



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**



Nevada Department of
**CONSERVATION &
NATURAL RESOURCES**

What to Expect During an Air Quality Inspection

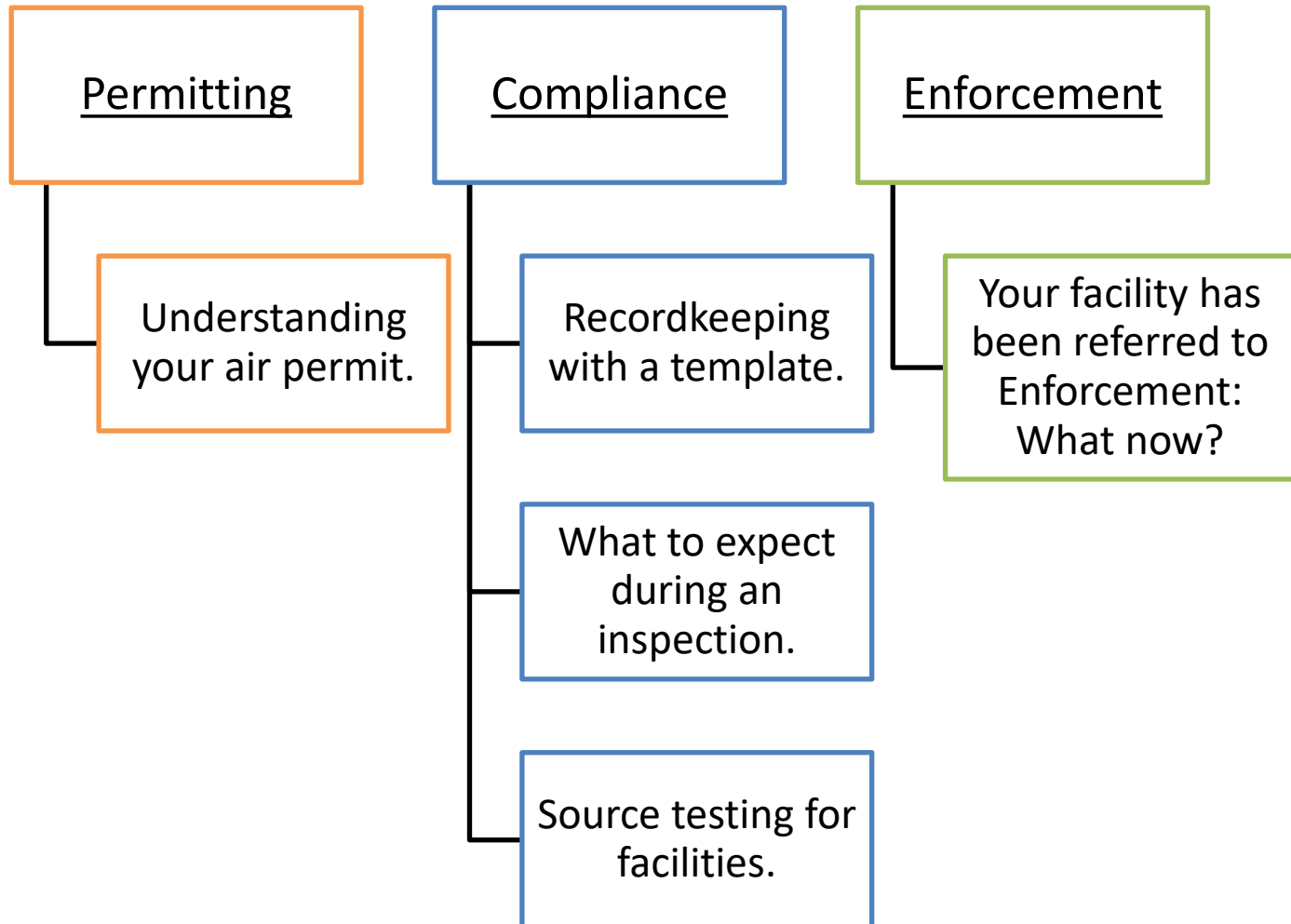
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Presented by

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LAYOUT OF WEBINAR SERIES

TODAY'S TOPIC: INSPECTIONS



OVERVIEW

Topics to be Covered today

- Inspection Schedule
- Inspector Arrival
- Full Compliance Inspection
 - Physical
 - Recordkeeping
- Next Steps after Inspection is Completed
- Questions

INSPECTION FREQUENCY

Permit Type	Source Category	Potential to Emit (PTE) Conditions	Inspection Frequency
Class 1	Major	<ul style="list-style-type: none"> - Controlled PTE \geq 100 tpy for any air pollutant - Controlled PTE \geq 10 tpy for any individual hazardous air pollutant (HAP) - Controlled PTE \geq 25 tpy all HAPs 	<ul style="list-style-type: none"> - Full Compliance Evaluation (FCE) every 2 years - Partial Compliance Evaluation (PCE) every year an FCE is not conducted
Class 2	Synthetic Minor 80 (SM-80)	<ul style="list-style-type: none"> - Uncontrolled PTE \geq major source threshold - Controlled PTE \geq 80% of major source threshold 	<ul style="list-style-type: none"> - FCE every 4 years - PCE every year an FCE is not conducted
	Synthetic Minor	<ul style="list-style-type: none"> - Uncontrolled PTE \geq major source threshold - Controlled PTE $<$ 80% of major source threshold 	<ul style="list-style-type: none"> - FCE every 4 years
	True Minor	<ul style="list-style-type: none"> - Uncontrolled and Controlled PTE $<$ major source threshold 	

This is only the minimum requirements, inspectors can conduct inspections more frequently

WHAT WOULD CHANGE MY INSPECTION SCHEDULE?

- Compliance Status
- Compliant
- Reporting
- All these factors can lead to an increase or decrease in Inspections depending on the facility type

INSPECTOR ARRIVAL ON-SITE

- Air Quality inspectors are at your front desk unannounced
 - Inspectors' mindset
- Understanding business needs, but air quality inspections are routine
- Best Practices to an easy, timely inspection from arrival
 - A person onsite who is available and knowledgeable on the Air Quality Operating Permit
 - Security, if applicable, reacting quickly
 - Inspectors cannot sign an NDA or release of liability
 - Open attitude - we get it, it's not the most fun thing, but we aren't out to get you.

FULL COMPLIANCE INSPECTION - PHYSICAL

- Physical Inspection – Looking at the permitted units
 - Inspectors focus is confirming Compliance with what is in the permit
- Compliance for each unit
 - Is the Unit on-site still?
 - Does unit match permit description?
 - Does it have the permitted control?
 - Is the control sufficient?
 - Is the unit being maintained?
 - Are there unpermitted equipment or connections?

FULL COMPLIANCE INSPECTION – PHYSICAL

- Does the emission unit match permit descriptions?
- Does it have the controls listed in the permit?

Section V. Specific Operating Conditions

A. Emission Unit PF1.001

System 1 - Crushing and Screening - Material Loading (Revised July 2023, Air Case #11619)		Location UTM (Zone 11, NAD 83)	
		m North	m East
PF1.001	Loader transfer of Aggregate to Hopper	[REDACTED]	

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
Emissions from **PF1.001** will be controlled by **water sprays**.

Unit
Description



Controls

FULL COMPLIANCE INSPECTION – PHYSICAL

- Are the controls sufficient?
- Does the unit look like it is being maintained?



<https://abcdust.net/how-do-you-control-dust-in-a-crushing-plant/>



<https://www.heavyequipmentguide.ca/article/40935/kleemann-reduces-dust-and-noise-around-aggregates-equipment>

FULL COMPLIANCE INSPECTION – RECORDS

Section V. Specific Operating Conditions (continued)

Q. Emission Unit S2.009

System 17 - Crushing Plant Generator (Revised July 2023, Air Case #11619)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.009	Crushing Generator (1971 hp, CAT, GEN SR, 4RJ01347, 1999)	[REDACTED]	

Section V. Specific Operating Conditions (continued)

Q. Emission Unit S2.009 (continued)

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346.2) (*Federally Enforceable SIP Requirement*)
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
 - a. Monitor and record the times at which operations start and stop as well as the total daily hours of operation for **S2.009**.
 - b. Monitor and record the consumption rate of **diesel** on a daily basis for **S2.009** (in **gallons**) by multiplying the maximum hourly fuel consumption rate as stated in **Q.2.b** of this section and the total daily hours of operation.
 - c. Monitor and record the total yearly hours of operation of **S2.009** per year. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.

FULL COMPLIANCE INSPECTION – RECORDS

- Inspectors will confirm the facility is operating within their permitted limits and operational parameters
- Most common complications with Records
 - Organization
 - “Contemporaneous log”
 - Formula errors
 - Missing Records – VEOs, Maintenance logs...

FULL COMPLIANCE INSPECTION – REPORT

- Inspection Report
 - Confirmation of Equipment and controls
 - Remarks on the status of compliance
 - Recommendations
 - If applicable, a list of non-compliance
- The Inspection Report is reviewed and signed internally and then the facility will get an emailed copy of the final inspection report.
- Our public record database will also have all copy of inspection reports associated with your facility in case you wanted to look back. It can be found here: <https://ndep.nv.gov/resources/public-records-request>

NEXT STEPS?

- Facility is in compliance with permit
 - See you next time
- Facility is not in compliance with various requirements
 - The BAPC recommends the Facility over to Enforcement
 - Field NOAVs
 - Follow-up Inspection
- Please reach out to your inspector if you have any questions or concerns. If you don't know who your assigned inspector is, that can be found on our website here : <https://ndep.nv.gov/air/permitting/download-permit-forms#compliance>

Questions?



Contact

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