



## On-site Implementation Log

The Bureau of Air Quality (BAQ) allows facilities to make certain changes that do not require a construction permit—as long as they follow the rules in their permit. The On-site Implementation Log (OSIL) helps track these changes and ensures compliance with air quality standards. This fact sheet is being provided to give facilities a brief overview of the Bureau of Air Quality's On-site Implementation Log (OSIL) requirements. For a complete discussion on the OSIL refer to [Simplifying the Air Permitting Process: OSIL](#).

### What is an OSIL?

An OSIL is a record kept at a facility (either on paper or electronically) to track minor changes made under the air operating permit's flexibility rules, without needing a construction permit. The OSIL should be kept with the facility's air quality permit, made available to the regional air evaluators during routine air quality inspections and submitted to the Department as required by the permit or requested by the Agency. Note that if a change is made that doesn't meet the requirements of an OSIL a construction permit maybe needed.

### Whom has an OSIL?

Facilities that are issued a lifetime operating permit have OSIL conditions within their operating permit. A lifetime operating permit is a permit that does not have an expiration date. In very rare instances a non-lifetime permit may also have an OSIL.

### What Should Be Recorded in the OSIL?

A facility should document each change made as allowed by the OSIL condition. Documentation needs to include a short description of the change, new equipment being installed and/or existing equipment being removed (along with Equipment ID's if applicable), date the change occurred, emission calculations, a demonstration that no new regulations, standards or requirements were triggered, a demonstration that the activity did not result in a change in any existing permit term, condition or limit, a demonstration that the change didn't cause an exceedance of a limit; and did not result in a need for a new permit term, condition or limit. A facility installing an emergency generator should document installation and start up dates, rated capacity of the engine, and regulatory applicability\*.

Note: An Excel spreadsheet including instructions, examples, and templates can be found at [OSIL Log Template.xlsx](#).

### Annual Facility Review

By January 31 of each year, review the facility's equipment, processes, and materials from the previous calendar year to ensure that all changes are documented. If no changes occurred during the prior year, document that no changes occurred in the review. The annual facility review is to be kept on-site.

Example: The annual review for calendar year 2024 should be completed no later than January 31, 2025.

### Reporting to the Department

Most permits require the OSIL to be submitted to the BAQ every 5 years. This OSIL submission and due date will appear within the facility's "Upcoming" list of reports on the facility's ePermitting Dashboard page.

Note: A facility's OSIL reporting period may not match the calendar year. For example, if a permit became effective on July 1, 2024, the first OSIL report is due by July 31, 2029.

\*Emergency generators are potentially subject to New Source Performance Standards Subpart IIII or JIII, or Maximum Achievable Control Technology Subpart ZZZZ. Additional information can be found at ([Compliance Requirements for Stationary Engines | US EPA](#)).