

6-MONTH MONITORING REPORT (SIXMON)

August 2001

INSTRUCTIONS

Use this form to summarize all monitoring on a 6-month or more frequent basis as required by your part 71 permit. In addition, attach all separate monitoring reports required by your permit or applicable requirements during this time period, report on all deviations from permit terms that occurred during the time period, and have your responsible official certify the truth, accuracy, and completeness of all information that is submitted in the form (and attachments). The permit will provide you with a mailing address where you should mail this form after it is complete and it has been certified as to truth, accuracy, and completeness.

Record Retention

You must retain records, materials, or other support material used in the preparation of this monitoring report for a period of at least 5 years from the date you submit this form to the permitting authority.

Availability of Information to the Public and Confidential Treatment of Information.

Information submitted in this form will, upon request, be made available to the public for inspection and copying. If you wish to request confidential treatment for business information, such information should be submitted separately to the permitting authority along with a claim of confidentiality, as governed by 40 CFR part 2, subpart B. Note that the part 2 regulations generally do not allow emissions information or information used for compliance purposes to be granted confidential treatment. Also note that you may be required by your permitting authority to provide a copy of your completed form directly to the EPA.

DETAILED INSTRUCTIONS

Complete Sections *A* and *B* once for each report to identify the permitted source and identify the reporting period covered by the report. On the next page, complete the table in Section *C* to summarize all monitoring performed during the reporting period, and indicate whether deviations occurred, and provide information on other monitoring reports (in addition to this report) that are required to be submitted now or at any time during the reporting period. Copy this table as many times as necessary to describe all monitoring. On the next page, complete the table in Section *D* to report on all deviations from permit terms that occurred during the reporting period. Copy this table as many times as necessary to report on all deviations. Finally, submit form **CTAC** with this form, because Part 71 requires that all submitted information be certified as to truth, accuracy, and completeness by a responsible official..

Section A (Identifying Information)

Enter the permitted facility's official or legal name. Do not use a colloquial or abbreviated name. Enter the complete mailing address for the facility and the name, telephone number, and facsimile number (if desired) for the contact person. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or other individual, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

Section B (Reporting Period)

Enter the beginning and ending dates for the reporting period covered by this form. The beginning date shall be

assumed to begin and end at midnight local time. The part 71 regulations require this reporting period to be at least every 6 months, but in some cases your permit may require more frequent reporting.

Section C (Monitoring Report)

All sources must complete this section. The purpose of this section is to provide the permittee with an organized way to summarize all monitoring required during the reporting period and to provide information on any separate monitoring reports required by the permit (such as reports required by 40 CFR parts 60, 61, or other applicable requirements) that are either submitted at this time or were submitted at any time during the reporting period covered by this form. Each individual monitoring requirement should be included in a separate row of the table. Copy section C of this form as many times as necessary to address all monitoring requirements.

In the first column of the table in Section C, describe and cross-reference the relevant permit term that requires monitoring, data collection or analysis. Provide a description that is specific about the monitoring in terms of the test methods or analytical techniques used, and the air pollutant or parameter monitored, as in the following example: “Method 5 stack test for concentration of particulate matter.” In order to “cross-reference” the permit term you should identify the term’s precise location in the permit, if possible [e.g., term (A)(2)(i)(a)].

Monitoring required in part 71 permits includes monitoring required by applicable requirements, periodic monitoring established for the first time in the permit, and, as necessary, requirements concerning the use, maintenance, and where appropriate, installation of monitoring equipment or methods. [See 40 CFR § 71.6(a)(3)(i)(A), (B), and (C).] Monitoring can also be generally defined as the collection and use of measurement data or other information to control or document the proper operation of a process or a pollution control device, or to assure compliance with applicable requirements (such as emissions limitations and standards, control equipment standards, work practice standards, and other requirements under the Clean Air Act). Monitoring may include instrumental or non-instrumental methods, including periodic inspections, visual observations, work practice check, and recordkeeping related to documenting that an action has been taken or that a permit requirement has been met. Some examples of monitoring include continuous emissions monitoring, periodic readings of parameters related to operating conditions, stack tests using EPA reference test methods, vendor or laboratory analytical testing, and manual inspections that include making records of process conditions or work practices.

In the second column, list the emission units (Unit IDs) upon which the monitoring was performed. If the permit does not include unit IDs, describe them as specifically as possible. You may list multiple units if all are subject to the same monitoring requirements. In addition, for monitoring that applies to the permitted facility as a whole or to all units at your source, you may enter “facility- wide” in the emissions unit column.

In the third column, indicate (by checking the appropriate box) whether or not the permit requires the submittal of a separate report (other than this form) for the monitoring described on this row (line) of the table. Separate monitoring reports may be required by applicable requirements or the part 71 permit itself, and separate monitoring reports may be required to be submitted on the same date as this form (as an attachment to the form) or on a different date (not as an attachment to this form). All such reports must meet the content requirements of the applicable requirement, the permit, and the part 71 operating permits regulations. If the separate monitoring report is submitted as an attachment to this form, the form instructs you to submit information that will help you to meet these content requirements. However, if you submitted the separate report on a different date from the form (not as an attachment) please be careful to meet these minimum content requirements. When submitted on a different date, the separate monitoring report should identify the company name and address; the beginning and ending dates of the reporting period; the emissions unit or activity; the emissions limitations or standards, including operational requirements and limitations (such as parameter ranges), specified in the permit; and all deviations from permit requirements (including when monitoring was not performed), and the date on which each deviation occurred. In addition, if a separate report is submitted on a different date from this form, the separate report must include a certification of truth, accuracy, and completeness.

Complete the fourth column of the table only if you are required to submit a separate report for the monitoring described on this line of the table. If this separate report was submitted prior to the submittal of this form, indicate the date you submitted it; if it is being submitted for the first time with this form, assign an attachment identification (ID) in the space provided, mark the attachment accordingly, and attach the separate monitoring report to this form.

Section D (Deviations That Should have been Reported Previously)

Use this section to summarize all deviations from permit terms that were required, either by applicable requirements or part 71, to be reported prior to the submittal of this monitoring report, consistent with § 71.6(a)(3)(iii)(B). Also be sure to include those deviations that were required to be reported, but either were not reported or not reported by the required deadline. Note that all deviations should either be reported in this section or in section E. Provide information on each deviation in a separate row of the table. Copy this page as many times as necessary to include all such deviations in the report.

Deviations from permit terms occur when any permit term is not met, including terms that establish emission limitations, emission standards, control equipment requirements, work practices, and parameter ranges, and those designed to assure compliance with such requirements, such as monitoring, recordkeeping, and reporting. For example, included in the meaning of deviation are any of the following: (1) a condition where emissions exceed an emission limitation or standard; (2) a situation where process or emission control device parameter values indicate that an emission limitation or standard has not been met; (3) a situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit (including indicators of noncompliance revealed through parameter monitoring); (4) a situation in which an exceedance or an excursion, as defined in 40 CFR part 64 (compliance assurance monitoring or CAM), occurs; (5), a situation in which required monitoring of emissions or parameters is not performed; and (6) failure to comply with a permit term that requires submittal of a report. You also must include deviations from permit terms that occur during startup, shutdown, malfunction, and upset conditions. A deviation is not necessarily a violation. Violations will be determined by EPA (or its delegate Agency).

In the first column of the table provided, cross-reference or otherwise similarly identify the permit term for which there is a deviation [e.g., “term (B)(2)(i)(a)”] and describe the requirement (e.g., “emissions limitation of 6 ppm for NOx” or “submission of annual compliance certification”).

In the second column, list the emission unit (Unit ID) where this deviation occurred. You may list multiple units here if they all had deviations of this permit term and they all occurred during the same time periods. In addition, for deviations of permit terms that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter “facility-wide” in the emissions unit column.

In the third column, identify the beginning and ending time periods over which the deviation occurred. Although each 24-hour period of deviation is considered a separate deviation, you may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, 12 a.m., or 00:00 in military time. Zone means time zone (e.g., EST or EDT).

In the fourth column, specify the date when the written deviation report was submitted to the permitting authority. Leave the date field blank if you did not submit a written report (whether required to or not) during the reporting period. It is a deviation to submit a required deviation report (whether required by telephone, fax, or in writing) after the deadline or to neglect to submit it at all during the reporting period as required by the permit. Such deviations must also be reported in the next section, Section E. In addition, if a prompt report was made by telephone or fax, consistent with the permit, shortly before the end of a reporting period, but the written deviation report is not required until the next reporting period, there would be no deviation of the submittal deadline for the written report to include in Section E for this reporting period.

Note that an emergency is also considered a deviation subject to prompt reporting requirements, and thus, emergencies must also be included in this table. An "emergency" is a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency does not include noncompliance to the extent it is caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of § 71.6(g)(3) of this section are met, including that notice of the emergency was submitted to the permitting authority within 2 working days of the time when emission limitations were exceeded due to the emergency.

Note that although the terms "upset," "startup," "shutdown," and "malfunction" refer to conditions that are not defined in part 71, the applicable requirements may define these terms, and all deviations from permit terms during such conditions should be reported as deviations on this form. Also note that the applicable requirement itself may define the term "deviation" or refer to "excess emissions;" and any such occurrences should also be reported as deviations on this form.

Section E (Deviations Not Required to be Reported Previously)

This section of the form is provided for you to report those deviations required by § 71.6(a)(3)(iii)(B)(3) to be reported for the first time within this 6-month monitoring report. Note that all deviations not included in section D should be reported in this section. Answer questions 1 through 5 as a group for each deviation. Each page is designed for you to report on 3 separate deviations. Copy this page as many times as necessary to report all such deviations. See the instructions for Section D for a description of what constitutes a deviation.

Question 1: Cross-reference or otherwise similarly identify the permit term for which there is a deviation [e.g., "term (B)(2)(i)(a)"] and describe the requirement (e.g., "emissions limitation of 6 ppm for NOx" or "submission of annual compliance certification").

Question 2: List the emission unit (Unit ID) where this deviation occurred. You may list multiple units here if they all had deviations of this permit term and they all occurred during the same time periods. In addition, for deviations of permit terms that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter "facility-wide" in the emissions unit column.

Question 3: Identify the beginning and ending time periods over which the deviation occurred. Although each 24-hour period of deviation is considered a separate deviation, you may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, or 00:00 in military time. Zone means time zone (e.g., EST or EDT).

Question 4: Briefly explain the probable cause of the deviation from permit terms, if known. Examples of possible answers to this question include "operator error" or "mechanical failure." Be as specific as possible.

Question 5: If any corrective actions or preventative measures were taken to avoid similar deviations at the same emissions units, briefly explain them. Examples of possible answers to this question include "trained operator on proper operation of control devices" or "repaired defective equipment and will perform routine maintenance on an accelerated schedule." If known, include dates when such actions or measures were taken or will be taken in the future.

Form CTAC (Certification of Truth, Accuracy, and Completeness by Responsible Official)

You must complete form **CTAC** and attach it to this monitoring report. Part 71 requires form **CTAC** to be completed and submitted with each set of documents that the permit requires to be sent to the permitting authority.

U.S. ENVIRONMENTAL PROTECTION AGENCY
FORMS FOR FEDERAL OPERATING PERMITS PROGRAM, 40 CFR PART 71

FORM SIXMON - 6-MONTH MONITORING REPORT

A. Identifying Information. All facilities must complete this section.

Source or company name _____

Mailing address: Street or P.O. Box _____

City _____ State _____ ZIP _____ - _____

Contact person _____ Title _____

Telephone (_____) _____ - _____ Ext. _____ Part 71 permit no. _____

B. Reporting Period. You must complete this section. The reporting period should be the 6-month, or shorter period, required by your part 71 permit.
It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning ____/____/____ Period ending ____/____/____

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D. Deviations that Should have been Reported Previously

All sources must complete this section. Use the table below to summarize all deviations from permit terms required to be reported previously (prior to this report). Copy this page as many times as necessary to include all such deviations. In the first column, describe and cross-reference the permit terms for which there is a deviation. In the second column, list the Emission unit IDs where the deviation occurred, if no IDs are listed in the permit, describe them instead. When reporting the beginning and ending times for deviations, use the 24-hour clock (e.g., midnight or 12 a.m. is 00:00). Zone means time zone (e.g., EST or EDT). In the fourth column, specify the date when the written deviation report was submitted to the permitting authority. If a written deviation report was required, but it was not submitted by the required deadline, leave this field blank. Failure to submit a required deviation report (including those required to be submitted by telephone or fax), or late submittal of such reports is a deviation from permit terms that must be reported in Section E of this form.

Permit Term for Which There is a Deviation	Emission Units (unit IDs)	Deviation Time Periods			Written Deviation Report Submittal Date (mo/dy/year)	
		Date (mo/day/yr)	Time (hr/min)	Time Zone		
		Beginning	___/___/___	___:___	___	
		Ending	___/___/___	___:___	___	___/___/___
		Beginning	___/___/___	___:___	___	
		Ending	___/___/___	___:___	___	___/___/___
		Beginning	___/___/___	___:___	___	
		Ending	___/___/___	___:___	___	___/___/___
		Beginning	___/___/___	___:___	___	
		Ending	___/___/___	___:___	___	___/___/___
		Beginning	___/___/___	___:___	___	
		Ending	___/___/___	___:___	___	___/___/___

E. Other Deviations From Permit Terms

All sources must complete this section. Answer questions 1 through 5 below as a group for each deviation from permit terms that is required to be reported for the first time in this monitoring report form. This page may be used to report three separate deviations. Copy this page as many times as necessary to include all such deviations. Include all such deviations, including those that occur during startup, shutdown, malfunction, and upset conditions. Question 1: describe and cross-reference the permit terms for which there is a deviation. Question 2: list the Emission unit ID (if not available, identify by some other method) where the deviation occurred. Question 3: Report the beginning and ending times for each deviation, use the 24-hour clock. Question 4: Briefly explain (if known) the probable cause of each deviation from permit terms. Question 5: If any corrective actions or preventative measures were taken to avoid these same types of deviation at the same emissions units, briefly describe them. If known, include dates when such actions or measures were taken or will be taken in the future.

<p>1. Permit Term for Which There is a Deviation:</p>	<p>2. Emission Units (unit IDs):</p>	<p>3. Time Period: Date (mo/day/yr) Time (hr:min) Time Zone</p> <p>Beginning ___/___/___ ___:___ _____</p> <p>Ending ___/___/___ ___:___ _____</p>
<p>4. Probable Cause of Deviation:</p>	<p>5. Corrective Actions or Preventative Measures Taken:</p>	

<p>1. Permit Term for Which There is a Deviation:</p>	<p>2. Emission Units (unit IDs):</p>	<p>3. Time Period: Date (mo/day/yr) Time (hr:min) Time Zone</p> <p>Beginning ___/___/___ ___:___ _____</p> <p>Ending ___/___/___ ___:___ _____</p>
<p>4. Probable Cause of Deviation:</p>	<p>5. Corrective Actions or Preventative Measures Taken:</p>	

<p>1. Permit Term for Which There is a Deviation:</p>	<p>2. Emission Units (unit IDs):</p>	<p>3. Time Period: Date (mo/day/yr) Time (hr:min) Time Zone</p> <p>Beginning ___/___/___ ___:___ _____</p> <p>Ending ___/___/___ ___:___ _____</p>
<p>4. Probable Cause of Deviation:</p>	<p>5. Corrective Actions or Preventative Measures Taken:</p>	