

Title V Permits

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Renewals
Modifications
CAM
Avoiding MACT



Title V – Renewal Permits

- Application Completeness
- EAC forms for insignificant activities?
- Emissions Unit list current?
- BAT requirements for non-insignificant emissions units identified?
- Applicable Requirements accurately identified and addressed?

Title V – Renewal Permits

- Compliance strategy for all applicable requirements
- Adequate monitoring, record keeping and reporting
- Can propose new compliance strategy

Title V – Renewal Permits

- Advantage over initial applications
- An issued Title V permit exists
- Greater alignment of PTI and Title V permit terms and conditions language
- Can reference existing Title V or PTI requirements in renewal application

Title V – Renewal Permits

- See Title V Renewal Checklist at http://www.epa.state.oh.us/dapc/title_v/TVrenewalguidance.pdf

Title V – Modifications

■ Types of Modifications

- Off Permit Changes
- Operational Flexibility
- Administrative Permit Amendments
- Minor Permit Modifications
- Significant Permit Modifications
- Reopening for Cause

■ Title V Modification guidance at

http://www.epa.state.oh.us/dapc/title_v/3-9-05_guidance_-_final.pdf

Compliance Assurance Monitoring (CAM)

Pollutant Specific Emissions Unit (PSEU)

- Located at a major source required to obtain a Title V permit
- Subject to emission limitation or standard for applicable pollutant
- Uses control device to achieve compliance with limitation or standard
- Potential pre-control emissions at least 100 percent of major source threshold (for Title V)
- Not otherwise exempt

CAM

- Evaluate whether CAM applies for each emissions unit that employs a control device
- Determine potential “pre-control” emissions
- PTE calculation, Fee Emission Reports, Stack Testing
- Existing parametric monitoring as basis for CAM
- Submit CAM Plan
- Sample CAM Plans at www.epa.gov/ttn/emc/monitoring

CAM

- CAM provides “reasonable assurance of compliance”
- CAM Plan - proper operation of control device
- Identify problem before a deviation occurs
- CAM “excursion” of indicator range
- Excursion is possible exception to compliance
- Excursion not necessarily violation of emission limitation/control requirement

CAM

- CAM rule exemption for MACT rules
 - applies only to monitoring for the *MACT emission limitation or standard*
- Exemption does not extend to other limitations

Avoiding MACT

- Synthetic minor limitations
- PTI
- Title V Renewal or Significant Modification