the unit (e.g. paint spray booth), corresponding to the numbering in your Operating Permit in Table 1. If the deviation is from a facility-wide requirement, then "Facility-Wide" is the Emission Unit number and description.
3. Enter the Operating Permit Table 3. emission limit and/or standard that was exceeded, or the Operating Permit Table 4 & 5 monitoring and/or record keeping requirement which is incomplete.



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This includes any applicable requirement or special terms and condition(s).

OPDR Instructions Continued

4. Indicate whether any permit condition has had a prior deviation within the last 6 months.
5. Indicate the averaging time for assessing compliance required by the Operating Permit. The averaging time may be 'hourly', 'daily', 'monthly', etc. If the averaging time is undefined or not applicable, use N/A.
6. Indicate the duration of the deviation. Assume worst case, if undefined. In most cases, the duration of the deviation will be as long as the frequency of monitoring.
7. Describe the compliance method used to determine the compliance status (e.g. monitoring, testing, record keeping, etc. of a particular operation).
8. Describe the deviation in sufficient detail to show how the deviation differs from the requirement.
9. Explain the reason for the deviation and describe the actions taken to correct the deviation.
10. On a separate sheet, provide additional supporting information for Items 6, 7, & 8, as needed. If submitting additional information, please give a brief description in the appropriate box(es) and note that additional supporting information is being submitted. Include pertinent Return to Compliance Plans if deviation has not been resolved (See Attachment C).
11. Organize multiple deviations in groups according to deviation type and methods for monitoring and/or testing using a Supplemental Deviation Report form.
12. Place the page number and total number of pages submitted. On subsequent pages you submit, the format of "Page ____ of ____" should be used to continue the series.

An example OPDR is presented on the next page. Highlighted text indicates information submitted by owner/operator of the facility.

When and Where to Submit?

The permittee shall promptly submit an Operating Permit Deviation Report (OPDR) as outlined in Attachment A from the date of discovery of the deviation by facility personnel. The OPDR shall be submitted to the Massachusetts Department of Environmental Protection, Attn: BWP OP Reporting Program, Regional Office stated in your Operating Permit.



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Operating Permit Deviation Report

Example:
Completed
OPDR

For Office Use Only	Date Rcvd: _____	Processor: _____	Routed to: _____	
	Rcvd by: _____	Date Completed: _____	Final Action: _____	
<p>Pursuant to 310 CMR 7.00: Appendix C(10)(f), the permittee must promptly report all instances of deviation. Failure to provide this information may result in civil and/or criminal penalties.</p> <p>This form shall be submitted to report deviations from all applicable requirements, special conditions, and general conditions in the Operating Permit for which deviations, required to be reported by 310 CMR 7.00: Appendix C(10)(f) and Operating Permit General Condition No. 25, have occurred. In addition, this information shall be summarized in the Semi-Annual Monitoring Summary and Certification to demonstrate compliance status as required by 310 CMR 7.00: Appendix C(10).</p> <p>Supporting information regarding the reports and documentation listed below must be kept on file for at least 5 years and be made available to the Department upon requested as required by 310 CMR 7.00: Appendix C(10). Items 1-8 must be completed for each deviation being reported. Photocopy this form as needed. Attach supplemental documentation and additional deviations with pages clearly numbered.</p>				
<u>Vandelay Plastics</u>				
Facility Name				
<u>111 Primus Road</u>				
Street Address				
<u>Boston</u>	<u>MA</u>	<u>02108</u>		
City	State	Zip Code		
<u>119-0000</u>	<u>445612</u>	<u>MBR-98-OPP-00</u>		
SSEIS ID Number	Transmittal Number	Application Number		
<u>George Kostanza</u>	<u>617.556.1212</u>			
Facility Contact Person	Telephone Number			
Report Type:	<input type="checkbox"/> Semi-Annual	<input checked="" type="checkbox"/> Timely Reporting of Deviation		
Date(s) of Deviation:	<u>04/01/2000</u> From	<u>04/30/2000</u> To		
<u>#2 Paint Spray Booth</u>	<u>2 tons VOC/Month</u>	Date(s)	<u>1 month</u> <u>1 month</u>	
1. EU No. and Description	2. Emission Limit and/or Standard Exceeded	3. Previous Deviation? <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Frequency of Monitoring	5. Duration of Deviation
<u>Record keeping in gallons of covering applied</u>		<u>Exceeded monthly VOC limit at 2.5 tons of VOC</u>		
6. Method Used to Determine Compliance Status		7. Description of Deviation		
<u>Coating line malfunction in March required overtime in April. Preventative Maintenance Plan was revised, as well as the company's SOMP to avoid future malfunctions</u>				
8. Reason for Deviation and Description of Corrective Action Taken				
I certify that I have personally examined the Deviation Reports and am familiar with the information contained in this document and all attachments and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.				
<u>George Kostanza</u>	<u>Operations Manager</u>	<u>617.555.1212</u>		
Name of Responsible Official	Title	Phone Number		
Signature of Responsible Official		<u>05/01/2000</u>		
		Date		



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By signing this form, you are certifying to page 1 through page 1

E. Semi-Annual Monitoring Data Summary

Regulatory Background

The Semi-Annual Monitoring Data Summary and Certification Form shall be submitted as required by 310 CMR 7.00: Appendix C(10)(c). Deviations occurring during the reporting period shall be reported.

The permittee shall list all deviations during the reporting period on the Semi-Annual Monitoring Data Summary form. All deviations must be reported in accordance with the terms and conditions of your OP. Failure to report deviations may warrant enforcement action.

Instructions

Complete and submit to the Department and/or EPA, as required by the facility's OP, a Semi-Annual Monitoring Data Summary Form and Certification. To develop the Summary, the owner/operator shall obtain and report information directly from the appropriate Table in the facility's OP for all deviations. Please retain a blank copy of your Semi-Annual Monitoring Data Summary Form for future submittals.

Complete the following background information on the Operating Permit Semi-Annual Compliance Certification using information directly from the facility's OP:

- | | |
|-------------------------|---|
| Facility Name | Provide the name of the facility |
| Facility Address | Provide the address for the physical location of the facility |
| City/Town | Provide the name of the city or town in which the permitted facility is located |
| SSEIS I.D. No. | Provide the facility's SSEIS Identification Number |
| Transmittal No. | Provide the Transmittal Number |
| Application No. | Provide the Application Number |

If no deviations have occurred during the reporting period, you only need to submit the Semi-Annual Compliance Certification form.

Complete and attach an OPDR for any/all deviations that have occurred during the reporting timeframe, but have not been reported to the Department in writing. See instructions for OPDRs if necessary.

Include the name of the Responsible Official (print or type), Title, and Phone number. The Responsible Official is then to sign and date the form in black ink.

The definitions in Attachment B shall be used to complete the Semi-Annual Monitoring Data Summary.



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The permittee shall submit a Semi-Annual Monitoring Data Summary, Corrective Action Plan (if required), related supporting information, and the attached Semi-Annual Compliance Certification form postmarked or delivered by January 30 and July 30 unless noted otherwise in Table 6. of the facility's OP.

These documents shall be submitted to the Massachusetts Department of Environmental Protection, Attn: BWP OP Reporting Program, Regional Office stated in your Operating Permit.

F. Annual Compliance Report

Regulatory Background

The Annual Compliance Report Form, along with the Operating Permit Annual Compliance Certification Form, shall be submitted as required by 310 CMR 7.00: Appendix C(5)(b)9 and Operating Permit General Condition 10.

Instructions

Complete annually and submit to the Department and EPA the Annual Compliance Report Form and Annual Compliance Certification Form. Information is obtained from the appropriate tables in your facility's Operating Permit. Annual Compliance must be certified for all terms and conditions, not limited to, footnotes, alternative operating scenarios, emissions trading, and special terms and conditions. General Condition 10 of the facility's OP specifies the contents of the Report.

Complete the following background information on the Operating Permit Annual Compliance Certification using information directly from your Operating Permit.

Facility Name	Provide the name of the facility
Facility Address	Provide the address for the physical location of the facility
City/Town	Provide the name of the city or town in which the permitted facility is located
SSEIS I.D. No.	Provide the facility's SSEIS Identification Number
Transmittal No.	Provide the Transmittal Number
Application No.	Provide the Application Number

Check the appropriate box and include the reporting period.

Include the name of the Responsible Official (print or type), Title, and Phone Number. The Responsible Official is then to sign and date the form in black ink.

The definitions in Attachment B should be used to complete the Annual Compliance Report.



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Annual Compliance Report and Summary Continued

For each emission unit, list each applicable requirement from the appropriate Sections and/or Tables of the facility's OP. For requirements that apply facility-wide, enter FW in the column for the emission unit. Several generally applicable requirements are included in the table titled "Special Terms & Conditions & Generally Applicable Requirements. There may be others that apply in your specific situation.

Using information from Table 3. of the facility's OP, complete the first three columns of the Annual Compliance Report and Certification, indicating the Emission Unit Number (EU#), Pollutant, Fuel/Raw Material, Restrictions/Limitations, and Regulation and/or Approval Number as applicable.

For each requirement, using the appropriate Section and/or Table of the facility's OP, indicate whether the facility:

- is currently in compliance (Yes or NO);
- was in Continuous or Intermittent compliance during the reporting period;
- is performing all required testing and monitoring pertaining to that requirement, and was either in continuous or intermittent compliance during the reporting period;
- is performing all required record keeping pertaining to that requirement, and was either in continuous or intermittent compliance with that record keeping during the reporting period;
- is performing all required reporting pertaining to that requirement, and was either in continuous or intermittent compliance with that reporting during the reporting period;
- Any additional comments as needed, such as the use of credible evidence, date of return to compliance, etc. should be attached with emission unit number clearly labeled.

All documents submitted to the Department concerning the Operating Permit shall contain certification by the responsible official of truth, accuracy, and completeness. This certification shall be in compliance with 310 CMR 7.01(2).

Place the page number and total number of pages submitted, including the cover sheet and attachments. On subsequent pages you submit, the format of "Page _____ of _____" should be used to continue the series.

When and Where to Submit?

The permittee shall submit an Annual Compliance Report Form and the attached Operating Permit Annual Compliance Certification Form postmarked or delivered by January 30 unless noted otherwise in your Operating Permit.

This report and certification shall be submitted to the Massachusetts Department of Environmental Protection, Attn: BWP OP Reporting Program, Regional Office stated in your Operating Permit.

An example OP Table 3: Emission Limits and Restrictions and Annual Compliance Report Form follows on the next page. Highlighted text indicates information submitted by owner/operator of the facility.



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Example: Operating Permit Table 3

EU#	FUEL/RAW MATERIAL	POLLUTANT	RESTRICTIONS	EMISSION LIMIT/STANDARD	APPLICABLE REGULATION
1	#2 fuel oil	PM		0.10 lb/MMBTU	310 CMR 7.02(8) Table 1
1	#2 fuel oil	PM	Fuel oil ash content not to exceed 4% by dry weight.		310 CMR 7.05(3)
1	#2 fuel oil	SO2	Fuel oil sulfur content not to exceed 0.3%by weight		310 CMR 7.0(1)(a)2
1	#2 fuel oil	Opacity	Not to exceed 20% for a period or aggregate period in excess of 2 minutes during any one hour provided that at no time during the one hour shall the opacity exceed 40%		310 CMR 7.06(1)(b)
1	#2 fuel oil	Smoke	N/A	No Smoke	#89116

Example: Annual Compliance Report

EU#	Pollutant	Fuel/Raw Material Regulation/Approval Number	Emission Limit / Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
1	PM	310 CMR 7.02(8) Table 1 No. 2 Fuel, 0.10 lbs/MMBTU		X	X		X		X		X		X	X				X	X			X
1	PM	310 CMR 7.05(3) No. 2 Fuel oil ash content not to exceed 4% by dry weight.		X	X		X		X		X		X	X				X	X			X
1	SO2	310 CMR 7.00 No. 2 Fuel oil sulfur content not to exceed 0.3% by weight		X	X		X		X		X		X	X				X	X			X
1	Opacity	No. 2 fuel oil 310 CMR 7.06(1)(b)		X	X		X		X		X		X	X				X	X			X
1	Smoke	No. 2 fuel oil. No smoke, approval #89116		X	X		X		X		X		X	X				X	X			X

Legend: Yes (Y); No (N); Intermittent (I); Continuous (C)



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ATTACHMENT A

DEVIATION REPORTING SCHEDULES FOR OPERATING PERMITS

Note: Reporting schedules outlined in your Operating Permit, Table 6., supersede the following schedules

Deviations to Report Within Three (3) Days

- Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the permit or approval as surrogate for an emission limit.
- Exceedances of permit operational limitations directly correlated to excess emissions.
- Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance

Deviations to Report with the Semi-Annual Monitoring Summary

- Any deviations not listed above



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ATTACHMENT B AIR OPERATING PERMIT DEFINITIONS

Compliance:	<p>A status where all applicable requirements are being met, based on the collection and evaluation of data, including any credible evidence.</p> <ul style="list-style-type: none">• Data includes but is not limited to parametric monitoring, indicators, operating practices, record keeping, and reporting
Continuous Compliance:	<p>The status where a facility or emission unit has continuously met all terms of the permit, regulation, or approval during the reportable timeframe.</p> <ul style="list-style-type: none">• No reportable deviations• Credible evidence supports status• Data must include but is not limited to self-monitoring, parametric monitoring, indicators, operating practices, record keeping, and reporting
Credible Evidence:	<p>Includes but is not limited to:</p> <ul style="list-style-type: none">• Reference test method• Other evidence comparable to information generated by the reference test method such as:<ul style="list-style-type: none">○ Engineering calculations○ Indirect estimates of emissions○ Continuous Emission Monitoring System (CEMS)○ Parametric monitoring data○ Record keeping
Deviation:	<p>Any situation in which a facility or an emission unit fails to meet an applicable requirement.</p> <ul style="list-style-type: none">• Includes emission limits, parametric limits, work practice standards, record keeping, and reporting• May be determined by observation or through review of data obtained from any testing, monitoring, or record keeping• May exclude instances reported as emergency conditions pursuant to Section 24 of your final Operating Permit
Intermittent Compliance:	<p>The status where the facility or emission unit has failed to continuously meet all terms of the permit, regulation, or approval during the reportable timeframe.</p> <ul style="list-style-type: none">• Reportable deviations• Credible evidence supports status• Data must include but is not limited to self-monitoring, parametric monitoring, indicators, operating practices, record keeping, and reporting
Non-Compliance:	<p>Any act or failure to act which constitutes or results in one or more of the following:</p> <ul style="list-style-type: none">• Engaging in any business or other activity without a license or approval whenever engaging in such business or activity requires such license or approval• Engaging in any activity prohibited by, or not in compliance with, any requirement• Not fully doing, or not doing in timely fashion, anything required by any requirement



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ATTACHMENT C

AIR OPERATING PERMITS CORRECTIVE ACTION PLAN OUTLINE

Note: Only used if a deviation has not been resolved

Corrective Action Plans must include the following:

- Identification of Emission Unit
- Permit Limitation
- Date of Deviation
- Cause of Deviation
- Remediation
- Proposed Date of Remediation Completion
- Preventative Measures