**A. GENERAL INFORMATION**

**1. INTRODUCTION**

This package provides general information and guidance for the owners/operators of stationary major sources to prepare and submit a complete application for an Air Quality Permit pursuant to 40 CFR 70 and OAC 252:100-8, which are referred to as Title V. Please read the information and instructions in this Permit Application Guide carefully and follow accordingly.

The Clean Air Act Amendments of 1990 (CAAA90) is a federal statute subdivided into various titles. Among these titles is Title V - Operating Permits. EPA promulgated rules pursuant to Title V in 40 CFR Part 70 which set out requirements to states implementing Title V permit programs. Oklahoma’s companion rules, OAC 252:100-8, detail Oklahoma’s major source operating permit program. The term “Title V” is used throughout this document to denote Oklahoma’s Major Source Operating Permit Program. The effective date of Oklahoma’s Title V program is March 6, 1996. Applications must be submitted according to the schedule established in OAC 252:100-8-5(b)(2)(A) which is included in Part D of this application guide.

This guide contains four parts. Part A “General Information” discusses application concepts, requirements, and procedures for Title V permits. Part B “Instructions for Parts” details instructions for completing the application parts. Part C “Blank Parts” contains several parts necessary to complete the permit application. Part D “Useful Information” contains several lists which may assist the applicant in preparing the Title V application. For multiple citations, units, or compliance demonstrations, copies of appropriate parts may be made as needed. Each application must be submitted with three (3) originally signed hard copies and an optional 3.5” diskette.

Efforts have been made to cite certain examples to clarify specific items and/or scenarios. It is assumed the applicant is aware of the fundamentals of Title V air permitting requirements or at least has access to sources of information. Additional assistance may be obtained from the Oklahoma Department of Environmental Quality (DEQ), Customer Service Division, at 1-800-869-1400.

**2. OBJECTIVE**

The purpose of the Title V operating permit program is to implement and enforce regulations mandated by CAAA90 and 40 CFR Part 70. These regulations define required minimum elements for State Operating Permit Programs and corresponding standards and procedures for EPA approval, oversight, and withdrawal of approval of these programs. Each Title V permit will address all applicable air contaminant emissions and regulatory requirements in a single document.

**3. KEY TERMS AND WORDS**

For clarification, some key terms and words used in this guide have been provided below. Detailed explanations and definitions of key words are found in OAC 252:100-8-2, others in Part D (glossary).

**Key terms**

**"Compliance"** - the act or method of proving how regulations will be observed.

**"Facility"** - the aggregation of all emissions units on property under common ownership within one fourth mile of each other, see OAC 252:100-1-3 Major Source (major emitting facility).

**"Limits" -** the operational limitations controlling emissions which can be verified by periodic testing, monitoring, recordkeeping, etc.

**"Source" -** any stationary source of Air Pollutants.

**"Unit"** - any equipment emitting one or more criteria or hazardous air pollutant.

**"Applicability Determination" (AD) -** a determination by the Agency of whether the facility is subject to Title V based on submitted information and the $100 fee.

**Key words**

Affected Source, Applicable Requirement, Emissions Unit, Fugitive Emissions, Major Source, Permit, Regulated Air Pollutants, responsible official, Stationary Source.

**4. DETERMINING PROGRAM APPLICABILITY**

DEQ’s Air Quality Division (AQD) regulations (OAC 252:100-8) require major sources and certain source-specific sites to obtain operating permits. An applicability outline is provided in Part D (Useful Information) to determine whether or not a Title V operating permit is required.

**5. SOURCES REQUIRING FUGITIVE EMISSIONS**

Sources which must count fugitive emissions for major source determination are identified under the above section in Part D.

**6. GENERAL CONCEPTS OF THE TITLE V PERMITTING PROGRAM**

The Title V operating permit program is based on state and federal regulations requiring the owner/operator to demonstrate compliance with all “applicable requirements.” No new limits or standards are imposed as a result of the Title V operating permit program. Emissions limits and standards are considered applicable, nonapplicable, or exempt depending on the nature of the facility’s “emissions units” and “operating scenarios.” These important concepts and others are explained below.

**6.1 Applicable Requirements**

Based on facility specific information, existing Air Quality rules may or may not apply. For example, a gas turbine may be subject to NSPS Subpart GG as an applicable requirement for that facility. However, the Kraft pulp mill rule found in NSPS Subpart BB is not an applicable requirement for a gas turbine. Some requirements may not apply due to date of construction, use, or size; however, this must be confirmed by considering specific standards of the requirements. See worksheets in Part D.

Some rules apply to all facilities. An example of this is Excess Emissions and Malfunction Reporting Requirements required by OAC 252:100-9. In the permit application, the owner/operator needs to identify all applicable and nonapplicable requirements for each operation. There are three reasons for this:

(i) The applicable requirements constitute the skeleton of the Title V permit. The full range of applicable requirements must be reflective of actual operations at the facility and must be identified in the permit application so that DEQ has adequate information to correctly process and issue the permit.

(ii) If the owner/operator identifies all applicable and nonapplicable requirements and submits a timely and administratively complete application as per OAC 252:100-8-5(b)(8), DEQ may grant a permit shield. If the Agency concurs with the applicable and nonapplicable requirements, it may include a provision in the permit stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirement.

(iii) At least annually, permitted facilities are required to certify compliance with all applicable requirements. The means of compliance demonstration will be established in the permit based on the applicable requirements identified in the permit application. Therefore, the owner/operator must comprehensively and accurately identify all applicable requirements to ensure that the facility’s compliance demonstration is appropriate and complete.

**6.2 Operating Scenarios**

An operating scenario is a unique combination of conditions, including equipment configurations and process parameters, under which a facility operates at any given time. For example, at any given point in time, a particleboard manufacturer may have the following pieces of equipment in operation: predryer, boiler, dry dryer, pressline, saws, reject lines, and similar equipment. These pieces of equipment, operated in combination, trigger a series of applicable requirements and emit certain regulated air pollutants.

To obtain a Title V operating permit for these activities, the owner/operator must describe the equipment and processes, the applicable requirements, and the emitted pollutants in the permit application. This description becomes the base operating scenario as defined in PART 3 (Facility Description). The description of the base operating scenario should encompass the wide range of equipment configurations and processes used at the facility. The owner/operator may be able to depict the base operating scenario sufficiently to avoid defining “alternative operating scenarios” as described above.

If the owner/operator uses equipment or operates processes in a manner which changes the way compliance must be demonstrated or causes different pollutants to be emitted, then alternative operating scenarios must be identified and described in additional PARTs 3 and 5. Scenarios allowed in the permit may be implemented without notifying AQD.

For example, alternative operating scenarios may be needed when different applicable requirements are triggered (e.g., a boiler may be subject to NSPS when burning coal but exempt when burning natural gas) and when different pollutants are emitted (e.g., a process that uses different solvents in which one requires emissions control and the other does not).

**6.3 Emissions Unit Group**

The Title V permit program requires that the applicant identify applicable regulations for each emissions unit in the permit application. Each facility may have one or more emissions units (see Definitions OAC 252:100-8-2). Emissions units may be combined into an emissions unit group (EUG) only if they meet all of the following criteria:

(i) Emit the same regulated air pollutant(s)

(ii) Trigger the same applicable requirements

(iii) Share the same compliance demonstration method

(iv) Share the same proposed compliance assurance certification

Thus, in grouping equipment and processes into an EUG, the owner/operator must consider how compliance will be demonstrated for the equipment and processes and how the emissions will be quantified. The owner/operator may divide the processes into smaller EUGs. For example, two identical compressors could be treated as either one or two EUGs depending on the configuration that provides the facility necessary operating flexibility.

**6.4 Facility-wide Emissions Unit Group**

Each facility’s applicable requirements include those that apply across the facility as well as to specific EUGs. Some of these requirements apply to the facility but not specifically to any EUG, such as the fugitive dust requirement defined in OAC 252:100-29. Other applicable requirements may apply to all EUGs and share the same compliance demonstration method. For these facility-wide requirements, a facility-wide EUG should be used to name specific EUGs on PART 3 and to identify applicable requirements, to demonstrate current compliance status, and to propose future compliance assurance measures on PART 5.

**6.5 Compliance Status Determination Method**

As part of the Title V operating permit application, the owner/operator must determine and certify the compliance status of the facility with all applicable requirements. In order for AQD to evaluate this compliance determination, the owner/operator must indicate the methods used to make the current (at the time of application) compliance status determinations and also must provide appropriate supporting documentation and calculations. The methods used for compliance status determination in the permit application may or may not be the same as the methods proposed for compliance assurance in the permit.

**6.6 Proposed Compliance Assurance** **Methods**

The Title V permit issued by DEQ must include future compliance assurance methods. In order to ensure proper designation of emissions units by DEQ, the owner/operator must propose compliance assurance measures (e.g. monitoring, recordkeeping, and operating procedures). Although the same approaches and methods may often be utilized, the proposed compliance assurance serves a different function than the compliance status determination method discussed above. DEQ reserves the right to modify the proposed compliance assurance requirements as needed.

**6.7 Modeling**

Compliance with OAC 252:100-31 and 41 may be demonstrated by means other than modeling; however, AQD may require the facility to submit modeling on a case-by-case basis to demonstrate compliance.

**6.8 Emissions Inventory**

The quantification and justification of emissions information is required according to OAC 252:100-8-5(d)(3). The annual Turn-Around Document may or may not fulfill this requirement. The Turn-Around Document itself is insufficient for a Title V permit application unless it is submitted with documented justification as per OAC 252:100-7-4(d)(2). Other means which may be employed to satisfy this requirement are:

(i) Referenced emissions from a current permit (if the information is available to confirm the data)

(ii) Worksheets developed by AQD for specific industries which employ standardized methods

(iii) Other means, as long as all information is fully justified and calculations are included

**6.9 Compliance Assurance Monitoring**

As proposed, compliance assurance monitoring strengthens existing operations and maintenance procedures rather than adding new monitoring equipment and requirements. EPA plans to propose rules for this program in the near future. The key elements of EPA’s draft plan for compliance assurance monitoring may include:

(i) A description of the emissions unit, including source type, emissions controls, monitoring data, equipment, and procedures

(ii) Operating ranges (trigger levels) for monitored parameters

(iii) Response times for correcting divergences from established operating ranges

(iv) A limit on the number of divergences per quarter

(v) A justification for the selected monitoring method, including how the method provides reasonable assurance of compliance

(vi) QA/QC requirements for monitoring

(vii) Procedures for recordkeeping and reporting

(viii) An optional quality improvement plan

**6.10 Title III**

For facilities subject to Title III of the CAAA90 and 40 CFR Part 63, the current requirements to be addressed in the application are:

(i) Demonstration of compliance with established MACT standards

(ii) A list of HAPs from the source if it is a major source for HAPs (from the most current EPA listing)

(iii) A statement that a risk management plan (RMP) will be submitted to the designated agency if any listed chemical is present on site or stored in an amount equal to or greater than the threshold limit

(iv) A list of the future MACT categories/facilities the facility will be subject to and a statement that the facility will comply with other applicable requirements of Section 112 by the existing source compliance date for each new rule

For more information, contact the Air Toxics Section at (405) 702-4194.

**6.11 Oklahoma Air Toxics**

Oklahoma air toxics are categorized according to health-based standards. Most of the chemicals from the AQD air toxics list have been assigned a toxicity category (A, B, or C) and a MAAC (Maximum Acceptable Ambient Concentration). Some requirements in OAC 252:100-41, Control of Emission of Hazardous and Toxic Contaminants, are state-only requirements. However, all requirements must be assessed in the Title V permit application. Emissions levels must be compared with the following de minimis levels for listed contaminants:

Category Lb/Hr Tons per Year

A 0.57 0.6

B 1.10 1.2

C 5.60 6.0

If evaluation shows emissions above these levels, modeling may be conducted to demonstrate compliance with the MAAC. If modeled emissions remain above the MAAC, OAC 252:100-41 details specific activities to achieve compliance which must be included in a compliance plan and submitted with the application.

**6.12 Grandfathered Emissions Units**

An intent of Title V is to consolidate each facility’s existing operating permits into a single permit without imposing any new limitations or monitoring requirements. The EPA guidance “White Paper”(July 10, 1995) states the same concept. A grandfathered source is an emissions unit which has never been subject to an Oklahoma Air Quality permit and which meets one of the conditions below:

(i) Constructed in Oklahoma before May 31, 1972

(ii) Subject to NSPS or NESHAP and constructed in Oklahoma before March 25, 1982

All of the following conditions apply to specifically identified grandfathered units requested by the owner/operator in the application.

(i) Only the equipment descriptions shall be listed as permit conditions

(ii) The units may be moved within the same facility or to a different facility without a permit modification

(iii) The units are subject to OAC 252:100 applicable requirements for existing sources

If the units are modified or replaced, they are subject to permit review and any consequences of the review such as loss of “grandfathered” status.

**6.13 Application Shield**

An application shield will be granted to the applicant when a timely submitted Title V application has been deemed administratively complete. Thus, the applicant shall not be in violation of the requirement to have a permit while the Agency prepares a permit. However, this protection will cease if additional information needed to process the application requested by the agency in writing is not submitted to AQD by the deadline specified in writing.

**6.14 Permit Shield**

The permit shield is an automatic part of the Title V permit. This shield assures the permittee that if the terms of the permit are met, the facility is in compliance with the CAAA90. In addition, the permittee may request that specific nonapplicable requirements be identified and then shielded in the permit.

**6.15 Current Permit References**

Current permitted emissions may be used for the emissions inventory. These permitted emissions must be validated for the referenced permit either in the permit memorandum, the permit application, or in additional supplemental information. Whichever is used, it must provide sufficient detail for the permit writer to identify methodologies and calculations. Specific conditions of a referenced permit may be used for compliance demonstration and proposed compliance assurance purposes on PART 5 (Emission Unit Group Compliance Demonstration). Applicants must state the referenced permit number and the specific condition number and must include a short description of how compliance will be confirmed.

**7. APPLICATION PARTS**

These parts have been developed strictly for the Title V application and must be utilized if an application is to be considered administratively complete as per OAC 252:100-8-5(b)(8). Other permitting activities (e.g., construction permits) must be submitted on other parts. Parts are available in both hard copy and on 3.5" diskette upon request. These diskettes are available in WordPerfect 5.1 and Microsoft Word 6.0. Applications must be sent to Title V Permit, Air Quality Division, c/o Oklahoma Department of Environmental Quality, Financial & Human Resources Management, P.O. Box 2036, Oklahoma City, OK 73101.

**7.1 Application Submittal and Formatting**

Each application must be submitted with three (3) hard copies (including three copies of PART 1 with original signature). For processing, all information must be legible and printed clearly in black ink or typed. Submittal of the application on a 3.5" floppy diskette is also encouraged to expedite an accurate and efficient review and issuance of the permit by DEQ. The application shall be formatted with a header or footer which includes the facility name, the date, and the page number on every sequentially numbered page throughout the entire application. As per OAC 252:100-8-9, the appropriate fee must accompany any application.

**7.2 Numbering and Naming on Parts**

The numbering and naming convention of emissions units, emission unit groups, processes, control equipment/methods, and pollutant release points must be consistent throughout the application and the emissions inventory.

**7.3 Supplemental Worksheets**

Supplemental worksheets will be available upon request for specific industries listed in OAC 252:100-8-5(b)(2)(A). These industry-specific worksheets provide useful supplemental information for compliance demonstrations and emissions inventories.

**7.4 Appendices**

Appendiceswill contain information which can be generated by compatible computer software (e.g. Microsoft Office), such as narrative descriptions, worksheets and compliance summaries. When referencing an appendix, give the page and section (e.g. Appendix B, page 4, section 4.4).

**7.5 Attachments**

Attachmentswill contain information which cannot be easily generated by compatible software such as copies of manufacturer information, test results, technical references, flow or block diagrams, etc.

**B. INSTRUCTIONS FOR PARTS**

**PART 1 - General Information**

Complete PART 1 *only once* to provide general facility information as per OAC 252:100-8-5(d)(1) and (2) and the application certification as per OAC 252:100-8-5(e).

Box 1 (Company Name) - Provide the name as it appears on company letterhead and throughout the parts.

Box 2 (Permit Processing Fees) - Indicate the dollar amount of the application fees included as established in OAC 252:100-8-9 (d)(2), permit processing fees shall be as follows:

Initial Title V Permit $2,000 Minor Title V Permit Modification $500

Renewal Title V Permit $1,000 Significant Title V Permit Modification $1,000

Title V Temporary Permit $1,000 Title V Temporary Source Relocation $500

Box 3 (Confidential Information) - Indicate if any confidential information is included by stating the appendix where it can be found and the name of the contact. Confidential information must be treated according to OAC 252:100-8-5 (b) (9). Any documents submitted pursuant to the Oklahoma Clean Air Act and declared to be trade secrets, to be so considered, must be plainly labeled by the provider and be in a part whereby the confidential information may be easily removed intact without disturbing the continuity of any remaining documents.

Box 4 (Owner/operator Information) - Provide the following information on the lines provided: the owner or operator (see OAC 252:100-1-3, Definitions) of the facility for which this application applies and the mailing address and telephone number of the central business office.

Box 5 (Technical Contact) - Indicate a designated person familiar with the applications to whom questions should be directed. Provide the following: name of technical contact, name of technical contact’s company, mailing address of technical contact, and telephone number of technical contact.

Box 6 (Facility Information) - Provide: the facility name which must be unique for the company and which will be used throughout the application, primary Standard Industrial Classification (SIC) code of the facility, secondary SIC codes(s) ( as applicable), legal description (Section, Township, Range, subsection), county, nearest town, name of facility contact person, phone number, driving instructions to the facility from the nearest town or major intersection, physical address,(including the street or route), city, state and zip code, and mailing address, (including the street or route), city, state and zip code.

Box 7 (Current Air Quality Permits, etc.) - List all construction, modification and operating permits, and compliance orders issued to the facility. In addition, include ARACT and other SIP specifications, etc.

Box 8 (Application Certification) - Provide the following information on the lines provided: Signature of the responsible official (as defined in OAC 252:100-8-2), typed name, title and phone number of the responsible official, and the typed date the application was signed.

**PART 1a - Emissions Inventory**

On this part, emissions inventory means a quantification of pollutants emitted from the facility as per OAC 252:100-8-5(d)(3). Complete PART 1a *only once* to identify the format of the facility emissions inventory. Emissions shall be fully justified with calculations or other documentation including manufacturer’s information and/or production data, etc. Data may be summarized if it cannot be presented in its entirety in a few pages. A Turn-Around Document is submitted to the AQD in order for the agency to properly assess annual operating fees. By itself, it is insufficient for the Title V permitting process unless it contains the information required in OAC 252:100-7-4(d)(2). The combination of the Turn-Around Document and the referenced justification documentation is referred to here as the Annual Emissions Inventory.

Box 1 (Company, Facility Name, and County) - Provide information as it appears on PART 1.

Box 2 (Annual Emissions Inventory) - Check the appropriate box to indicate the use of the Annual Emissions Inventory on file with AQD or the use of the attached revised Annual Emissions Inventory.

The owner/operator should use the Annual Emissions Inventory as it appears in the most recent Turn-Around Document on file with AQD only if the inventory is accurate and complete and if it uses the same numbering and naming conventions as presented elsewhere in the Title V permit application. Each application must include supporting information to document emissions calculations pursuant to OAC 252:100-7-4(d)(2).

The owner/operator should attach a new or revised Annual Emissions Inventory which corrects inconsistencies in naming and numbering conventions between the Turn-Around Document and the Title V permit application. Likewise, supporting information which documents emissions calculations pursuant to OAC 252:100-7-4(d)(2) should be included in a separately named appendix to the application.

Box 3 (Alternate Methods to Inventory Emissions) - Check the appropriate box if a means other than the Annual Emissions Inventory is used to quantify emissions. The applicant should be consistent in the methods of emissions quantification; however, a combination of the choices may be allowed if properly justified. Follow the guidelines in OAC 252:100-8-5(d)(3).

**PART 1b - Insignificant Activities**

Complete PART 1b *only once* to identify any insignificant activities at the facility as per OAC 252:100-8-5(d)(11). Trivial activities, as listed in Section D, should not be included in the Title V application.

$ - Provide company and facility name as on PART 1.

$ - Check the box to the left of each insignificant activity performed at the facility. Appropriate recordkeeping for activities with a plus sign (+) in front is required for compliance certification.

Activities which may be insignificant are any emission unit, operation or activity that has the potential to emit no more than 1 lb/hr or 4.38 TPY of any criteria pollutant, excluding 112(b) HAPs but including 112(r) flammable and toxic regulated pollutant that are not listed in the partial list of air toxics subject to OAC 252:100-41. Regulated 112(r) pollutants that are in the partial list are insignificant if they are emitted in quantities less than the deminimis level of that regulation. Multiple emission units, operations and activities that perform identical or similar functions shall be combined in determining the applicability of this exemption.

**PART 1c - Shield Request (optional)**

*Only one* completed PART 1c should be submitted which requests that DEQ review and approve key permit shield provisions as required by OAC 252:100-8-6(f). Although this part is not required as part of an administratively complete Title V application, submittal of this part allows DEQ to consider inclusion of permit shield conditions.

Item 1 - (Company and Facility Name) Enter as it appears on PART 1.

Item 2 - (Request Options) Check the appropriate box(es) to indicate request(s).

**PART 3 - Emissions Unit Group Description**

A complete PART 3 to describe equipment within each Emissions Unit Group (EUG) must be submitted as per OAC 252:100-8-5(d)(2). An EUG is equipment that can be logically associated by applicable requirements having to do with operating processes, location within the facility, or any logical combination. A facility-wide PART 3 must be completed to identify and number the EUGs to be addressed on individual EUG PART 3s. Initially, the group(s) must be associated with a baseline operating scenario for the facility. Additional copies of PART 3 must be completed for each additional operating scenario to be permitted. A Completed PART 3 provides an overview of the facility by identifying the emissions units, showing how the emissions units are related to each other, and describing the processes and permitted activities. It will also provide information needed to determine the applicable requirements for processes and equipment throughout the facility. Designation of units and points must be consistent with flow or block diagrams and emissions inventory.

Box 1 (Company and Facility Name). Enter as it appears on PART 1.

Box 2 (EUG) - Each EUG must be given a unique identification number. EUGs will be numbered accordingly to the identification and numbering in the facility wide PART 3.

Box 3 (Scenario) - The entire PART 3, including Box 5, must be completed for all equipment involved in each operating scenario to be permitted. Scenario 1 is the baseline scenario, with others sequentially numbered.

Box 4 (Emissions Unit (EU) Information) - Identify all equipment and/or activities for each EUG by: (a) emissions unit identification number (EU ID #), (b) point identification number (Point ID #), (c) descriptive name (e.g., make and model) of the emissions unit (Name), and (d) the date the emissions unit or component(s) were constructed or last modified (Date Constructed/Modified). Identification numbers must be consistent with emission inventory and flow or block diagrams.

Box 5 Submit a process flow or block diagram as well as a narrative description of the activities conducted at the facility in separately named appendices. The flow or block diagram should indicate interrelationships of emission units and use the identification numbers consistent with boxes 2 and 4 above and other parts. The narrative description must identify the permitted activities at the facility and include a discussion of emissions information that includes raw materials, principal products, major processes, etc.

**PART 5 - Emission Unit Group Compliance Demonstration**

A completed PART 5 should be submitted for each EUG as per OAC 252:100-8-5(d)(4) through (10). If another process or an alternate scenario changes the requirements from the baseline operating scenario for any emission unit, additional copies of PART 5 are necessary to describe compliance methods for those altered requirements. PART 5 contains short descriptions of compliance methods which reference an attached appendix where more detailed descriptions may be found. AQD may provide additional guidance and worksheets for specific industries to further reduce the application burden. Any appendix or guidance must satisfy all requirements of OAC 252:100-8-5(d)(4) through (10). See these regulations for requirements. This PART and referenced Appendices may be lifted from the application and made part of the permit as specific conditions.

Box 1 - (Company and Facility Name) Provide information as it appears on PART 1.

Box 2 - Show which emissions units (EU#), group (EUG #), and scenario (SCENARIO) apply.

Box 3 - (Citation/Method) For each applicable requirement, provide the regulatory citation and the corresponding test method in the “Description” column. Note any state-only requirements with an asterisk (\*). If necessary, describe the test method in a separately named appendix (“Appendix” column). See OAC 252:100-8-5(d)(4).

Box 4 - (Initial Compliance Limits, Demonstration, and Status) Quote the limitation or condition from the applicable regulation , permit, consent order, or other applicable requirement. Provide a brief description of the initial enforceable compliance demonstration method if different from the method in Box 3 above. If necessary, describe the test method in detail in a separately identified appendix (“Appendix” column). State the compliance status of the EUG with the cited regulation as “In Compliance” or “Not In Compliance.” If compliance is unknown or has not been determined, state such in this column. Any indication other than “In Compliance” will necessitate the completion of a PART 5a (Schedule of Compliance) to be placed behind the appropriate PART 5. If there is more than one compliance status within an EUG, depict it in another PART 5 and 5a. See OAC 252:100-8-5(d)(8).

Box 5 - (Proposed Compliance Assurance Certification and Reporting) A compliance certification for each emission group is required annually (unless required more frequently by an applicable requirement or by the permitting authority). Give a brief description of the enforceable method(s), from continuous monitoring to recordkeeping, that will be used to demonstrate compliance with the applicable regulation in the future. If necessary, describe the test method in detail in a separately named appendix (“Appendix” column). State the frequency of required certification reports. See OAC 252:100-8-5(d)(9).

Box 6 - (Other Requirements) In the “Description” column, note if any of the requirements listed in OAC 252:100-8-5(d)(5), (6), (7), or (10) apply to any unit in the EUG. Indicate the corresponding subparagraph by placing italicized numbers in parentheses and explain or demonstrate enforceable actions either in the “Description” column or in a separately named appendix (“Appendix” column). The subparagraphs are:

*(5)* Other specific information is required by Agency rules

*(6)* An explanation of any proposed exemptions is included

*(7)* Additional information is needed to define alternate operating scenarios

*(10)* Nationally-standardized Acid Rain parts are included in the application

If necessary, reference an appendix (“Appendix” column) where the information can be found.

**PART 5a - Schedule of Compliance**

For each EUG not deemed “In Compliance” on PART 5, a PART 5a must be submitted as per OAC 252:100-8-5(d)(8)(B)(iii) and (C)(iii). In PART 5a, define all actions the facility has taken and plans to take to in order to resolve compliance issues for applicable requirements per EUG. A completed PART 5a must be submitted for each issue that is *not* “In Compliance” identified on PART 5.

Box 1 - (Company and Facility Name) Enter as it appears on PART 1 and the emissions unit group (EUG) and operating scenario as either baseline (1) or an alternate operating scenario number.

Box 2 - (Reference/Citation) Provide a complete citation for the requirement.

Box 3 - (Limit/Requirement/Condition) Provide a quotation or summary of the limit, requirement, or condition.

Box 4 - (Compliance Status Summary) Provide a description of the nature and extent of the compliance issue.

Box 5 - (Schedule of Remedial Measures) Provide an enforceable plan to resolve the compliance issue. If compliance is unknown or has not been determined, specify enforceable plans for determining and demonstrating compliance. Identify: (a) an enforceable sequence of actions with milestones and (b) the proposed date and (c) the achieved date of the action. The plan should include actions that have been completed as well as actions that are planned.

**PART 5b - Emissions Unit Group Nonapplicable Requirements (optional)**

A completed PART 5b may be submitted for each EUG identified in PART 5 as per OAC 252:100-8-6(f)(2). PART 5b defines requirements *not* applicable to the EUG. Although this part is not required as part of an administratively complete Title V application, submittal of this part allows DEQ to include nonapplicable requirements in the permit shield. Facility-wide nonapplicable requirements with a “Facility-Wide Emissions Unit” should be addressed accordingly. All nonapplicable requirements that the owner/operator requests to be included in the permit shield such as state rules, federal rules, and existing permit conditions and consent orders should be identified. If necessary, reference an appendix which conveys additional information.

Box 1 ( Company and Facility Name) Enter as it appears on PART 1 and the emissions unit group (EUG) and the operating scenario as either baseline (1) or an alternate operating scenario number.

Box 2 (Nonapplicable Requirements) Present emissions unit group specific nonapplicable requirements in the table. Detailed instructions are provided for Items a through d for each requirement.

Item a - (Citation) Provide a complete citation of the source of the requirement (e.g., OAC 252:100-8-5(c)(7) would be the citation of alternative operating scenarios).

Item b - (Topic) Indicate the general topic of the requirement (“opacity,” “monitoring,” “NOX”).

Item c - (Reason) Indicate why the requirement is nonapplicable with a Reason Code from the list.

Item d - (Notes) Include notes, as needed, to explain the non-applicability of the cited requirement or refer to a separately identified appendix.

**PART 5c - Proposed Change Request (optional)**

The owner/operator may use multiple copies of PART 5c to request that conditions in existing permits and compliance orders, etc. be revised in the Title V permit as per OAC 252:100-8-6(a)(1)(A). Although this part is not required as part of an administratively complete Title V application, submittal of this part may be used to remove conditions which are inaccurate, vague, or unnecessary. A separate PART 5c should be submitted for each requested specific condition change. Changes that may be accomplished through this part are limited. For example, a Title V application cannot change emissions limits established by regulation or permitting. If submitted, this part should be placed behind the appropriate PARTs 5 and 5a.

Box 1 - (Company and Facility Name) Enter as it appears on PART 1.

Box 2 - (Permit Number) Identify the permit number, title, and specific condition for requested change(s).

Box 3 - (Existing Permit Condition) Quote the specific condition from the permit.

Box 4 - (Type of Change) Indicate the nature of the requested change (e.g., change verbiage or condition unnecessary).

Box 5 - (Reason for Change) Explain the reasons for seeking the requested change. For example, “The existing condition is too general and vague for the owner/operator to be able to demonstrate compliance. The owner/operator suggests more specific standards by which to measure compliance as follows. . . .”

Box 6 - (Requested Federally Enforceable Condition) Provide verbiage and explain the proposed new condition.

**C. BLANK PARTS**

Please refer to Part B “Instructions for Parts” prior to completing the enclosed parts. These parts may be duplicated as needed. If an appendix is referenced on a part, make sure that a separate name is identified clearly on the part and the corresponding appendix.

The parts included are as follows:

Parts required for administrative completeness

* PART 1 Facility General Information
* PART 1a Emissions Inventory
* PART 1b Insignificant Activities
* PART 2 (Reserved)
* PART 3 Emissions Unit Group Description
* PART 4 (Reserved)
* PART 5 Emissions Unit Group Compliance Demonstration
* PART 5a Schedule of Compliance
* PART 6 (Reserved)

Optional parts

* PART 5b Emissions Unit Nonapplicable Requirements
* PART 1c Shield Request
* PART 5c Proposed Change Request

**D. USEFUL INFORMATION**

In preparing a Title V application, the information listed below provides additional general assistance. These have been provided as a service to the applicant. It is the duty of the applicant to ensure that updated copies are referenced at the time of application submittal.

This information includes the following:

* Applicability Outline
* Sources which must figure Fugitive Emissions List
* Application Submittal Schedule
* Applicable Requirements
* State Requirements
* List of Trivial Activities
* List of Part 60 NSPS Subparts and Part 61 NESHAP Subparts
* List of PART 63 NESHAP Subparts, present and future
* List of Title III HAPs
* List of EPA Monitoring Methods
* Glossary of Air Quality Terms