



So you have a construction permit, now what?

How to comply with your new construction permit



Recordkeeping and reporting


- Complete records demonstrate ongoing compliance – the goal!
- Identify the elements of a complete record for the emission limit:
 - SDS
 - Ordering and purchasing (how much, dates)
 - Manufacturer's operating guidance or maintenance manuals
 - Proper operation of control devices (including devices monitoring flowrates or pressure drops)
 - Maintenance orders and completion logs – do they match your startup, shutdown or malfunction records for the unit/control device?
 - QA/QC checks and records
 - Fuels used

Recordkeeping and reporting

- Construction approval/construction permit reporting
 - Notification to KDHE district offices or local agency
 - When construction is complete and operating
 - Time clock to submit operating permit application
 - Inspection
 - NSPS or MACT
 - Initial and subsequent notifications http://www.kdheks.gov/air-permit/forms/NSPS_Notification.pdf
 - Notification for MACT 6J <https://www.sbeap.org/aqrules/boilers>
 - CEDRI reporting <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>
 - Send required notifications to KDHE and EPA.

Recordkeeping and reporting

- Notification of performance test
 - Pre-test
 - Post-test
 - Use of EPA's ERT to submit performance testing results
<https://www3.epa.gov/ttnchie1/ert/>
- Notification to KDHE BOA of deviations from approval/permit
 - Did you install equipment that is an emission unit not approved or permitted?
 - Is the equipment a larger HP, MMBtu/hr, increased process throughput, different manufacturer with increased emission factors for similar unit, or other "increase" in emissions?
 - Did you fail to initiate construction within 18 months of the construction approval or permit date?



Hey! I don't have a construction permit or approval for a piece of equipment on site, so how do I know what records to keep?

- What's the situation?
 - Didn't turn in required application?
 - May need to determine if an approval or permit was required.
 - Was permit issued but misplaced or lost?
 - Who you gonna call?
 - Very old unit installed a long time ago?
 - Before a permit would have been required?
 - Old, but recently subject to a new MACT?

Recordkeeping and reporting

- K.A.R. limits and records construction approvals/permits:
 - Maintain two years from date of record
- NSPS records:
 - Maintain two years from date of record [40 CFR 60.7(f)], *“Unless otherwise specified”*
- MACT records:
 - Maintain five years from date of record [40 CFR 63.10(b)], *“Unless otherwise specified” – two years must be on site; the other three can be off site (company headquarters)*

No construction permit or approval : What records to keep?

- PTE calculations
 - Includes lists of chemicals, fuel types, process rates, hours of operation (as applicable), etc., used to determine PTE and potential actuals
- Date of manufacture of emission unit or equipment
- Date construction commenced
- Date of startup of equipment or process
- List of state or federal regulations
- Regulation or common sense?

Example recordkeeping tools

www.sbeap.org





Class II permit-by-rule tools

- Reciprocating engines [KAR 28-19-561]
- Organic solvent evaporative sources [KAR 28-19-562]
- Hot mix asphalt facilities [KAR 28-19-563]
- Sources with actual emissions less than 50% of major source thresholds [KAR 28-19-564]





Class II Permit-by-Rule Tools

If your facility operates under a Class II permit-by-rule, the following recordkeeping/reporting tools (in Microsoft Excel format) may be useful for you to use:

- Reciprocating engines  [KAR 28-19-561]
- Organic solvent evaporative sources  [KAR 28-19-562]
- Hot mix asphalt facilities  [KAR 28-19-563]
- Sources with actual emissions less than 50% of major source thresholds  [KAR 28-19-564]

Each spreadsheet/tool begins with a set of instructions and applicability/reporting information.

Webinars highlighting how to use the permit-by-rule tools were held on March 13, 2013. The archived webinars are available below. You can also view the [introductory presentation](#)  [PDF] that was shown during the webinar.

<p>Reciprocating engines</p>  <p>Permit-by-rule tool webinar - Reciprocating engines from PPI/SBEAP</p> <p>Permit-by-Rule Tool Reciprocating Engines</p> <p>March 13, 2013 24:35 Small Business Environmental Assistance Program vimeo</p>	<p>Organic solvent evaporative sources</p>  <p>Permit-by-rule tool webinar - Organic solvent evaporative sources from PPI/SBEAP</p> <p>Permit-by-Rule Tool Organic Solvent Evaporative Sources</p> <p>March 13, 2013 31:42 Small Business Environmental Assistance Program vimeo</p>
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Recordkeeping/reporting for Class II Permit by Rule: Reciprocating engines

PBRtool.ReciprocatingEngines.xlsx - Microsoft Excel

File Home Insert Page Layout Formulas Data Review View Acrobat

Clipboard Font Alignment Number Styles Cells

B4 You will need to enter data about your facility's reciprocating engines. The spreadsheet automatically calculates total annual operations and notifies you if a permit threshold has been crossed. Some sample data has already been entered (in blue font) to assist with completing this form.

Recordkeeping/reporting spreadsheet for Class II Permit by Rule: Reciprocating engines (KAR 28-19-561)

Instructions - Please read before beginning to fill out spreadsheet

You will need to enter data about your facility's reciprocating engines. The spreadsheet automatically calculates total annual operations and notifies you if a permit threshold has been crossed. Some sample data has already been entered (in blue font) to assist with completing this form. You will need to replace sample data with your own. *Because the information is inputted on a rolling-total basis, at least once every twelve months, you will need to "save as" and start a new spreadsheet file, in order to not lose any previous months' data. You are required to maintain records on-site for at least two years from the date of record.* Text in blue font needs to be inputted by the user; otherwise, values and information in black are automatically calculated.

Steps to complete the spreadsheet

1:	In the <i>Engine inventory</i> tab/worksheet, you will need to input information in the "Reciprocating engine inventory" section: <ul style="list-style-type: none"> - A list of your facility's reciprocating engines (using a naming system that makes sense for your facility) - The number of engines (by engine type) - The power of each engine and associated measurement unit [<i>the drop down list allows for HP, kW, BTU/hr, MTU/hr, or MMBTU/hr</i>] Your facility's total engine power is automatically calculated in the <i>Data&summary</i> worksheet. A notice is displayed to confirm whether your facility continues to meet the parameters for the Class II permit-by-rule for reciprocating engines.
2:	In the <i>Data&summary</i> tab/worksheet, enter the number of hours the engines operated on a monthly basis. If you have multiple engines of the same type, enter the total number of hours of all engines. Because you are required to keep a rolling/running total, you will always be dropping off one month of data as you add in a new one. For example, in October 2012, you would replace the October 2011 data with October 2012's (don't forget to change the "Year" field each month). This makes sure you always have data from the most recent 12-month period.
2a:	In the "Additional action required?" table, you will see any of three notifications: YES, WARNING, NO. If you see a "YES," reporting or a notification of exceedance is required. "WARNING" indicates the facility exceeds thresholds for reporting, but because it is not the end of a



MACT-related spreadsheet

- WWW (reinforced plastics composites production) [compliance demonstration calculators](#)
- MMM (surface coating of misc. metal parts and products)

Questions or comments?

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