

West Virginia Division of Environmental Protection
Office of Air Quality

Policy on Regulations 2 and 10 Record Keeping and Reporting Requirements

I. Preamble

This policy of the Office of Air Quality (OAQ) provides guidance and clarification for complying with the reporting and record keeping requirements of 45 CSR 2 and 45 CSR 10 as authorized by the provisions of sections 45-2-8.5 and 45-10-6.5, respectively. A review of existing practices pursuant to these sections has revealed inconsistent and inadequate reporting. All affected sources are not reporting and often an affected source may have requirements beyond those needed to establish compliance.

The guidance contained herein will provide consistency among affected sources and assure quality data for OAQ enforcement studies.

All fuel burning units having a heat input under 10 million Btu's per hour are exempt from the provisions of 45 CSR 2 and 45 CSR 10 as detailed in §45-2-11 and §45-10-9 and also from the reporting and record keeping guidance found within this policy.

II. Policy Requirements

In accordance with 45 CSR 2, "To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers", Section 8.5, and 45 CSR 10, "To Prevent and Control Air Pollution from the Emission of Sulfur Oxides", Section 6.5, the Chief of the Office of Air Quality (OAQ) adopts this policy revising the reporting guidance for fuel burning units as defined in 45 CSR 2, Section 2.9, and 45 CSR 10, Section 2.6.

45 CSR 2, Sections 8.3 - 8.5 state:

- 8.3. The operators of fuel burning units shall submit data on operating schedules and the quality of fuel used in such units. Such data shall be reported in the manner the Director may specify, and will include, but not necessarily be limited to, information such as the number of start-ups and shutdowns, the quantity of fuel burned, and the ash, sulfur, moisture, volatile matter, and B.T.U. content.
- 8.4. Within a reasonable time after the start-up or shut-down of a fuel burning unit(s), the owner and/or operator of such unit(s) shall notify the Director of the start-up or shut-down by telephone or telefax or by such other method determined by the Director. This requirement will be deemed to have been satisfied with respect to any unit for which approved continuous opacity monitoring data, including start-up and shut-

down dates, are submitted to the Director no less frequently than on a calendar month basis.

- 8.5 The Director may publish, and from time to time revise, reporting instructions implementing the provisions of this section.

45 CSR 10, Section 6.5 states:

- 6.5. The operators of the fuel burning units or persons selling fuel shall submit data on the fuel used or sold for use in such units. Such data shall be reported in the manner the Chief may specify. However, reports on such data shall not exceed one (1) per month. Such reports must be filed within fifteen (15) days of the end of the established reporting period and will include, but not necessarily be limited to, information such as the quantity of fuel burned or sold and the sulfur, moisture, volatile matter, and the BTU content.

45 CSR 2, Section 2.9 and 45 CSR 10, Section 2.6, both state:

“Fuel Burning Unit” means and includes any furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer. For the purposes of this rule, all fuel burning units are classified in the following categories:

- a) Type ‘a’ means any fuel burning unit which has as its primary purpose the generation of steam or other vapor to produce electric power for sale.
- b) Type ‘b’ means any fuel burning unit not classified as a Type ‘a’ or Type ‘c’ unit such as industrial pulverized-fuel-fired furnaces, cyclone furnaces, gas-fired and liquid-fuel-fired units.
- c) Type ‘c’ means any hand-fired or stoker-fired fuel burning unit not classified as a Type ‘a’ unit.

Record Keeping and Reporting Policy

A. General

1. The owner or operator of a fuel burning unit(s) which burns a combination of fuels shall comply with the record keeping and reporting requirements of Sections B through E of this policy for each fuel burned, unless an alternative is approved by the Chief under the provisions of Section A.2 of this policy.

2. After receipt and consideration of written application, the Chief may approve alternatives to any record keeping and reporting requirements contained herein. Such application shall include a proposed monitoring and reporting schedule and rationale for alternative monitoring. Such alternative requirements may be approved in a variety of circumstances, such as a fuel burning unit that is infrequently operated, or the sulfur content of a fuel is so low that the limit cannot be exceeded.
3. Sources subject to the requirements of Title V (45 CSR 30, Section 5.1.c), shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report or application. Sources which are not subject to the requirements of Title V shall maintain records of all required monitoring data and support information for a period of at least two (2) years from the date of monitoring sample, measurement, report or application.
4. For purposes of this policy a fuel shipment shall be defined as any discrete, identifiable quantity of fuel for which a quality report is available. For example, a fuel shipment may be all fuel delivered from a specific lot, identified by the lot number; or fuel delivered under a specific purchase order number.

B. Requirements for Maintaining Startup/Shutdown Records

The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule for each unit. Such records shall include, but may not be limited to the date and time of start-ups and shutdowns. All such requirements, including notification by telephone, telefax, or other such method determined by the Director, shall be deemed to be satisfied when the records are maintained on site per the requirements of Section A. 3. of this policy and shall be made available upon request to the Chief or his/her duly authorized representative.

45 CSR 2, Section 9.1 provides an exemption from the applicable opacity standard during periods of start-ups, shut-downs and malfunctions. For purposes of this policy a start-up shall be considered to begin either when the burners are lit or at the start of purge (i.e., fans on) and startup shall be considered to end when minimum stable load is achieved. For the purposes of this policy a shut-down shall be considered to start with minimum stable load and end with the end of purge (i.e., fans off).

C. Requirements for Maintaining Fuel Use Records

1. The owner or operator of a fuel burning unit(s) which burns **pipeline quality natural gas, fuel oil, wood, or coal** shall record the total quantity of fuel burned in such units monthly, at a minimum, but may record it more often at the discretion of the owner or operator. Such requirement shall be deemed to be satisfied when records are maintained on site per the requirements of Section A.3. of this policy and shall be

made available, upon request, to the Chief or his/her duly authorized representative.

- a. For fuel burning units which burn **pipeline quality natural gas, fuel oil, wood or coal** the quantity of fuel consumed by all affected fuel burning units may be determined on a source by source basis, or a facility wide basis, per the discretion of the owner or operator.
 - b. When direct measurement of fuel consumed by a fuel burning unit is not practical the Chief may approve a plan per Section A.2. of this policy for parametric determination of the quantity of fuel burned, i.e. calculated based on steam production, or product production. If parametric determination is used the method of determination shall also be reported with the same frequency as the quantity burned.
2. The owner or operator of a fuel burning unit(s) which burns **alternative fuel(s)**, (fuels other than pipeline quality natural gas, fuel oil, wood or coal, such as propane and process waste products) shall maintain records of the quantity of fuel burned in such units. The owner or operator shall submit a written application to the Chief containing a proposed monitoring and reporting schedule and rationale for such schedule. After approval of a monitoring and reporting schedule all records shall be maintained on site per the requirements of Section A.3. of this policy and shall be made available upon request of the Chief or his/her duly authorized representative.

D. Requirements for Maintaining Fuel Quality Records

1. The owner or operator of fuel burning units which burn **pipeline quality natural gas** shall maintain records on the quality of fuel burned in such units. Such requirement will be deemed to be satisfied by an initial characterization of the fuel quality, which shall include, but may not be limited to, the ash, sulfur, moisture, volatile matter and Btu content. Such data may be obtained from the supplier(s), ASTM testing or other method approved by the Chief. Those records shall be maintained on site per the requirements of Section A.3. of this policy and shall be made available upon request of the Chief or his/her duly authorized representative.
2. The owner or operator of fuel burning units which burn **fuel oil** shall maintain records on the quality of fuel burned in such units. Such requirement will be deemed to be satisfied by an initial characterization of the fuel quality, which shall include, but may not be limited to, the ash, moisture, and volatile matter content, and an analysis of each shipment for sulfur and Btu content. Such data may be obtained from the supplier(s), ASTM testing or other method approved by the Chief. The quality of fuel consumed in such units shall be determined for each shipment of fuel received. Those records shall be maintained on site per the requirements of Section A.3. of this policy and shall be made available upon request of the Chief or his/her duly authorized

representative.

3. The owner or operator of fuel burning units which burn **only wood or wood products** shall maintain records of the quality of fuel burned in such units. Such requirement will be deemed to be satisfied by an initial characterization of the fuel quality, which shall include, but may not be limited to, the sulfur, and volatile matter content, and a semi-annual analysis, once during each of the second and fourth calendar quarters, for ash, moisture and Btu content. The fuel characterization and semi-annual analysis results shall be reported on a "dry basis". Such data may be obtained from the supplier, ASTM testing or other method approved by the Chief. Fuel quality may be determined on a company wide basis for the same fuel type, i.e., green wood, bark, dry wood chips, or sander dust. Such requirement shall be deemed to be satisfied when records are maintained on site per the requirements of Section A.3. of this policy and shall be made available upon request of the Chief or his/her duly authorized representative.
4. The owner or operator of fuel burning units which burn **coal** shall maintain records on the quality of fuel burned in such units. Such requirement will be deemed to be satisfied by an initial characterization of the fuel quality, which shall include, but may not be limited to, volatile matter content, and an analysis of each shipment for the ash, sulfur, moisture and Btu content. Such data may be obtained from the supplier, ASTM testing or other method approved by the Chief. Sampling for analysis shall be conducted either on an "as received" or "as burned" basis. In the absence of an "as burned" analysis the OAQ will assume that fuel is burned "as received" and not blended on site. The requirement shall be deemed to have been satisfied when records are maintained on site per the requirements of Section A.3. of this policy and shall be made available upon request of the Chief or his/her duly authorized representative.
5. The owner or operator of fuel burning units which burn **alternative fuel(s)** shall maintain records on the quality of fuel burned in such units. The owner or operator shall submit a written application to the Chief containing a proposed monitoring and reporting schedule and rationale for such schedule. After approval of a monitoring and reporting schedule the requirement shall be deemed to be satisfied when records are maintained on site per the requirements of Section A.3. of this policy and shall be made available upon request of the Chief or his/her duly authorized representative.

E. Requirements for Submitting Reports to OAQ

1. The owner or operator of fuel burning units which burn fuel oil, wood, coal or alternative fuels for which a continuous opacity monitoring system (COMS) is required under 45 CSR 2, shall submit an opacity report. Such report shall be filed as specified in the applicable permit or Order.

2. The owner or operator of fuel burning units which burn fuel oil, coal or alternative fuels for which an SO₂ continuous emissions monitoring system (CEMS) is required under 45 CSR 10, shall submit an SO₂ report as specified in the applicable permit or Order.

III. Effective Date

This Policy providing guidance and clarification for complying with the reporting and record keeping requirements of 45 CSR 2 and 45 CSR 10 shall become effective July 1, 1998.

John H. Johnston, Chief
Office of Air Quality
Division of Environmental Protection
Bureau of the Environment
State of West Virginia

Date

SUMMARY TABLE

Fuel Type	COMS Required under 45 CSR 2	SO ₂ CEMS Required under 45 CSR 10	Startup/Shutdown	Fuel Quality	Fuel Consumption	Excess Emissions Reports
Natural Gas	No	No	Maintain records on site 2/5 years	Initial characterization for each supplier, maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	No
Fuel Oil	No	No	Maintain records on site 2/5 years	Initial characterization for each supplier, and shipment analysis maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	No
	Yes	No	Maintain records on site 2/5 years	Initial characterization for each supplier, and shipment analysis maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	Opacity report
	No	Yes	Maintain records on site 2/5 years	Initial characterization for each supplier, and shipment analysis maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	SO ₂ report
	Yes	Yes	Maintain records on site 2/5 years	Initial characterization for each supplier, and shipment analysis maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	Opacity and SO ₂ report
Wood	No	No	Maintain records on site 2/5 years	Semi-annual analysis maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	No
	Yes	No	Maintain records on site 2/5 years	Semi-annual analysis maintained on site 2/ 5 years	Maintain records of monthly usage on site for 2/5 years	Opacity report
Coal	No	No	Maintain records on site 2/5 years	Analysis of each shipment maintained on site 2/5 years	Maintain records of monthly usage on site for 2/5 years	No
	Yes	No	Maintain records on site 2/5 years	Analysis of each shipment maintained on site 2/5 years	Maintain records of monthly usage on site for 2/5 years	Opacity report
	No	Yes	Maintain records on site 2/5 years	Analysis of each shipment maintained on site 2/5 years	Maintain records of monthly usage on site for 2/5 years	SO ₂ report
	Yes	Yes	Maintain records on site 2/5 years	Analysis of each shipment maintained on site 2/5 years	Maintain records of monthly usage on site for 2/5 years	Opacity and SO ₂ report
Alternative Fuels	Yes/No	Yes/No	Maintain records on site 2/5 years	Approved by Chief on a case by case basis	As approved by Chief on a case by case basis	As approved by Chief