

AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

Policy No. XII.D
Supersedes Date New
Date November 22, 1993

Draft _____
Final X
Pages 4

Topic: Annual Report Review Procedure

Distribution: All Policy Holders

The purpose of this policy and procedure is to provide guidance to APCD staff on the proper procedure for reviewing and determining the compliance of annual reports.

GENERAL PROCEDURE

1. Receipt

All annual reports submitted to the APCD will be initially routed to the annual report coordinator. The date of receipt will be input into the permit tracking system database by permit.

2. Copying and Filing

The annual report coordinator will note which reports must be copied to north county and which need to be copied to the Emissions Inventory Section. The reports will then be routed to clerical staff. After copying, the original report shall be filed in Section V of the south county permit files. North county copies shall be sent to the Buellton office for filing and the Emissions Inventory Section copies shall be sent to the Planning Division.

3. Report Review

A weekly program shall be run by the annual report coordinator for all reports received the previous week, by permit and facility name, and will be forwarded to the north and south county enforcement supervisors. The supervisors shall then delegate review of each report to staff members, to ensure that compliance is determined within sixty days of the receipt of the report.

BASIC REVIEW PROCEDURES

1. Obtain an annual report review memorandum. Fill out all requested information.
2. Compare format and contents of information provided in the annual report with the recordkeeping and annual report conditions of the source's permit.

- A. Check that all information required by these conditions has been submitted. In many cases, a summary, rather than the exact breakdown described in the permit, is acceptable.
 - B. If sufficient information has not been provided, mark the third line on the review memo. Initial action should consist of a telephone call to the facility's contact person, advising him/her that some information was missing, and requesting that it be sent in within two weeks. If it is not received at the end of two weeks, a request for information form (RFI or APCD-02) should be prepared and submitted to the RCD supervisor along with a copy of the annual report and the review memo. The supervisor shall approve the request within two days and forward to an RCD clerk typist for mailing.
3. Once the presence of sufficient data has been determined, review the data provided and determine or check the resulting emissions.
- A. Check throughput, ROC contents, or other data reported in the annual report with applicable rules and permit conditions. The reviewer may consider issuing an RFI or contacting the source to clarify items in question.
 - B. Briefly check to make sure that individual columns have been multiplied and added correctly. If the reviewer notes a mathematical mistake in the report, the correction should be noted and a corrected copy should be sent to the source. Be aware of possible errors in ROC content.
4. Evaluate emissions for lbs/hr and tons/yr.
- A. For lbs/hr, take total yearly emissions and divide by 2080 (8 hrs/day, 5 days/wk, 52 wks/yr). Note: Some facilities have specifically requested that emissions be calculated on a number other than the standard 2080. This is generally not the case, but the engineering evaluation should be checked if you have reason to believe that the operating hours may be different.
 - B. Evaluate emissions for tons/yr. Take the total number of lbs. emitted and divide by 2000.
5. Check that emissions data shows the source to be in compliance with permitted limits. See source specific calculation directions below for guidance.
- A. If emissions are below permitted limits, mark the first line of the review memo and send the report and the memo to the clerk typist for copying and filing.
 - B. If emissions exceed permitted limits, mark the second line of the review memo. Prepare a Notice of Violation (NOV) with the cover letter and submit it, along with a copy of the annual report and review memo, to the RCD supervisor who shall review it and forward to a clerk typist for mailing.

GUIDANCE FOR SOURCE SPECIFIC EMISSION CALCULATIONS

1. Fiberglassing

Form APCD-64 (FGO) includes the appropriate emission factor for the type of process (hand-layup, spray, etc.). Check whether the source used the factor or calculated emissions on straight mass balance. The use of emission factors is relatively new. Check whether the source exceeded emissions limits that would have been lower had the emission factor been used. The source may need to receive a copy of the form.

2. Body Shops

Use the facility's busiest month to compare with permitted emissions. Divide the calculated or estimated emissions by the number of days of operation for that month, then divide by 8 to obtain lbs/hr. If this lbs/hr level is less than the permitted emission limit, assume compliance for the entire year until a more detailed review of the facility's records is done during the routine site inspection.

Recordkeeping required by Section F of APCD Rule 339 supersedes any recordkeeping requirements on the permit to operate (PTO).

3. Dry Cleaners

The "Solvent Added" column may be completed every three to four months rather than monthly. The "Recycled Amount" column accounts for material removed by the waste hauler. This amount should be subtracted from the total gallons added to obtain total facility usage for the year. Take the yearly total and divide by twelve (12) to confirm with emission limits in the permit and throughput limits on the permit or in the engineering evaluation.

Emissions (lbs) = Amount of Solvent Used * .3103 * 13.47 lb/gal

4. Sand, Rock, and Gravel

To obtain maximum tons/per day, find month with the highest number of tons used and divide by the number of days of operation for that month.

If the permit requires periodic testing of moisture, compare the moisture percentage reported to the permitted limit.

5. Other Source Types

Use common sense or check with the RCD supervisor.

MEMORANDUM

TO: Source File _____ (NC/SC)

FROM:

DATE:

RE: 1993 Annual Report Review

I have reviewed this facility's annual report for compliance with their permitted emission limitations and have determined the following:

- _____ The report is complete and the facility is in compliance. Send to file.
- _____ The report is complete, but the facility has exceeded their permitted emissions, See comments below. Copy to enforcement supervisor for further action.
- _____ The report is incomplete and compliance cannot be determined. A phone call was made on ___/___/___ talked to _____. A Request for Information form has been sent out to the facility on ___/___/___ for information to be submitted by ___/___/___ (2 weeks later). See comments below. Copy to enforcement supervisor for further action.
- _____ The report is incomplete and the facility has exceeded their permitted emissions. See comments below. Copy to enforcement supervisor for further action.
- _____ Compliance cannot be determined due to confusing or otherwise inefficient reporting. See comments below. Copy to enforcement supervisor for further action.

Comments: _____

cc: _____