FREQUENTLY ASKED QUESTIONS (FAQ's) FOR

SEMI-ANNUAL MONITORING REPORT SUBMITTALS

1. What is a Semi-Annual Monitoring Report?

Division for Air Quality (DAQ) permits contain a requirement, that summary reports of all monitoring, required by the permit, be submitted to the Regional Office listed on the front of the permit. These reports are to be post marked by July 30th and January 30th of each year, for the life of the permit. As long as the facility has an active permit, Semi Annual Monitoring Reports are to be submitted even if the actual equipment permitted was not in the state during the reporting period.

2. Do I have to use the same form for the Semi-Annual Monitoring Report that I use for the Annual Compliance Certification (Form DEP 7007CC)?

No. There is no designated form for the semi-annual monitoring report.

3. What form or format should be used for my Semi-Annual Monitoring Report?

There is no official form or format to report this information. Report formats will vary from facility to facility due to differences in permit conditions, but the SA Report must contain all applicable monitoring information. Summary tables may also be appropriate. A facility may always check with their inspector, regarding format, prior to submittal.

4. When are Semi-Annual Monitoring Reports due to be submitted?

Every 6 months for the life of the permit to be submitted on or before January 30th and July 30th of each year. As long as the facility has an active permit, Semi Annual Monitoring Reports are to be submitted even if the actual equipment permitted was not in the state during the reporting period.

5. Is there a penalty involved if my Semi-Annual Monitoring Report forms is not post marked by the 30th of June and January each year?

Yes. Failure to submit reports by the specified time may result in the issuance of a Notice of Violation as well as any other appropriate enforcement action.

6. What items do I need to include in the Semi-Annual Monitoring Report?

Each monitoring requirement is found under the *Specific Monitoring Requirements* section of the DAQ permit under each emission unit. There is sometimes some variability in how DAQ permits are written and the Specific Monitoring Requirements section of the permit may also refer you to the *Specific Recordkeeping Requirements* or *Specific Reporting Requirements* sections of the permit for additional monitoring requirements.

7. Do I need to refer to plant-wide monitoring requirements?

Yes. Plant-wide requirements, such as limits on source wide 12-month-rolling-total emissions or maintaining a maintenance and operation logs of air pollution control equipment, are an important part of the monitoring required for some facilities.

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8. How do I report monitoring for a '12-month-rolling-total emissions' limit or other "rolling" limits?

Spreadsheets or data tables are often the best format to use when verifying compliance with these rolling annual limits on a monthly basis. A column for each month of the reporting period and a row with individual operating unit totals, then a monthly total, then a row with the annual total for the 12 month period ending that month is common. Call your inspector or the Compliance Assistance Help Desk at 502-782-6189 for assistance, or email envhelp@ky.gov.

9. How much detail is required in the Semi-Annual Monitoring Report?

For each emission unit list each monitoring requirement specified by your permit; the frequency of each monitoring requirement; whether the monitoring was completed with the required frequency (if there were gaps in performing the required monitoring this should be explained with the reasons the monitoring was not completed and include actions taken to ensure the required monitoring will be completed in the future); whether there are any deviations of permit or monitoring requirements during the reporting period (if deviations occurred these should be listed with dates, values of exceedances, and corrective actions taken to return to compliance); and a statement should be included that the document certifies the information listed was collected, maintained for the reporting period specified, and the monitoring records are available for inspection at the facility.

10. Do I need to submit all of the actual monitoring log sheets?

Not normally. The semi-annual monitoring report should be a summary of the required monitoring rather than logs of the actual monitoring. However, if instructed by the permit or requested by a DAQ inspector, actual logs may be the best way to report your monitoring efforts.

11. Who needs to sign the semi-annual monitoring report?

The responsible official for the facility. This term is defined by regulation (401 KAR 52:001(1)(62)(a-d), but in general means the owner, sole proprietor, general partner, president, secretary, treasurer, or vice-president of a corporation, or the principal executive officer or ranking elected official of a public agency.

12. Is there a template available for me to use?

No. Given the variability in types of monitoring required it is left to each facility to collect and format the reporting elements into a logical and easy to understand format.

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13. Who can I call for help with my Semi Annual Monitoring Report?

Contact your DAQ Regional Office and ask for the inspector assigned to your facility. If you are unsure where your regional office is go to:

https://eec.ky.gov/Environmental-Protection/Air/Documents/RegionMap-CountyNames.pdf or contact the **Division of Compliance Assistance at 502-782-6189.**

14. Where should I mail the Semi Annual Monitoring Report?

Mail it to your Regional Office or submit it electronically via eForms. <u>Please do not send a copy to the 'central file' in Frankfort.</u>

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