### Comprehensive Air Compliance Checklist

#### 1. ****General Information****

* Facility Name
* Facility Location
* Contact Information (Environmental Compliance Officer, Permit Manager)
* Permit Number (if applicable)
* Permit Duration and Expiration Date
* Facility Description
* Units of Interest

#### 2. ****Regulatory Framework****

* **Federal Regulations:**
  + **Clean Air Act (CAA)**
    - National Ambient Air Quality Standards (NAAQS)
      * 40 CFR 50
    - New Source Performance Standards (NSPS)
      * 40 CFR Part 60 (if applicable)
    - National Emission Standards for Hazardous Air Pollutants (NESHAP)
      * 40 CFR Part 63 (if applicable)
  + **~~Emergency Planning and Community Right-to-Know Act (EPCRA)~~**
    - ~~Toxic Release Inventory (TRI) Reporting (if applicable)~~
      * ~~40 CFR Part 372~~
  + **~~Resource Conservation and Recovery Act (RCRA)~~**
    - ~~Air Emission Standards for Hazardous Waste TSDFs~~
      * ~~40 CFR Part 264, Subparts AA, BB, and CC (if applicable)~~
* **New Mexico Regulations:**
  + New Mexico Administrative Code (NMAC) Title 20, Chapter 2 - Air Quality
    - **20.2.1 NMAC** - General Provisions
    - **20.2.3 NMAC** - Ambient Air Quality Standards
    - **20.2.7 NMAC** - Excess Emissions
    - **20.2.23 NMAC** - Fugitive Dust Control
    - **20.2.33 NMAC** - Gasoline Dispensing Facilities
    - **20.2.61 NMAC** - Smoke and Visible Emissions
    - **20.2.72 NMAC** - Construction Permits (for minor sources)
    - **20.2.73 NMAC** - Notice of Intent (NOI) for minor sources
    - **20.2.74 NMAC** - Permits – Prevention of Significant Deterioration (PSD)
    - **20.2.75 NMAC** - Construction Permit Fees

#### 3. ****Emission Sources Inventory****

* List all emission sources (e.g., boilers, furnaces, engines, tanks)
* Distinguish permitted and non-permitted sources
* Identify potential pollutants for each source (e.g., NOx, SO2, CO, VOCs, PM)
* Reference specific regulatory requirements for each source type

#### 4. ****Permitting Requirements****

* Verify if the facility requires a minor source construction or an operating permit
* Ensure all emission units are correctly listed and described in the permit
* Confirm emission limits for each source
* Document any special conditions or requirements for each permit
* Ensure compliance with
  + NMAC Title 20, Chapter 2, Part 72 (Construction Permits)
  + Part 73 (Notice of Intent)

#### 5. ****Monitoring and Recordkeeping****

* Outline required monitoring methods for each emission source
  + Periodic stack testing requirements
    - 40 CFR Part 60, Appendix A (if applicable)
  + Visual inspections and opacity monitoring
    - 40 CFR Part 60, Appendix A, Method 9
* Develop a recordkeeping system for monitoring data
  + Emission logs
  + Maintenance records
  + Calibration records for monitoring equipment

#### 6. ****Reporting Requirements****

* Identify all required reports and submission schedules
  + Annual compliance reports (if required by permit)
  + Excess emissions reports
    - 20.2.7 NMAC
  + Deviations and corrective action reports (as required)
* Ensure timely submission to the relevant authorities
  + New Mexico Environment Department (NMED)
  + U.S. Environmental Protection Agency (EPA) (if applicable)
* Maintain copies of all submitted reports

#### 7. ****Operational Control and Maintenance****

* Establish Standard Operating Procedures (SOPs) for each emission source
* Schedule regular maintenance for emission control equipment
  + Filters, scrubbers, catalysts, etc.
* Train staff on proper operation and maintenance procedures

#### 8. ****Compliance Assurance****

* Conduct regular internal audits and inspections
* Develop a corrective action plan for addressing non-compliance issues
* Maintain a compliance calendar to track due dates and submission schedules
* Ensure compliance with 20.2.72 NMAC for Construction
* Ensure compliance with 20.2.73 NMAC for Notice of Intent

#### 9. ****Training and Competency****

* Ensure staff are trained on regulatory requirements and compliance procedures
* Conduct periodic refresher training sessions
* Document training sessions and maintain records of attendance

#### 10. ****Public and Environmental Safety****

* Develop an Emergency Response Plan for accidental releases
  + EPCRA Section 304
* ~~Implement community right-to-know programs~~
  + ~~EPCRA Sections 311-312~~
* Ensure compliance with Risk Management Plan (RMP) requirements
  + 40 CFR Part 68 (if applicable)

#### 11. ****Documentation and Recordkeeping****

* Maintain an organized filing system for all compliance-related documents
* Ensure easy access to permits, reports, monitoring data, and inspection records
* Retain records for the required retention period (e.g., 5 years)

#### 12. ****Continuous Improvement****

* Periodically review and update the air compliance checklist
* Incorporate feedback from internal audits and inspections
* Stay updated on regulatory changes and adjust compliance strategies accordingly

Applicable Requirements

**Entire Facility**

* 20.2.1 NMAC General Provisions
* 20.2.3 NMAC Ambient Air Quality Standards
* 20.2.7 NMAC Excess Emissions
* [20.2.61 NMAC Smoke and Visible Emissions](https://www.srca.nm.gov/parts/title20/20.002.0061.html)
* [20.2.70 NMAC Operating Permits](https://www.srca.nm.gov/parts/title20/20.002.0070.html)
* 20.2.72 NMAC Construction Permit
* 20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements
* 20.2.74 NMAC Permits – Prevention of Significant Deterioration (PSD)
* 20.2.75 NMAC Construction Permit Fees
* 20.2.77 NMAC New Source Performance
* 20.2.82 NMAC MACT Standards for Source Categories of HAPS
* 40 CFR 50 National Ambient Air Quality Standards

**20.2.61 NMAC Smoke and Visible Emissions**

* 400 Area Process Boilers (1A, 1B, 1C, 1D),
* Diesel Engines (4-10),
* Process Flares (12A, 12B, 15), and
* Firing Range Generator (17)

**40 CFR 60, Subpart A, General Provisions**

* 400 Area Process Boilers (1A, 1B, 1C, 1D),
* Diesel Engines (4-10), and
* Firing Range Generator (17)

**40 CFR 60, Subpart Dc**

* 400 Area Process Boilers (1A, 1B, 1C, 1D)

**40 CFR 60, Subpart IIII**

* Diesel Engines (4-10)
* Firing Range Generator (17)

**40 CFR 63, Subpart A, General Provisions**

* Diesel Engines (4-10)
* Firing Range Generator (17)

**40 CFR 63, Subpart ZZZZ**

* Diesel Engines (4-10)
* Firing Range Generator (17)

**20.2.77 NMAC New Source Performance**

* Units subject to 40 CFR 60

**20.2.82 NMAC MACT Standards for Source Categories of HAPS**

* Units subject to 40 CFR 63

Applicable Requirements

**Entire Facility**

* 20.2.1 NMAC General Provisions
* 20.2.3 NMAC Ambient Air Quality Standards
* 20.2.7 NMAC Excess Emissions
* [20.2.61 NMAC Smoke and Visible Emissions](https://www.srca.nm.gov/parts/title20/20.002.0061.html)
* [20.2.70 NMAC Operating Permits](https://www.srca.nm.gov/parts/title20/20.002.0070.html)
* 20.2.72 NMAC Construction Permit
* 20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements
* 20.2.74 NMAC Permits – Prevention of Significant Deterioration (PSD)
* 20.2.75 NMAC Construction Permit Fees
* 20.2.77 NMAC New Source Performance
* 20.2.82 NMAC MACT Standards for Source Categories of HAPS
* 40 CFR 50 National Ambient Air Quality Standards

**20.2.61 NMAC Smoke and Visible Emissions**

* 400 Area Process Boilers (1A, 1B, 1C, 1D),
* Diesel Engines (4-10),
* Process Flares (12A, 12B, 15), and
* Firing Range Generator (17)

**40 CFR 60, Subpart A, General Provisions**

* 400 Area Process Boilers (1A, 1B, 1C, 1D),
* Diesel Engines (4-10), and
* Firing Range Generator (17)

**40 CFR 60, Subpart Dc**

* 400 Area Process Boilers (1A, 1B, 1C, 1D)

**40 CFR 60, Subpart IIII**

* Diesel Engines (4-10)
* Firing Range Generator (17)

**40 CFR 63, Subpart A, General Provisions**

* Diesel Engines (4-10)
* Firing Range Generator (17)

**40 CFR 63, Subpart ZZZZ** - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

* Diesel Engines (4-10)
* Firing Range Generator (17)

**20.2.77 NMAC New Source Performance**

* Units subject to 40 CFR 60

**20.2.82 NMAC MACT Standards for Source Categories of HAPS**

* Units subject to 40 CFR 63