

*Instructions Related to*  
**Deviation Reporting**  
**Under the Operating Permits Program in Texas**

**Texas Natural Resource Conservation Commission**

**PURPOSE**

These instructions are intended to provide guidance related to the reporting of deviations for sources permitted under the Federal Operating Permit program (Title V) in Texas.

Where to Find It

General guidance on deviations as well as specific guidance using form DevRpt are as follows:

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*Special Note: References to Chapter 122 in this document refer to 30 TAC 122 with an effective date of November 1997.*

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This section provides basic background on deviations and deviation reporting.

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## **BACKGROUND**

### **What is Deviation Reporting?**

Deviation reporting is simply ‘minimum required reporting’ under the Operating Permits Program. This reporting requirement came into existence with the Operating Permits program and is required regardless of any reporting requirements that currently exist in the various federally enforceable rules.

The goal of deviation reporting is to allow the company, citizens, and the regulatory agencies to know when situations that potentially indicate noncompliance occur and what was done to solve those situations. This knowledge should result in improvement towards continuous compliance with all requirements at the site.

Deviation reporting does not alter or eliminate any existing reporting requirements; however, many existing reports, if slightly modified, can be used to satisfy both their original reporting duty and the new deviation reporting requirements. Deviation reports, unlike many existing reports, are required to be submitted at least semiannually.

Deviation reports are only required to be submitted when a federally enforceable term or condition of the federal operating permit may not have been complied with. Those terms and conditions can be either emission limits or other procedural requirements. *Deviation Reporting is not required for terms and conditions marked ‘state enforceable only’ in the permit. If it is not federally enforceable, it is not subject to deviation reporting as defined in 30 TAC 122..*

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### **Deviation Definition**

A deviation is defined in 30 TAC §122.10(3) as:

“Any indication of noncompliance with a term or condition of the [Federal Operating] permit, as found using, at a minimum, compliance method data from monitoring, record keeping, reporting, or testing required by the permit.”

The requirements for deviation reporting have their roots in the Federal Clean Air Act Amendments of 1990 (FCAAA), Section 504(a) and (b). These federal requirements are implemented by EPA in 40 CFR70.6(3)(iii)(A) and (B), and are reflected in state rule 30 TAC 122.145(2).

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### **Relationship of Deviation Reporting to Other Reporting**

This section describes how deviation reporting is related to other reporting.

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### **Deviation Reporting and Annual Compliance**

All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification. As a result of this, there is a very large overlap between the information required under deviation reporting and that required for compliance

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Certifications

certifications. The information required for both is described in the section of this document entitled 'What Must be Reported'. As a result of this overlap of required information, the company may find it simpler to certify compliance concurrent with deviation reporting on a semiannual or quarterly basis.

Deviation Reporting and Annual Compliance Certifications(*Con't*)

The requirements related to annual compliance certification can be found in 30 TAC §122.146 and are the subject of the TNRCC guidance document related to Annual (Permit) Compliance Certification.

Deviation Reporting as Related to Existing Reporting

There are a very large number of existing reporting requirements found in the rules that already require a company to indicate when specific rule requirements may not have been met. These reports, provided three additional obligations are met, can very likely be used to satisfy the deviation reporting requirements of the Operating Permits program. These three additional obligations are:

- The report must clearly identify which Operating Permit is involved.
- The report must contain at a minimum the information as described below in the 'What Must be Reported' section of this document.
- When submitted to fulfill the Deviation Reporting requirements, the report must be Certified by the Responsible Official.

Provided they are modified to meet the stated criteria, the following are examples of existing reporting that could be used to fulfill the deviation reporting obligation:

- Existing Upset/Maintenance reporting (when the upset/maintenance emissions are governed by federally enforceable emission limits that are part of an operating permit).
- Existing NSPS (40 CFR60), NESHAPS (40 CFR 61), or MACT standard (40 CFR 63) required reporting.
- Reporting required in the relevant portions of a PSD permit.

Note that these examples are not an exhaustive list of potential reports that could be used.

**Report Requirements**

This section identifies how to determine what should be in the report and information on report submittal requirements themselves.

What Terms and Conditions of the Permit are subject to deviation reporting?

Each and every federally enforceable requirement of the permit is subject to deviation reporting. The requirement applies equally for sites permitted using either a Site Operating Permit (SOP) or a General Operating Permit (GOP) or both.

For an area permitted using a Site Operating Permit (SOP), any federally enforceable requirement found in any portion of the issued permit (unless otherwise indicated in the permit), including:

- General Provisions: e.g., the requirement to keep records for five years or any other requirement under 30 TAC 122.143.
- Special Conditions: e.g., sitewide requirements such as visible emission limitations under 30 TAC 111.

What Terms and Conditions of the Permit are subject to deviation reporting?(*Con't*)

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- Emission Unit Specific requirements: e.g., any reference to a requirement in Attachment A such as a reference for a boiler governed by NSPS Db emission limits on SO<sub>2</sub> together with its associate monitoring, recordkeeping, testing and reporting requirements.
  - Any federally enforceable requirement found in any other attachment to the permit. Requirements marked 'State Only' or 'State Enforceable Only' are not subject to deviation reporting.

For an area permitted using a General Operating Permit (GOP), any requirement found in any portion of the GOP rule under which the applicant has been issued the authority to operate, including:

- Qualifying Criteria: e.g., any portion of paragraph (a) of the relevant rule, such as 30 TAC 122.511(a)(8) which reads: " Emission units in marine terminal loading and unloading operations are not authorized to operate under this General Operating Permit."
- General Provisions: e.g., any portion of paragraph (b) of the relevant rule, such as 30 TAC 122.511(b)(2) which reads: "The owner or operator shall comply with the conditions listed in §122.143 of this title (relating to Permit Conditions)." This means that every element of 122.143 is also a requirement of the GOP.
- Permit Tables: e.g., any portion of paragraph (c) of the relevant rule that applies at the site. For example, if an application for a GOP includes a GOP index number linking a stationary gas turbine with a specific requirement found in 40 CFR 60 Subpart GG (Stationary Gas Turbine requirements), then each requirement associated with that GOP index number is a term of the permit for that gas turbine.

What Must be Reported?

For each individual requirement of the permit that was deviated from, the following minimum information must be reported:

- Identification of the relevant term or condition of the permit.
- Each instance of deviation (e.g., when it began, when it ended).
- What caused the deviation and what was done to correct the problem.

The Deviation Report that contains all instances of deviations for the reporting period must be certified by the Responsible Official (*30 TAC 122.165*).

It should be noted that the Annual Compliance Certification requirements found in 30 TAC 122.146(5) require the following additional information related to deviations:

- Identification of the monitoring method used to assess compliance.
- Identification of the frequency that compliance assessments must be made.
- Identification of the total number of deviations that were experienced over the compliance certification period for each term or condition of the permit for which deviations were experienced.

What Must be Reported? (*con't*)

The inclusion of these data elements in the deviation reports will significantly simplify fulfilling the annual compliance certification requirements; therefore, it is recommended that those elements be included in the report as they are in the suggested deviation report form, DevRpt.

What Form Should be Used to Report Deviations?

It is the permit holders choice:

- If an existing report can be modified slightly so that it contains the information required for deviation reports, then the existing report should be modified and used.
- If an existing requirement does not have a specified reporting format, then form DevRpt should be used. Note that form DevRpt contains all the data elements that should be included on a deviation report.
- Permit holders are free to create their own report forms. Those report forms must contain the information required for form DevRpt, described below.

When and Where are Reports Required to be Submitted?

Deviation reports are required to be submitted at least semiannually to the appropriate TNRCC regional office or local program. The reports need not be submitted to the Environmental Protection Agency (EPA) unless specifically directed to by the permit or other requirement.

Many existing reporting requirements call for quarterly or annual reporting. These existing reports, modified as required as to content (as described above), can be used to report deviations provided they are submitted no less frequently than semiannually.

Reports must be:

- *Submitted to* the 'Air Section Manager' of the appropriate regional office of the TNRCC. Note that the rule technically requires the reports be addressed to the Executive Director. Practically, the report should be addressed to the Executive Director, in care of the Air Section Manager and should be mailed to proper regional office. (*see 30 TAC 122.145(2)(A)*)
- *Submitted at least semiannually*, unless a specific applicable requirement requires more frequent reporting (*see 30 TAC 122.145(2)(B)*); and,
- *Submitted within 30 days* of the end of the reporting period, (*see 30 TAC §122.145(2)(C)*).

In addition, all reports must be:

- *Certified* by a Responsible Official in accordance with the requirements of 30 TAC §122.165 (see 30 TAC 122.165(a)(7)). (Note: Form OP-CRO1 is used for this purpose).

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No Deviations= No  
Deviation Report  
Required

Deviation reporting is based on individual permit terms and conditions. If no deviations have occurred over the entire reporting period for a given permit term or condition, then no deviation report is required to be submitted for that reporting period for that term or condition.

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**USING FORM  
'DEV RPT'**

This section provides specific instructions on reporting deviations using form DevRpt.

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Form 'DevRpt'  
Defined

Form DevRpt is a means to report deviations from federal operating permit terms and conditions, as required under 30 TAC §122.145(2). It is primarily used where existing reporting requirements do not meet minimum standards required under the operating permits program.

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Form DevRpt  
Description

Form DevRpt is comprised of:

- **Identification Block.**  
This block occurs at the top of each page of the report, and contains relevant information to identify the source, permit, and certification period, and certification report date.
- **Operating Permit Requirement for Which Deviations are Being Reported Block.**  
This section allows the permit term or condition for which deviations have been experienced to be identified. It also contains two pieces of monitoring information that will prove useful when completing the annual compliance certification.
- **Details of Deviations from Above Referenced Requirement Block**  
This block provides space to describe the details of each deviation event. The 'Grand Total Number of Deviations' field captures required information for the annual compliance certification requirements.

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A Note on  
Identifying Terms  
and Conditions of the  
Permit.

As stated previously, a site can be permitted using either a Site Operating Permit (SOP) or a General Operating Permit(GOP) or a combination of the two.

Sources permitted under a SOP can rely on the SOP document to contain all the information that will be needed to identify emission units and applicable requirements related to deviation reporting. In general, all relevant information can be found in Attachment A of the SOP and in the 'Special Terms and Conditions' section of the SOP.

Sources permitted under a GOP must reference the GOP application, the appropriate GOP rule, and the appropriate GOP grant letter to find all the information that will be needed to identify emission units and applicable requirements related to deviation reporting. In general, most

requirements will be found in the GOP application together with the GOP rule tables (Section (c) of each GOP rule). These are analogous to 'Attachment A' of an SOP. Section (b) of each GOP rule contains requirements similar in nature to those found in the 'Special Terms and Conditions' section of an SOP, and will contain some of the information that will be needed to complete a deviation report. For example, emission units with unit specific requirements and GOP index numbers are found in the GOP application. To link these emission units with unit specific applicable requirements, one must refer to both the GOP permit application and the appropriate GOP rule tables.

**Form DevRpt  
Data Elements**

The following tables list all the elements found in form DevRpt. Note that the 'Name' column of the following table contains the name of the element found in the form. The elements in the table are listed in the order that they appear in the form. *Unless otherwise specifically noted as optional, all fields on the form are required where relevant and must be completed.*

Form DevRpt  
Report Identification  
Data Elements

<b>Report Information</b>	
<b>Name</b>	<b>Description of Data Element</b>
Company Name	Company name, as listed in the SOP or GOP Grant Letter.
Account No.	The TNRCC air account number for the site, as listed in the SOP or GOP Grant Letter. (e.g., AB-0001-C)
Area Name	Area or Site name, as listed in the SOP or GOP Grant Letter.
Operating Permit No.	The operating permit number, as listed in the SOP or GOP Grant Letter. (e.g., O-00012)
Report Period Began on	Date Deviation Report period began. (Format: <i>mm/dd/yyyy</i> )
And Ended on	Date Deviation Report period ended. (Format: <i>mm/dd/yyyy</i> )
Report Submittal Date	Date Deviation Report submitted. (Format: <i>mm/dd/yyyy</i> )

Form DevRpt  
Requirement  
Identification Data  
Elements

<b>Permit Requirement Identification</b>	
<b>Name</b>	<b>Description Of Element</b>
ID Number Unit ID	Enter the identification number for the emission unit. In most cases, the Unit ID number is listed in the SOP or in the GOP application. In some cases the

Permit Requirement Identification	
Name	Description Of Element
ID Number Group ID	Enter the identification number for the group or process, as listed in the SOP or GOP Permit Application. In the case where no group or process name exists, use N/A. (format: <i>14 characters, max</i> )

Form DevRpt  
Requirement  
Identification Data  
Elements (*Con't*)

Requirement Identification	
Name	Description of Data Element
Permit Provision No.	Some terms and conditions of the permit will occur not in an Attachment to the SOP, but rather in as a series of paragraphs in the Special or General Terms and Conditions section of the SOP. If this is so, enter the provision number for the applicable regulatory requirement as listed in the SOP. Put N/A if the citation is part of an Attachment section of the SOP. GOP permitted sites always put N/A for this element.
Pollutant	Enter the pollutant that is the subject of the applicable requirement shown in the permit, as listed in the SOP or GOP Application and associated GOP rule tables. (e.g., NO <sub>x</sub> , SO <sub>2</sub> , etc). If not applicable, use N/A.
Regulatory Requirement( citation rq'd, if applicable)	Enter the citation of the applicable rule, as listed in the SOP or in the appropriate GOP rule table (e.g., 60.453(a)(1); 30 TAC 115.115(b)). Some SOP special terms and conditions also include regulatory citations. If this is true, enter the citation here. GOP permitted sites will have to use the GOP Application to find the GOP index number associated with the emission unit, and then use the GOP index number to arrive at the appropriate requirement listed in the GOP rule tables. In addition, some GOP requirements are contained in Section (b) of the GOP rule. In these cases, list the citation of the relevant part of the GOP rule. (e.g, 122.511(b)(4)). <i>Note: Some permit requirements reference multiple citations. In this case, simply include the first of the citations that are relevant.</i>
Type of Requirement (Rq'd)	Use the following entries, as appropriate: <b>Standard:</b> When the requirement is an emission limit or standard <b>Monitor:</b> When the requirement is monitoring <b>Test:</b> When the requirement is testing <b>Record:</b> When the requirement is recordkeeping <b>Report:</b> When the requirement is reporting.

Requirement Identification	
Name	Description of Data Element
SOP or GOP Index Number (may be known as OP-SCN)	Enter the value from either the issued SOP permit or the GOP permit application as appropriate. This is not a required field, but it makes very clear which requirement of the permit is at issue, and thus its inclusion is encouraged. If not applicable, use N/A. This might be referred to as the OP-SCN in permits issued in 1997 and early 1998.
Monitoring Requirement Citation	This information is only required if referencing the deviation report in the annual compliance certification. Use the rule citation identified the monitoring that is required. This citation can be found in the Permit (for a SOP permitted source) or in the applicable rules tables of a GOP permitted source. If there are multiple regulatory citations involved in the monitoring method, use the first of the series. If no monitoring method is included in the permit, use "Undefined". If a method other than that specified in the permit is used to assess compliance, put 'Other' here, and describe the method used in the 'cause of deviation' field. If not applicable, use N/A.

Form DevRpt  
Deviation Details  
Data Elements

Deviation Details	
Name	Description of Data Element
Monitoring Requirement Frequency	This information is only required if referencing the deviation report in the annual compliance certification. Indicate the frequency of assessing compliance required by the permit. The frequency might be 'Hourly', 'Every 3 Hours', 'Daily', etc. If the frequency is undefined by the rule, use "Undefined" here. If not applicable, use N/A.
Event No.	This number is assigned by the company and is optional. Event numbers are helpful when deviations experienced by multiple emission units were all caused by a single event. It can also be used when a single event caused multiple deviations to occur at a single emission unit. (Maximum 6 digit integer)
Deviation Period Start Date, Time	Enter the date (format: <i>mm/dd/yyyy</i> ) and time (format: <i>hh:mm; 24 hr clock</i> ) the deviation started.
Deviation Period End Date	Enter the date (format: <i>mm/dd/yyyy</i> ) and time (format: <i>hh:mm; 24 hr clock</i> ) the deviation ended.

Deviation Details	
Name	Description of Data Element
# of Devs	Provide the total number of deviations that occurred between the start and end date/times. The start date/time-end date/time (elapsed time) should be time that the source was in a state of deviation (either continuously or intermittently) from the permit requirement for the same cause that was remedied with the same corrective action. Consult the monitoring requirements to determine the averaging period for deviations from emission limits and standards. Count deviations from procedural requirements (e.g., recordkeeping or reporting) based on the number of times the activity was required to be performed but was not. For example, if a report was required to be submitted each month, but two months' submittals were missed, then that constitutes 2 deviations regardless of when the reports were finally submitted. This data element will be required for annual compliance certification.
Cause of Deviation	Provide a brief description of the cause of the deviation. (format: 80 characters)
Corrective Action Taken	Provide a brief description of the corrective action taken to end the deviation or to avoid future similar events. (format: 80 characters)
Total Deviations	This is the total for <i>this cited requirement for this reporting period</i> , not for just the single page. Therefore; if you have a list of deviations that extend to multiple pages, then provide this total at the end of the last page. This will provide required information when completing the annual compliance certification requirements.

**EXAMPLE REPORTS**

This section of the instructions provides examples of how deviations could be documented using form DevRpt.

**Please Note:** *The example deviations are provided to illustrate the reporting procedure only and do not exhaust all possible types of deviations. In addition, the site used in the example does not exist. Deviations reported at an actual site will be different, but the method would be similar.*

The example reports can be seen beginning on Page 11.

Description of Example Deviation Reports

ABC Tech. (TNRCC Air account number HG-1234-A) has been operating their West Location Site, an oil and gas processing facility, for 15 years in Harris county, a county designated as non-attainment area for ozone. The company applied for an Operating Permit in early 1997. Operating Permit number O-1234 was issued by the TNRCC on June 12, 1997 and the site has been operating under this authority for approximately twelve months. The site contains 35 emission units.

Over the course of year, the company experienced some deviations from their permit requirements. Most of the deviations were from permit emission limits or standards, while a few of the deviations were from procedural requirements of the permit.

The company submitted two reports in January of 1998 and a third in July of 1998. The situations described in these three reports are:

- 1) A deviation report submitted in 1/1998 covering the first semiannual period for Tank 1 chapter 115 requirements. The situation here was that the tanks are to be sealed at all times except when sampling. The rule requires that each tank be inspected daily for proper closure. Apparently various people failed to close the hatch at various times over the six month period, as each day, the supervisor found the hatch standing open. Each day the supervisor found the hatch open was listed as a deviation in this report.
- 2) A deviation report submitted for the first semiannual period for Tank 3 chapter 115 requirements. Again, deviations from the requirement to have vapor tight tanks was experienced. Because these tanks were different from Tank 1, it has its' own deviation report.
- 3) The third deviation report identifies a situation where a Method 9 visible emissions observation was required to be conducted daily against a grandfathered unit but was not conducted for 118 days due to employee turnover.

## Texas Operating Permit Deviation Reporting Form

<b>Company Name</b>		ABC Tech			<b>Account No.</b>		HG-0123-A	
<b>Area Name</b>		West Location			<b>Operating Permit No.</b>		O-01234	
<b>Report Period Began on</b>		06/12/1997	<b>And Ended on</b>		12/11/1997	<b>Report Submittal Date</b>		01/07/1998
<b>Operating Permit Requirement for Which Deviations are Being Reported</b>								
<b>ID Number (Rq'd if Applicable)</b>		<b>Permit Provision No. (Rq'd If Applicable)</b>	<b>Pollutant (Rq'd if Applicable)</b>	<b>Regulatory Requirement (Citation Rq'd if Applicable)</b>	<b>Type of Requirement (Rq'd)</b>	<b>SOP or GOP Index Number (See Instructions)</b>	<b>Monitoring Requirements (Rq'd as Applicable)</b>	
<b>Unit ID</b>	<b>Group ID</b>						<b>Citation</b>	<b>Frequency</b>
Tank1	Tanks		VOC	115.112(a)(1)	Standard	A	115.117(a)	daily

<b>Details of Deviations from Above Referenced Requirement</b>							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	08/12/1997	11:00	08/15/1997	13:00	5	Observation hatch left open by driver	Hatch closed by supervisor.
	08/17/1997	08:00	08/21/1997	15:00	5	Observation hatch left open by driver	Hatch closed by supervisor.
	09/05/1997	09:00	09/06/1997	10:00	2	Observation hatch left open by driver	Hatch closed by supervisor. Staff reminded of procedures.
	09/11/1997	15:00	09/12/1997	08:00	2	Observation hatch left open by driver	Hatch closed by supervisor.
	09/25/1997	06:00	09/27/1997	14:00	3	Observation hatch left open by driver	Hatch closed by supervisor. New written procedures created. Staff trained in new procedures.
<b>Total Deviations:</b>					17		

## Texas Operating Permit Deviation Reporting Form

<b>Company Name</b>		ABC Tech				<b>Account No.</b>		HG-0123-A		
<b>Area Name</b>		West Location				<b>Operating Permit No.</b>		O-01234		
<b>Report Period Began on</b>		06/12/1997		<b>And Ended on</b>		12/11/1997		<b>Report Submittal Date</b>		01/07/1998
<b>Operating Permit Requirement for Which Deviations are Being Reported</b>										
<b>ID Number (Rq'd if Applicable)</b>		<b>Permit Provision No. (Rq'd If Applicable)</b>	<b>Pollutant (Rq'd if Applicable)</b>	<b>Regulatory Requirement (Citation Rq'd if Applicable)</b>	<b>Type of Requirement (Rq'd)</b>	<b>SOP or GOP Index Number (See Instructions)</b>	<b>Monitoring Requirements (Rq'd as Applicable)</b>			
<b>Unit ID</b>	<b>Group ID</b>						<b>Citation</b>		<b>Frequency</b>	
Tank3	Tanks		VOC	115.112(a)(1)	Standard	A	115.117(a)		daily	

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event No. (Optiona l)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
	Start		End							
	Date	Time	Date	Time						
	10/01/1997	08:00	10/02/1997	09:00	2	Hatch left open after sampling	Hatch closed by supervisor			
<b>Total Deviations:</b>					2					

## Texas Operating Permit Deviation Reporting Form

<b>Company Name</b>	ABC Tech			<b>Account No.</b>	HG-0123-A
<b>Area Name</b>	West Location			<b>Operating Permit No.</b>	O-01234
<b>Report Period Began on</b>	12/12/1997	<b>And Ended on</b>	06/11/1998	<b>Report Submittal Date</b>	07/01/1998

### Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Boiler1	GRPBLR	2a	Opacity	111.111(a)(1)(F)	Monitor		Undefined	Daily

### Details of Deviations from Above Referenced Requirement

(Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optiona l)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	02/01/1998		05/30/1998		118	Certified opacity reader quit	Obtained training for new opacity reader
<b>Total Deviations:</b>					118		