

Summary of Title V Interim Approval Issues

For Non-grantee Districts Who Based Interim Title V Programs on ARB's Model Rule and Program

January 18, 2001

Non-grantee Districts	Federal Register Section	ARB Model Rule Section	ARB Model Program Section	Title V Interim Program Issue/Suggested Correction
<p>Amador, Butte, Great Basin, Imperial, Lassen, Mendocino, Modoc, North Coast, Northern Sonoma, Placer, Siskiyou, Tuolumne</p> <p>Glenn, Lake, Shasta</p>	<p>12/8/94 III.A.1., B.1, G.2., H.1, J.1, K.1., L.1., M.1., O.1., P.5., Q.1, R.1.</p> <p>11/29/94 III.A.1., B.1., C.1.</p>	<p>Pre-1996 V.C.6.</p> <p>1996 V.C.6</p> <p>Already corrected</p>	<p>NA</p>	<p>Early Reductions Final Permit Action</p> <p>“For any permit application with early reductions pursuant to section 112(I)(5) of the CAA, within 9 months <u>from the date a complete</u> after the application is <u>received</u> deemed complete.”</p>
<p>Amador, Tuolumne</p> <p>ARB recommends for all districts</p>	<p>12/8/94 III.A.2., R.2.</p>	<p>Pre-1996 II.W.1.</p> <p>1996 II.X.1.</p>	<p>NA</p>	<p>Definition of “Potential to Emit”</p> <p>Revise second sentence of II.W.1. (Pre-1996) or II.X.1. (1996) as follows: “Physical and operational limitations on the emissions unit</p>

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				shall be treated as part of its design, if the limitations are set forth in permit conditions <u>or in rules or regulations which address applicable federal requirements that are legally and practicably enforceable by U.S. EPA and citizens or by the District.</u> "
Placer	12/8/94 III.P.1.	Pre-1996 II.T. 1996 II.U.	NA	Definition of Major Source Section 507.219.1 "A <u>major</u> source, as defined in Section 112 of the Federal Clean Air Act, ..."
All Districts	12/8/94 II.C.1.,C.2., III.K.3., O.3* 11/29/94 II.C.1., C.2. 12/7/95 II.B.1(1), B.1.(2) *Northern Sonoma also needs to change District Policy A-33A	Pre-1996 IV.C.1.q. 1996 IV.C.1.v.	III.B.1.e.	Insignificant Activities Option I Rule Revision Add the following as IV.C.1.q.(Pre-1996) or v. (1996) and attach Attachment 1 of this summary to your Title V rule: <u>"Activities identified as insignificant in Attachment 1 of Rule [insert the District's Title V rule number] based upon size and production rate shall be listed in the permit application but are not required to be specified in the permit. All other activities identified as insignificant in Attachment 1 of Rule [insert the District's Title V rule number] are not required to be listed in the permit application nor specified in the permit. An application may not omit information needed to determine the applicability of, or to impose, any applicable</u>

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				<p><u>requirement, or to evaluate the fee amount required in Section VII of this rule. [Reference: 40 CFR Part 70.5(c)]</u></p> <p>[NOTE: In order that the List of Insignificant Activities be considered “regulatory,” it must be adopted by the District. Therefore, public comment must be solicited on both Attachment 1 and the revised Title V rule during the District’s adoption process.]</p> <p>Program Revision Replace Section III.B.1.e. with the following: “The District’s criteria for Title V insignificant activities are set forth in Section IV.C.1. and Attachment 1 of Rule [insert the District’s Title V Rule number].”</p> <p>Option 2</p> <p>Rule Revision Add the following as IV.C.1.q. (Pre-1996) or v. (1996): “1) <u>Any insignificant activity need not be listed in the permit application nor specified in the permit.</u> 2) <u>For the purposes of this rule, an insignificant activity shall be any activity, process, or emissions unit which is not subject to a source-specific applicable federal requirement and which emits no more than 0.5 tons per year of a HAP and no more than two tons per year of a</u></p>

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				<p><u>regulated air pollutant that is not a HAP. Source-specific applicable federal requirements include requirements for which emission unit-specific information is required to determine applicability.</u></p> <p>3) <u>An application may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to evaluate the fee amount required in Section VII of this rule. [Reference: 40 CFR Part 70.5(c)]</u></p> <p>Program Revision Replace Section III.B.1.e. with the following: “The District’s criteria for Title V insignificant activities are set forth in Section IV.C.1. of Rule [insert the District’s Title V Rule Number].”</p>
All Districts	12/8/94 II.D. 11/29/94 II.A.2. 12/9/95 II.B.1.(2)	NA	III.A.	Agricultural Permit Exemption Add the following sentence at end of Section III.A.: <u>“Upon amendment of the California Health and Safety Code to allow the issuance of Title V permits to agricultural production sources, such sources shall be subject to evaluation for applicability to the requirements of Title V. “</u>

Non-grantee Districts	Federal Register Section	ARB Model Rule Section	ARB Model Program Section	Title V Interim Program Issue/Suggested Correction
<p>All Districts*</p> <p>*Yolo-Solano only needs to change its Rule 3.9, Section 403.1(l) [IV.C.1.I. in ARB Model Rule]. Section 302.9(e) [VI.B.9. in ARB Model Rule] is already consistent with suggested language.</p>	<p>12/8/94 II.C.3., C. 10</p> <p>11/29/94 II.C.3., C.10.</p> <p>12/7/95 II.B.1.(3), B.1.(10)</p>	<p>Pre-1996 IV.C.1.I. and VI.B.9.</p> <p>1996 IV.C.1.I. and VI.B.9.</p>	<p>NA</p>	<p>Compliance Schedule</p> <p>IV.C.1.I. (Pre 1996): “For a source not in compliance with an applicable federal requirement at the time of permit issuance, <u>or renewal, and modification (if the non-compliance is with units being modified), a schedule of compliance which resembles and is at least as stringent as that contained in any judicial consent decree, administrative order, or schedule approved by the District hearing board if required by state law and which that identifies ...</u>”</p> <p>IV.C.1.I. (1996): “A schedule of compliance, <u>which resembles and is at least as stringent as that contained in any judicial consent decree, administrative order, or schedule approved by the District hearing board if required by state law, that and which identifies ... every 6 months for a source that is:</u>1) N not in compliance at the time of permit issuance, <u>or renewal, and modification (if the non-compliance is with units being modified) and is:</u> 1) a <u>A</u> streamlined emission limit proposed ...”</p> <p>VI.B.9. (Pre-1996): “The permit shall include a compliance schedule for any</p>

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				<p>emissions unit which is not in compliance with current applicable federal requirements <u>at the time of permit issuance, renewal, and modification (if the non-compliance is with units being modified)</u>. The compliance schedule shall resemble and be at least as stringent as that contained in any <u>judicial consent decree, administrative order, or schedule approved by the District hearing board if required by state law and</u> shall require: ...”</p> <p>VI.B.9. (1996): “The permit shall include a compliance schedule for any emissions unit which is not in compliance, <u>at the time of permit issuance, renewal, and modification (if the non-compliance is with units being modified)</u>, with any permit streamlining requirement imposed in accordance with subsection V.J., above, any District-only rule which applies in accordance with subsection V.K.1., above, and any current applicable federal requirements not subsumed by such permit streamlining requirements(s) or District-only rules. The compliance schedule <u>shall resemble and be at least as stringent as that contained in any judicial consent decree, administrative order, or schedule approved by the District hearing board if required by state law and</u> shall require: ...”</p>

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<p>Recommended for Amador, Butte, Calaveras, Colusa, El Dorado, Feather River, Imperial, Kern, Mariposa, Northern Sierra, Tehama</p>	<p>NA</p>	<p>Pre-1996 VI.B.14.a. 1996 IV.C.1.k.1) a and b; VI.B.8.a. 1) and 2); VI.B.14.a.</p>	<p>NA</p>	<p>Responsible Official Certifies Compliance</p> <p>IV.C.1.k.1)a) 1996-only “For all applicable federal requirements ... the owner or operator <u>responsible official</u> may certify compliance with only the requirements of the permit streamlining proposal ...”</p> <p>IV.C.1.k.1)b) 1996-only “In order to certify compliance with ... the owner or operator <u>responsible official</u> may certify compliance ...”</p> <p>VI.B.8.a.14.a.1) 1996-only “For all applicable federal requirements which are satisfied by compliance with streamlining requirements ... the owner or operator <u>responsible official</u> may certify compliance with ...”</p> <p>VI.B.8.a.14.a.2) 1996-only “In lieu of a corresponding requirement ... the owner or operator <u>responsible official</u> may certify compliance with a District-only rule ...”</p> <p>VI.B.14.a. Pre-1996 and 1996 “An owner or operator <u>responsible official</u> of the source shall submit a compliance certification ...”</p>

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<p>All Districts*</p> <p>*Yolo-Solano only needs to change Rule 3.9 Section 302.14 [VI.B.14.a. in ARB Model Rule]. Section 403.l.m. [IV.C.1.m. in ARB Model Rule] is already consistent with the suggested language.</p>	<p>12/8/94 II.C.4., C.9., C.11.</p> <p>11/29/94 II.C.4., C.9., C.11.</p> <p>12/7/95 II.B.1.(4), B.1.(9), B.1.(11)</p>	<p>Pre-1996 IV.C.1.m. and VI.B.14.a.</p> <p>1996 IV.C.1.m. and VI.B.14.a.</p>	<p>NA</p>	<p>Certification</p> <p>IV.C.1.m <u>“A certification by a responsible official of the truth, accuracy and completeness of all reports and other documents submitted for permit application forms, compliance progress reports at least every 6 months, statements on compliance status with any applicable enhanced monitoring, and compliance plans at least annually which shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete;”</u></p> <p>VI.B.14.a. <u>“ The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months or more frequently as specified in an applicable requirement or by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete;”</u></p>

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All Districts Except Northern Sierra, Yolo-Solano and Great Basin (corrected in 7/13/95 submittal)	12/8/94 II.C.5. 11/29/94 II.C.5. 12/7/95 II.B.1.(5)	Pre-1996 IV.B.1.b. 1996 IV.B.1.b.	NA	Permit Application Submittal IV.B.1.b. (Pre-1996): “For a source that becomes subject to [insert the District’s Title V Rule Number] after the date the rule becomes effective, a responsible official shall submit a standard District application within 12 months of the source commencing operation <u>or of otherwise becoming subject to [insert the District’s Title V Rule Number].</u> ” IV.B.1.b. (1996): “For a source that becomes subject to [insert the District’s Title V Rule Number] after the date the rule becomes effective, a responsible official shall submit a standard District application within 12 months of the source commencing operation <u>or of otherwise becoming subject to [insert the District’s Title V Rule Number], whichever is later.</u> ”
Amador, Great Basin, Lassen, Mendocino, Modoc, Northern Sonoma, Placer, Siskiyou,	12/8/94 III.A.1., G.2., J.1., K.1., L.1., O.1., P.5., Q.1., R.1.	Pre-1996 V.C. 2-4 1996 V.C. 2-4 Already corrected	NA	Permit Action Deadlines Change V.C. 2, 3, and 4 as follows: “ ... no later than 18 months after the <u>complete</u> application is <u>received</u> deemed complete ;...”

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Tuolumne Lake, Shasta	11/29/94 III.B.1.,C.1.			
All Districts	12/8/94 II.C.6. 11/29/94 II.C.6. 12/7/95 II.B.1.(6)	Pre-1996 V.F., or V.D.1.d. 1996 V.F., or V.D.1.d.	NA	<p>Affected States Notification</p> <p>Option 1</p> <p>V.F. , second paragraph: <u>“Written notification of the final decision ... comment period. Written notification of any refusal by the District to accept all recommendations for the proposed permit that an affected state submitted during the public comment period shall be sent to U.S. EPA and affected states. The APCO ...”</u></p> <p>Option 2</p> <p>V.D.1.d. : <u>“A written response, including reasons for not accepting comments and recommendations for a proposed permit, to persons or agencies that submitted written comments which are postmarked by the close of the public notice and comment period. All written comments and responses to such comments shall be sent to all commenters and kept on file at the District office and made available upon request. [Reference: 40 CFR Part 70.7(h)(5) and 70.8]</u></p>

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Amador	12/8/94 III.A.4.	Pre-1996 II.C. 1996 II.C.	NA	Definition of “Affected State” – Rule 500 II.C. <u>‘An “affected state” for the purpose of Rule 500 is the state of Nevada is any state that: 1) is contiguous with California and whose air quality may be affected by a permit action, or 2) is within 50 miles of the source for which a permit action is being proposed.’</u>
El Dorado, Feather River, Placer, Yolo-Solano	12/8/94 III.E.1., F.1., P.3, S.1.	Pre-1996 II.U. 1996 II.V	NA	Minor Permit Modification “A minor permit modification is any modification to a federally-enforceable condition on a permit to operate which: 1) is not a significant modification, and 2) is not an administrative permit amendment. <u>However, for modifications involving economic incentives, marketable permits, emissions trading, or other similar approaches, minor permit modification procedures may be used only to the extent provided for in the applicable implementation plan or applicable federal requirement.</u> ”
Butte, Colusa, Lassen, Modoc, Siskiyou Tehama	12/8/94 III.B.2., D.1., J.2., J.3., L.2., L.3., Q.2., Q.3. 11/29/94	Pre-1996 IV.B.4. 1996 IV.B.4.	NA	Operation Prior to Final Action on a Minor Permit Modification Replace Section IV.B.4. with the following: “4. Minor Permit Modification [Reference 40 CFR Part 70.5(a)(1)(ii) and 70.7(e)(2)(ii and v)] a. After obtaining any required pre-construction permits, a

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	III.D.1.			<p>responsible official shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The emissions unit(s) affected by the proposed permit modification shall not commence operation until the APCO takes final action to approve the permit revision or until the requirements in subsection b., below, are met. [NOTE: If your District decides that it does not want to offer provision b., below, delete the phrase: “or until the requirements in subsection b., below, are met” and delete subsections b., c., and d.] In the application, the responsible official shall include the following:</p> <ol style="list-style-type: none"> 1) A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply; 2) Proposed permit terms and conditions; and 3) A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. <p>b. After filing its minor permit modification application as required by subsection a., above, and prior to final action by the District to issue or deny the requested minor permit modification or to determine it is a significant permit modification, the stationary source may immediately make the change(s) in a proposed</p>

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				<p>minor permit modification, provided:</p> <ol style="list-style-type: none"> 1) The modified emissions unit(s) complies with the conditions of any applicable pre-construction or temporary permit to operate issued pursuant to District rules and regulations; 2) The modified emissions unit(s) complies with all proposed permit terms and conditions identified in its minor permit modification application; and 3) The change(s) does not violate any applicable federal requirement or any rule or regulation of the District. <p>c. Allowing a stationary source to make a change prior to permit issuance does not constitute final action and does not preclude the District from denying the change or requiring the change to be processed as a significant permit modification, nor does it preclude the U.S. EPA from objecting to the permit modification.</p> <p>d. After the stationary source makes the change and before the minor permit modification is issued, the stationary source need not comply with the existing permit terms and conditions it seeks to modify. If the modified emissions unit(s) fails to comply with the terms and conditions of the proposed minor permit modification, the existing permit terms and conditions the stationary source seeks to modify may be enforced against it.”</p>

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<p>Butte, Colusa, Feather River, Lassen, Modoc, Placer, Siskiyou</p> <p>Tehama</p>	<p>12/8/94 III.B.3., D.2., F.3., J.4., L.4., P.2., Q.4.</p> <p>11/29/94 III.D.2.</p>	<p>Pre-1996 IV.B.3.</p> <p>1996 IV.B3.</p>	<p>NA</p>	<p>Changes Prior to Final Action on a Significant Permit Modification</p> <p>Replace Section IV.B.3. with the following:</p> <p>“3. Significant Permit Modification {Reference: 40 CFR Part 70.5(a)(1)(ii)}</p> <p>a. After obtaining any required pre-construction permits, a responsible official shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant permit modification. Upon request by the APCO, the responsible official shall submit copies of the latest pre-construction permit for each affected emissions unit. The emissions unit(s) affected by the proposed permit modification shall not commence operation until the APCO takes final action to issue the revised permit or until the requirements of subsection b., below, are met.</p> <p>b. An emissions unit may commence operation of change(s) in a proposed significant permit modification prior to final action by the APCO to issue the permit modification, provided:</p> <p>1) The stationary source has received and complies with a pre-construction permit under Section 112(g) of the CAA, or under pre-construction review programs either approved into the State Implementation Plan, or</p>

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				<p>authorized by the provisions of 40 CFR Part 52.21, pursuant to Parts C and D of Title I of the CAA;</p> <p>2) [NOTE: Include this provision only if your District issues temporary operating permits] The stationary source has received and complies with a temporary permit to operate issued pursuant to Rule [insert number for District's Rule which provides for a temporary operating permit];</p> <p>3) The stationary source submits an application for a significant permit modification within 12 months of commencing operation of the change(s);</p> <p>4) The change(s) is not prohibited by any permit conditions including those issued pursuant to Rule [insert the District's Title V rule number]; and</p> <p>5) The modified emissions unit(s) complies with all applicable federal requirements and rules and regulations of the District."</p>
All Districts	12/8/94 II.C.8. 11/29/94 II.C.8. 12/7/95 II.B.1.(8)	Pre-1996 V.D.1.b. 1996 V.D.1.b.	NA	<p>Public Notice "By Other Means" As Necessary</p> <p>"On or after providing written notice pursuant to subsection a., above, public notice that shall be published in at least one newspaper of general circulation in the District <u>and, if necessary, by other means to assure adequate notice to the affected public.</u> The notice shall ..."</p>

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All Districts	12/8/94 II.C.7. 11/29/94 II.C.7. 12/7/95 II.B.1.(7)	Pre-1996 V.E.2. 1996 V.E.2.	NA	Public Petition After U.S. EPA Review "If the U.S. EPA objects in writing to the proposed decision within 45 days of being notified of the decision and receiving a copy of the proposed permit and all necessary supporting information pursuant to subsection D.1.e., above, the APCO shall not issue the permit. <u>Also, if the public petitions the U.S. EPA within 60 days after the end of the U.S. EPA's 45-day review period and the permit has not yet been issued, the APCO shall not issue the permit until U.S. EPA objections in response to the petition are resolved. The APCO shall either ...</u> "
El Dorado, Feather River, Placer, Yolo-Solano	12/8/94 III.E.2., F.2., P.4., S.2.	Pre-1996 VI.B. 1996 VI.B	NA	No Permit Revision For Economic Incentives, etc. Add VI.B.21. as follows: "21. Permit Revision Exemption No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit."
Lake	7/13/95 P. 36068 II.B.1.a-c	Pre-1996 VI.B.12. 1996 VI.B.12.	NA	District Upset/Breakdown Rule: Chapter III, Articles I and II, Sections 500, 510, and 512 No change to Title V rule required; but, revise Chapter III, Article I, Section 500 as follows:

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				<p>“Maintenance and scheduled ...are not <u>exceeded and other applicable requirements, including permit terms issued pursuant to Chapter XII – Title V, are not violated.</u> Each scheduled ...shutdown warrants. <u>This rule shall not be construed to exempt from enforcement any violation of applicable federal requirements, including federally-enforceable permit terms and conditions pursuant to Chapter XII.</u>”</p> <p>Revise Chapter III, Article II, Section 510 as follows: <u>“Emissions exceeding any local, state, or federal emission limit or standard resulting from equipment failure or malfunction are a violation of these Rules and Regulations. However, t</u> The APCO shall use reason and experience to determine if excess emissions resulting from an upset or breakdown are beyond the reasonable control of the source operator and therefore not an enforceable violation of an emissions limitation contained in a permit or rule. <u>and may choose not to pursue enforcement action, p</u> Provided all of the following criteria and required actions are met by the source, the APCO shall not pursue an enforcement of such excess emissions violation resulting from an upset or breakdown: ...”</p> <p>Revise Chapter III, Article II, Section 512 as follows: “Nothing in sections 500, 510, or 511 shall be construed to</p>

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				limit EPA <u>or citizen</u> enforcement of federally enforceable requirements under the <u>Federal Clean Air Act</u> . Notwithstanding Sections 500,510,511, or the granting of a variance by the Hearing Board, relief from federal enforcement will not be provided unless the “major source permit” has been modified pursuant to Chapter 12.
Amador, Great Basin, Imperial, Lassen, Mendocino, Modoc, North Coast, Northern Sonoma, Placer, Siskiyou, Tuolumne Glenn, Lake, Shasta, Tehama	12/8/94 III.A.3., G.3., H.3., J.5., K.2., L.5., M.3., O.2., P.6., Q.5., R.3 11/29/94 II.C.12.	Pre-1996 V.1.2. and 3. 1996 V.1.2. and 3. Already corrected	NA	U.S. EPA Notification of Changes Under Operational Flexibility V.1.2.c, second sentence: “A permit condition shall require that a responsible official provide written notice to the <u>U.S. EPA and APCO</u> 30 days in advance of a change by clearly requesting operational flexibility under this subsection of [insert District’s Title V Rule Number].” V.1.3.e.: “Written notice is given to the <u>U.S. EPA and APCO</u> 30 days in advance of a change ...”
North Coast Other districts that may be affected in the future: Feather River, (Calpine) Kern	12/8/94 III.M.2.	NA	NA	Acid Rain Program Submittal Contact U.S. EPA liaison listed in Attachment 2 of this summary.

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Desert (Antelope Valley), Shasta (Three Mountain)				
<p>Calaveras, Colusa, El Dorado, Feather River, Great Basin, Northern Sierra</p> <p>Glenn, Shasta, Tehama</p> <p>Mariposa</p>	<p>12/8/94 IV.A.</p> <p>11/29/94 IV.A.</p> <p>12/7/95 II.B.2.</p>	NA	NA	<p>Section 112(g) "Toxic NSR" Program</p> <p>District needs to submit letter certifying that it has a local Section 112(g) program in place. See Attachment 3 of this summary for guidance.</p>
<p>All Districts</p> <p>No action necessary at this time.</p>	<p>12/8/94 IV.B.</p> <p>11/29/94 IV.B.</p> <p>12/7/95 II.B.3.</p>	NA	NA	<p>Section 112(l) Delegation of MACT Standards</p> <p>NOTE: U.S. EPA IX has clarified that Section 112(l) delegation is not necessary for complete approval of final Title V programs. A draft model 112(l) MOA has been developed but can not be finalized until U.S. EPA takes final action on revisions to the 112(l) implementing regulation (i.e., 40 CFR Part 63 Subpart E)</p>

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All Districts Recommended Change	NA	Pre-1996 III.B 1996 III.B	NA	Sources Exempt from Title V Rule Revise Section III.B. to read: "The sources listed below are not subject to the requirements of Rule [insert the District's Title V rule number]: a. Sources regulated <u>Any stationary source that would be required to obtain a permit solely by because it is subject to 40 CFR Part 60, Subpart AAA (Standards of Performance for New Residential Wood Heaters;</u> b. Sources regulated <u>Any stationary source that would be required to obtain a permit solely by because it is subject to 40 CFR Part 61, Subpart M, section 145 (National Emission Standards for Hazardous Air Pollutants for Asbestos, Standard for Demolition and Renovation); and</u> c. Any other source in a source category deferred pursuant to 40 CFR Part 70.3, by U.S. EPA rulemaking, <u>unless such source is otherwise subject to Title V (i.e., it is a major source).</u>
All Districts Optional Change	NA	Pre-1996 I. and II.L. 1996 I. and II.M.	NA	Effective Date of Revised Title V Rule Delete the third sentence of Section I., Paragraph 1, and change II.L. (Pre-1996) or II.M. (1996) to : "Effective Date of Rule XXX The "effective date of Rule XXX " is the date the <u>District Board adopts U.S. EPA promulgates interim,</u>

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				<p data-bbox="1060 397 1900 430">partial, or final approval of the rule in the Federal Register."</p> <p data-bbox="1060 470 1900 609">NOTE: This change, approved by U.S. EPA IX and Headquarters, would mean a District could implement their corrected Title V rule without waiting for U.S. EPA IX's Federal Register notice of final approval.</p>

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