



State of Utah

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GUIDELINES

TO: Permitting Branch Staff

FROM: Regg Olsen, Permitting Branch Manager

DATE: April 3, 2013

PDD
4/3/13

SUBJECT: Title V Six-Month Monitoring Reports

1. R307-415-6a(3)(c) requires a Title V permitted source to submit "... reports of any required monitoring every sixth months, or more frequently if specified by the underlying applicable requirement..." and also describes minimal elements of that report. This rule language is identical to that found in 40 CFR Part 70.6 and actually originates with the Clean Air Act (§504(a)).

2. The Operating Permit Section has chosen not to define exactly when the sixth-month periods occur to allow sources to adjust their reporting schedule to their existing practices and schedule when possible. In addition, the division cannot require anything beyond what is required by the rule.

3. Another factor to consider is that it is impossible to report data through a certain date (for example Dec 31) and submit that report by the same date. A period of time is necessary to collect, analyze and report data. It may take as much as 30 days (or in some cases, longer) for a source to accomplish the necessary tasks to submit a report following the cut-off for the data.

4. As a result of these considerations, it is intended that sources comply with the rule (and permit) language as follows:

- a. The date of the permit will start the clock in the sense that the first sixth-month monitoring report will be due no later than six months from the date of the permit. For example, if the date of the permit were April 15, the first six-

month report would be due no later than October 15. It may be submitted earlier, but in any case, will not cover a full six-month period of data collection. It cannot be submitted after October 15 and be considered "on time".

- b. The next report would be due no later than April 15 of the next year. Again, an early report would be acceptable, but a late report would be a "deviation" from a permit condition.
 - c. The combination of successive reports must cover a continuous period of time. In other words, there can be no data gaps or periods that are not addressed by a report and there can be no more than six months between report due dates.
5. The report should indicate the period of time being covered by the report, more as a matter of clarification than required by rule. If a report is submitted without the period being covered by the report, we should go back to the source and ask for clarification of what period the report covers. This is necessary to assure that all periods are in fact reported.
 6. The content of the report may be rather simple and straightforward. Data showing compliance is not necessary. Further, a source may reference previously submitted deviation reports or simply indicate that no deviation from permit terms and conditions had occurred during the reporting period. In July 1993, as part of the final rulemaking for part 70, EPA published a Q&A document; one question in the document was, "Does a source have to submit raw data on monitoring/testing as part of its monitoring report?" and the answer was "No. The permittee is not required to submit raw data, but is required to keep monitoring data and support information".

This Guideline shall be audited every two years by the Operating Permits Section Manager to determine the current status and relevance of the information.