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
Determining compliance…..

• Facility Permits
  • Operating Plans
  • Performance Test parameters

• Kansas regulations
Determining compliance.....

• Inspections
  • Notice of Non-Compliance (NON)

• Performance Testing
  • Compliance Testing and Asbestos

• Reporting Requirements

• Know your facility
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
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
Common Violations…..

...the paperwork

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>40 CFR Parts 60 NSPS</td>
<td>KDHE</td>
</tr>
<tr>
<td>40 CFR Parts 61, and 63 NESHAP, and MACT Standards</td>
<td>KDHE, copy to EPA</td>
</tr>
<tr>
<td>Semi-Annual Reports for Title V Permits</td>
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<tr>
<td>Annual Certifications for Title V Permits</td>
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<td>Emissions Inventory (both Class I and Class II permits)</td>
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</tr>
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<td>Performance Test Reports</td>
<td>KDHE</td>
</tr>
</tbody>
</table>

The state belongs to all of us - "Kansas Don't Spoil It"
Common Violations.....

Excessive Emissions of Regulated Pollutants

- Regulatory limitations on emissions
- Permit Conditions or limitations
- Monitoring requirements
Common Violations.....

Equipment Operation

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