CAPCOA  
Enforcement, Engineering, and Toxics Symposium  
November 8, 2017  

ENFORCEMENT AT  
Title V Facilities  

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SAFETY FIRST
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

- 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)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SCAB (Area 1)</th>
<th>Riverside Portion</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>SSAB (Area 2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>MDAB (Area 3)</td>
</tr>
<tr>
<td>Volatile Organic Compounds or Hydrocarbons (VOC)</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>50</td>
<td>100</td>
</tr>
<tr>
<td>Fine Particulate Matter (PM10)</td>
<td>70</td>
<td>70</td>
</tr>
<tr>
<td>Single Hazardous Air Pollutant (HAP)</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Combination of HAPs</td>
<td>25</td>
<td>25</td>
</tr>
</tbody>
</table>
## Major Source Threshold (tons/year)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>EPA default (tons/year)</th>
<th>Sacramento Metro AQMD</th>
<th>South Coast AQMD</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC</td>
<td>100</td>
<td>25</td>
<td>10</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>25</td>
<td>10</td>
</tr>
<tr>
<td>SOx</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>PM10</td>
<td>100</td>
<td>70</td>
<td>70</td>
</tr>
<tr>
<td>CO</td>
<td>100</td>
<td>100</td>
<td>50</td>
</tr>
<tr>
<td>Single HAP</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Combination of HAP</td>
<td>25</td>
<td>25</td>
<td>25</td>
</tr>
</tbody>
</table>

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.
15 Title V facilities in SMAQMD
Title V facilities in Northern California
Regulation XXX
Title V Permits

Table of Contents

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Rule 3000 General
(Amended November 5, 2010)

Rule 3001 Applicability
(Amended November 5, 2010)

Rule 3002 Requirements
(Amended November 5, 2010)

Rule 3003 Applications
(Amended November 5, 2010)

Rule 3004 Permit Types and Content
(Amended December 12, 1997)

Rule 3005 Permit Revisions
(Amended November 5, 2010)

Rule 3006 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 Information Page

### Title V Company, Inc.

100 Title V Street
Diamond Bar, CA 91765

John Doe
(909) 555-2000

John Smith
(909) 555-2001

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### 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

---

### Title V

<table>
<thead>
<tr>
<th>RECLAIM</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx: NO</td>
</tr>
<tr>
<td>SOx: NO</td>
</tr>
<tr>
<td>CYCLE: 0</td>
</tr>
<tr>
<td>ZONE: INLAND</td>
</tr>
</tbody>
</table>
### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

<table>
<thead>
<tr>
<th>Equipment</th>
<th>ID No.</th>
<th>Connected To</th>
<th>RECLAIM Source Type/ Monitoring Unit</th>
<th>Emissions And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Process 1: FOAM CUP MANUFACTURING</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CONVEYOR, GAYLORD</td>
<td>A/N: 316738</td>
<td>D2</td>
<td></td>
<td></td>
<td>P2.1, P13.1</td>
</tr>
<tr>
<td>MIXER, NO.1, POLYSTYRENE</td>
<td>A/N: 316738</td>
<td>D3</td>
<td></td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>CONVEYOR, GAYLORD</td>
<td>A/N: 316738</td>
<td>D4</td>
<td></td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>TANK, PRE-EXPANDER</td>
<td>A/N: 316738</td>
<td>D5</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>FOAM EXPANSION, NO.1A, PRE-EXPANDER</td>
<td>A/N: 316738</td>
<td>D6</td>
<td>D180 D181 D182 D254 D304</td>
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<td>D323.2</td>
</tr>
<tr>
<td>FOAM EXPANSION, NO.2A, PRE-EXPANDER</td>
<td>A/N: 316738</td>
<td>D7</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>FOAM EXPANSION, NO.3A, PRE-EXPANDER</td>
<td>A/N: 316738</td>
<td>D8</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>FOAM EXPANSION, NO.4A, PRE-EXPANDER</td>
<td>A/N: 316738</td>
<td>D9</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>FOAM EXPANSION, NO. 5A, PRE-EXPANDER</td>
<td>A/N: 316738</td>
<td>D10</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>CONVEYOR, PNEUMATIC</td>
<td>A/N: 316738</td>
<td>D11</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>CONVEYOR, PNEUMATIC</td>
<td>A/N: 316738</td>
<td>D12</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
<tr>
<td>CONVEYOR, PNEUMATIC</td>
<td>A/N: 316738</td>
<td>D13</td>
<td>D180 D181 D182 D254 D304</td>
<td></td>
<td>D323.2</td>
</tr>
</tbody>
</table>

**System 1: POLYSTYRENE BEAD EXPANSION - LINE 1**
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
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:

<table>
<thead>
<tr>
<th>CONTAMINANT</th>
<th>EMISSIONS LIMIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC</td>
<td>Less than or equal to 3281 LBS IN ANY ONE DAY</td>
</tr>
</tbody>
</table>

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

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

NONE
## PERMITTED EQUIPMENT LIST

The following is a list of all permits to construct and permits to operate at this facility:

<table>
<thead>
<tr>
<th>Application number</th>
<th>Permit to Operate number</th>
<th>Equipment description</th>
</tr>
</thead>
<tbody>
<tr>
<td>175599</td>
<td>D10982</td>
<td>ETHYLENE OXIDE STERILIZATION HOSPITAL</td>
</tr>
<tr>
<td>217251</td>
<td>D36401</td>
<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>217252</td>
<td>D22390</td>
<td>I C E (50-500 HP) NON-EM PORT N-RENT GASOLINE</td>
</tr>
<tr>
<td>269995</td>
<td>D64727</td>
<td>I C E (&gt;500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>269996</td>
<td>D64728</td>
<td>I C E (&gt;500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>269998</td>
<td>D64729</td>
<td>I C E (&gt;500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>274107</td>
<td>D71056</td>
<td>ETHYLENE OXIDE STERILIZATION HOSPITAL</td>
</tr>
<tr>
<td>274108</td>
<td>D71057</td>
<td>ETHYLENE OXIDE STERILIZATION CTL (HOSPITAL)</td>
</tr>
<tr>
<td>303977</td>
<td>D61222</td>
<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>314936</td>
<td>D98823</td>
<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
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<tr>
<td>314937</td>
<td>D98824</td>
<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
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<td>314938</td>
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<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>314939</td>
<td>D98826</td>
<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>316435</td>
<td>F11044</td>
<td>BOILER (&gt;20-50 MM BTU/HR) COMB GAS-LPG</td>
</tr>
<tr>
<td>316436</td>
<td>F11046</td>
<td>BOILER (&gt;20-50 MM BTU/HR) COMB GAS-LPG</td>
</tr>
<tr>
<td>316437</td>
<td>F11047</td>
<td>BOILER (&gt;20-50 MM BTU/HR) COMB GAS-LPG</td>
</tr>
<tr>
<td>355721</td>
<td>F26612</td>
<td>CHARBROILER – NATURAL GAS</td>
</tr>
<tr>
<td>411676</td>
<td>F73865</td>
<td>BOILER (&gt;5 MM BTU/HR) NATURAL GAS</td>
</tr>
<tr>
<td>430068</td>
<td>N14408</td>
<td>SERV STAT STORAGE &amp; DISPENSING GASOLINE</td>
</tr>
<tr>
<td>452326</td>
<td>G0935</td>
<td>I C E (50-500 HP) EM ELEC GEN DIESEL</td>
</tr>
<tr>
<td>509812</td>
<td>G0935</td>
<td>BOILER (&gt;20-50 MM BTU/HR) COMB GAS-LPG</td>
</tr>
<tr>
<td>509813</td>
<td>G0935</td>
<td>BOILER (&gt;20-50 MM BTU/HR) COMB GAS-LPG</td>
</tr>
<tr>
<td>509814</td>
<td>G0935</td>
<td>BOILER (&gt;20-50 MM BTU/HR) COMB GAS-LPG</td>
</tr>
</tbody>
</table>

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.
## 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]
PERMIT TO OPERATE

Permit No. D36401
A/N 217451

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]
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
<table>
<thead>
<tr>
<th>Category</th>
<th>Permit Status</th>
<th>Application Submission Window</th>
<th>Application Status</th>
<th>Potential Enforcement Action</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Expired</td>
<td>Closed</td>
<td>None Received</td>
<td>NOV</td>
<td>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 Rule 3002 (a)(1). 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 Rule 3004 (f)(3). 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 Rule 3003 (a)(6).</td>
</tr>
<tr>
<td>B</td>
<td>Expired</td>
<td>Closed</td>
<td>Received After Window Closed</td>
<td>NOV</td>
<td>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 Rule 3003 (a)(6). 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 Rule 3002 (c)(1).</td>
</tr>
<tr>
<td>C</td>
<td>Not Expired</td>
<td>Closed</td>
<td>None Received</td>
<td>NOV</td>
<td>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 Rule 3003 (a)(6).</td>
</tr>
<tr>
<td>D</td>
<td>Not Expired</td>
<td>Closed</td>
<td>Received After Window Closed</td>
<td>NOV</td>
<td></td>
</tr>
<tr>
<td>E</td>
<td>Not Expired</td>
<td>Open</td>
<td>None Received</td>
<td>None</td>
<td>Remind facility that the application submission window will be closing this quarter.</td>
</tr>
<tr>
<td>F</td>
<td>Not Expired</td>
<td>Open</td>
<td>None Received</td>
<td>None</td>
<td>Remind Facility that they may now submit their Title V permit renewal.</td>
</tr>
</tbody>
</table>
**Title V Permit Renewals Without Application Shields**

**Timeline:**
- **Submission Window for Application Shield**
  - 545 to 180 Days
- **After Submission Window**
  - 179 to 1 Days
- **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

# Title V Application Forms

## Decision Matrix for Form Submittal Determination

<table>
<thead>
<tr>
<th>Reason for Application</th>
<th>A0A</th>
<th>A0B-CQA</th>
<th>500-A2 App Cert</th>
<th>500-B Exempt Setup</th>
<th>500-C1 Comp Status Cert</th>
<th>500-D Non-Compliant Plan</th>
<th>500-E Exemption Request</th>
<th>500-F1 Title V Summary</th>
<th>500-F2 Title IV Repower Exp Plan Request</th>
<th>500-F3 Title IV New Unit Exemption Request</th>
<th>500-H4 Title IV Retired Unit Exemption Request</th>
<th>500-H CAM Plan</th>
<th>Other Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial TV App, TV Renewal, and MACT Part 2</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>I/A</td>
<td>I/A</td>
<td>I/A</td>
<td>I/A</td>
<td>I/A</td>
<td>I/A</td>
<td>I/A</td>
<td>I/A</td>
</tr>
<tr>
<td>Title V Administrative Change: Change of Operator, Change of Facility Info, Other (Refer to Rule 3000(B)(1) for others)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Title V Permit Revision</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>I/A</td>
<td>X</td>
<td>I/A</td>
<td>I/A</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Exemption Plan: Option A - PTE</td>
<td>X</td>
<td></td>
<td></td>
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<tr>
<td>Exemption Plan: Option B - FAC CAP</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>Exemption Plan: Option C - REVISED AER</td>
<td>X</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Exemption Plan: Option D - MOST CURRENT AER</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Other: Permit Shield, etc.</td>
<td>X</td>
<td></td>
<td></td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>
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.
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. [...]
## Example for Compliance Year 2016

<table>
<thead>
<tr>
<th>Compliance Year</th>
<th>Submittal Type</th>
<th>Reporting Period</th>
<th>Submittal Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>500-SAM (1)</td>
<td>01/01/16 – 06/30/16</td>
<td>08/31/16</td>
</tr>
<tr>
<td></td>
<td>500-SAM (2)</td>
<td>07/01/16 – 12/31/16</td>
<td>02/28/17</td>
</tr>
<tr>
<td></td>
<td>500-ACC</td>
<td>01/01/16 – 12/31/16</td>
<td>03/01/17</td>
</tr>
</tbody>
</table>
Form 500-SAM
Title V - Semi-Annual Monitoring 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) (mo/day/year) (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*:
   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*:

<table>
<thead>
<tr>
<th>Type of Incident</th>
<th>Indicate Deviation (D), Breakdown (B), or Emergency (E)</th>
<th>Notification Number</th>
<th>Was Form 500-C2 previously submitted for the non-compliance? (Attach additional sheets as necessary)</th>
</tr>
</thead>
<tbody>
<tr>
<td>○ D</td>
<td>○ B</td>
<td>○ E</td>
<td>○ Yes, on: __________________________ (mo/day/year) ○ No, Form 500-N is attached to this report</td>
</tr>
<tr>
<td>○ D</td>
<td>○ B</td>
<td>○ E</td>
<td>○ Yes, on: __________________________ (mo/day/year) ○ No, Form 500-N is attached to this report</td>
</tr>
<tr>
<td>○ D</td>
<td>○ B</td>
<td>○ E</td>
<td>○ Yes, on: __________________________ (mo/day/year) ○ No, Form 500-N is attached to this report</td>
</tr>
<tr>
<td>○ D</td>
<td>○ B</td>
<td>○ E</td>
<td>○ Yes, on: __________________________ (mo/day/year) ○ No, Form 500-N is attached to this report</td>
</tr>
<tr>
<td>○ D</td>
<td>○ B</td>
<td>○ E</td>
<td>○ Yes, on: __________________________ (mo/day/year) ○ No, Form 500-N is attached to this report</td>
</tr>
<tr>
<td>○ D</td>
<td>○ B</td>
<td>○ E</td>
<td>○ Yes, on: __________________________ (mo/day/year) ○ No, Form 500-N is attached to this report</td>
</tr>
</tbody>
</table>
**Form 500-ACC**

**Title V - Report For Annual Compliance Certification**

### 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 Appendix 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: (mo/day/year) and covers the period from: (mo/day/year) 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:**
   - □ This facility has been in compliance with all terms and conditions in the Title V permit as referenced in Section I.
   - □ 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)

<table>
<thead>
<tr>
<th>Permit Condition Or Rule Number(s)</th>
<th>Device Number(s)</th>
<th>Was Form 500-C2 previously submitted for the non-compliance?</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Yes, on ______________________ (mo/day/year)</td>
<td>□ No, Form 500-C2 is attached to this report</td>
<td></td>
</tr>
<tr>
<td>□ Yes, on ______________________ (mo/day/year)</td>
<td>□ No, Form 500-C2 is attached to this report</td>
<td></td>
</tr>
<tr>
<td>□ Yes, on ______________________ (mo/day/year)</td>
<td>□ No, Form 500-C2 is attached to this report</td>
<td></td>
</tr>
<tr>
<td>□ Yes, on ______________________ (mo/day/year)</td>
<td>□ No, Form 500-C2 is attached to this report</td>
<td></td>
</tr>
</tbody>
</table>

2. The methods used for determining the compliance status are:
   - □ Entirely consistent with the applicable requirements in the permit terms and conditions of the Title V permit.
   - □ 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 ____________________________  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

© South Coast Air Quality Management District, Form 501-ACD (2014.07)
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

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Inspection Date:</th>
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</thead>
<tbody>
<tr>
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</table>

<table>
<thead>
<tr>
<th>Equipment Address</th>
<th>Facility ID#:</th>
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<tbody>
<tr>
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</table>

<table>
<thead>
<tr>
<th>City</th>
<th>Zip:</th>
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<table>
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<tr>
<th>Mailing Address</th>
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<table>
<thead>
<tr>
<th>Contact Name</th>
<th>Title:</th>
<th>Phone #</th>
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</table>

<table>
<thead>
<tr>
<th>Responsible Official</th>
<th>Title:</th>
<th>Phone #</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### SECTION II - Monitoring Requirements

1. Does facility comply with **equipment specific conditions** of Section D?  
   - [ ] Yes  [ ] No  [ ] N/A

2. Does facility comply with all **general administrative conditions** of Section E?  
   - [ ] Yes  [ ] No  [ ] N/A

3. Does facility comply with **construction requirements and specific operating conditions** of Section H?  
   - [ ] Yes  [ ] No  [ ] N/A

4. Does facility comply with all **compliance plans** and schedules identified in Section I?  
   - [ ] Yes  [ ] No  [ ] N/A

5. Does facility comply with applicable **NESHAPS,** and **HAPs (toxics)** limits and rule requirements identified in Section J?  
   - [ ] Yes  [ ] No  [ ] N/A

6. Does facility comply with performance of **SOURCE TESTING** requirements of Section D and H?  
   - [ ] Yes  [ ] No  [ ] N/A

7. Do **Source Test results** show compliance with permit conditions and/or rule limit requirements?  
   - [ ] Yes  [ ] No  [ ] N/A

### SECTION III - Reporting Requirements

8. Does facility comply with all **federally enforceable Title V administrative conditions** of Section K?  
   - [ ] Yes  [ ] No

9. Did facility comply with the **breakdown provisions** of Rule 430, or Section (I) of Rule 2004 whichever is applicable?  
   - [ ] Yes  [ ] 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?  
    - [ ] Yes  [ ] No

11. Did facility identify **deviations** and properly report **within the 72-hour** period?  
    - [ ] Yes  [ ] 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?  
    - [ ] Yes  [ ] No

13. Did field inspector identify **deviations** during the course of the inspection that were not reported by the source?  
    - [ ] Yes  [ ] No

14. Did facility submit the two **Semi-Annual Report** in a timely manner?  
    - [ ] Yes  [ ] No

15. Did facility submit the **Annual Compliance Certification Report** in a timely manner to SCAQMD and EPA?  
    - [ ] Yes  [ ] No
<table>
<thead>
<tr>
<th>Reporting Requirements</th>
<th>Reporting Period</th>
<th>Form Used</th>
<th>F/U Report</th>
<th>Rule Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Report (Non-RECLAIM)</td>
<td>Due March 1st</td>
<td>500-ACC</td>
<td>None</td>
<td>3004a10E</td>
</tr>
<tr>
<td>Annual Report (RECLAIM)</td>
<td>Due with APEP</td>
<td>500-ACC</td>
<td>None</td>
<td>3004a10E</td>
</tr>
<tr>
<td>Semi-annual Report for all facilities</td>
<td>Due August 31st</td>
<td>500-SAM</td>
<td>None</td>
<td>3004a4F</td>
</tr>
<tr>
<td>Semi-annual Report for all facilities</td>
<td>Due February 28th</td>
<td>500-SAM</td>
<td>None</td>
<td>3004a4F</td>
</tr>
<tr>
<td>Breakdown Report</td>
<td>Within 1 hour</td>
<td>500 N</td>
<td>7 to 30 days</td>
<td>3002g6</td>
</tr>
<tr>
<td>Emergency Deviation</td>
<td>Within 1 hour</td>
<td>500 N</td>
<td>Two days</td>
<td>3002g4</td>
</tr>
<tr>
<td>Deviation</td>
<td>72 hours</td>
<td>500 N</td>
<td>14 days</td>
<td>3004a5</td>
</tr>
<tr>
<td>Non-compliance Status</td>
<td>Operating under a Variance, Order of Abatement or AOC</td>
<td>500 C-2</td>
<td>Increments of Progress</td>
<td></td>
</tr>
</tbody>
</table>

## SECTION V - Enforcement Actions Summary

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

16. Additional inspector’s comments:

Field Inspector’s Name: ____________________________ Date: ____________

Supervising A. Q. Inspector: ______________________ Date: ____________
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.
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.
• Fugitive emissions analyzer
• Portable NOx, 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
VIOLATIONS

• 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
(909) 396-2792
bgallivan@aqmd.gov

**Don Dumaine**
Stationary Sources Division
Associate Air Quality Specialist
(916) 874-2693
ddumaine@airquality.org