Submitting Reports and Using the Compliance Report Cover Sheet

It is critical that sources submit reports in a clear, accurate and concise format. DES is tasked with 1) correctly identifying the reports being submitted, 2) reviewing the content of each report to determine if it contains the required information and if the source is in compliance with all applicable requirements, and 3) verifying that each report has been received by DES prior to the respective deadline.

Reports must include:

- The source's name
- The reporting period
- The report title
- A description of its contents
- The permit number
- The specific permit condition and/or permit item number requiring the report submittal.

The report should highlight problems, discrepancies, or any unexpected or unusual information or data that are listed in the report. All reports should be signed and dated by the owner or operator of the permitted facility. Non-Title V permitted sources should include a statement verifying the accuracy of the information contained in the report; for example, "I certify that the information contained in this report is true, accurate and complete." Title V-permitted sources **must include** in each report to DES and/or EPA a **certification of accuracy** statement. The requirement to include this statement is specified in 40 CFR 70.5(d). The specific language to be included in this certification statement is listed in the General Title V Operating Permit Conditions of the Title V permit. This statement must be signed and dated by the responsible official for the Title V source.

The **REPORTING DEADLINE** specified in a permit, NH Administrative Rule or statute for any reporting requirement is the **date by which the report must be received by DES,** either by mail, by electronic mail (with a paper copy to follow), or hand-delivered to DES. The deadline is NOT the date the report is to be placed in the mail for delivery to DES.

Upon receipt by DES, the report is stamped with the receipt date and entered into the Air database. Because DES receives hundreds of reports, it is critical that the report cover sheet or cover letter clearly identifies the report contents and the permit requirements that it is intended to fulfill.

DES strongly recommends that all sources use the Compliance Report Cover Sheet. Using this sheet will allow the ARD Compliance Bureau to accurately and efficiently document the receipt of the report. When using the Compliance Report Cover Sheet, it is very important to check all boxes that apply and label reports properly as follows:

1. Indicate each individual report submitted under the Compliance Report Cover Sheet by checking the respective cover sheet's box(es), either under "Original" or under "Revised/Re-Submitted."

2. Indicate clearly each attached report's title on the front of each report and match its title to the title of the corresponding report box checked on the Compliance Report Cover Sheet.

3. If individual reports are bundled into one package, each individual report title must be listed on the package cover and checked on the Compliance Report Cover Sheet. For example, a package that includes a combined annual emissions report, annual NOx report, and annual VOC report must have all three titles listed on the package cover and checked on the Compliance Report Cover Sheet.

The Compliance Report Cover Sheet lists the most commonly submitted state and federally-required reports. Any report not listed should be written in one of the spaces allocated to "Other Report Type" with the respective box checked.

Electronic Reporting

Except for the optional electronic 24-hour reporting of individual permit deviations, ARD currently requires submittal of all other reports in a hardcopy format that are signed and dated by the source's responsible official. However, as a supplement to the quarterly emissions reporting by those sources with CEM systems, ARD does allow and prefers the actual emissions data part of the report to be provided either in a spreadsheet sent as an email attachment or with the files saved to a compact data disc. This makes the emissions data easier for ARD to review. If the source is submitting hourly emissions data for a calendar quarter of operation, which is required for sources with emission limits that are averaged over periods shorter than a 24-hour period, it is easier for the source to submit this large amount of information electronically. Currently, ARD is developing procedures and processes for sources to submit and DES to handle other types of electronic data. Eventually, the goal is for sources to be able to move away from the submittal of paper reports entirely such that all required reporting, including permit applications, can be done electronically.