



Department of
**Environment &
Conservation**

Air Pollution Control: Field Services

Non - Title V Inspections and Report Reviews

Objectives:

- General Overview of Field Services
 - Who are we and what do we do?
 - Where are we located?
- The Inspection and Report Review Processes
 - How does it work?
 - Helpful Hints for Compliance
- Air Quality Complaints
 - Types of complaints and the investigation process
- Questions/Comments

Who are Field Services and what do we do?

- Field Services personnel are TDEC's boots on the ground carrying out its mission to enhance the quality of life for the citizens of Tennessee while promoting responsible stewardship of our natural environment.
- Air Pollution Control Field Services personnel have many tasks. The three largest are:
 - Compliance Inspections
 - Title V, Conditional Major, True Minor Sources
 - Air Quality Complaint Investigations
 - Open burning, stack opacity, fugitive dust, odor....
 - Ambient Air Monitoring
 - Ozone
 - Sulfur Dioxide
 - Lead
 - PM 2.5

Where are we located?

Environmental Field Offices

<https://www.tn.gov/environment/contacts/about-field-offices>

Have a question about
Tennessee's Environment?
Call 1-888-891-TDEC (8332)
ask.tdec@tn.gov

Nashville

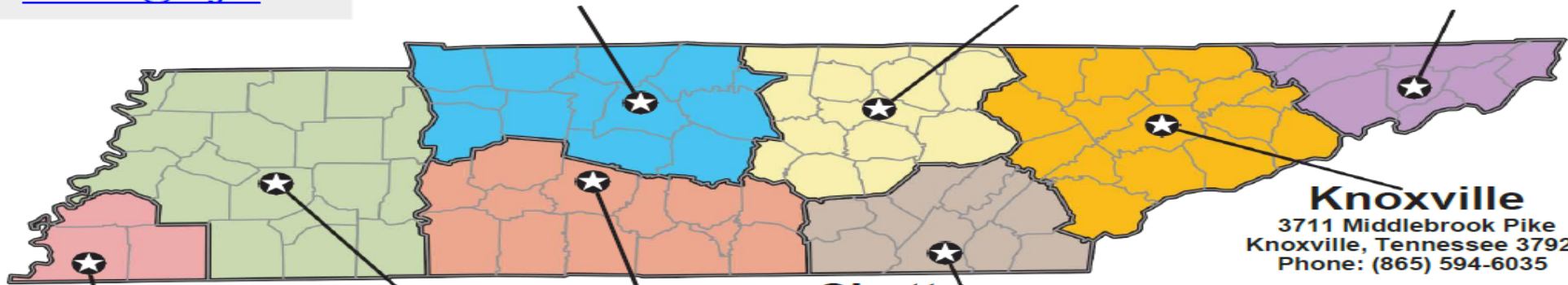
711 R.S. Gass Boulevard
Nashville, Tennessee 37243
Phone: (615) 687-7000

Cookeville

1221 South Willow Avenue
Cookeville, Tennessee 38506
Phone: (931) 520-6688

Johnson City

2305 Silverdale Road
Johnson City, Tennessee 37601
Phone: (423) 854-5400



Knoxville

3711 Middlebrook Pike
Knoxville, Tennessee 37921
Phone: (865) 594-6035

Chattanooga

1301 Riverfront Parkway, Suite #206
Chattanooga, Tennessee 37402
Phone: (423) 634-5745

Jackson

1625 Hollywood Drive
Jackson, Tennessee 38305
Phone: (731) 512-1300

Columbia

1421 Hampshire Pike
Columbia, Tennessee 38401
Phone: (931) 380-3371

Memphis

8383 Wolf Lake Drive
Bartlett, Tennessee 38133
Phone: (901) 371-3000



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APC Field Services' Organizational Structure...

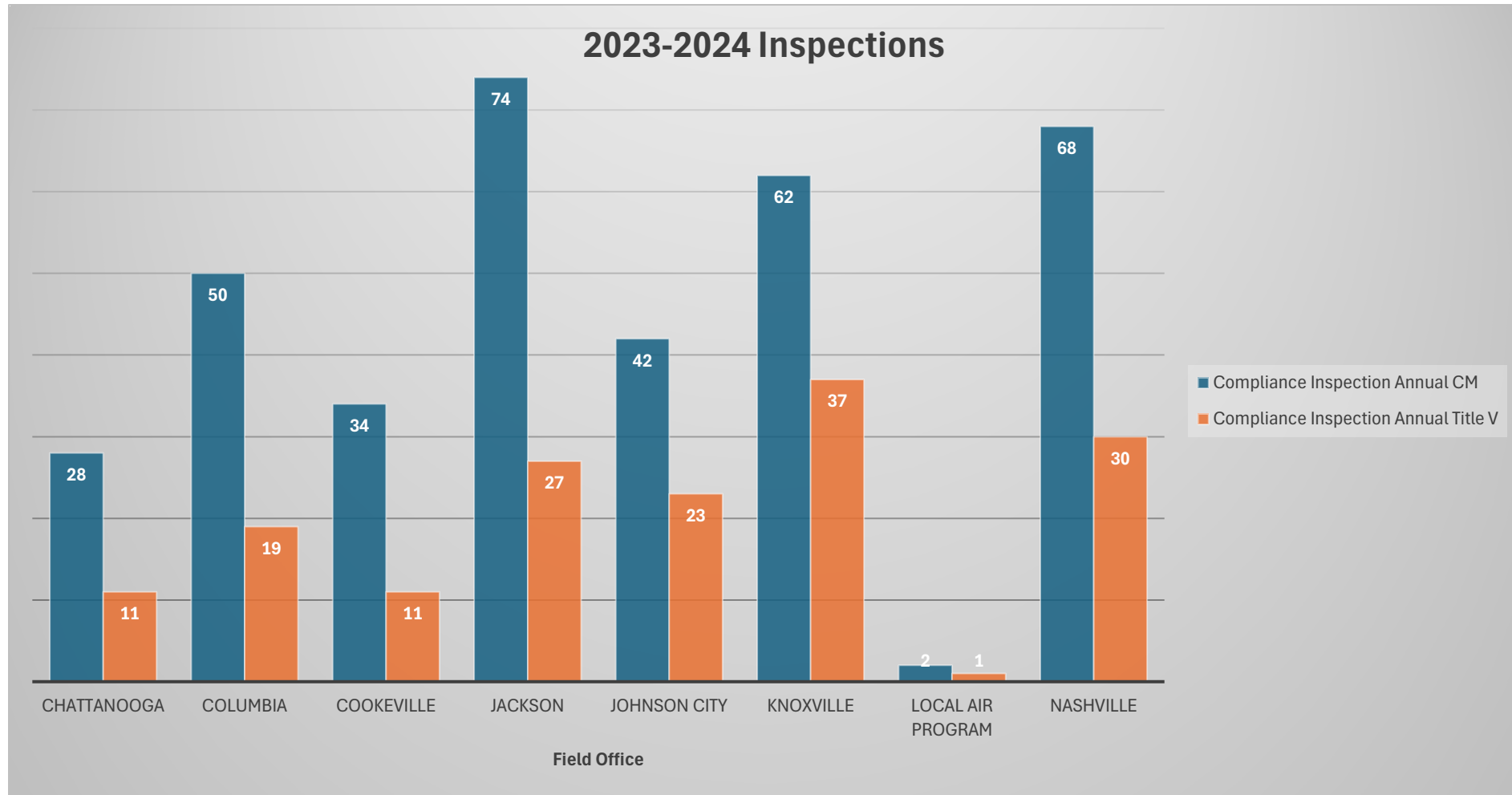


- Managers are primarily responsible for ensuring that each office's workload is completed both in a timely manner and in accordance with standard operating procedures.

Inspections



Field Office Statistics



The Inspection Process: Planning and Preparation

- Managers divide the Title V and CM facilities amongst the inspectors.
- Inspectors spend a considerable amount of time preparing for the site visit:
 - Gather all permits effective during the inspection period
 - Review file for compliance issues, modifications, new sources, etc.
 - Prepare a pre-inspection report/checklist to be used as a guide on-site



The Inspection Process: Timing

- While inspections may be either announced or unannounced, facilities may notice that site visits often follow the receipt of reports.
 - Saves time for both parties
 - Semiannual and conditional major reports contain much of the information needed for the inspection report.
 - Logs that have been fully reviewed prior to the site visit may be spot checked while on-site



The Inspection Process: Facility Preparation

- Inspectors are often asked what they will need to see.
 - The answer is simple: **Know your permit!**
- The facility's permit(s) is the basis for the inspection.
 - The inspection will go more smoothly if both parties are familiar with the permit requirements.
 - Inspectors go through the permits on a condition by condition basis and will need to see that all of the required documentation is kept complete and up to date and that all reporting deadlines have been met.
- Note: Inspectors do not have the authority to sign a "Hold Harmless" or other agreement, waiver, covenant, etc. that would be binding on the State of Tennessee, and should not be asked to do so.

The Inspection Process: Site Visit

- Inspectors will hold an opening meeting first.
 - Credentials and contact information will be provided and the purpose of the visit explained.
 - The inspection time frame will be discussed.
 - Ask about the facility's PPE requirements and other safety precautions to be taken during the walkthrough.
 - Confidential Business Information (CBI)
 - The inspector will ask about CBI to ensure it is not included in inspection reports.

The Inspection Process: On-site Records Review

- The inspector will need to see the required documentation for the inspection period. While each permit differs, required documentation may include:
 - Production logs
 - Emission logs
 - Safety data sheets and/or vendor formulation VOC/HAP content data
 - Maintenance logs
 - Hours of operation logs
 - Pressure drop logs
 - Temperature logs
- Inspectors will check calculations for accuracy

The Inspection Process: The Walk-Through

- Inspectors will need to see facility's operation from start to finish.
 - Inspectors will make a note of which sources are operating and will need to see each emission point to check for opacity.
 - A visible emission evaluation may be performed if opacity is observed.
 - Inspectors will verify that control devices are operating.
 - If the permit contains parametric monitoring limits (temperature, pressure drop, pH, flow, etc), the inspector will take readings.
 - If the permit has specific work practice standards, the inspector will verify they are being followed. (i.e. No open VOC containers)
 - The inspector will verify that there aren't any additional sources that need further evaluation.

The Inspection Process: The Closure Meeting

- After the walk-through, the inspector will hold a closure meeting before departing.
 - Questions, comments, concerns
 - Additional information

The Inspection Process: The Write-up

- The inspector will return to the office and compile all the data collected during the inspection.
- Inspectors make a compliance determination:
 - No NOV Issued: No violations were found during the entire inspection time period.
 - NOV Issued: There were compliance issues during the inspection period and a Notice of Violation (NOV) was issued or will be issued in the near future.
 - Common compliance issues:
 - Records not kept or not kept in the proper format
 - Failure to notify the Division of a change in responsible person
 - Reports not submitted or submitted late
 - Constructing without a permit
- The finished report is reviewed by the manager and uploaded to the database. The report will be available through the data viewers after final approval by the Deputy Director of Field Services.

Data Viewer



Tennessee Division of Air Pollution Control (DAPC)

Permits Complaints **Inspections** eDocuments

> Search Guidance • [Example search for inspections in Hamblen county.](#)

Inspections Conducted by APC

Rows

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ID	Inspector	Facility Id	Site ID	Site Name	County	City	EFO Name	Insp Date	Inspection Type	Status
11364	RTH	-	99838	Ruilman Center	Wilson	Lebanon	Nashville	AUG-08-2014	Asbestos compliance inspection	In Compliance
9989	RTH	-	97245	Former Patterson Hardware	Bedford	Shelbyville	Columbia	JAN-14-2014	Asbestos compliance inspection	In Compliance
11508	RTH	-	100546	26th Ave & Clarksville Pike Apts. (fka River Village Apts.)	Davidson	Nashville	Local Air Program	SEP-22-2014	Asbestos compliance inspection	In Compliance
11507	RTH	-	100546	26th Ave & Clarksville Pike Apts. (fka River Village Apts.)	Davidson	Nashville	Local Air Program	SEP-15-2014	Asbestos compliance inspection	In Compliance
10129	RTH	-	97510	Rutherford County Agricultural Building	Rutherford	Murfreesboro	Nashville	FEB-06-2014	Asbestos compliance inspection	In Compliance
10671	RTH	-	97520	IGA	Campbell	Jellico	Knoxville	FEB-19-2014	Asbestos compliance inspection	In Compliance
10330	JLH	92-0155	97705	Casey's General Store 3341	Weakley	Martin	Jackson	FEB-13-2014	Compliance Inspection Annual TM	Out of Compliance
11099	RTH	-	100531	Ridgeview Behavior Health Services	Roane	Harriman	Knoxville	JUL-17-2014	Asbestos compliance inspection	In Compliance
11114	RTH	-	100531	Ridgeview Behavior Health Services	Roane	Harriman	Knoxville	JUL-23-2014	Asbestos compliance inspection	In Compliance
11116	RTH	-	100544	Upland Retirement Village	White	Pleasant Hill	Cookeville	JUL-23-2014	Asbestos compliance inspection	In Compliance
11115	RTH	-	100544	Upland Retirement Village	White	Pleasant Hill	Cookeville	JUL-17-2014	Asbestos compliance inspection	In Compliance
10339	RTH	-	97534	Former Pine Cliff Motel	Sevier	Gatlinburg	Knoxville	FEB-18-2014	Asbestos compliance inspection	In Compliance
8902	RTH	-	93111	Dillard's	Coffee	Tullahoma	Columbia	SEP-05-2013	Asbestos compliance inspection	In Compliance
11351	JCH	63-0320	93559	Hankook Tire Manufacturing Tennessee LP	Montgomery	Clarksville	Nashville	OCT-03-2014	Compliance Inspection Annual Title V	In Compliance
8971	RTH	-	93205	First Presbyterian Church	Weakley	Greenfield	Jackson	SEP-17-2013	Asbestos compliance inspection	In Compliance

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Conditional Major Annual Compliance Status Reports

Basics of an Annual Compliance Status Report

- Required for all Conditional Major facilities
- Due by **March 31** of each year
- Will address the preceding calendar year
- Contains 2-3 parts depending on your permit
 1. A statement of compliance with any permit conditions that are used to avoid Title V status
 - Reporting condition will specify which conditions to certify
 - Do not certify in compliance with all conditions
 2. Copies of the records required by your permit
 3. (New permits only) A compliance certification statement

Updated Permit Condition Language

- For permits drafted and issued **after January 1, 2021**, Annual Compliance Status Reports will now require:
 - A standard compliance certification statement that is included in the permit appendices
 - Certifies the truth and accuracy of the information provided in the report
 - A signature from the Responsible Person listed in **G1** of the permit

New Annual Compliance Certification Language

C5. Annual Compliance Status Report

The permittee shall submit a written report stating the compliance status of this facility with permit Condition(s) <XX> by March 31 of every year. The report shall cover the preceding calendar year and shall include the records required by Conditions <XX, XX>. The first report is due March 31, <XXXX>, and shall cover the time period from issuance of this permit to December 31, < year>. The report must include the compliance certification statement included in Appendix 6. Reports submitted with unsigned certification statements will be deemed incomplete.

TAPCR 1200-03-09-.03(8), 1200-03-09-.02(11)(a), and 1200-03-10-.02(2)(a)

Compliance Certification Statement Template

Appendix 7: Compliance Certification Statement

Facility (Permittee): _____ Facility Name

Facility Address: _____

Facility ID: _____ **_****

Conditional Major Permit Number	Reporting Period	Report Deadline

This report is required pursuant to TAPCR 1200-03-09-.02(11)(a).

Responsible Person Certification

I, the undersigned, am a Responsible Person (as described in **Condition G1**) of the facility for which this report is being submitted. This document consists of _____ pages and they are numbered from page _____ to _____. As a Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Annual Compliance Status Report is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.



Signature		Date
Signer's name (print)	Title	Phone (with area code)

Common Problems: Reports in General

- No signature or date
- Wrong permit numbers
- Not addressing all permits effective during the reporting period
- Not submitting the required logs
- Data formatting issues
 - i.e., calendar year totals vs 12-consecutive month totals or incorrect calculations
- Missing compliance status for each condition that is used to avoid Title V status
 - In compliance vs Out of Compliance

Example Compliance Status Certification

Condition 5 of facility XYZ's permit states:

"A written report stating the **compliance status** of this facility with **Condition 8**, shall be submitted by March 31 This report shall include the **records** required by **Condition 12**."

*Note that the permit requires **both** a specific compliance status statement and records to be submitted.*

The compliance statement may read something similar to this:

This report is being submitted on behalf of XYZ, as required by Condition 5 of permit #123456. The facility is in compliance with the limits stated in Condition 8 for the 2021 calendar year, and this report includes the records required by Condition 12.

Tips to Prevent Issues with Your Report

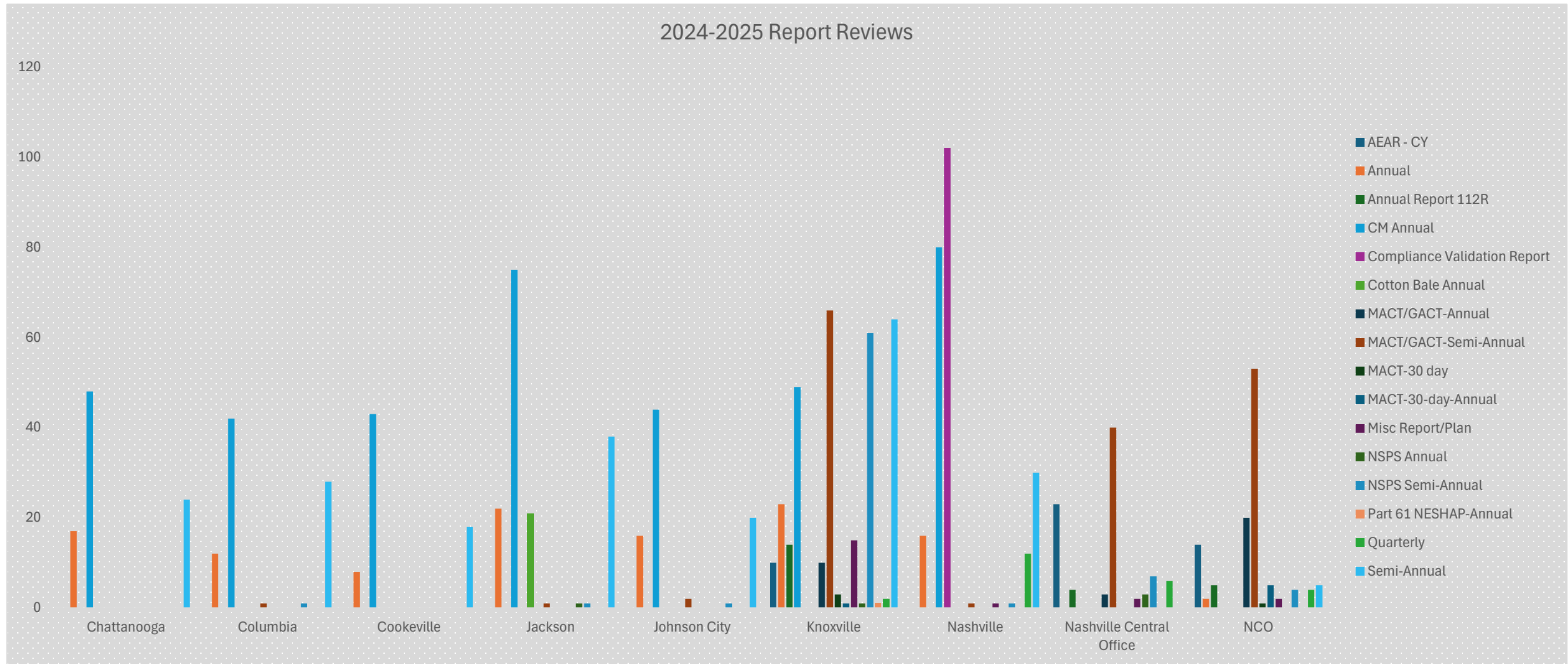
- Ensure you include all required components of the report
 - Certify compliance (in compliance vs out of compliance) with the required conditions
 - Submit the required logs
 - Complete and sign the compliance certification statement (if required by your permit) otherwise make sure to sign the report cover letter
 - Unsigned reports will be deemed incomplete
- Submit your reports early
 - Inspectors are given 20 days from receipt to review reports
 - Early submittals increase the chance that your report will be reviewed prior to the deadline
 - Deficiencies can be fixed without compliance issues if a corrected report is submitted before the deadline

Submittals

- Please ensure that reports submitted via email are in Adobe Portable Document format (pdf).
- Please refer to the Division Program if submitting paper copies

Permitting Program	Compliance Validation Program	Field Services Program
• Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission statements • Construction permit extension requests	• Test protocols • Emission test reports • Visible emission evaluation reports	• Semiannual reports • Annual compliance certifications/status reports
Division of Air Pollution Control Davy Crockett Tower, 7 th Floor 500 James Robertson Parkway Nashville, TN 37243 Air.Pollution.Control@tn.gov		Johnson City Environmental Field Office Division of Air Pollution Control 2305 Silverdale Drive Johnson City, TN 37601 APC.JCEFO@tn.gov

Report Review Statistics





Complaints

Complaints

- The Division occasionally receives complaints on facilities
 - i.e., Stack Opacity, Fugitive Dust, Odors
- A site visit is usually required.
 - Explain the complaint
 - Ask about recent events that may have caused the complaint
 - Review required records
 - maintenance logs, production logs, emissions logs.....
 - Conduct an inspection if one has not already been conducted
- Investigation results are available through the data viewers.



Other Complaints

- Many of the air quality complaints we investigate do not concern industrial facilities.



Open Burning



Fugitive Dust

Complaints: No Jurisdiction

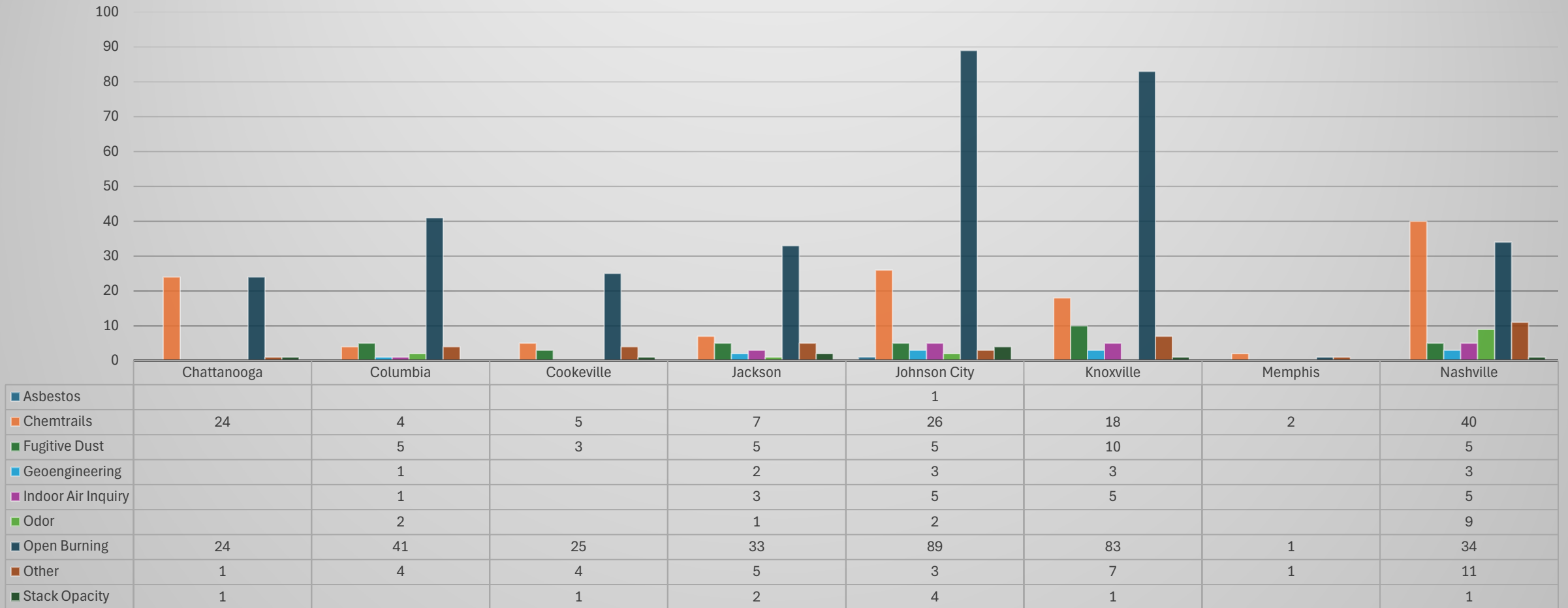


Balloon Releases

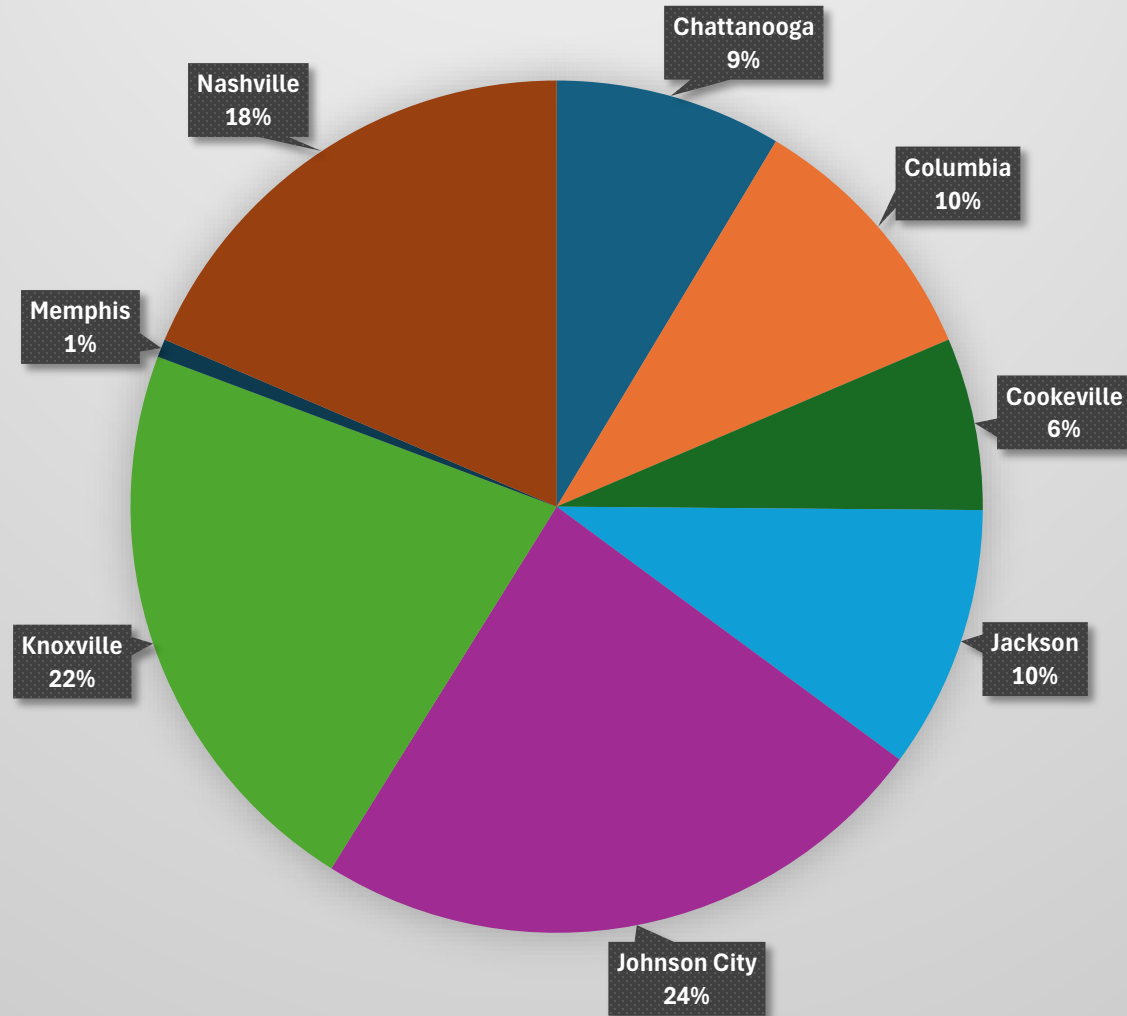


Complaint Statistics

Completed Complaints



Complaint Statistics



APC staff thanks you!

<https://www.tn.gov/environment/air/air-contacts.html>



Questions?