State of Wisconsin
Department of Natural Resources
Hazardous Waste Management Program

Standards for Closed-Vent Systems and Control Devices for Subch. AA and BB (Process Vents and Equipment Leaks) Inspection Report

Section A: Inspection Information		
Inspection Date(s)	DNR Inspector	DNR Region

Section B: Facility Information			
Facility Name	EPA ID Number	Facility ID (FID) Number	
Street Address	City		Zip Code

Note: All "NR" references are to the Wisconsin Administrative Code. When entering information into the Field Investigator Site Tracking (FIST) database, only enter the **bold** citation into the Code or Statute Citation field. Use NR 664 citations for licensed facilities; use NR 662.034(1)(a) for large generators, which requires the LQG to comply with subchs. AA and BB in ch. NR 665 (interim licensed facility standards).

This inspection report includes the following requirements for closed-vent systems and control devices for subch. AA and BB:

- Section C: General Standards for All Closed-Vent Systems and Control Devices
- Section D: Vapor Incinerators
- Section E: Condensers
- Section F: Boiler or Process Heaters
- Section G: Flares
- Section H: Carbon Adsorption Units
- Section I: General Recordkeeping Requirements

Section C: General Standards for All Closed-Vent Systems and Control Devices		
NR 662.034(1)(a) **NR 664.1033(13)** NR 665.1033(12)	1. Is the closed-vent system and control device operated whenever emissions are vented to it?	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(11)(a)** NR 665.1033(10)(a) NR 664.1034(2) NR 665.1034(2)	2. Has testing been conducted to determine if the control device is operating with no detectable emissions (<500 ppmv) according to all of the following? ☐ Each of the following has been conducted according to Method 21 in appendix A of 40 CFR part 60. ___ Monitoring. ___ Performance criteria of the detection instrument. ___ Daily calibration procedures of the detection instrument. ___ Determination of background levels. ___ Determination of potential leak interfaces. ☐ Calibration gases consist of zero air with < 10 ppm hydrocarbons and a mixture of < 10,000 ppm methane or n-hexane in air. ☐ The arithmetic difference between the maximum instrument reading and background level is compared to 500 ppm to determine compliance.	☐ Yes ☐ No

NR 662.034(1)(a) **NR 664.1034(3)** NR 665.1034(3)	3. If the total organic emissions from all affected process vents subject to subch. AA are reduced to below 3 lb/hr and 3.1 tons/yr or by 95 weight percent, was compliance determined using a performance test that meets all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device are determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rate are correctly calculated. ___ The total organic emissions from all affected units are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance test are recorded. ☐ Information that the following performance testing facilities were made available. ___ Sampling ports adequate for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(a)** NR 665.1033(6)(a)	4. Is the control device equipped with a flow indicator that is calibrated, maintained and operated so it provides a record of the vent stream flow from each affected unit to the control device at least once every hour?	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(6)(c)** NR 665.1033(6)(c)	5. Are readings from each monitoring device inspected at least once each operating day to check the operation of the control devices?	☐ Yes ☐ No A
NR 662.034(1)(a) **NR 664.1033(6)(c)** NR 665.1033(6)(c)	6. If necessary, are corrective measures taken immediately to ensure the control device is adequately recovering organic vapors?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(11)** NR 665.1033(10)	7. Does the closed vent system meet either of the following design requirements? ☐ Operated with no detectable emissions as indicated by an instrument reading of < 500 ppmv above background and by visual inspection. ☐ Operated at a negative pressure (below atmospheric pressure) ___The negative pressure is measured by a readily accessible pressure gauge or other pressure measuring device.	☐ Yes ☐ No

NR 662.034(1)(a) **NR 664.1033(12)(a)** NR 665.1033(11)(a)	8. If the closed-vent system is designed to operate with no detectable emissions (instrument reading < 500 ppmv), is proper operation ensured by all of the following? ☐ Initial leak detection monitoring was conducted on or before the date the system was subject to subch. AA or BB to demonstrate the unit operates with no detectable emissions. ☐ At least annually, visually inspect closed-vent system joints, seams or other connections that are permanently or semi-permanently sealed for defects that could result in air pollutant emissions. ☐ Monitor components or connections after repair or replacement to demonstrate they are operating without detectable emissions. ☐ Monitor other components or connections annually. ___ Components are not monitored because they are designated as unsafe. ___The exposure to an immediate danger has been documented and a written plan for monitoring during safe-to-monitor times is followed.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(12)(b)** NR 665.1033(11)(b)	9. If the closed-vent system is designed to operate at negative pressure, was it visually inspected for defects that could result in air pollutant emissions by the date the system was subject to subch. AA or BB and annually thereafter?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(12)(c)** NR 665.1033(11)(c)	10. Are defects corrected to control detectable emissions according to all of the following schedules? ☐ The first attempt at repair is made within 5 calendar days. ☐ The repair is corrected as soon as possible, but no later than 15 calendar days after the emissions are detected. ☐ Complete repair of the equipment is delayed to the end of the next process unit shutdown because: ___ Repair is technically infeasible without a process unit shutdown. ___ Emissions from immediate repair would be greater than those resulting from delay of repair.	☐ Yes ☐ No ☐ N/A
NR 664.1033(9)	11. For a facility with a final operating license, if an alternate operational or process parameter is monitored at a facility, has the facility demonstrated that the alternate parameter will ensure the control device is operating in conformance with these standards and the control device design specifications?	☐ Yes ☐ No ☐ N/A
Section D: Vapor Incinerators		
	1. Is the control device a vapor incinerator? If NO, go to Section E.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(3)** NR 665.1033(3)	2. Is the vapor incinerator designed and operated to result in any of the following? ☐ Reduce the organic emissions by 95 weight percent or greater. ☐ Achieve a total organic compound concentration of 20 ppmv, expressed as the sum of actual compounds on a dry basis corrected to 3% oxygen. ☐ Provide a minimum residence time of 0.50 seconds at a minimum temperature of 760°C.	☐ Yes ☐ No

NR 662.034(1)(a) **NR 664.1034(3)** NR 665.1034(3)	3. If the vapor incinerator is designed and operated to achieve a total organic compound concentration of 20 ppmv, was compliance determined using a performance test that meets all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device were determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rate are correctly calculated. ___ The total organic emissions from all affected units are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance test are recorded. ☐ Information that the following performance testing facilities were made available. ___ Sampling ports adequate for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(b)** NR 665.1033(6)(b)	4. Is a temperature monitoring device with a continuous recorder maintained and operated to continuously monitor the operation of the thermal or catalytic vapor incinerator?	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1035(2)(d)3.a.** NR 665.1035(2)(d)3.a.	5. If engineering calculations are used for a thermal vapor incinerator, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations and flow rate. ☐ Establishes the design minimum, the average temperature in the combustion zone and the combustion zone residence time.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(3)(d)** NR 665.1035(3)(d)	6. For a thermal vapor incinerator, does the operating record include the date, time and duration of each period when any of the following occur? ☐ The combustion temperature is below 760°C when the incinerator is designed to operate with a minimum residence time of 0.50 seconds and minimum temperature of 760°C. ☐ The combustion zone temperature is more than 28° C below the design average temperature when the incinerator is designed to operate with an organic emission reduction efficiency of at least 95 weight percent.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(2)(d)3.b.** NR 665.1035(2)(d)3.b.	7. If engineering calculations are used for a catalytic vapor incinerator, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations and flow rate. ☐ Establishes the design minimum and average temperatures across the catalyst bed inlet and outlet.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a) **NR 664.1035(3)(d)3.** NR 665.1035(3)(d)3.	8. For a catalytic vapor incinerator, does the operating record include the date, time and duration of each period when any of the following occur? ☐ The temperature of the vent stream at the catalyst bed inlet is more than 28° C below the average temperature of the inlet vent stream. ☐ The temperature difference across the catalyst bed is less than 80% of the design average temperature difference.	☐ Yes ☐ No ☐ N/A
Section E: Condensers		
	1. Is the control device a condenser? If NO, go to Section F.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(2)** NR 665.1033(2)	2. Is the condenser designed and operated to recover the organic vapors according to either of the following? ☐ The efficiency of recovery is 95 weight percent or greater. ☐ If the efficiency is less than 95 weight percent, total organic emissions of 3 lb/hr and 3.1 tons/yr are attained.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1035(2)(d)3.e** NR 665.1035(2)(d)3.e	3. If engineering calculations are used for a condenser, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations, flow rate, relative humidity and temperature. ☐ Establishes the design outlet organic compound concentration level, design average temperature of the condenser exhaust vent stream and design average temperatures of the coolant fluid at the condenser inlet and outlet.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(b)6.** NR 665.1033(6)(b)6.	4. Is one of the following devices maintained and operated to continuously monitor the operation of the condenser? ☐ A monitoring device with a continuous recorder to measure the organic compound concentration level in the exhaust vent stream from the condenser. ☐ A temperature monitoring device with a continuous recorder.	
NR 662.034(1)(a) **NR 664.1035(3)(d)6.** NR 665.1035(3)(d)6.	5. For a condenser with a concentration monitoring device, does the operating record include the date, time and duration of each period when the organic compound concentration level or readings of organic compounds in the exhaust vent stream from the condenser are more than 20% greater than the design outlet organic compound concentration level?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(3)(d)7.** NR 665.1035(3)(d)7.	6. For a condenser with a temperature monitoring device, does the operating record include the date, time and duration of each period when any of the following occurs ? ☐ Temperature of the exhaust vent stream from the condenser is more than 6° C above the design average exhaust vent stream temperature. ☐ Temperature of the coolant fluid exiting the condenser is more than 6 °C above the design average coolant fluid temperature at the condenser outlet.	☐ Yes ☐ No ☐ N/A
Section F: Boiler or Process Heaters		
	1. Is the control device a boiler or process heater? If NO, go to Section G.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(3)** NR 665.1033(3)	2. Is the boiler or process heater designed and operated to result in any of the following? ☐ Reduce the organic emissions by 95 weight percent or greater. ☐ Achieve a total organic compound concentration of 20 ppmv, expressed as the sum of actual compounds on a dry basis corrected to 3% oxygen. ☐ Provide a minimum residence time of 0.50 seconds at a minimum temperature of 760°C.	☐ Yes ☐ No

NR 662.034(1)(a) **NR 664.1034(3)** NR 665.1034(3)	3. If the boiler or process heater is designed and operated to achieve a total organic compound concentration of 20 ppmv, was compliance determined using a performance test that meets all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device were determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rate are correctly calculated. ___ The total organic emissions from all affected units are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance test are recorded. ☐ Information that the following performance testing facilities were made available. ___ Sampling ports adequate for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(b)4.** NR 665.1033(6)(b)4.	4. If a boiler or process heater has a design heat input capacity less than 44 megawatt, is it continuously monitored with a temperature monitoring device and continuous recorder?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(b)5.** NR 665.1033(6)(b)5.	5. If the boiler or process heater has a design heat input capacity of 44 megawatt or more, is it equipped with a continuous monitoring device and continuous recorder that measures a parameter indicating good combustion operating practices?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(2)(d)3.c.** NR 665.1035(2)(d)3.c.	6. If engineering calculations are used for a boiler or process heater, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations and flow rate. ☐ Establishes the design minimum and average flame zone temperatures, combustion zone residence time and description of method and location where the vent or equipment stream is introduced into the combustion zone.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(3)(d)4.** NR 665.1035(3)(d)4.	7. Does the operating record include the date, time and duration of each period when any of the following occur? ☐ Flame zone temperature is more than 28° C below the design average flame zone temperature. ☐ Position where the vent stream is introduced to the combustion zone changes from the established location.	☐ Yes ☐ No
Section G: Flares		
	1. Is the control device a flare? If NO, go to Section H.	☐ Yes ☐ No

NR 662.034(1)(a) **NR 664.1033(4)** NR 665.1033(4)	2. Is the flare designed and operated according to all of the following? ☐ No emissions are visible except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. ☐ The flame is present at all times. ☐ The flare is steam-assisted, air-assisted or non-assisted. ☐ The net heating value of the gas being combusted is either of the following: ___ If the flare is steam or air-assisted, 300 Btu/scf or more. ___ If the flare is non-assisted, 200 Btu/scf or more. ☐ The exit velocity for a steam-assisted or non-assisted flare is any of the following: ___ Less than 60 ft/sec. ___ Between 60 ft/sec and 400 ft/sec if the net heating value of the gas is greater than 1,000 Btu/scf. ___ Less than the maximum velocity, V_{max} and less than 400 ft/sec. ☐ The exit velocity for an air-assisted flare is less than V_{max}.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(5)** NR 665.1033(5)	3. Does the flare meet all of the following requirements? ☐ Compliance with the visible emissions requirement has been determined using Method 22 in appendix A of 40 CFR part 60. ☐ The following have been calculated correctly: ___ Net heating value of the gas being combusted. ___ Actual exit velocity. ___ Maximum allowed velocity or V_{max}.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(b)3.** NR 665.1033(6)(b)3.	4. Does a heat sensing monitoring device with a continuous recorder meet both of the following? ☐ Indicates the continuous ignition of the pilot flame. ☐ The device is maintained and operated to continuously monitor the operation of the flare.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(2)(d)3.d.** NR 665.1035(2)(d)3.d.	5. If engineering calculations are used for a flare, does the design analysis consider the vent stream composition, constituent concentrations, flow rate, and design and operation standards (no visible emissions)?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(3)(d)5.** NR 665.1035(3)(d)5.	6. Does the operating record include the date, time and duration of each period when the pilot flame is not ignited?	☐ Yes ☐ No ☐ N/A
Section H: Carbon Adsorption Units		
	1. Is the control device a carbon adsorption unit? If NO, go to Section I.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1033(2)** NR 665.1033(2)	2. Is the carbon adsorption unit designed and operated to recover the organic vapors according to either of the following? ☐ The efficiency of recovery is 95 weight percent or greater. ☐ If the efficiency is less than 95 weight percent, total organic emissions of 3 lb/hr and 3.1 tons/yr are attained.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(7)** NR 665.1033(7)	3. If the facility uses a fixed-bed carbon adsorption system that regenerates the carbon bed in the control device, is the carbon replaced with fresh carbon at regular, pre-determined time intervals that are shorter than the carbon service life?	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a) **NR 664.1033(8)** NR 665.1033(8)	4. If the carbon bed is not regenerated in the control device, is the existing carbon replaced with fresh carbon on a regular basis using either of the following procedures? ☐ The concentration level of organic compounds in the exhaust vent stream is monitored and the existing carbon is immediately replaced when carbon breakthrough is indicated. ___ The monitoring frequency is either daily or at an interval no more than 20% of the time required to consume the total carbon working capacity, whichever is longer. ☐ The existing carbon is replaced at a regular predetermined time interval that is less than the design carbon replacement interval.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(14)** NR 665.1033(13)	5. Does the facility document that carbon removed from the carbon adsorption system is managed as a hazardous waste by one of the following methods? ☐ Regenerated in a thermal treatment unit licensed or permitted as a miscellaneous unit; or, in a unit in compliance with NR 665 subch. AA, BB, CC or Clean Air Act requirements. ☐ Incinerated in a licensed or permitted hazardous waste incinerator. ☐ Burned in a licensed or permitted boiler or industrial furnace.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1033(6)(b)7.** NR 665.1033(6)(b)7.	6. Is one of the following devices maintained and operated to continuously monitor the operation of a carbon adsorption system that regenerates the carbon bed in the control device? ☐ A monitoring device with a continuous recorder to measure the organic compound concentration level in the exhaust vent stream from the carbon bed. ☐ A monitoring device equipped with a continuous recorder to measure a parameter indicating the carbon bed is regenerating on a regular predetermined time cycle.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(2)(d)3.f.** NR 665.1035(2)(d)3.f.	7. If engineering calculations are used for a carbon adsorption system that regenerates the carbon bed on-site in the control device, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations, flow rate, relative humidity and temperature. ☐ Establishes the design exhaust vent stream organic compound concentration level, number and capacity of carbon beds, type and working capacity of activated carbon used for carbon beds, design total steam flow over the period of each complete carbon bed regeneration cycle, duration of the carbon bed steaming and cooling or drying cycles, design carbon bed temperature after regeneration, design carbon bed regeneration time and design service life of carbon.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(2)(d)3.g.** NR 665.1035(2)(d)3.g.	8. If engineering calculations are used for a carbon adsorption system that does not regenerate the carbon bed on-site in the control device, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations, flow rate, relative humidity and temperature. ☐ Establishes the design outlet organic concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a) **NR 664.1035(3)(d)** NR 665.1035(3)(d)	9. For a carbon adsorption system that regenerates the carbon bed directly on-site in the control device, does the operating record include the date, time and duration of each period when the following occur? ☐ For units measuring organic compound concentrations, the period when the organic compound concentration level in the exhaust vent stream from the carbon bed is more than 20% greater than the design exhaust vent stream organic compound concentration level. ☐ For units measuring regeneration of the carbon bed, the period when the vent stream continues to flow through the control device beyond the predetermined carbon bed regeneration time.	☐ Yes ☐ No ☐ N/A
Section I: General Recordkeeping Requirements		
NR 662.034(1)(a) **NR 664.1035(1)(b)** NR 665.1035(1)(b)	1. If more than one unit is subject to subch. AA or BB, does the facility keep one recordkeeping system that identifies each record by each hazardous waste management unit?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a) **NR 664.1035(2)(b)1.** NR 665.1035(2)(b)1.	2. Do records include up-to-date information and data identifying all of the following? ☐ All process vents or equipment subject to subch. AA or BB requirements. ☐ Annual throughput and operating hours of each affected unit. ☐ Estimated emission rates for each affected unit and for the overall facility. ☐ A facility map showing the approximate location of each affected unit. ☐ Determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests. ___ Determinations are made using operating parameter values that represent the conditions when maximum organic emissions occur.	☐ Yes ☐ No
NR 662.034(1)(a) **NR 664.1035(2)(c)** NR 665.1035(2)(c)	3. If test data is used to determine the organic removal efficiency or total organic compound concentration achieved by the control device, does the facility have a performance test plan that includes all of the following? ☐ A description of how it is determined that the planned test is conducted when the hazardous waste management unit is operating at the highest load or capacity level reasonably expected to occur, including all of the following information: ___ Estimated or design flow rate and organic content of each vent or equipment stream. ___ Definition of the acceptable operating ranges of key processes and control device parameters. ☐ Detailed engineering description of the closed-vent system and control device, including all of the following: ___ Manufacture's name and model number of the control device. ___ Type, dimensions and equipment capacity. ___ Construction materials. ☐ Detailed description of sampling and monitoring procedures, including all of the following: ___ Equipment to be used. ___ Sampling and monitoring locations in the system. ___ Frequency of sampling and monitoring. ___ Planned analytical procedures.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a) **NR 664.1035(2)(d)** NR 665.1035(2)(d)	4. If a design analysis is used, do records include all of the following design documentation for the closed-vent and control devices? ☐ A list of all information references and sources used in preparing the documentation. ☐ Records, including the date, for each compliance test showing that the closed vent system operates with no detectable emissions. ☐ A statement signed and dated by the owner or operator certifying that the operating parameters used in the design analysis represent the conditions that exist when the unit is operating at the highest load reasonably expected to occur. ☐ A statement certifying that the control device is designed to operate at ≥ 95% efficiency or the total organic emissions are reduced to < 3 lb/hr and 3.1 tons/yr with < 95% efficiency. ___ Owner or operator signed and dated the statement; OR, ___ Manufacturer or vendor certified that the control equipment meets design specifications. ☐ If performance tests are used to demonstrate compliance, all of the test results. ☐ Design analysis, specifications, drawings, schematics, piping and instrument diagrams prepared by the owner or operator or provided by the manufacturer or vendor that describes the control device design information.	☐ Yes	☐ No
NR 662.034(1)(a) **NR 664.1035(3)** NR 665.1035(3)	5. Does the operating record include all of the following design documentation and monitoring, operating and inspection information for each closed-vent system and control device? ☐ Description and date of each modification made to the unit design. ☐ Identification of operating parameters, description of monitoring devices and diagram of monitoring sensor locations. ☐ Monitoring, operating and inspection information. ☐ Explanation of the cause for the control device operating parameters to exceed the design value and the measures implemented to correct the control device operation for each exceedance period. ☐ For a carbon adsorption system, the date when existing carbon is replaced with fresh carbon. ☐ For a carbon adsorption system where the carbon bed is not regenerated on-site, both of the following: ___ The date and time when the control device is monitored for carbon breakthrough and the monitoring device reading. ___ The date when existing carbon in the control device is replaced with fresh carbon. ☐ Date of each control device startup and shutdown. ☐ Identify each of the closed-vent system components that are designated as unsafe to monitor, why the unit is unsafe to monitor and the plan for monitoring each component. ☐ When a leak is detected, all of the following information: ___ The instrument ID number, the closed-vent system component ID number and the operator name, initials or ID number. ___ The date the leak was detected and the date of the first attempt to repair. ___ The date the leak was successfully repaired. ___ The maximum instrument reading after the leak is successfully repaired or determined to be nonrepairable. ___ A notation of “repair delayed” and the reason for delay if the leak is not repaired within 15 days.	☐ Yes	☐ No
NR 662.034(1)(a) **NR 664.1035(4)** NR 665.1035(4)	6. Are records of monitoring, operating and inspection information for the closed vent system and control device kept for 3 years from the date of each occurrence?	☐ Yes	☐ No

NR 662.034(1)(a) **NR 664.1033(10)** NR 665.1033(9)	7. If an alternative control device is used, is there sufficient information to describe its operation and identify the process parameters that indicate proper operation and maintenance?	☐ Yes ☐ No ☐ N/A
NR 664.1036	8. If the facility has a final operating license and the control device operated outside of the design specifications for more than 24 hours or the flare operated with visible emissions for more than 5 minutes during any 2 consecutive hours, has a semi-annual report containing all of the following been sent to the department by the specified date? ☐ The EPA ID number, name and address of the facility. ☐ For each month, the dates the control device exceeded or operated outside of the design specifications. ☐ The duration and cause of each exceedance or visible emission. ☐ Corrective measures that were taken.	☐ Yes ☐ No ☐ N/A
DNR Inspector Signature:		Date: