Air Permit Compliance Calendar

From the Wisconsin Small Business Environmental Assistance Program
August 2014

A special "Thank You" to the Kentucky Business Environmental Assistance Program for sharing the template for their Air Quality Compliance Calendar.

WISCONSIN SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM (SBEAP)

ABOUT SBEAP

Wisconsin's Small Business Environmental Assistance Program (SBEAP) helps small businesses understand and comply with state and federal environmental regulations. The SBEAP serves as a **free, advisory, non-regulatory** resource to small business owners around the state. Small Business Assistance Specialists work as a liaison between small businesses and state (Wisconsin Department of Natural Resources) and federal (Environmental Protection Agency) regulators. The staff creates "plain language" publications and tools, answers compliance questions, and directs businesses to other pertinent technical assistance providers, among other activities.

OUR STAFF

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CONTACT US

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Wisconsin Department of Natural Resources OB/7
PO Box 7921
Madison WI 53707-7921

Website: http://dnr.wi.gov search "small business"
Email: DNRsmallbusiness@wisconsin.gov
Phone: 1-855-889-3021
Fax: 608-267-9305

ADDITIONAL COPIES

Record keeping and monitoring requirements can vary quite a bit from one emissions unit to another. Therefore, you may want to have one calendar for each unit. See the SBEAP web page above to download additional copies.

There are no days of the week on this calendar. Use it for any year, and download a new one before you fill up all 12 months.

If you file used calendars and keep them for 5 years, they can serve as your official record!

Welcome to the Air Permit Compliance Calendar

The Air Permit Compliance Calendar can be used by any business in Wisconsin that reports to the Wisconsin Department of Natural Resources (DNR) on the Annual Emissions Inventory through the Consolidated Reporting System (CRS), has been issued an air pollution operation or registration permit or has any other reporting or record keeping requirements. Even if you are exempt from needing an air pollution permit, you may still be required to keep records and report your annual emissions through the Air Emissions Inventory, which is due March 1st of each year.

Many types of businesses may have air pollution that, based on their emissions rates, requires them to have an air pollution permit. Evaporation from paints, printing inks, other coatings or cleaning solvents, and dust, smoke or fumes created by activities like sanding, grinding or combustion of fuels are all examples of activities that will have emissions that are regulated. Even if your facility is exempt from needing a permit, this calendar can provide a format to help you meet record keeping and reporting requirements.

In every permit there are conditions specific to each process or assembly line (emissions unit). Each emissions unit may also have conditions specific to each of the pollutants emitted. Regulated pollutants may include volatile organic compounds (VOCs) from coatings and solvents; particulate matter (dust, smoke or fumes) and gases like nitrogen oxides, sulfur dioxides and carbon monoxide. There are also specific rules that regulate hazardous air pollutants (HAPs).

Conditions in your permit may be applied to individual pollutants or to specific groups of pollutants. For example, state or federal HAPs may be limited as a group with a cap on total emissions whereas other limits may apply to a single pollutant. Each pollutant will have a specific requirement (e.g. emissions limit or cap on material usage) that must be met. Different monitoring, record keeping and reporting conditions are included in the permit to demonstrate to DNR, and anyone else concerned, that you are meeting the requirements. If you have a limit of 3 pounds of VOCs per gallon for each coating and a 2,500 gallon per month cap on coating use, you will also have daily, weekly or monthly record keeping requirements to show that you can always meet that limit. If you need to operate a baghouse to meet a limit of 5 pounds per hour of particulate matter, you will likely also have a pressure drop monitoring requirement each shift or each day and some periodic inspection requirements for the baghouse to show that it is operating properly.

Use this calendar as a reminder to follow your facility's requirements. Refer to the next page for more items to look out for in your permit. **Read your permit and fill in the calendar pages with any site specific conditions you need reminders for each month.** Feel free to contact the SBEAP or your local DNR Air Program staff member if you have questions on how to comply with your permit or how to use this calendar.

AIR PERMIT COMPLIANCE GUIDE

STEP 1: PLAN AHEAD

Construction and operation of new sources and modification of existing sources is not authorized without an air pollution control permit unless you qualify for an exemption. Many permits take several months to issue. **Avoid non-compliance by planning ahead and applying early.**

STEP 2: READ YOUR PERMIT

One of the simplest ways to understand your compliance requirements is to read your facility's air permit in its entirety. When reading your air pollution control permit, make note of the following:

- ✓ Emission Units/Points
- ✓ Emission Limitations
- ✓ Applicable Regulations
- ✓ Test Methods
- ✓ Monitoring Requirements
- ✓ Compliance Demonstration
- ✓ General Permit Conditions
- ✓ Permit Expiration Date
- ✓ Any Discrepancies

STEP 3: RECORD KEEPING

All air permits require some type of record keeping. The following are general requirements that may be present in your facility's air pollution permit. It should be noted that any record required by your facility's air permit must be maintained for a period of 5 years.

- ✓ Monthly material usage, throughput records or purchase records
- ✓ Material Safety Data Sheets
- ✓ Equipment specification sheets
- ✓ Maintenance logs
- ✓ Inspection logs
- ✓ Emission Calculations
- ✓ Start-up/Shutdown/Malfunction logs
- ✓ Stack Test Results
- ✓ Monitoring Records

STEP 4: REPORTING

Along with record keeping, the general reporting requirements are relatively easy to complete. For most facilities, the following reports are required.

- ✓ Biennial Record Keeping and Monitoring Summary Reports
- ✓ Annual Compliance Certification
- ✓ Unplanned Startups, Shutdowns and Malfunctions
- ✓ Air Emissions Inventory Annual Report (**Consolidated Reporting System - CRS**) and Certification

STEP 5: NOTIFICATIONS

Often facilities are required to submit various notifications to the DNR Air Program. These notifications may include:

- ✓ Construction commencement
- ✓ "Start-up" date
- ✓ Attainment of maximum production rate
- ✓ Applicability for Federal Standards (MACT, etc.)
- ✓ Compliance Status (Federal Standards - MACT, etc.)
- ✓ Stack Tests
- ✓ Malfunctions
- ✓ Permit Deviations
- ✓ Any Emergency Releases
- ✓ Unplanned Shutdowns or Malfunctions

ADDITIONAL ASSISTANCE

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Additional assistance concerning air permits is also available by contacting the DNR's Bureau of Air Management directly. They can be reached by phone at 608/266-7718 or by fax at 608/267-0560. You can also contact your nearest regional service center at the locations below.

REGIONAL OFFICES

NORTHEAST REGION

Green Bay Service Center
2984 Shawano Ave.
Green Bay, WI 54313
Phone: (920) 662-5100

Oshkosh Service Center
625 E County Road Y
Suite 700
Oshkosh, WI 54903
Phone: (920) 424-3050

NORTHERN REGION

Rhinelander Service Center
107 Sutliff Ave.
Rhinelander, WI 54501
Phone: (715) 365-8900

Superior Satellite Center
1701 N 4th St.
Superior, WI 54880
Phone: (715) 392-7988

SOUTH CENTRAL REGION

Fitchburg Service Center
3911 Fish Hatchery Rd.
Fitchburg, WI 53711
Phone: (608) 275-3266

SOUTHEAST REGION

Milwaukee Service Center
2300 N Dr. Martin Luther King Jr Dr.
Milwaukee, WI 53212
Phone: (414) 263-8500

Plymouth Service Center
1155 Pilgrim Rd.
Plymouth, WI 53073
Phone: (920) 892-8756

Sturtevant Satellite Center
9531 Rayne Rd. Ste. 4
Sturtevant, WI 53177
Phone: (262) 884-2300

Waukesha Service Center
141 NW Barstow Rd.
Waukesha, WI 53188
Phone: (262) 574-2100

WEST CENTRAL REGION

Eau Claire Service Center
1300 W Clairemont Ave.
Eau Claire, WI 54701
Phone: (715) 839-3700

La Crosse Satellite Center
3550 Mormon Coulee Rd.
La Crosse, WI 54601
Phone: (608) 785-9000

Wausau Satellite Center
5301 Rib Mt. Rd.
Wausau, WI 54401
Phone: (715) 359-4522

Wisconsin Rapids Service Center
473 Griffith Ave.
Wisconsin Rapids, WI 54494
Phone: (715) 421-7800

Air Permit
Compliance Calendar

Monthly Permit Requirements to Remember:
- ❑ Complete any monitoring and/or record keeping (hourly, daily, weekly, monthly).
- ❑ Record material usage rates and calculate monthly rolling averages and/or emissions.

Periodic Permit Requirements to Remember:
- ❑ Summarize emissions for previous year.
- ❑ Complete and submit any notifications or reports - check permit for dates.
- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
- ❑ _____
- ❑ _____
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- ❑ _____
- ❑ _____
- ❑ _____

January

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31	**TIP: The Annual Air Emissions Inventory is due on March 1st. Start on it now!**			

Air Permit Compliance Calendar

Monthly Usage Rates and Emissions Summary

MONTHLY USAGE

Enter the type/name of each raw material and fuel used or final product throughput in the Product/ Material column. Enter the quantity used throughout the month in the Monthly Usage/ Throughput column.

MONTHLY AVERAGING

Enter each air pollutant in your permit with a limit on a 12-month rolling average basis. Enter the monthly emissions or usage for that pollutant, calculate the rolling 12-month average for that pollutant* and enter the permit limit.

Please indicate units reporting in (pounds - lbs, gallons - gal, cubic feet - cf, square feet - sq ft, etc.) and make sure they match the permit.

Product/Material	Monthly Usage/ Throughput

Pollutant	Monthly Total	12 Month Rolling Avg	Permit Limit

* Rolling 12 Month Average for a Pollutant = Monthly Total for that Pollutant + Previous 11 Month Total for that Pollutant / 12 months

If the permit limit is in emissions and it doesn't specify how to calculate, these example calculations may help:

PM, NOx, SO2 - volume material (gal fuel, etc.) per month x EF (lb pollutant/volume material) = lb pollutant/mo

VOC - amount material (pounds, gallons, etc.) per month x lb VOC per gallon (see MSDS) = lb VOC/mo

HAP - amount material per month x lb HAP per lb material (see MSDS) x density of material (lb/gal) = lb HAP/mo

Air Permit
Compliance Calendar

Don't forget to work on the annual Air Emission Inventory reporting, due March 1st!

Monthly Permit Requirements to Remember:
- ❑ Complete any monitoring and/or record keeping (hourly, daily, weekly, monthly).
- ❑ Record material usage rates and calculate monthly rolling averages and/or emissions.

Periodic Permit Requirements to Remember:
- ❑ Complete and submit any notifications or reports - **check permit for dates.**
- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
- ❑ _____
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February

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15	16	17	18	19	20	21
22	23	24	25	26	27	28
(29)						

Air Permit Compliance Calendar
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Air Permit
Compliance Calendar

**Air Emissions Inventory reporting due
by March 1!**

Monthly Permit Requirements to Remember:
- ❑ Complete any monitoring and/or record keeping (hourly, daily, weekly, monthly).
- ❑ Record material usage rates and calculate monthly rolling averages and/or emissions.

Periodic Permit Requirements to Remember:
- ❑ Complete and submit any notifications or reports - **check permit for dates.**
- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
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- ❑ _____

March

1 Inventory Due!	2	3	4	5	6	7
8	9	10	11	12	13	14
15 Inventory Extensions Due	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Air Permit Compliance Calendar

Monthly Usage Rates and Emissions Summary

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Air Permit
Compliance Calendar

Monthly Permit Requirements to Remember:
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- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
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April

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22	23	24	25	26	27	28
29	30					

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Air Permit
Compliance Calendar

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Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
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- ❑ _____
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May

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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Air Permit Compliance Calendar
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Air Permit
Compliance Calendar

Emissions Inventory Fees and Certification Month!

Monthly Permit Requirements to Remember:
- ❑ Complete any monitoring and/or record keeping (hourly, daily, weekly, monthly).
- ❑ Record material usage rates and calculate monthly rolling averages and/or emissions.

Periodic Permit Requirements to Remember:
- ❑ Complete and submit any notifications or reports - check permit for dates.
- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
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- ❑ _____
- ❑ _____

June

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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30 **Emission Inv. Certification Due**	TIP: Emission Inventory Fee statement is sent out prior to certification and any fees not in dispute are due within 30 days of the billing date.				

Air Permit Compliance Calendar

Monthly Usage Rates and Emissions Summary

MONTHLY USAGE

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Air Permit
Compliance Calendar

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Periodic Permit Requirements to Remember:
- ❑ Complete and submit any notifications or reports - **check permit for dates.**
- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
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- ❑ _____

July

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15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Air Permit Compliance Calendar

Monthly Usage Rates and Emissions Summary

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Air Permit
Compliance Calendar

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Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
- ❑ _____
- ❑ _____
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- ❑ _____
- ❑ _____

August

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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Air Permit Compliance Calendar
Monthly Usage Rates and Emissions Summary

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Air Permit
Compliance Calendar

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- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
- ❑ _____   ❑ _____
- ❑ _____   ❑ _____
- ❑ _____   ❑ _____

September

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	**TIP: If you implement sufficient P2 measures at your facility, you may be able to avoid permitting and maybe even the annual Air Emissions Inventory reporting requirements.**				

Air Permit Compliance Calendar

Monthly Usage Rates and Emissions Summary

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Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):
- ❑ _____
- ❑ _____
- ❑ _____
- ❑ _____
- ❑ _____
- ❑ _____

October

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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Air Permit Compliance Calendar
Monthly Usage Rates and Emissions Summary

MONTHLY USAGE
Enter the type/name of each raw material and fuel used or final product throughput in the Product/ Material column. Enter the quantity used throughout the month in the Monthly Usage/ Throughput column.

MONTHLY AVERAGING
Enter each air pollutant in your permit with a limit on a 12-month rolling average basis. Enter the monthly emissions or usage for that pollutant, calculate the rolling 12-month average for that pollutant* and enter the permit limit.

Please indicate units reporting in (pounds - lbs, gallons - gal, cubic feet - cf, square feet - sq ft, etc.) and make sure they match the permit.

Product/Material	Monthly Usage/ Throughput

Pollutant	Monthly Total	12 Month Rolling Avg	Permit Limit

Rolling 12 Month Average for a Pollutant = Monthly Total for that Pollutant + Previous 11 Month Total for that Pollutant / 12 months

If the permit limit is in emissions and it doesn't specify how to calculate, these example calculations may help:

PM, NOx, SO2 - volume material (gal fuel, etc.) per month x EF (lb pollutant/volume material) = lb pollutant/mo

VOC - amount material (pounds, gallons, etc.) per month x lb VOC per gallon (see MSDS) = lb VOC/mo

HAP - amount material per month x lb HAP per lb material (see MSDS) x density of material (lb/gal) = lb HAP/mo

Air Permit
Compliance Calendar

Monthly Permit Requirements to Remember:

- ❑ Complete any monitoring and/or record keeping (hourly, daily, weekly, monthly).
- ❑ Record material usage rates and calculate monthly rolling averages and/or emissions.

Periodic Permit Requirements to Remember:

- ❑ Complete and submit any notifications or reports - check permit for dates.
- ❑ Check new raw materials for hazardous air pollutant rule applicability.

Site Specific Requirements (inspections, maintenance, calibration, testing, fuel sampling, etc.):

- ❑ _____
- ❑ _____
- ❑ _____
- ❑ _____
- ❑ _____
- ❑ _____

November

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

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December

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

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