

Certification of Compliance & Deviation Reports

Air Quality Division
Nebraska Department of Environmental Quality



www.deq.state.ne.us

Who is required to submit Certification of Compliance Reports?

Everyone with an operating permit
Including those under Permit-by-Rules



Certification of Compliance Reports

- ◆ Due March 31st of each year
- ◆ All Class I sources must send their reports to NDEQ & EPA Region VII
- ◆ Must certify compliance with all permit conditions
- ◆ Must certify to the general conditions
 - This can be one general statement

Certification of Compliance Reports

- ◆ Certifying compliance for previous calendar year – January - December
- ◆ Must be signed by a responsible official
- ◆ NESHAP/NSPS COC reports can be included if standard allows and noted on the report form
- ◆ Please do not send in with Emission Inventory

Certification of Compliance Reports

- ◆ Must include
 - Identification of each term or condition of the permit that is the basis for certification;
 - Compliance status at the time of submittal
 - A determination of whether compliance was continuous or intermittent; and
 - The methods used for determining the compliance status

Sample Format for Illustration Purposes

Guidance Document for Annual Certification of Compliance

Facility Name: _____ Facility ID #: _____
 Facility Address: _____ Facility Contact: _____
 Permit Issuance Date: _____

This Certification of Compliance is being submitted for January 1, ____ (Year) through December 31, ____ (Year)

Permit Condition	Compliance Status	"C" Continuous or "I" Intermittent	Method for Determining Compliance
I – XVII General Conditions	In compliance	Continuous	Routine records review and report submittals
XVIII (A) The amount of grain processed shall be limited to a maximum of 52,700 tons per any period of 12 consecutive months	In compliance	Intermittent	Grain is weighed by load and receiving record is generated. The received quantities are input into a computer database from which quantities received are monitored. (22,500 tons were received in ____ (Year))
XVIII (B) Particulate emission control equipment shall consist of bag houses on the following emission points: receiving, transfer, load out	In compliance	Continuous	All emission control equipment remains in full operation; no modifications to dust system in previous 12 months
XVIII (C) Opacity from the bag houses shall be less than 20%	Out of Compliance	Intermittent	Method 9 observations are made and recorded daily

Signature by a responsible official (per Title 129, Chapter 1) is required. Certifications of compliance and Semi-Annual Deviations Reports without a responsible official signature will be returned as incomplete.

Semi-annual Deviation Reports

◆ **Class I Sources**

- Due
 - March 31st (for reporting period July – December) and
 - September 30th (for reporting period January – June)
- Do not have to send to EPA
- Must be signed by a responsible official

Deviation Reports

◆ **Class II Sources**

- Only due once per year – March 31
- Included within Certification of Compliance requirement
- Do not have to send to EPA
- Must be signed by a responsible official

- Please do not send with Emission Inventory

Deviation Reports

◆ **Must include:**

- Permit condition or applicable requirement that has been deviated
- Date and time of occurrence
- Cause of deviation
- Details of the corrective action



Semi-annual Deviation Reports

- ◆ Deviation
 - A departure from an indicator range or work practice for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.
 - Examples
 - Required to record pressure drop every day, missing a day is a deviation
 - Fugitive dust crossing property line
 - Failure of control equipment

Reporting Formats

- ◆ No specific forms
- ◆ Just need required information



NDEQ Publications

- ◆ Annual Certification of Compliance and Deviation Reports Guidance Document
 - www.deq.ne.gov
 - Publications/Air Quality Program/Guidance Documents
- ◆ Deviations Fact Sheet
 - www.deq.ne.gov
 - Publications/Air Operating Permit Program/Fact Sheets

NDEQ Contacts

- ◆ Air Assistance
 - Yvonne Austin – (402) 471-3305
- ◆ Air Compliance Section
 - Todd Ellis, Supervisor – (402) 471-4561
- ◆ NDEQ Field Offices
 - Lincoln Office – (402) 471-2189
 - North Platte – (308) 535-8140
 - Norfolk – (402) 370-4424


