2006
Compliance Assistance Conference

Successfully Navigating
Reporting, Permitting & Inspections

Basics of Air and Water Reporting

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Successfully Navigating Reporting, Permitting & Inspections

Session Overview
Air Reporting Requirements

- Why?
- Types of Reporting
- Location in air permits
- Types of fee reports
- PTIO

Why have reporting requirements?

- Method of notifying regulatory authorities of the following:
  - equipment malfunctions
  - (un)scheduled maintenance
  - emission releases
  - failure to follow permit requirements
  - fee reports

What requires operator to submit a Report?

- Permits:
  - quarterly, annual, other
- Rules:
  - immediately, within 30 days, within 45 days
- Federal rules:
  - quarterly, annual, other
- Emergency Response

Where are reporting requirements found?

- Issued PTI and/or PTO:
  - general terms and conditions (T&C)s
  - emission unit specific T&Cs
- Rules:
  - OAC rules 3745-21-09, 3745-15-06, etc.
  - federal rules MACT, NSPS, etc.

Malfunctions

- Breakdown of control equipment that results in a violation (i.e., fabric filter, incinerator, carbon absorber, etc.)
- Scheduled/unscheduled maintenance to avoid a malfunction
- Report malfunction immediately

Malfunctions

OAC 3745-15-06(B):

- Notify Ohio EPA or Local Air Authority
- Written report within 2 weeks if longer than 72 hours
- If reported properly, then not included in quarterly deviation report

Malfunctions

- Identification of and location of source
- Duration of breakdown
- Quantity of air release
- Statement saying
  - why shutdown of EU was not possible
  - breakdown time is reasonable
  - interim control measures used
  - used PM&MA plan, if applicable

Permit structure

- General terms and conditions
- Facility specific requirements
- Emissions Unit specific requirements

  A. Summary Table

  - Emission unit description
  - Applicable rules
  - Emission limits

Permit Structure

B. Operational restrictions
C. Monitoring and/or record keeping requirements
D. Reporting requirements
E. Testing requirements
F. Miscellaneous requirements

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
N002 - Animal Crematory, ISI-1600, 200 pounds of waste per hour with an afterburner	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.20 pound per hour and 0.88 ton per year. Visible PE from the afterburner stack shall not exceed 5% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(B)&(C). See section A.2.a below.
	OAC rule 3745-15-07	See section B.3 below.
	OAC rule 3745-17-09(B)&(C)	PE shall not exceed 0.10 pound per 100 pounds of material charged. See A.2.b below.

2. Additional Terms and Conditions

2.a The hourly and annual criteria pollutant emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, only the monitoring, record keeping and/or reporting requirements of the afterburner are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

1. All material shall be incinerated in a controlled air, multi-chamber incinerator, or equivalent technology as approved by the Director, which provides complete

2. The secondary combustion chamber temperature shall be maintained at 1600 degrees Fahrenheit or greater during each cremation cycle.

3. The stack shall be designed to minimize any building down wash impacts from emissions and/or odors on employees and nearby residences. The design shall meet good engineering practices so as not to result in excessive concentrations of air contaminants and/or odors in locations at, near or, in such a configuration, as to affect any air intake for heating and cooling of buildings or at operable windows or doors.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor which measures the secondary combustion chamber temperature, in degrees Fahrenheit. The monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days of when the deviations occur, which provide the following information for each period during which the secondary combustion chamber exhaust gas temperature fell below the applicable limitations:

   a. the date of the excursion;
   b. the time interval over which the excursion occurred;
   c. the temperature values during the excursion;

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   PE shall not exceed 0.20 pound per hour.

   Applicable Compliance Method:
   This limit is based on the maximum rated capacity of the emissions unit (200 pounds of waste per hour) multiplied by the allowable emission limit of 0.10 pound particulate/100 pounds charged.

F. Miscellaneous Requirements

None

Permit reports

Quarterly Deviations include departures from the following:

- emission limits
- operational restrictions
- control device operating parameters

Permit Reports

Include the following for each quarterly deviation:

- probable cause(s) of each deviation
- any corrective actions or preventative measures which have been or will be taken.

Permit Reports

Negative declaration reports are needed

- "If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter..."
- In other words, facilities must submit a report each and every quarter, regardless of whether or not deviations occurred

Rule Based Reports

- Found in issued air permits
- Frequency of the report will be specified
- Examples:
  - within 30 days, within 45 days, etc.
  - See handout

Permit Reports

Synthetic minor facilities may have additional reporting

- annual emissions
- annual production
- other unique reports

Fee reports

- Actual emissions determine fee
- Different for Minor facilities and Synthetic Minor facilities
- All fee reports are mailed in February and due April 15
- Invoice sent later by Ohio EPA

Blue Sheets

- Permittee reports emissions
- Ohio EPA confirms and calculates fee
- Invoice based upon the amount reported

Blue Sheets

- 2 year reporting cycle
- Effective 01/01/04, annual fees are:
  - 0-9 tons = $100.00
  - 10-49 tons = $200.00
  - 50-99 tons = $300.00
  - 100 or more = $700.00

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Synthetic Minor Fee Reports

- Permittee reports emissions
- Ohio EPA confirms and calculates fee
- Invoice based upon the amount reported

Synthetic Minor Fee Reports

- Emissions are calculated on an emissions unit basis
- Annual reporting cycle
- Annual fee ranges from $170.00 to $3,350.00

PTIO: What?

- Permit to Install and Operate (PTIO)
  - will last for 10 year
  - allows installation and operation
  - Minor and Synthetic Minor facilities
- Permit Evaluation Report (PER)
  - annual report for deviations
  - will replace most quarterly reports

PTIO: When?

- Implementation expected in 2008
- Get on the “interested party” list and find additional information at:

  www.epa.state.oh.us/dapc/permits/ptio.html

Contacts

- Ohio EPA District Offices and Local Air Agencies
- Ohio EPA, Office of Compliance Assistance and Pollution Prevention (OCAPP)
  (800) 329-7518
- Ohio EPA Web Page
  www.epa.ohio.gov/dapc/dapcmain.html
- U. S. EPA Web Page
  www.epa.gov

Basics of Surface Water Reporting

Ken Ziegler

Environmental Specialist II

Division of Surface Water, CDO

Session Overview

- Types of NPDES Permits
- Parts of the NPDES Permit
  - Part III
  - Part II
  - Part I
  - Cover Page

Surface Water Handouts

- Sample NPDES Permit
- Guidance on Proper Completion of The National Pollutant Discharge Elimination System (NPDES) Self-Monitoring EPA 4500 and EPA 4519 Report Forms

Types of NPDES Permits

- Direct Discharger
- Indirect Discharger

Direct NPDES Permits

- For facilities that discharge directly to waters of the state.
- Majority of permits issued in the state are direct permits.
- Sampling limits more restrictive than indirect discharge permits.
- Permit requires monthly sampling and reporting.

Indirect NPDES Permits

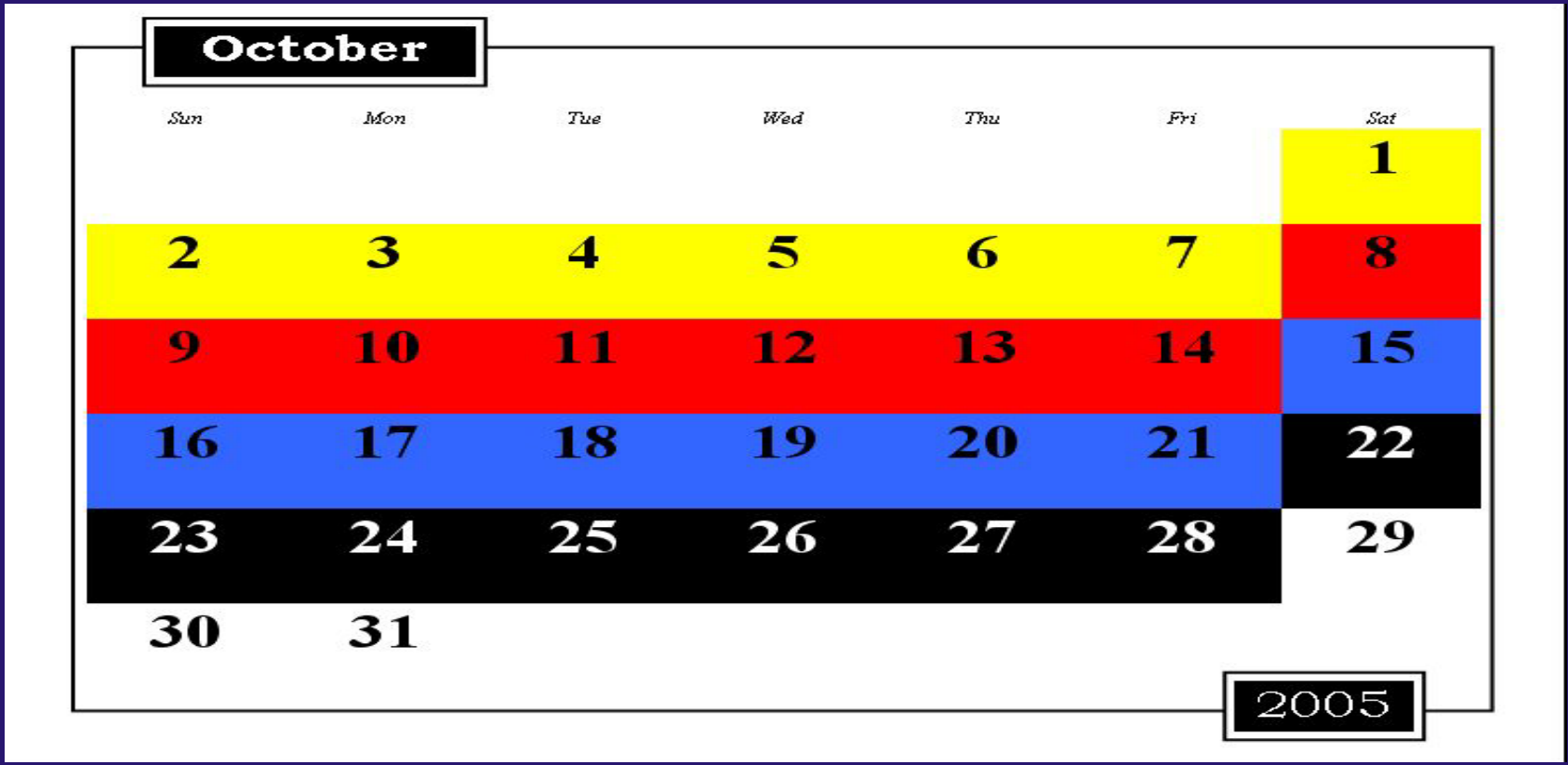
- For facilities that discharge to a sanitary sewer that runs to a Publicly Owned Treatment Works (POTW).
- Permit requires twice yearly reporting.

Parts of the NPDES Permit

- Part III
  - General conditions of the permit
- Part II
  - Other requirements
- Part I
  - Effluent limitation and monitoring requirement tables & schedule of compliance
- Cover Page

Part III

- Sampling Frequency
  - Sampling Weeks are days 1-7, 8-14, 15-21, and 22-28.



Sampling Frequency

- Quarterly sampling frequency should be done in March, June, August & December.
- Yearly sampling frequency should be done in September.
- Semi-annual sampling frequency should be done in June & December.

Sampling Frequency

- Winter months are from November 1 through April 30.
- Summer months are from May 1 through October 31.

Reporting Requirements

- Data sampled each month must be reported to Ohio EPA the following month on Ohio EPA 4500 report forms.
  - Form is commonly called the Monthly Operating Report (MOR).

Reporting Requirements

- Two ways to submit a MOR
  - Complete pre-printed form and mail to Ohio EPA.
    - Form is due by the **15th** day of the following month.
  - Enter data electronically using SWIMware software and E-mail the form to Ohio EPA.
    - Form is due by the **20th** day of the following month.

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Reporting Requirements

- Samples taken more frequently than required by permit should be included in the MOR.
- Samples taken of pollutants not listed in permit do not need to be included in MOR, however, records of the analysis should be kept.

Recording of Results

- Information that should be recorded for each sample:
  - Place and date of sample
  - Person who performed sampling
  - Date analysis was performed
  - Person who performed analyses
  - Analytical method used
  - Results of analyses and measurements

Record Retention

- The following records must be kept for a minimum of 3 years:
  - All sampling and analytical records (including sampling data not reported)
  - All original recordings for any continuous monitoring instrumentation
  - All instrumentation, calibration and maintenance records
  - All plant operation and maintenance records
  - All reports required by the permit
  - Records of all data used to complete the application for the permit

Availability of Reports and Duty to Provide Information

- Reports provided to Ohio EPA are considered public record and shall be available for public inspection.
- Any records required to be kept by the permit holder shall be furnished to the Director upon request.

Noncompliance Notification

- Call by telephone within 24 hours to: **1-800-282-9378**
- The following information should be provided:
  - The times at which the discharge occurred and was discovered
  - The approximate amount and the characteristics of the discharge
  - The stream affected by the discharge
  - The circumstances which created the discharge
  - The names and telephone numbers of the persons who have knowledge of these circumstances
  - What remedial steps are being taken
  - The names and telephone numbers of the persons responsible for such remedial steps

Noncompliance Notification

- The telephone reports should be followed up in writing within five days.

- The report should contain the following:
  - The limitation(s) which have been exceeded
  - The extent of the exceedance(s)
  - The cause of the exceedance(s)
  - The period of the exceedance(s) including exact dates and times
  - If uncorrected, the anticipated time the exceedance(s) is expected to continue
  - Steps being taken to reduce, eliminate and/or prevent occurrence of the exceedance(s)

Part II

- Part II of the permit contains language that is standard in most permits.
- The permit writer will amend or add sections in Part II to make it applicable to each facility.

Sampling Location

Sampling Station	Description of Location
5IN0003100 1	Discharge from 8-inch diameter turndown outlet on North bank of retention pond into Test Run, downstream of outfall 002 (Lat: 40 N 01 ' 01 "; Long: 80 W 01 ' 01")
5IN0003100 2	Discharge from the ground water treatment system from 4-inch diameter pipe on the North bank of Test Run (Lat: 40 N 01 ' 01 "; Long: 80 W 01 ' 01")

- Found in every permit this area describes the exact location where sampling should be done

Monitoring Days

C. All parameters, except flow, need not be monitored on days when the plant is not normally staffed (Saturdays, Sundays, and Holidays). On those days, report "AN" on the monthly report form.

- The AN code should only be used for days when the facility is not normally staffed.

Part II

8) Grab samples of all discharges should be collected and analyzed for pH, total iron, total suspended solids, total dissolved solids, chemical oxygen demand, total organic carbon, benzene, toluene, ethylbenzene, phenols, chlorine (when city water is used), and oil and grease. Unless the effluent is retained, combined with other sources prior to discharge, a set of three grab samples shall be collected: one at the beginning, one in the middle, and one at the end of each discharge. All sample results shall be reported on the monthly operating report forms.

- Some permits may contain very specific conditions in the permit while others may stick to very broad conditions.

Part I

- Part I of the permit contains the effluent limitations and monitoring requirement tables.
- Part I can also contain a schedule of compliance.
  - A schedule of compliance sets dates for certain criteria to be met in a permit.
  - Most permits do not contain a schedule of compliance.
- The effluent limitations and monitoring requirement table shows all parameters that should be sampled and analyzed.

Part I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting until the expiration date of this permit, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from outfall 5IN00031001. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

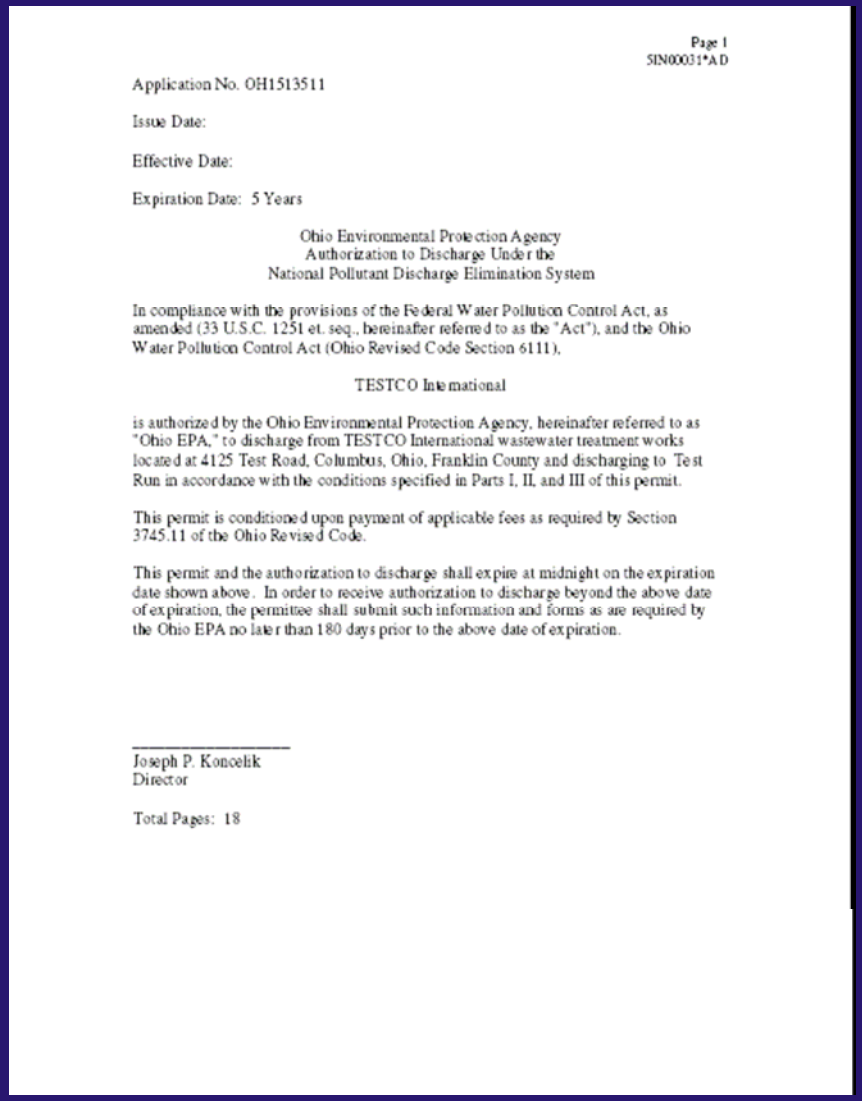
Table - Final Outfall - 001 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00045 - Total Precipitation - Inches	-	-	-	-	-	-	-	2/Week	Grab	All
00310 - Biochemical Oxygen Demand, 5 Day - mg/l	-	-	-	-	-	-	-	1/Day	Grab	All
00335 - Chemical Oxygen Demand (Low Level) - mg/l	-	-	-	-	-	-	-	2/Month	Grab	All
00400 - pH - S.U.	9.0	6.5	-	-	-	-	-	1 / 2 Weeks	Grab	All
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	3/Week	Grab	All
00550 - Oil and Grease, Total - mg/l	20	-	-	15	-	-	-	1/Week	Grab	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
34010 - Toluene - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
34030 - Benzene - ug/l	-	-	-	-	-	-	-	1/Month	Grab	Winter
34371 - Ethylbenzene - ug/l	-	-	-	-	-	-	-	1/Month	Grab	Summer
34694 - Phenol - ug/l	-	-	-	-	-	-	-	1/Quarter	Grab	Quarterly
34696 - Naphthalene - ug/l	-	-	-	-	-	-	-	1/Quarter	Grab	Quarterly
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	24hr Total Estimate	All
81551 - Xylene, Total - ug/l	-	-	-	-	-	-	-	1/Year	Grab	All

Notes for Station Number 5IN00031001

- At least one sample must be collected during the month if a discharge occurs anytime during the month.
Reporting "No Flow" on the monthly operating report form will be acceptable only if a discharge did not occur during the entire month. If NO DISCHARGE OCCURS DURING THE ENTIRE MONTH, report "AL" in the first column of the first day of the month on the 4500 Form (Monthly Operating Report). A signature is still required.

Cover Page



Page 1
5IN00031*AD

Application No. OH1513511

Issue Date:

Effective Date:

Expiration Date: 5 Years

Ohio Environmental Protection Agency
Authorization to Discharge Under the
National Pollutant Discharge Elimination System

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq., hereinafter referred to as the "Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111),

TESTCO International

is authorized by the Ohio Environmental Protection Agency, hereinafter referred to as "Ohio EPA," to discharge from TESTCO International wastewater treatment works located at 4125 Test Road, Columbus, Ohio, Franklin County and discharging to Test Run in accordance with the conditions specified in Parts I, II, and III of this permit.

This permit is conditioned upon payment of applicable fees as required by Section 3745.11 of the Ohio Revised Code.

This permit and the authorization to discharge shall expire at midnight on the expiration date shown above. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration.

_____
Joseph P. Koncelik
Director

Total Pages: 18

- Shows the name and location of facility as well as the receiving stream.
- Application No. is the USEPA number for the permit.

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Contacts

- Contact district office with questions about permit issuance and to report non-compliance.
- For help with SWIMware or other question about entering data into the 4500 form call the Ohio NPDES/SWIMware Hotline at (614) 644-2050.
- Ohio EPA DSW webpage:
  http://www.epa.state.oh.us/dsw/
- SWIMware webpage:
  http://www.epa.state.oh.us/dsw/swims/swimintro.html