

CAPCOA
Enforcement, Engineering, and Toxics Symposium

November 8, 2017

ENFORCEMENT AT TITLE V FACILITIES

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TODAY'S TOPICS

- **Background**
- **What are Title V Facilities**
- **Purpose**
- **Initial Title V**
- **Elements of Permit**
- **Renewals**
- **Reporting**
- **Responsible Officials**
- **Investigation**
- **Moving Forward**



CLEAN AIR ACT

- **Title I – Air Pollution Prevention and Control**
- **Title II – Emission Standards for Moving Sources**
- **Title III – General Provisions**
- **Title IV – Noise Pollution (*predates CAA*)**
- **Title IV-A -Acid Deposition Control**
- **Title V – Permits**
- **Title VI – Stratospheric Ozone Protection**

BACKGROUND

- **Legal Basis**
 - 1990 Amendments to the Clean Air Act
- **Regulation**
 - EPA Final Regs: 40 CFR Part 70, May 1, 2007
- **National operating permit program for major sources**
- **Consolidates requirements into one document**
 - Command-and-Control permit requirements are now part of a single Facility Permit.
- **Implemented through SCAQMD Regulation XXX**

WHAT IS TITLE V

- **Permit is federally enforceable**
- **Individual command & control permits are consolidated into one facility permit (RECLAIM FP or Alternate format – permits in Word)**
- **Does NOT require additional reduction in emissions**
- **DOES require additional monitoring, recordkeeping and reporting**
- **Encourages public participation in permitting process**

PROGRAM BENEFITS

- **Industry**
 - Consolidates Requirements
 - Simplifies Permit Descriptions
- **Public**
 - Enhances input in permitting process
 - Allows opportunity for Comment at P/C stage
 - Increases Information Availability
- **Clean Air**
 - Increases Compliance Accountability

MAJOR SOURCES (OUTSIDE OF CALIFORNIA)



MAJOR SOURCE

Potential to Emit Emission Thresholds (tons/year)

Pollutant	SCAB (Area 1)	Riverside Portion	
		SSAB (Area 2)	MDAB (Area 3)
Volatile Organic Compounds or Hydrocarbons (VOC)	10	25	100
Nitrogen Oxides (NOx)	10	25	100
Sulfur Oxides (SOx)	100	100	100
Carbon Monoxide (CO)	50	100	100
Fine Particulate Matter (PM ₁₀)	70	70	100
Single Hazardous Air Pollutant (HAP)	10	10	10
Combination of HAPs	25	25	25

MAJOR SOURCE THRESHOLD (TONS/YEAR)

Pollutant	EPA default (tons/year)	Sacramento Metro AQMD	South Coast AQMD
VOC	100	25	10
NOx	100	25	10
SOx	100	100	100
PM10	100	70	70
CO	100	100	50
Single HAP	10	10	10
Combination of HAP	25	25	25

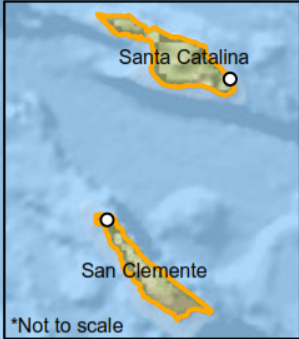
HAP= hazardous air pollutant (benzene, xylene, H2S plus 184 other compounds)

TITLE V IN SCAQMD

- There are approximately 66,000 active permits.
- There are approximately 26,000 facilities with active permit with SCAQMD.
- There are about 420 Title V Facilities annually.
- This is 50% of the California's major sources.



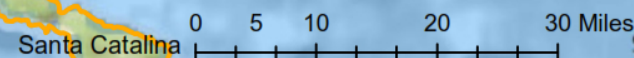
TITLE V FACILITIES



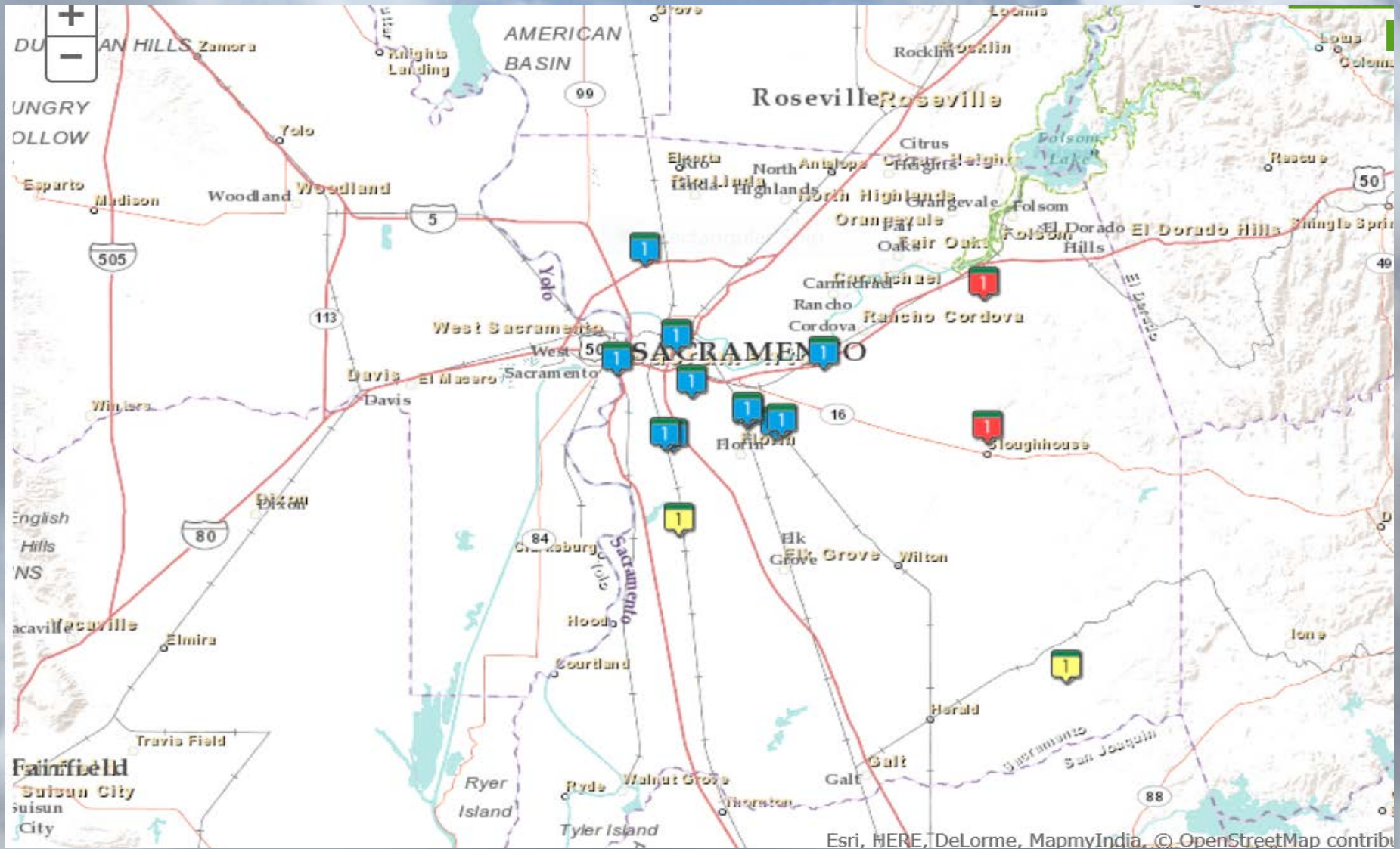
Legend

- Title V Facility
Total: 385
- Major Roads
- SCAQMD Boundary
- ▭ County Boundary

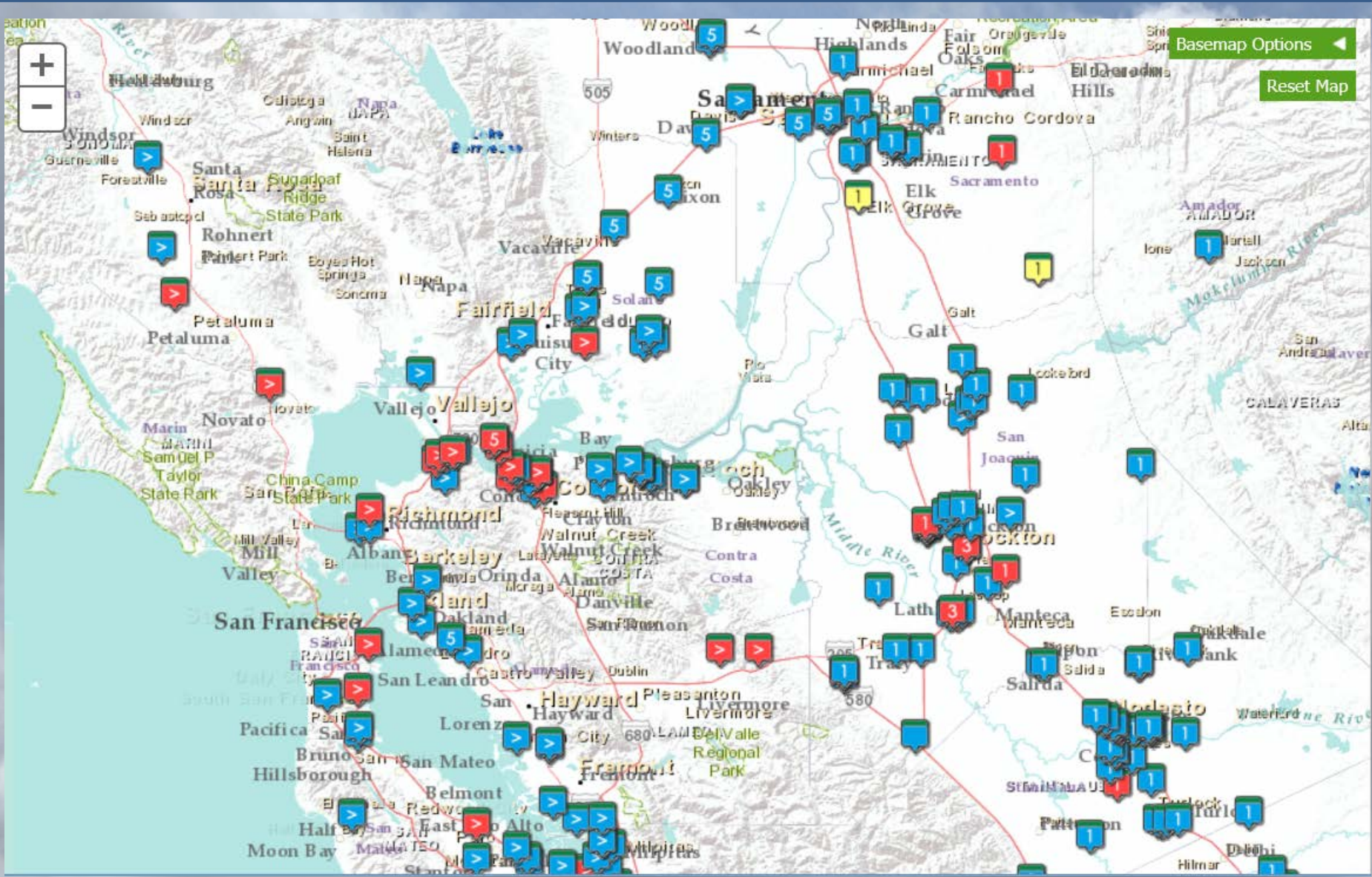
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15 TITLE V FACILITIES IN SMAQMD



TITLE V FACILITIES IN NORTHERN CALIFORNIA



SCAQMD REGULATION XXX



Regulation XXX Title V Permits

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[Rule 3000](#)

General

(Amended November 5, 2010)

[Rule 3001](#)

Applicability

(Amended November 5, 2010)

[Rule 3002](#)

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(Amended November 5, 2010)

[Rule 3003](#)

Applications

(Amended November 5, 2010)

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Permit Types and Content

(Amended December 12, 1997)

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Permit Revisions

(Amended November 5, 2010)

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Public Participation

(Amended November 5, 2010)

[Rule 3007](#)

Effect of Permit

(Adopted October 8, 1993)

[Rule 3008](#)

Potential to Emit Limitations

(Amended November 5, 2010)

CONTRARY TO TV PERMIT

Rule 3002 (c)(1)

A person shall construct and operate a Title V facility and all equipment located at a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V permits at all times.

INITIAL TITLE V

- Facility files initial TV application package
 - specific forms and fees
 - Engineer prepares draft package & sends to facility for review
 - Draft facility permit (consolidate permits, tag conditions, add periodic monitoring, etc.)
 - Permit Summary (psum)
 - Statement of Basis (SOB)
 - Public Notice
- All based on application submittal

INITIAL TITLE V CONT.

- Incorporate comments from facility, send all to EPA for 45-day review
- Publish notice in newspaper
- Post notice, psum, SOB, and facility permit on AQMD website
- Send notice and psum to enviros and mailing list
- Track hours spent - will bill facility - T & M above 8 hrs

ELEMENTS OF TV PERMIT

- **Section A - Facility Information**
- **Section D - Equipment Description and Conditions**
- **Section E - Administrative Conditions**
- **Section H - Permits to Construct**
- **Section I - Compliance Plans**
- **Section J - Air Toxics**
- **Section K - Title V Administration**
- **Appendix B - Rule Emission Limits**

**FACILITY PERMIT TO OPERATE
CITY OF HOPE MEDICAL CENTER**

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: Title V Company, Inc.
LEGAL OPERATOR (if different than owner):
EQUIPMENT LOCATION: 100 Title V Street
Diamond Bar, CA 91765
MAILING ADDRESS: 1500 E DUARTE RD
DUARTE, CA 91010
RESPONSIBLE OFFICIAL: John Doe
TITLE: VICE-PRESIDENT
TELEPHONE NUMBER: (909) 555-2000
CONTACT PERSON: John Smith
TITLE: LEAD STATIONARY ENGINEER
TELEPHONE NUMBER: (909) 555-2001
TITLE V PERMIT ISSUED: October 18, 2011
TITLE V PERMIT EXPIRATION DATE: October 17, 2016

FACILITY INFORMATION PAGE

TITLE V	RECLAIM
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YES	NOx:	NO
	SOx:	NO
	CYCLE:	0
	ZONE:	INLAND

FACILITY PERMIT TO OPERATE

TITLE V COMPANY, INC.

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: FOAM CUP MANUFACTURING					P2.1, P13.1
System 1: POLYSTYRENE BEAD EXPANSION - LINE 1					
CONVEYOR, GAYLORD A/N: 316738	D2			PM: (9) [RULE 405, 2-7-1986]	D323.2
MIXER, NO.1, POLYSTYRENE A/N: 316738	D3			PM: (9) [RULE 405, 2-7-1986]	D323.2
CONVEYOR, GAYLORD A/N: 316738	D4			PM: (9) [RULE 405, 2-7-1986]	D323.2
TANK, PRE-EXPANDER A/N: 316738	D5	D180 D181 D182 D254 C304			D323.2
FOAM EXPANSION, NO.1A, PRE-EXPANDER A/N: 316738	D6	D180 D181 D182 D254 C304		PM: (9) [RULE 405, 2-7-1986]	D323.2
FOAM EXPANSION, NO.2A, PRE-EXPANDER A/N: 316738	D7	D180 D181 D182 D254 C304		PM: (9) [RULE 405, 2-7-1986]	D323.2
FOAM EXPANSION, NO.3A, PRE-EXPANDER A/N: 316738	D8	D180 D181 D182 D254 C304		PM: (9) [RULE 405, 2-7-1986]	D323.2
FOAM EXPANSION, NO.4A, PRE-EXPANDER A/N: 316738	D9	D180 D181 D182 D254 C304		PM: (9) [RULE 405, 2-7-1986]	D323.2
FOAM EXPANSION, NO. 5A, PRE-EXPANDER A/N: 316738	D10	D180 D181 D182 D254 C304		PM: (9) [RULE 405, 2-7-1986]	D323.2
CONVEYOR, PNEUMATIC A/N: 316738	D11	D180 D181 D182 D254		PM: (9) [RULE 405, 2-7-1986]	D323.2
CONVEYOR, PNEUMATIC A/N: 316738	D12	D180 D181 D182 D254		PM: (9) [RULE 405, 2-7-1986]	D323.2
CONVEYOR, PNEUMATIC A/N: 316738	D13	D180 D181 D182 D254		PM: (9) [RULE 405, 2-7-1986]	D323.2

FACILITY PERMIT / RECLAIM FORMAT Process and System Descriptions

DEVICE NOMENCLATURE

- **D – Basic equipment (primary ID)**
- **C – Control equipment (primary ID)**
- **B – Secondary (“child”) equipment such as burner, tank seal, etc. (*assigned to a Primary ID; secondary ID is not shown in permit*)**
- **E – Exempt equipment**
- **S – Stack**

**FACILITY PERMIT TO OPERATE
TITLE V COMPANY, INC.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 3281 LBS IN ANY ONE DAY

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**]

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[**RULE 401, 3-2-1984; RULE 401, 11-9-2001**]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[**RULE 431.2, 5-4-1990**]

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

FACILITY PERMIT / RECLAIM FORMAT

Facility Conditions

CONDITION NOMENCLATURE

- **Facility Conditions (Fx.x) appear only in the Condition detail/text section**
- **Process Conditions (Px.x) are listed next to the applicable process name**
- **System Conditions (Sx.x) are listed next to the applicable system name**

CONDITION NOMENCLATURE CONT.

- **Device Conditions (Xx.x multiple letters-see below) are listed next to the applicable device**
 - A. Emissions Limits**
 - B. Material/Fuel Type Limits**
 - C. Throughput or Operating Parameter Limits**
 - D. Monitoring/Testing Requirements**
 - E. Equipment Operation/Construction Requirements**
 - F. (see Facility Conditions-no device conditions begin with F)**
 - G. CEQA Requirements**
 - H. Applicable Rules**
 - I. Administrative**
 - J. Rule 461**
 - K. Recordkeeping/Reporting**

ALTERNATE FORMAT

**FACILITY PERMIT TO OPERATE
TITLE V COMPANY, INC.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

NONE

**FACILITY PERMIT TO OPERATE
TITLE V COMPANY, INC.**

PERMITTED EQUIPMENT LIST

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AND PERMITS TO OPERATE AT THIS FACILITY:

Application number	Permit to Operate number	Equipment description
175699	D10962	ETHYLENE OXIDE STERILIZATION HOSPITAL
217251	D38401	I C E (50-500 HP) EM ELEC GEN DIESEL
217252	D22390	I C E (50-500 HP) NON-EM PORT N-RENT GASOLINE
269895	D64727	I C E (>500 HP) EM ELEC GEN DIESEL
269896	D64728	I C E (>500 HP) EM ELEC GEN DIESEL
269898	D64729	I C E (>500 HP) EM ELEC GEN DIESEL
274107	D71056	ETHYLENE OXIDE STERILIZATION HOSPITAL
274108	D71057	ETHYLENE OXIDE STERILIZATION CTL (HOSPITAL)
303977	D91222	I C E (50-500 HP) EM ELEC GEN DIESEL
314936	D98623	I C E (>500 HP) EM ELEC GEN DIESEL
314937	D98624	I C E (>500 HP) EM ELEC GEN DIESEL
314938	D98625	I C E (>500 HP) EM ELEC GEN DIESEL
314939	D98626	I C E (>500 HP) EM ELEC GEN DIESEL
316435	F11044	BOILER (>20-50 MMBTU/HR) COMB GAS-LPG
316436	F11046	BOILER (>20-50 MMBTU/HR) COMB GAS-LPG
316437	F11047	BOILER (>20-50 MMBTU/HR) COMB GAS-LPG
355721	F26612	CHARBROILER - NATURAL GAS
411676	F73865	BOILER (<5 MMBTU/HR) NATURAL GAS
430068	N14408	SERV STAT STORAGE & DISPENSING GASOLINE
452326	G9935	I C E (50-500 HP) EM ELEC GEN DIESEL
509812		BOILER (>20-50 MMBTU/HR) COMB GAS-LPG
509813		BOILER (>20-50 MMBTU/HR) COMB GAS-LPG
509814		BOILER (>20-50 MMBTU/HR) COMB GAS-LPG

NOTE: EQUIPMENT LISTED ABOVE THAT HAVE NO CORRESPONDING PERMITS TO OPERATE NUMBER ARE ISSUED PERMITS TO CONSTRUCT. THE ISSUANCE OR DENIAL OF THEIR PERMITS TO OPERATE IS SUBJECT TO ENGINEERING FINAL REVIEW. ANY OTHER APPLICATIONS THAT ARE STILL BEING PROCESSED AND HAVE NOT BEEN ISSUED PERMITS TO CONSTRUCT OR PERMITS TO OPERATE WILL NOT BE FOUND IN THIS TITLE V PERMIT.

**ALTERNATE
FORMAT**

**Equipment
List**

**FACILITY PERMIT TO OPERATE
TITLE V COMPANY, INC.**

FACILITY WIDE CONDITION(S)

Condition(s):

1. EXCEPT FOR OPEN ABRASIVE BLASTING OPERATIONS, THE OPERATOR SHALL NOT DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSIONS WHATSOEVER ANY AIR CONTAMINANT FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR WHICH IS:
 - A. AS DARK OR DARKER IN SHADE AS THAT DESIGNATED NO. 1 ON THE RINGELMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES; OR
 - B. OF SUCH OPACITY AS TO OBSCURE AN OBSERVER'S VIEW TO A DEGREE EQUAL TO OR GREATER THAN DOES SMOKE DESCRIBED IN SUBPARAGRAPH (A) OF THIS CONDITION. [RULE 401]
2. THE OPERATOR SHALL NOT PURCHASE ANY DIESEL FUEL UNLESS THE FUEL IS LOW SULFUR DIESEL FOR WHICH THE SULFUR CONTENT SHALL NOT EXCEED 15 PPMV BY WEIGHT AS SUPPLIED BY THE SUPPLIER. [RULE 431.2]
3. THE OPERATOR SHALL NOT USE OR SELL GASEOUS FUEL CONTAINING SULFUR COMPOUNDS IN EXCESS OF 40 PPMV CALCULATED AS HYDROGEN SULFIDE AVERAGED OVER FOUR HOURS. [RULE 431.1]

ALTERNATE FORMAT

Facility Wide Conditions

**FACILITY PERMIT TO OPERATE
TITLE V COMPANY, INC.**

PERMIT TO OPERATE

Permit No. D36401
A/N 217251

Equipment Description:

INTERNAL COMBUSTION ENGINE, CUMMINS, DIESEL-FUELED, EMERGENCY ELECTRICAL GENERATION, MODEL NO. NTA855-G2, 6 CYLINDERS, FOUR CYCLE, TURBOCHARGED, AFTERCOOLED, 465 BHP, WITH 1 EXHAUST.

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THE FUEL INJECTION TIMING OF THIS ENGINE SHALL BE RETARDED A MINIMUM OF 4° (FOUR DEGREES) RELATIVE TO STANDARD TIMING.
[RULE 1303(a)(1)-BACT]
4. THE INJECTION IGNITION TIMING OF THIS ENGINE SHALL BE INSPECTED, ADJUSTED AND CERTIFIED, AT A MINIMUM, ONCE EVERY FIVE YEARS OF OPERATION. INSPECTIONS, ADJUSTMENTS, AND CERTIFICATIONS SHALL BE PERFORMED BY A QUALIFIED MECHANIC AND ACCORDING TO THE ENGINE MANUFACTURER'S PROCEDURES.
[RULE 1303(a)(1)-BACT]
5. THE ENGINE IS LIMITED TO AN OPERATING SCHEDULE OF NO MORE THAN 11.5 HOURS IN ANY ONE DAY AND NO MORE THAN 125 HOURS (CUMULATIVE) IN ANY ONE CALENDAR YEAR UNLESS ADDITIONAL HOURS ARE OTHERWISE AUTHORIZED BY THE EXECUTIVE OFFICER. THIS EQUIPMENT MAY ONLY OPERATE DURING MAINTENANCE TESTING, PERFORMANCE TESTING, OR IN CASES OF EMERGENCY.
[RULE 1304(a)-MODELING AND OFFSET]
6. THIS ENGINE SHALL NOT OPERATE MORE THAN 125 HOURS IN ANY ONE YEAR, WHICH INCLUDES NO MORE THAN 20 HOURS IN ANY ONE YEAR FOR MAINTENANCE AND TESTING PURPOSES.
[RULE 1303 (b)(2)-OFFSET, RULE 1304(a)-MODELING AND OFFSET, RULE 1470]
7. AN OPERATIONAL NON-RESETTABLE TOTALIZING TIME METER SHALL BE INSTALLED AND MAINTAINED TO INDICATE THE ENGINE ELAPSED OPERATING TIME.
[RULE 1303 (b)(2)-OFFSET, RULE 1304(a)-MODELING AND OFFSET, RULE 1470]

**ALTERNATE
FORMAT**

**Equipment
Permit**

TITLE V RENEWAL

- **Permit expiration – 5 years**
(except for solid waste incineration units – 12 years)
- **File renewal application between 180 and 545 days prior to permit expiration for application shield**
- **Reminder letters may be sent by SCAQMD to facility as courtesy – not required**
- **Facility files same forms as for initial Title V application, basically same process as Initial TV**

Category	Permit Status	Application Submission Window	Application Status	Potential Enforcement Action	Guidance
A	Expired	Closed	None Received	NOV	Constructing, modifying, relocating, or operating a Title V facility, or equipment located at a Title V facility, without first obtaining a Title V permit or permit revision that allows such construction, modification, relocation or operation, in violation of <u>Rule 3002 (a)(1)</u> . On or after the date of expiration of a Title V permit a person shall not operate a Title V facility, or equipment located at a Title V facility, unless such permit has been renewed pursuant to SCAQMD Rule 3004, in violation of <u>Rule 3004 (f)(3)</u> . Failure of operator of a Title V facility to submit a timely and complete Title V permit application in accordance with this rule, in violation of <u>Rule 3003 (a)(6)</u> .
B	Expired	Closed	Received After Window Closed	NOV	Failure of operator of a Title V facility to submit a timely and complete Title V permit application in accordance with this rule, in violation of <u>Rule 3003 (a)(6)</u> . Failure to operate a Title V facility and all equipment located at a Title V facility in compliance with condition (K)(4) of the Title V permit by failing to renew this permit at least 180 days, but no more than 545 days prior to the expiration date of this permit, in violation of <u>Rule 3002 (c)(1)</u> .
C	Not Expired	Closed	None Received	NOV	Remind facility that the application submission window will be closing this quarter.
D	Not Expired	Closed	Received After Window Closed	NOV	Remind Facility that they may now submit their Title V permit renewal.
E	Not Expired	Open	None Received	None	
F	Not Expired	Open	None Received	None	

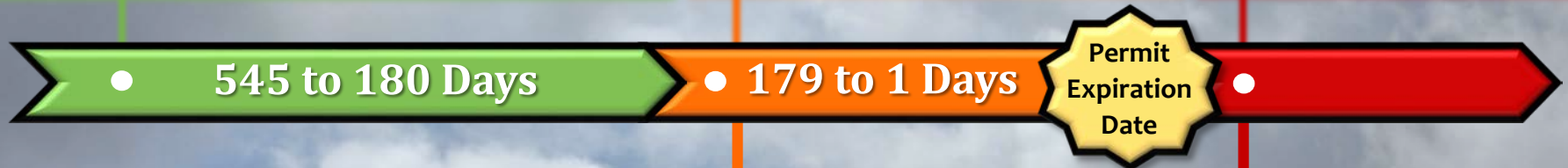
TITLE V PERMIT RENEWALS WITHOUT APPLICATION SHIELDS

TIMELINE:

Submission Window for Application Shield

After Submission Window

Expired Title V Permit



ENFORCEMENT ACTION:

1st NOV

- Rule 3003 (a)(6)
- Rule 3002 (c)(1)

2nd NOV

- Rule 3002 (a)(1)
- Rule 3004 (f)(3)
- Rule 3003 (a)(6)

TITLE V FORMS WEBSITE

South Coast Air Quality Management District Search aqmd.gov

Home / Library / Documents & Support Material / Technical Guidance for Title V / Title V Forms

Title V Forms

The following Title V forms are available for downloading. Any inquiries about using these forms may be sent via e-mail to Title_V@aqmd.gov.

To determine which Title V forms are necessary for your individual situation please refer to this [Title V Application Matrix](#).

FORM TITLE	FILE NAME
Application for Permit to Construct and Permit to Operate	400-A
California Environmental Quality Act Applicability Form	400-CEQA
Application for Plans - NO LONGER USED - Use AQMD Form 400-A	
Application Certification	500-A2
List of Exempt Equipment	500-B
Compliance Status Report	500-C1
Non-Compliant Operations Report and Compliance Plan	500-C2
Semi-Annual Monitoring Report	500-SAM
Annual Compliance Certification for Title V	500-ACC
Permit Shield Request	500-D
Title V Applicability Questionnaire & Exclusion/Exemption Request	500-E
Title IV – Acid Rain Phase II Facility Information Summary	500-F-1
Title IV – Acid Rain Phase II Repowering Extension Plan	500-F-2
Title IV – Acid Rain Phase II New Unit Exemption Request	500-F-3
Title IV – Acid Rain Phase II Retired Unit Exemption Request	500-F-4
Permit Hearing Request Form	500-G
Compliance Assurance Monitoring (CAM) Applicability Determination for Initial, Renewal, & Significant Permit Revision Title V Applications	500-H
Notification Report For Deviations, Emergencies & Breakdowns	500-N
Complete Title V Forms Package (.zip file) - includes all files listed above - plus the Title V Application Matrix	Form Package

Trending

- [SCAQMD Rule Book](#)
- [Rules](#)
- [Paramount - Ongoing Air Monitoring Activities](#)
- [Proposed Rules](#)
- [Contact](#)

<http://www.aqmd.gov/home/library/documents-support-material/technical-guidance-for-title-v/title-v-forms>

TITLE V APPLICATION FORMS

Decision Matrix for Form Submittal Determination

Reason for Application	Forms														Other Documentation
	400-A	400-CEQA	500-A2 Appl Cert	500-B Exempt Equip	500-C1 Comp. Status Cert	500-C2 Non-Compliant Plan	500-D Permit Shield	500-E Exemption Request	500-F1 Title IV Summary	500-F2 Title IV Repower Ext Plan	500-F3 Title IV New Unit Exemption Request	500-F4 Title IV Retired Unit Exemption Request	500-H CAM Plan		
Initial TV App, TV Renewal, and MACT Part 2	X	X	X	X	X	I/A			I/A	I/A	I/A	I/A	X		
Title V Administrative Change: Change of Operator, Change of Facility Info, Other (Refer to Rule 3000(B)(1) for others)	X	X	X												
Title V Permit Revision	X	X	X	I/A	X	I/A			I/A						
Exemption Plan: Option A - PTE	X								X						
Exemption Plan: Option B - FAC CAP	X								X					ALSO include (1) 400-A and (1) 400-E for each piece of equipment	
Exemption Plan: Option C - REVISED AER	X								X					Must include at least: Revised AER, Throughput records, Emission calculations and MSDS sheets	
Exemption Plan: Option D - MOST CURRENT AER	X								X					Attach most current AER as submitted (NO CHANGES)	
Other: Permit Shield, etc.	X						X							ALSO include (1) 400-A and (1) 400-E for each piece of equipment	

REPORTING

- **Verbal Notification**
 - Breakdowns & Emergencies (within 1 hour)
 - Excess Emissions (within 72 hours)
- **Written Notification**
 - Breakdowns (within 7 to 30 calendar days)
 - Emergencies (within 2 working days)
 - Excess Emissions (within 14 days of discovery)
 - Semi-annual compliance certification reports
 - Annual compliance certification reports to AQMD and US EPA

REPORT FORMS

- **Form 500-SAM - Semi-annual report**
- **Form 500-ACC - Annual report – compliance certification**
- **Form 500-N – Deviations, Emergencies, Breakdowns (if any)**
- **Form 500-C2 – Non-Compliant Operations Report and Compliance Plan (if any)**
- **Responsible Official must sign all forms**

RESPONSIBLE OFFICIAL

- **Defined in Rule 3000**
- **For a corporation:**
 - **A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or**
 - **A person who performs similar policy making functions for the corporation, or**
 - **A duly authorized representative of such person provided the representative is responsible for the overall operation of the facility**

RESPONSIBLE OFFICIAL CONT.

- **Partnership – general partner**
- **Sole proprietorship – the proprietor**
- **Municipality, State, Federal, Other Agency**
 - **A principal executive officer such as:**
 - **Military Base Commander**
 - **Hospital Chief Administrator**
 - **Prison Warden**
 - **College Chancellor**
 - **Landfill – Department General Manager**

TV FACILITY PERMIT - SAM

Section K, Condition No. 23

[. . .] The operator shall submit reports of any required monitoring to the AQMD at least twice per year. [. . .] A report for the first six calendar months of the year is due by August 31 and a report for the last six calendar months of the year is due by February 28.

TV FACILITY PERMIT - ACC

Section K, Condition No. 24

The operator shall submit to the Executive Officer and to the EPA, an annual compliance certification. [. . .] The certification is due on March 1st for the previous calendar year. [. . .]

SAM & ACC SUBMITTALS

Example for Compliance Year 2016

Compliance Year	Submittal Type	Dates	
		Reporting Period	Submittal Due
2016	500-SAM (1)	01/01/16 – 06/30/16	08/31/16
	500-SAM (2)	07/01/16 – 12/31/16	02/28/17
	500-ACC	01/01/16 – 12/31/16	03/01/17



Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit): _____

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): _____

3. This report is based on the applicable rules, permit terms and requirements as specified in Sections A through K and Appendices A and B inclusive, and any compliance plans, variances, and alternative operating conditions in effect during the permit term of the Title V Facility Permit to Operate issued on: _____ (mo/day/year)

4. This report is due: _____ and covers the period from: _____ to: _____ (mo/day/year)

5. This report supersedes a semi-annual monitoring report previously submitted on: _____ (mo/day/year)

Section II - Reference Summary of Deviations, Emergencies & Breakdowns Reported

1. Indicate the status of Deviations, Emergencies & Breakdowns during this reporting period*: Clear

a. This facility has not experienced any deviations, emergencies or breakdowns.

b. This facility has experienced one or more deviations, emergencies or breakdowns as indicated in the table below*:

Type of Incident Indicate Deviation (D), Breakdown (B), or Emergency (E)			Notification Number	Was Form 500-C2 previously submitted for the non-compliance? (Attach additional sheets as necessary)	
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report



Section I - Operator Information

1. **Facility Name** (Business Name of Operator That Appears On Permit): _____

2. **Valid AQMD Facility ID** (Available On Permit Or Invoice Issued By AQMD): _____

3. This report is based on the applicable rules, permit terms and requirements as specified in Sections A through K and Appendices A and B inclusive, and any compliance plans, variances, and alternative operating conditions in effect during the permit term of the Title V Facility Permit to Operate issued on: _____ (mo/day/year)

4. This report is due: _____ and covers the period from: _____ to: _____ (mo/day/year)

5. This report supersedes an Annual Compliance Certification previously submitted on: _____ (mo/day/year)

Section II - Annual Compliance Certification Report *

1. **Compliance Status for the Reporting Period:**

a. This facility has been in compliance with all terms and conditions in the Title V permit as referenced in Section I.

b. This facility has been in compliance with all of the terms in the Title V permit as referenced in Section I, except non-compliance for: _____ (Attach additional pages as needed.)

Permit Condition Or Rule Number(s)	Device Number(s)	Was Form 500-C2 previously submitted for the non-compliance? (Attach additional sheets as necessary)	
		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-C2 is attached to this report
		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-C2 is attached to this report
		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-C2 is attached to this report
		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-C2 is attached to this report

2. **The methods used for determining the compliance status are:**

a. Entirely consistent with the applicable requirements in the permit terms and conditions of the Title V permit.

b. Partially consistent with the applicable requirements in the permit terms and conditions of the Title V permit, with the exception of: _____ Describe in detail how the methods used are different from those listed in the permit and to what extent the devices or operations at the facility are impacted. Attach additional pages as necessary.

* Additional information may be required to comply with Section K Condition 24 of your Title V permit.

3. Compliance is:
- a. Continuous
 - b. Intermittent

If Intermittent, describe intermittent compliance in detail. Attach additional pages as necessary.

4. Are there any other facts or circumstances that have been required to determine the compliance status of the facility (e.g., compliance plans, terms of a variance, or order of abatement)?
- a. No
 - b. Yes

If Yes, Please Explain

Section III - Responsible Official Signature Statement

I certify under penalty of law that I am the responsible official for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attached application forms and other materials are true, accurate, and complete.

1. Signature of Responsible Official:	2. Title of Responsible Official:
3. Print Name:	4. Date:
5. Phone #:	6. Fax #:
7. Address of Responsible Official:	
Street # _____	City _____ State <u>CA</u> Zip _____

Mail 1st Copy to: Cher Snyder, Sr. Enforcement Manager
 South Coast AQMD
 P.O. Box 4941
 Diamond Bar, CA 91765

Mail 2nd Copy to: USEPA, Region IX, Air-3
 Director of Air Division
 75 Hawthorne Street
 San Francisco, CA 94105

PARTIAL COMPLIANCE EVALUATION (PCE)

- All of the basic inspection and audit functions constitute one of four PCE's
 - Facility Audit – 1st PCE
 - Annual Compliance Certification Receipt – 2nd PCE
 - Annual Compliance Certification Review – 3rd PCE
 - Source test report review, including review of protocol approval processing – 4th or more PCE's
- These four pieces, at a minimum, will allow us to take credit for a Full Compliance Evaluation... the fifth piece of the puzzle.

FULL COMPLIANCE EVALUATION (FCE)

- When all the four of the PCE pieces are completed, we can then take credit for an FCE.
- We are committed by our Continuous Monitoring Strategy (CMS) agreement with EPA to complete ALL title v inspection/FCEs at a minimum of every two years.
- Our internal commitment is to complete ALL title v inspections once every year.

FULL COMPLIANCE EVALUATION (FCE) CONT.

- **Title V Permit**
 - Equipment description
 - Operating conditions
 - Monitoring requirements (CEM, S/T, operating records)
 - Reporting requirements
 - Applicable regulations (local, state & federal)
- **Title V Inspection Checklist**
 - Verify monitoring requirements
 - Verify reporting requirements
 - Document violations

SECTION I – Facility Information

Facility Name			Inspection Date:	
Equipment Address			Facility ID#:	
City			Sector:	
Mailing Address				
City			Zip:	
Contact Name		Title:	Phone #	
Responsible Official		Title:	Phone #	

SECTION II – Monitoring Requirements

1. Does facility comply with equipment specific conditions of Section D?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2. Does facility comply with all general administrative conditions of Section E?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3. Does facility comply with construction requirements and specific operating conditions of Section H?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4. Does facility comply with all compliance plans and schedules identified in Section I?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5. Does facility comply with applicable NESHAPS , and HAPs (toxics) limits and rule requirements identified in Section J?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6. Does facility comply with performance of SOURCE TESTING requirements of Section D and H?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
7. Do Source Test results show compliance with permit conditions and/or rule limit requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

SECTION III – Reporting Requirements

8. Does facility comply with all federally enforceable Title V administrative conditions of Section K?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9. Did facility comply with the breakdown provisions of Rule 430, or Section (I) of Rule 2004 whichever is applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No
10. If emission limits were exceeded due to an EMERGENCY , did facility operator submit written notification to the AQMD within two working days from the time of discovery?	<input type="checkbox"/> Yes <input type="checkbox"/> No
11. Did facility identify deviations and properly report within the 72-hour period?	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. If a deviation(s) was reported, did facility submit a report within 14 days from the date of discovery of this deviation describing the corrective action and preventive measures taken?	<input type="checkbox"/> Yes <input type="checkbox"/> No
13. Did field inspector identify deviations during the course of the inspection that were not reported by the source?	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. Did facility submit the two Semi-Annual Report in a timely manner?	<input type="checkbox"/> Yes <input type="checkbox"/> No
15. Did facility submit the Annual Compliance Certification Report in a timely manner to SCAQMD and EPA?	<input type="checkbox"/> Yes <input type="checkbox"/> No

TILE V INSPECTION CHECKLIST

SECTION IV – Reporting Summary

Reporting Requirements	Reporting Period	Form Used	F/U Report	Rule Section
Annual Report (Non-RECLAIM)	Due March 1st	500-ACC	None	3004a10E
Annual Report (RECLAIM)	Due with APEP	500-ACC	None	3004a10E
Semi-annual Report for all facilities	Due August 31st	500-SAM	None	3004a4F
Semi-annual Report for all facilities	Due February 28th	500-SAM	None	3004a4F
Breakdown Report	Within 1 hour	500 N	7 to 30 days	3002g6
Emergency Deviation	Within 1 hour	500 N	Two days	3002g4
Deviation	72 hours	500 N	14 days	3004a5
Non-compliance Status	Operating under a Variance, Order of Abatement or AOC	500 C-2	Increments of Progress	

SECTION V – Enforcement Actions Summary

Violations Observed	Rule Section	Action Taken	Notice #
1. Failed to comply with operating & administrative conditions as required in Section D	3002c1	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____
2. Failed to comply with permit to construct operating conditions as required in Section H	3002a	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____
3. Failed to report emission limits exceedances in a timely manner and subsequent reports as a result of an EMERGENCY	3002g4	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____
4. Failed to report deviation and subsequent reports in a timely manner as required in Section K	3002c1	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____
5. Failed to submit the semi-annual report(s) in a timely manner as required in Section K	3002c1	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____
6. Failed to submit certified annual report in a timely manner as required in Section K	3002c1	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____
7. Source Test shows non-compliance with permit condition and/or rule limit	Applied Rule	<input type="checkbox"/> NOV <input type="checkbox"/> None	_____

16. Additional inspector's comments:

Field Inspector's Name: _____ Date: _____

Supervising A. Q. Inspector: _____ Date: _____

TILE V INSPECTION CHECKLIST CONT.

TITLE V DIFFERENCES FROM OTHER INSPECTIONS/FACILITIES

- Typically work with environmental professionals
- Many facilities strive for 100% compliance
- Inspections and violation activities are visible to the public through ECHO
- Facilities are significant sources of air pollution
- Responsible official has personal responsibility for some violations

REGULATORY OVERSIGHT TOOLS

- **6-month and annual reports**
- **Source Tests**
- **Breakdowns**
- **Self reported violations**
- **On-site inspections**
- **Off-site records review**

SAFETY AND PPE

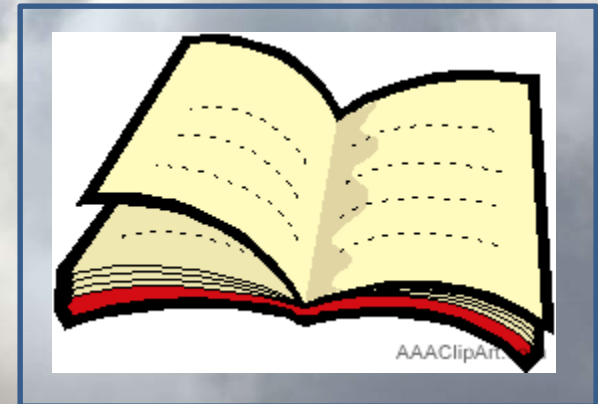
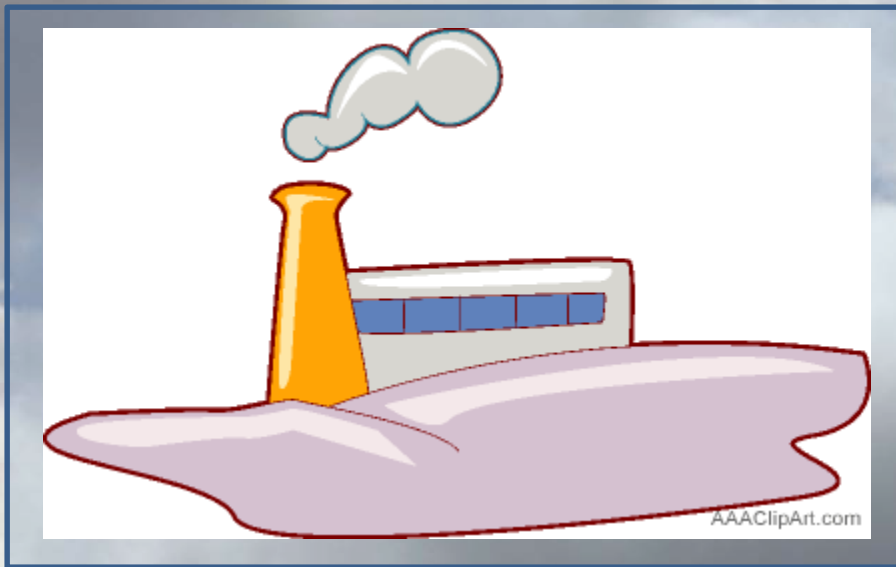


WHERE DO YOU BEGIN?



INSPECTION

- Physical Inspection
- Records Review



PHYSICAL INSPECTION OF THE EQUIPMENT

- Plan for at least one day of preparation
- Read the permit and identify all of the equipment and processes in the permit by permit number
- Break the inspection into areas or equipment groups: e.g. South manufacturing area, Cooling Tower, Combustion Turbine HRSG/SCR etc.

Where are the emission sources?

What are the emissions?

INITIALLY FOCUS ON THE EQUIPMENT YOU ARE FAMILIAR WITH



EXAMPLES

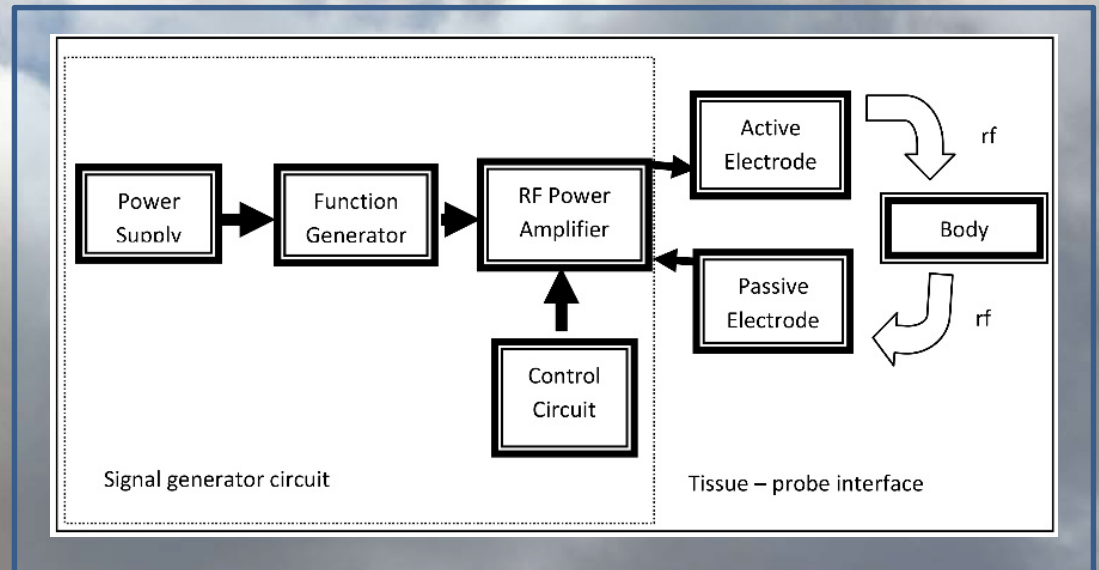


NOTHING TO SEE HERE, KEEP MOVING....



TAKE NOTES!

- Make sketches, diagrams of the process
- Learn how the facility operates
- Ask questions then ask more questions



REMEMBER: YOU ARE THE EXPERT

- **...eventually.**
- **You are the only consistent oversight for these facilities**
- **Your observations and experience will be needed for complaints, breakdowns and variances**
- **Learn as much as you can about the equipment and processes, not just the emission sources.**

RECORDS REVIEW

Verify all permit limits in the records

- **ECMPS data review for power plants.**
- **Data Acquisition System (DAS)**
- **Distributive Control System (DCS)**
- **Print-outs**
- **Follow-up review of submitted records (EPA or other)**

HIDDEN REGULATIONS

- NESHAP, MACT, GACT
- 40CFR60, 40CFR75
- CEMS regulations: calibration drift, gas audits etc.
- Local Rules: solvent cleaning, architectural coatings etc.



SPECIAL TOOLS

- Fugitive emissions analyzer
- Portable NO_x, CO, O₂ analyzer
- Floating roof tank seal gap inspections
- Camera



BE VISIBLE

- Logo on hard hat, safety vest etc.
- Clipboard
- Leave business card
- Sign in legibly in the visitor log book

Facility employees can be a great asset



REPORTS

- Reports will be a narrative of the entire inspection: physical inspection and records review.
- Check-list type reports are typically not applicable except for inspection of individual component, engine, boiler etc.
- The inspection (FCE or PCE) must be entered into ICIS-Air

VIOLETIONS

- EPA rarely gets involved
- Penalties are collected by the District
- SMAQMD uses a mutual settlement process (MSP).
Title V status does not increase the penalties.



RESOURCES

- Other air districts
- Source testing companies
- Other facilities
- CARB training
- EPA
- The internet



THE ROAD AHEAD



BEST WISHES!



For additional questions:

BRITNEY C. GALLIVAN

Office of Compliance and Enforcement

Staff Specialist



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DON DUMAINE

Stationary Sources Division

Associate Air Quality Specialist



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