



Southwest Clean Air Agency Title V Air Operating Permit Application and Instructions

Prepared by:

Washington State Department of Ecology and
the Southwest Clean Air Agency

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Southwest Clean Air Agency

Title V Air Operating Permit Application and Instructions

This package contains forms and instructions to facilitate the submittal and review of an Air Operating Permit (AOP) application consistent with Title V of the Federal Clean Air Act Amendment (FCAA) of 1990.

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CHAPTER I. GENERAL INFORMATION

A. General Information and Certification (Form A-1)

The applicant should provide this information on Form A-1 (or the equivalent) and include the form as the first page of the application. A Table of Contents would be very useful.

B. Facility Description (Forms B-1 through B-4)

1. Begin with Facility Description:

- a. Form B-2 is used to describe the facility. Different parts of the facility can be defined as separate processes. You may find it useful to use Process 1 for applicable requirements that apply plant-wide, such as opacity requirements. In this way, these requirements will not need to be repeated for all other processes.
- b. You may find it useful to provide a brief (less than five pages) narrative description of the facility which generally describes the following elements of operation of the facility:
 - 1) Products produced
 - 2) General processes used
 - 3) Raw materials and fuels used
 - 4) Facility operating schedule

2. Products, Raw Materials, Fuels, Processes:

Complete Forms B-1 through B-4, or the equivalent.

C. Plant Operational Characteristics (Form C-1)

1. Emission Points, Controls, Stacks:

Complete Form C-1.

2. Facility Process Flow Diagram:

Provide one or more process flow diagrams which describe the logical relationship between emission units, fugitive sources, area sources, air pollution control devices, and stacks, and the flow of raw materials, fuels and products to and from these items. The process flow diagrams shall define materials used if appropriate and shall use the same process numbers as specified in Forms B-1 through B-4, C-1, and C-3.

3. Site Map:

Provide a detailed site map or maps which show the following:

- a. Facility boundaries.
- b. Locations of emission points, controls and stacks.
- c. Outline and elevations of buildings.
- d. Access and haul roads.
- e. Locations of raw material, fuel, and waste piles.
- f. Locations of waste water treatment facilities and evaporation ponds.

CHAPTER II. REGULATORY REQUIREMENTS

Chapter II of the application is designed to identify applicable regulatory requirements for each process, discharge point, and emission point. Submit separate sub-chapters for each emission point and for "plant-wide" requirements. Each sub-chapter should include the information specified in sections A through E.

Plant-wide requirements are those requirements that apply to the facility in general and are not specific to individual emission points. They should be listed under "Process 1" (refer to page 1).

A comprehensive list of federal, state and local requirements is provided with this application for purposes of facilitating completion of Chapter II. If complete, the most recent emission inventory submittal may be referenced in this section.

A. Description of Discharge and Emission Points

"Discharge Point" refers to the point where multiple generation points have been collected, and possible control equipment have been placed; for example, a stack.

"Generation Point" refers to any point where emissions occur, but no collection or control occurs; this is where pollutants leave the place they are generated. In some cases, these two points are one in the same.

B. Applicable Requirements

Complete the sections of Form C-2, or the equivalent, which address applicable requirements.

For each applicable requirement, ensure the following:

1. Requirement Citation:

A comprehensive list of federal, state, and local requirements is provided with this application (see Attachment 2). The list contains all potential applicable requirements except for those requirements contained in Orders of Approval and other Regulatory Orders. Using the list, the applicant can select the requirements that are applicable to the emission point or plant in general. The list contains the requirement citation, and a brief description of the requirement. Note: Be sure to consider and include requirements from all Regulatory Orders.

2. Description of Compliance Methods:

Provide in an attachment to Form C-2 the description of, or reference to, any applicable test method for determining compliance, including source testing and monitoring requirements.

3. Applicability Demonstration:

Provide information that was used in determining applicability of the requirement.

C. Exemptions

For exemptions from otherwise applicable requirements, provide the following information:

1. Requirement Citation:

Use same list as discussed in the first paragraph of Chapter II.

2. Brief Description:

Provide a brief description of the requirement. Use the description contained in the list provided by Ecology or SWCAA.

3. Applicability Demonstration:

Provide all information that was used in determining applicability of the requirement.

4. Description of the Exemption:

Provide a description of how the exemption applies to the facility.

5. Permit Shield:

Provide a request to extend the Permit Shield to the exemption.

D. Inapplicable Requirements

In general, inapplicable requirements are those requirements that do not apply to the facility or unit. However, for purposes of the application, documentation should be provided only for those requirements where the determination of applicability requires comparison with an emission, capacity, or some other size threshold, or some other determination that involves details of the emissions, capacity, or operations of the facility or unit, or construction and installation dates. Requirements that categorically do not apply, in general, should not be included in this section. However, the applicant should consider providing the following information for any requirements where applicability may be an issue:

1. Requirement Citation:
Use same list as discussed in first paragraph of Chapter II.
2. Brief Description:
Provide a brief description of the requirement. Use the description contained in the list provided by SWCAA.
3. Applicability Demonstration:
Provide a demonstration that the requirement does not apply. Include all information necessary in determining that the requirement does not apply.
4. Permit Shield:
Provide a request to extend the Permit Shield to the inapplicable requirement.

E. Compliance Plan

Provide the following information for this subsection:

1. Status:
The status of compliance with the applicable requirements. Complete the sections of Form C-2, or the equivalent, which addresses compliance.
2. Compliance Methods:
A statement of the methods used for determining compliance, including a description of monitoring, record keeping, and reporting requirements and test methods.
3. Compliance Certification:
A schedule for submission of compliance certifications during the permit term.
4. Enhanced Monitoring:
A statement indicating compliance status with any applicable enhanced monitoring and compliance certification requirements.
5. Compliance Schedule:
Provide a plan and schedule for achieving and maintaining compliance with applicable requirement if the Facility is not in compliance with the requirement at the time of application submittal.

CHAPTER III. COMPLIANCE PLAN SUMMARY

Chapter III shall contain the following information and items:

A. Statements of Intent

Provide the following statements:

1. For applicable requirements with which the source is in compliance, a general statement that the source will continue to meet such requirements on a timely basis.
2. For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis.
3. A statement that the source will meet the requirements of the compliance schedules provided in Chapter II.

CHAPTER IV. INSIGNIFICANT EMISSION UNITS

The following information on insignificant emission units shall be provided in Chapter IV.

A. List of Insignificant Emission Units

Complete Form C-3, or the equivalent.

B. Determination

For those emission units listed as insignificant because of size, production rate, etc., provide sufficient information to evaluate the determination.

CHAPTER V. PERMIT SHIELD SUMMARY

- A. Provide a list of all requirements for which the applicant requests a Permit Shield.
- B. Provide a general statement which requests permit shield from the requirements cited in Chapter V., Section A, above.

Form A-1: General Information and Certification

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

The purpose of Form A-1 is to record general information for the facility and to obtain signatures from plant personnel verifying that the information provided is accurate and complete.

Applications must be signed by an authorized responsible official (Corporations: President, secretary, treasurer or vice-president or other duly authorized person as allowed by WAC 173-401-200(27)(a); Partnership: General partner; Sole proprietorship: Proprietor; Public agency: Principal executive officer or ranking elected official). The following specific instructions apply: Item 3. Unified Business Identification Number is the Washington State uniform business identifier.

Item 10. Claim of Confidentiality: If materials contained in the complete application contain information considered to be confidential by the applicant, check the box adjacent to the word "are". Proceed with submittal of application by simultaneously submitting both the complete application and a separate application void of the materials considered confidential. Each page considered confidential must be individually identified by stamping "confidential" or similar method. In addition, complete Form C-2, and E-1 (Compliance Status Summary), if necessary. Include in both the confidential and nonconfidential versions of the application.

You may be required to submit your confidential information and the supporting basis for the confidentiality claim directly to the USEPA. Such information will be treated in accordance with the provisions of 40 CFR Part 2.

Following are excerpts applicable to the most common situations involving confidentiality claims. For further details, the applicant is referred to the complete text of 40 CFR Part 2:

Confidentiality reasons: Trade secrecy and similar concepts whereby limited disclosure is necessary to retain business advantages. Documentation: The confidential information must be clearly identified by use of a cover sheet, "confidential" stamp or similar method.

Criteria:

- (1) Reasonable measures have been and will continue to be taken by the business to protect the confidentiality of the information.
- (2) The information has not been reasonably obtainable by other persons without the company's consent.
- (3) No statute specifically requires disclosure.
- (4) The business satisfactorily shows that disclosure is likely to cause substantial harm to its competitive position.

Form A-1: General Information and Certification

AIR OPERATING PERMIT APPLICATION

1. Company Name: _____
2. Plant or Facility Name: _____
3. Unified Business Identification Number (UBI#): _____
4. Facility Address: _____

_____ County: _____

5. Mailing Address: (if applicable) _____

6. Owner: _____

Parent Company: _____

7. Facility contact who is familiar with the information contained in this application.

Name: _____

Title: _____

Telephone: _____

8. Type of operating permit application: (check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Initial permit application | <input type="checkbox"/> General permit application |
| <input type="checkbox"/> Early reductions application | <input type="checkbox"/> Permit modification application |
| <input type="checkbox"/> Renewed permit application | <input type="checkbox"/> Other (specify): _____ |

9. Reason for Application (tonnage of emission per year): _____

10. Claim of Confidentiality:

Some of the records and information contained in this application are are not (check one) unique to the applicant and/or are likely to adversely affect the competitive position of the applicant if released to the public or a competitor. If a claim of confidentiality is made for this application, provide a separate application for general distribution which is devoid of confidential information.

11. Certification:

I certify that I am the responsible official, as defined in WAC 173-401-200(27) for this facility. I further certify as required by WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Signature of Responsible Official Date Title

Printed Name

Form B-1: Facility SIC Codes and Associated Principal Products

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

The purpose of Form B-1 is to give the permit writer, inspectors, and permit reviewers an overall understanding of how your facility operates. Using Form B-1, list the principal (e.g. marketable) products produced by your facility, grouping them according to standard industrial classification codes (SIC) codes, see *Standard Industrial Classification Manual*, 1987 ed. Include the maximum annual production, taking into account any federally enforceable limits of each of these products and the units of measure for these products. If you wish this information to be kept confidential, circle the confidential indicator on the form.

Form B-2: Process Information

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

The purpose of Form B-2 is to give the permit writer, inspectors, and reviewers an overall understanding of how your facility operates. Using Form B-2, briefly describe all manufacturing processes, and/or commercial activities. Assign each process a number. This number will be used on Forms B-3, B-4, C-1, and C-3 (see "Process #____") on these forms). "Process #1" should be used exclusively to describe plant-wide activities (refer to page 1). If you wish this information to be kept confidential, circle the confidential indicator on the form. Number each process sequentially, assigning each process a unique number. Include normal and all alternative operating scenarios. Use additional copies of Form B-2 as necessary.

Form B-3: Raw Materials Used by Processes

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

The purpose of Form B-3 is to give the permit writer, inspectors, and reviewers an overall understanding of how your facility operates. Using Form B-3, briefly describe the raw materials, not including fuels, associated with each process listed on form B-2. Enter the number of the process (using the number indicated on Form B-2) which use these raw materials under the process number column. Include the maximum annual use of the raw material taking into account any federally enforceable limits. Enter the units of measure (UOM) for annual use. Use additional copies of form B-3 as necessary. If you wish this information to be kept confidential, circle the confidential indicator on the form.

Raw materials are "substances that enter into the process and become part of the product(s) or by-product(s)." By-products include emissions. This does not preclude listing emissions as otherwise required, but simplifies the raw materials list. For example, maintenance may be a process at a facility; but there are no raw materials in that process.

Form B-4: Fuels Used by Processes

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

The purpose of Form B-4 is to give the permit writer, inspectors, and reviewers an overall understanding of how your facility operates. Using Form B-4, briefly describe the fuels associated with each process. Enter the number of the process using the number indicated on Form B-2, and provide information on all fuel types including whether they use primary, back-up, or emergency fuels. Include the maximum annual use of the fuel, taking into account any federally enforceable limits and note units of measure (UOM). Use additional copies of the form as necessary. If you wish this information to be kept confidential, circle the confidential indicator on the form.

Fuels do not include electricity since there are generally no emissions from electrical usage.

Form C-1: Plant Operational Characteristics, Emission Point Descriptions

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

Using Form C-1, identify each emission point by a unique number under each plant process. Use "process #1," to equate plant-wide processes, as described on page 1. If the generation point is different than the discharge point (for example, a vent discharges emissions for three baghouses), identify the baghouses as the generation point and the vent as the discharge point for those three baghouses. Emission point types include emission units (EU), area sources of emissions (A), and fugitive emissions (F). Enter this information under "Description." Use the process numbers assigned in associated forms to associate points with fuels, emission controls, stacks, and raw materials. Emission controls include operational controls and methods as well as control equipment. Source Classification Codes can be obtained from SWCAA, Ecology's AFRS program, or from EPA's Technology Transfer Network (TTN) bulletin board at (919) 541-5742, under Chief, SCC lists. This information is also available on the annual emission inventory forms. Control equipment codes can also be found on the EPA bulletin board or in the EPA Aerometric Information Retrieval System (AIRS) Users Guide, Volume 7, AIRS Codes and Values, AF2, Section 7.5.8, page 175.

Emission rates or factors used in calculating annual potential emissions may be based on source test results, vendor guaranteed emission rates or concentrations, AP-42 emission factors, or other basis as approved by SWCAA. All data, assumptions, and calculations used in calculating potential emissions must be documented in Appendix A of the application. The following detailed instructions apply:

1. For emission rates based on source test information, please provide a one page summary including test results, the name of the testing firm, the test date, and reference to the methods used.
2. For emission estimates based on vendor guarantees, please provide a signed and dated copy of the guarantee from the vendor.
3. For calculated emission rates, please provide details of all assumptions, operational data, calculations, and other pertinent information used in calculating the annual emissions.
4. Additional applicability documentation, such as operational requirements, should be submitted in narrative form.

Form C-1: Plant Operational Characteristics, Emission Point Descriptions

AIR OPERATING PERMIT APPLICATION

Facility Name: _____

Process #

Process #	Discharge Point #	Emission Point #	Emission Point Description	SCC Code (# Factor Used)	Control Equipment Code	

Form C-2: Regulations and Regulated Emissions

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

Form C-2 is designed to provide information on (1) applicable requirements and initial compliance with those requirements and (2) methods to evaluate ongoing compliance with those requirements. This information is required under WAC 173-401-510.

Discharge Point #: Discharge point means the point at which pollutants are released into the outdoor ambient air. It includes stacks, activities, and vents. A discharge point may include emissions from multiple generation points. In some cases, a generation point and discharge point will be the same. The discharge point numbers specified on Form C-1 should also be used in completing Form C-2.

Generation Point #: A generation point means the point at which a pollutant is generated. It includes individual pieces of equipment, units, and activities that generate pollutants. Individual generation points only need to be shown on Form C-2 if an applicable requirement applies to the point.

Emissions Information: The following types of emissions-related information is required:

- Pollutants or Regulatory Requirement: The applicant should identify regulated pollutants emitted from each discharge point. A list of regulated pollutants is included in Attachment B. For applicable requirements that apply to all pollutants from a particular discharge point (i.e., operation and maintenance plans), the applicant should list "all."
- Annual Potential Emissions: Information on "potential to emit" may be required to determine whether certain requirements apply to a source or emission unit (i.e., enhanced monitoring requirements). Where required, applicants should list potential annual emissions or "potential to emit" for each regulated pollutant. "Potential to emit" means the maximum capacity of a stationary source to emit air pollutants under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable.
- Actual Emissions or Regulated Parameter: Applicants must provide information on actual emissions of regulated pollutants. Actual emissions must be expressed in terms of tons/year. The applicant may also need to report emissions in other terms that are necessary to evaluate compliance with an applicable requirement. Actual emissions may be estimated using source test results, vendor guaranteed emission rates or concentrations, AP-42 emission factors, or other methods approved by the permitting authority. All data, assumptions, and calculations should be documented in attachments to the application form.

- For emission rates based on source test results, please provide a one page summary including test results, the name of the testing firm, the test date, and reference to testing methods.
- For emission estimates based on vendor guarantees, please provide a signed and dated copy of the guarantee from the vendor.
- For calculated emission estimates (i.e., emission estimates based upon AP-42 emission factors), please provide assumptions, operational data, calculations, and other pertinent information used to prepare estimates.
- Additional applicability documentation, such as operational requirements, should be submitted in narrative form.

The applicant should also provide numerical information for standards that contain numerical limits on parameters other than emissions (i.e., sulfur content in fuels).

Applicable Requirements: Form C-2 (or attachments) must include a list of all applicable requirements:

- State Only: The applicant should identify which requirements are state-only requirements. All other requirements are assumed to be Federally enforceable requirements. These include rules and regulatory orders that are not included in the State Implementation Plan and/or been approved by EPA under Section 111 or Section 112 of the Federal Clean Air Act.
- Requirement Identification: For each discharge point, the applicant should identify all applicable requirements for each regulated pollutant. The requirement identification is the number of the regulation (or order of approval), section, and subsection. For example, an applicant would list SWCAA 400-060 as an applicable requirement for general process units.
- Allowable Limit: For each applicable requirement, the applicant should list the allowable limits. For example, SWCAA 400-060 establishes an exhaust gas allowable limit for particulate matter from general process units of 0.1 grains per dry standard cubic foot (gr/dscf). An Order of Approval for this process unit may have a different limit for the same piece of equipment and both should be listed.

Compliance Information: The applicant needs to provide information to evaluate compliance with applicable requirements:

- Compliance Status: The applicant should compare actual emissions with allowable limits and determine compliance status. Requirements that a source is not complying with should be identified in the compliance plan. For those requirements, the applicant must include a schedule of measures to achieve compliance with the applicable requirement in the compliance plan required under WAC 173-401-510(2)(h).

- Method or Test Used to Determine Compliance Status: The applicant should identify the method used to determine compliance. The test method for establishing initial compliance will generally be the method in the underlying regulation, order, or permit. If the underlying requirement does not specify a method, the applicant must propose one. Test methods may include compliance calculations, stack tests, surrogate parameters (i.e., scrubber pressure drop), or continuous emissions monitoring. In some cases, an applicant may propose to use a testing method for ongoing compliance (to be incorporated in the permit) that differs from the method that was used to demonstrate initial compliance. Alternative methods should be identified in an attachment to Form C-2.

Attachments: The attachments column should identify any attachments that contain backup information. This may include the calculations and bases for emission estimates, test method or monitoring plan references, explanations of compliance determinations, etc. In addition, applicants should attach the list of inapplicable requirements specified in WAC 173-401--510(2)(k) to Form C-2.

Form C-3: Insignificant Emissions

AIR OPERATING PERMIT APPLICATION

INSTRUCTIONS

The information provided in Form C-3 is explicitly required under WAC 173-401-300. Designation of an emission unit or activity as insignificant for Title V purposes does not exempt the unit or activity from any applicable requirement. An emission unit or activity is insignificant based on one or more of the following reasons:

1. Actual emissions of all regulated air pollutants from a unit or activity are less than the emission thresholds (see enclosed emission thresholds list).
2. It is listed in WAC 173-401-830 as categorically exempt.
3. It is listed in WAC 173-401-830 and is considered insignificant if its size or production rate based on maximum rated capacity is below the specified level.
4. It generates only fugitive emissions (as defined in SWCAA 400-030(37)), which are subject to no applicable requirement other than generally applicable requirements of the Washington State Implementation Plan (SIP).

Any unit or activity that meets one of these criteria can be identified as an Insignificant Emission Unit (IEU). For each such unit or activity, enter the process # using the same # indicated on Form B-2. Enter an IEU name and the basis for designation using reasons #1-4, as indicated above. If applicable, enter data documenting IEU status. As a convenience, a list of the emission thresholds is provided to be checked off.

