



# Air Permitting and Compliance Tips

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## Areas of expertise:

- Environmental compliance
- Air quality compliance
- Multi-media compliance auditing
- Management systems
- Environmental training



## Senior Consultant, Manager of Tellevate's Training Services

- Certified environmental and management systems auditor
- Previous experience as a Regulatory Inspector and Compliance Assistance Provider
- 22 years environmental and auditing experience



# Air Permitting and Compliance Tips



## 1. Read Draft Permit and Provide Comments

- ✓ Realistic operational limits
- ✓ Records align with day-to-day operations
- ✓ Understand testing requirements
- ✓ Communicate comments and concerns



# Air Permitting and Compliance Tips



## 2. Read and Understand Final Permit

- ✓ Do not just place on shelf/file folder
- ✓ Understand requirements
  - ✓ Operational limits
  - ✓ Testing
  - ✓ Monitoring
  - ✓ Recordkeeping
  - ✓ Reporting
- ✓ Compare to constructed facility



# Air Permitting and Compliance Tips



## 3. Assign Responsibilities

- ✓ Assign and communicate permit responsibilities
- ✓ Ensure staff understand requirements
  - ✓ What is the requirement?
  - ✓ Why is it important?
  - ✓ How should it be documented?
  - ✓ Where should the records be kept?
  - ✓ How often should it be conducted?



# Air Permitting and Compliance Tips



## 4. Maintain and Operate Air Pollution Control Equipment

- ✓ Operate in accordance with permit
- ✓ May need manufacturer specifications
- ✓ May need to operate within specific parameters
- ✓ Document maintenance and downtime
- ✓ May need to report malfunctions and excess emissions



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## 5. Conduct Required Inspections, Maintenance, and Observations

- ✓ Visual emission observations
- ✓ Method 9 readings
- ✓ Air pollution control equipment inspections
- ✓ Haul roads maintenance
- ✓ Keep records of observations and maintenance



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## 6. Conduct Internal Monitoring

- ✓ Annually conduct internal inspection
- ✓ Hire an outside party
- ✓ Check records
- ✓ Re-read permit
- ✓ Document corrective actions and root causes





# Air Permitting and Compliance Tips



## 7. Communicate Operational Changes

- ✓ Discuss internally
  - ✓ Corporate office
  - ✓ Operational staff
  - ✓ EHS staff
- ✓ Discuss regulatory implications with EHS staff and consultant
- ✓ Communicate to regulatory agency sooner rather than later



# Air Permitting and Compliance Tips



## 8. Submit Required Reports and Keep Submittal Records

- ✓ Certification of Compliance Reports – annual
- ✓ Deviation Reports – semi-annual
- ✓ Emission Inventory – annual
- ✓ Excess Emissions
- ✓ Startup, Shutdown, and Malfunctions
- ✓ Notifications



# Air Permitting and Compliance Tips



## 9. Maintain and Organize Records

- ✓ Keep 5 years of records
- ✓ Maintain centralized repository
- ✓ Keep records organized and easily retrievable
- ✓ Ensure records align with permit requirements
- ✓ Make sure more than one person can locate



# Air Permitting and Compliance Tips

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## 10. Ask for Help!

- ✓ Grain industry peers
- ✓ Corporate office
- ✓ Grain Associations
- ✓ Consultants
- ✓ Regulatory staff and assistance providers



# QUESTIONS?

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