

Pinal County Air Quality Workshop

Compliance Reporting And Inspections

Florence – February 15, 2018

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Air Quality Engineer



Compliance Reporting

Reports you need to submit to
PCACQD on a periodic basis



Quarterly/Semi-Annual/Annual Appendix “A” Reports

- Semi-Annual - Due on/by Jan 30th and July 30th
- Annual – Due Jan 30th
- Quarterly – 30 Days After each Quarter



Example of Appendix “A” Report



Appendix A

Semi-annual Report

Permit B30999.000

Abstract

This constitutes a semi-annual report, documenting emissions and use of emission-generating materials during the subject reporting period.

**Facility - Sand and Gravel Site #1
325 Schnepf Rd.
Queen Creek, AZ**

Reporting Period - January-June __ or July-December __ Year ____

Fuel Report

Sulfur in diesel fuel - ____ percent by weight

Material Report

Product crushed and screened - _____ tons

Generator Report

Operational hours of the generator - _____ hours

Dust Control Report

Water used to control roadway emissions - _____ gallons

Water used to control process emissions - _____ gallons

Test Reports

Were the performance tests for the crushing and screening lines performed as required under Section §5.E.1?

Yes ____ No ____

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry,

that the statements and information in this report are true, accurate and complete.

Signed _____

Title _____

Date _____

**Mail to - Pinal County Air Quality Control District
PO Box 987
Florence, AZ 85232**

Annual Certifications

Due on/by Jan 30th of each year



ANNUAL CERTIFICATION

2017

As required under your permit, please sign the annual certification statement, as presented below:

Annual Regular Compliance/Compliance Progress Certification

(Permittee shall annually submit a certification of compliance with the provisions of this permit)

Accordingly, I have:

1. *Identified each term or condition of the permit that is the basis of the certification;*
2. *Verified the compliance status with respect to each term or condition; **
3. *Verified whether compliance with respect to each term or condition has been continuous or intermittent;**
4. *Identified the permit provision, or other, compliance mechanism upon which the certification is based;*

Source Name (i.e., company name): _____

Print Name: _____

Signature: _____

Title: _____

Date: _____

(To be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit)

*Note: If you are not in compliance with each condition or term in your permit, in a separate report specify the areas of non-compliance, the reasons for non-compliance, actions taken to remediate the problem(s), and expected date your facility will become compliant. The report should be attached to this document.

- 1. Identified each term or condition of the permit that is the basis of the certification;*
- 2. Verified the compliance status with respect to each term condition; **
- 3. Verified whether compliance with respect to each term or condition has been continuous or intermittent;**
- 4. Identified the permit provision, or other, compliance mechanism upon which the certification is based;*



Source Name (i.e., company name): _____

Print Name: _____

Signature: _____

Title: _____

Date: _____

(To be signed by a responsible official only, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit)

***Note: If you are not in compliance with each condition or term in your permit, in a separate report specify the areas of non-compliance, the reasons for non-compliance, actions taken to remediate the problem(s), and expected date your facility will become compliant. The report should be attached to this document.**

Emission Inventory

- Due 90 days after receipt of EI notification letter from PCAQCD (i.e., late spring of each year).



ELEMENTS OF A LONG FORM EI

- Section 1: Facility ID and Mailing Info
- Section 2: Data Certification (pollutant totals...PM10, SOX, NOX , VOC,CO, etc., and signature page)
- Section 3: Stack and Vent info (height, diameter, exit temperature, flow rate, velocity, lat /long, etc)
- Section 4: Equipment and Control Device Info (Quantity, Rated Capacity, Installation Date, Manufacturer Name, etc)

ELEMENTS OF A LONG FORM EI (con't)

- Section 5: Process ID Info (SCC Code, Process Material, Operating Schedule, Seasonal/Annual Throughput, Throughput Units, etc)
- Section 6: Pollutant Info (CAS #, Name, Emission Factor, Est. Actual Emissions, etc.)
- Section 7: Sample Calculations



Inspections



What To Expect

- Unannounced Visit
- Presentation of a PCAQCD entry form.
- Record Review (site specific)

Examples: Production Reports

Inspection of Baghouse Logs

Water Logs

- Tour of Site
- Conduct EPA Method 9 Opacities of Stacks and Vents



PCAQCD Entry Statement





STATIONARY SOURCE INSPECTION ENTRY STATEMENT

Inspector Name: _____ Date: _____ Time: _____
Permit Holder: _____ Permit #: _____
Site Address: _____
Site Contact: _____ Contact Phone #: _____
I acknowledge that I have read and understand the Inspection Rights on the back of this form.
Acknowledged: _____
Signature Title Date

INSPECTION REPORT

Criteria	Observed	Comments
1. Permit Posted?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
2. Annual regular compliance / compliance progress certification submitted?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
3. Semi-annual or annual compliance report submitted?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
4. Emissions inventory report submitted?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
5. Opacity threshold met?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
6. Source performance testing conducted?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
7. Record keeping complete?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
8. Any new or non-permitted equipment?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
9. Emission control equipment operating efficiently?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
10. Any abnormal operations, shutdowns, or malfunctions?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
11. COM or CEM equipment operating appropriately?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
12. TIN R8E or West Pinal unpaved lots silt loading less than 0.33 oz/ft ² or silt content 8% or less?	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
13.	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
14.	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
15.	Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	

Complaint # _____ N/A Field Activity Report # _____ N/A
Were photographs taken? Y N Temperature: _____ Wind Direction: _____ Wind Speed: _____

INSPECTION FINDINGS

Facility appears in compliance Deficiencies have been observed

Notice of Opportunity to Correct _____ days

You must fix the following problems and provide written confirmation within _____ days

This report is *preliminary* and we WILL provide you with an official written inspection report within 30 working days.
 The forthcoming inspection report will review the deficiencies to determine if any were committed intentionally, not correctable within a reasonable time, a pattern of noncompliance, or a risk to any person, the public health, safety or welfare or the environment.
 This report is *final* and we WILL NOT provide you with an additional written inspection report.

Contact refused to sign No representative could be found from whom to seek a signature

Acknowledged: _____
Inspector's Signature Date

INSPECTION RIGHTS (ARS §41-1009)

1. This inspection is to assess whether or not you or your facility either needs a permit or registration, or to assess compliance with any permit or registration you may already have.
2. Arizona Revised Statutes (ARS), Title 49, Chapter 3, Article 3, and the Pinal County Air Quality Control District Code of Regulations (PCAQCD Code) adopted by the Pinal County Board of Supervisors provide legal authority for this inspection.
3. You are entitled to see the inspector's photo identification.
4. There is no additional fee for this inspection.
5. You may accompany the agency inspector during this inspection.
6. This inspection will not involve taking original documents.
7. You may request a split of any samples taken, if the split will not prohibit analysis. Copies of any analysis performed on said samples may also be requested.
8. You may request copies of any documents relied on to determine compliance if the agency is otherwise permitted by law to do so.
9. Statements will not be tape recorded.
10. Any statements made may be included in the inspection report.
11. Participation in an interview is voluntary unless you are legally compelled to participate.
12. You are allowed twenty-four (24) hours to review and revise any signed written witness statement that is drafted by any Pinal County Air Quality Control District inspector.
13. You may have an attorney or other field experts present to advise you during any interview.
14. The Pinal County Air Quality Control District may not take any adverse action, treat a regulated person less favorably or draw any inference as a result of the regulated person's decision to have an attorney or other experts present during any interview.
15. Pursuant to PCAQCD Code §3-1-120 documents and information provided to Pinal County Air Quality Control District shall become public record. You may submit a request to redact trade secrets and proprietary or confidential information by following the procedures set forth in PCAQCD Code §3-1-120.
16. Potential civil actions for violations cited as a result of this inspection are not subject to an applicable statute of limitation. Criminal prosecution based on violations cited as a result of this inspection may be subject to limitations set forth in ARS § 13-107.
17. The Statutes and Regulations identified above will allow you to appeal any formal action resulting from this inspection.
18. Pursuant to Arizona Revised Statutes Title 49 Chapter 10 the inspector will not request or accept any environmental audit reports. The inspector may ask for copies of records required by rule or permit.
19. Any questions regarding this inspection may be directed to the inspector identified above at 520-866-6929.
20. You may contact the Division Director, Michael Sundblom, at the number above to express concern or seek further information.

11. Participation in an interview is voluntary unless you are legally compelled to participate.

12. You are allowed twenty-four (24) hours to review and revise any signed written witness statement that is drafted by any Pinal County Air Quality Control District inspector.

13. You may have an attorney or other field experts present to advise you during any interview.

14. The Pinal County Air Quality Control District may not take any adverse action, treat a regulated person less favorably or draw any inference as a result of the regulated person's decision to have an attorney or other experts present during any interview.

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16. Potential civil actions for violations cited as a result of this inspection are not subject to an applicable statute of limitation. Criminal prosecution based on violations cited as a result of this inspection may be subject to limitations set forth in ARS § 13-107.

Inspection Checklist



- Permit Posted?
- Annual regular compliance/compliance report submitted?
- Semi-Annual or annual compliance report submitted?
- Emissions inventory report submitted?
- Meet opacity threshold?
- Source performance testing conducted?
- Record keeping complete?
- Any new or non-permitted equipment?
- Emissions control equipment operating efficiently?
- Any abnormal operations, shutdowns, or malfunctions?
- COM or CEM equipment operating appropriately?
- West Pinal Attainment?



Top Five Inspection Problem Areas That May Result In An Enforcement Action:

1. Pollution devices not properly working/maintained
2. Installation of equipment without a permit
3. Record keeping
4. Source Performance Testing
5. Exceed permit limitations



Inspection Report

Submitted to facility by PCAQCD within 30 working days of inspection.



Questions



Who To Call?

- Bob Farrell
- (520) 866-6949
- Bob.Farrell@pinalcountyz.gov

