

Common Compliance Violations



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The importance of compliance.....

Take care of the environment, avoid additional inspections, and potential fines.

- **Kansas is an EPA delegated state for the air program**
- **Kansas does move to adopt regulations that meet EPA expectations but these are not concurrent events**

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Determining compliance.....

- **Facility Permits**
 - **Operating Plans**
 - **Performance Test parameters**
- **Kansas regulations**

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Determining compliance.....

- **Inspections**
 - **Notice of Non-Compliance (NON)**
- **Performance Testing**
 - **Compliance Testing and Asbestos**
- **Reporting Requirements**
- **Know your facility**



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Common Violations.....

- **Performance Test**
 - **Didn't meet deadline**
 - **Failure to submit required notifications or prior notice of testing dates**
 - **Failure to demonstrate compliance**
 - **Failure to follow the required testing procedures and protocols**

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Common Violations.....

Operating Permits

- Failure to obtain an operating permit when required
- Failure to submit a timely Class I renewal application for the operating permit

Construction Permits and Approvals

- Timely submittal for construction permits and approvals prior to groundbreaking and/or installation



Common Violations.....

...the paperwork

- **Keep data accessible**
- **Set up calendar**
- **Check the calculations**
Rolling 12 month



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Common Violations.....

...the paperwork

40 CFR Parts 60 NSPS	KDHE
40 CFR Parts 61, and 63 NESHAP, and MACT Standards	KDHE, copy to EPA
Semi-Annual Reports for Title V Permits	KDHE
Annual Certifications for Title V Permits	KDHE, copy to EPA
Emissions Inventory (both Class I and Class II permits)	KDHE
Performance Test Reports	KDHE



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Common Violations.....

Excessive Emissions of Regulated Pollutants

- **Regulatory limitations on emissions**
- **Permit Conditions or limitations**
- **Monitoring requirements**



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Common Violations.....

Equipment Operation

- **Failure to install, maintain, or operate required control equipment – baghouses, scrubbers, catalytic converters**
- **Visible Emissions**
- **Open Burning**



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Be Proactive.....

- **Find tools that work for you**
- **Be familiar with the facility requirements**
- **Resources: consultants, trade groups, K-State's SBEAP**
- **Facility involvement**
- **Monitoring requirements**



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