

AIR OPERATING PERMIT APPLICATION

General Instructions and Checklist

The Title V permit application forms must be completed and submitted for each facility required to obtain a Title V Air Operating Permit (AOP) under Chapter 173-401 WAC. Instructions for completing each form are shown below. Including a Table of Contents for the application is strongly encouraged.

IMPORTANT: The Puget Sound Clean Air Agency (the Agency/PSCAA) must receive a complete application within twelve months of your facility becoming subject to the Air Operating Permit Program.

Upon receiving an application, the Agency has 60 days to determine whether it is complete. If the Agency determines that an application is not complete within 60 days of receiving the application, the Agency will notify the source in writing. Any notification of incompleteness will specify what information is needed to make the application complete and give a reasonable time frame for the applicant to respond. **The Agency recommends that you submit your application 90 days prior to the due date to assure that a complete application is received by the due date.** Submitting a timely and complete application will give you an “application shield” to allow you to operate until a final permit is issued. To maintain the “application shield” the applicant must also submit any requested additional information by the deadline specified by the Agency.

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Submit a complete application to the Agency and send a copy to EPA.

Puget Sound Clean Air Agency

Email to facilitysubmittal@pscleanair.gov

If the documents cannot be emailed due to file size, mail to the following address:

Attn: Operating Permit Certification
1904 3rd Ave, Suite 105
Seattle, WA 98101

If you mail documents, send an email to the address above notifying the Agency that the documents were mailed.

EPA Region 10

Email to R10_Air_Permits@epa.gov

If the documents cannot be emailed due to file size, mail to the following address:

Attn: Air Operating Permits and Toxics Branch
US EPA Region 10, Mail stop 15-H13
1200 Sixth Ave, Suite 900
Seattle, WA 98101

If you mail documents, send an email to the address above notifying EPA Region 10 that the documents were mailed.

Your AOP Application must include the following:

- ☐ Form A: General Information
- ☐ Form B: Emissions Unit Information
- ☐ Form C: Compliance Plan Summary
- ☐ Form D: Insignificant Emission Unit Information

Duty to Correction Application:

An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information. In addition, an applicant must provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

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Form A: General Information

The applicant should provide general information on Form A and include the form as the first page of the application. Applications must be signed by a responsible official as defined in WAC 173-401-200:

- Corporations: President, secretary, treasurer or vice-president or other duly authorized person as allowed by WAC 173-401-200(29)(a);
- Partnership: General partner;
- Sole proprietorship: Proprietor;
- Public agency: Principal executive officer or ranking elected official.

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Form A: General Information

FACILITY INFORMATION

| | | | |
|------------------|------------------------|-------|-----|
| Company Name | Plant or Facility Name | | |
| Site Address | City | State | Zip |
| Mailing Address | City | State | Zip |
| Registration No. | | | |

FACILITY CONTACT INFORMATION

| | | |
|----------------------------|-------|-------|
| Plant/Site Manager Contact | | |
| Title | Phone | Email |

Attach a description of the processes and products at the facility including any associated with each alternative operating scenario pursuant to WAC 173-401-650

RESPONSIBLE OFFICIAL

| | | | |
|--|-------|-------|-----|
| Name | Title | | |
| Phone | Email | | |
| Address (if different from site address) | City | State | Zip |

STATEMENT OF CERTIFICATION

Responsible Official Statement:

I, the undersigned, certify that I am the responsible official, as defined in WAC 173-401-200, of the Title V source addressed in this application. I further certify, based on information and belief formed after reasonable inquiry, that the statements and information in this application are true, accurate and complete.

Printed Name of Responsible Official

Title of Responsible Official

Signature

Date

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Form B: Emissions Unit Information Instructions

Complete a separate Form B for each:

1. Emission unit
2. Fugitive emission source. Fugitive emissions are emissions which are not vented through a well-defined stack.

All calculations used to complete Form B must be included in the application.

Section 1 – Equipment Information

Each emission point at a unit must be assigned a unique identification number; alternative operating scenarios for an emission point must also be assigned a unique identifier (i.e., emission points 1.a and 1.b). Emissions of fugitive (nonpoint) emissions must be included in this section.

Section 2 and Section 3– Operating Schedule and Production Rates

Fill in the maximum operating schedule and production rates, considering any federally enforceable limits. If an operational or throughput limit exists, provide the NOC# and Condition#.

Section 4 – Products of Emission Unit or Process

Fill in the products produced by the EU or process.

Section 5 – Fuels Used

Identify the fuels used by the EU or process and indicate whether the fuel is used as a primary, backup, or emergency fuel. Include the maximum use of the fuel, considering any federally enforceable limits (this includes limits established in an Order of Approval for a NOC).

Attach additional pages/rows as necessary.

Section 6 – Air Contaminants Emitted

Provide the potential annual emissions or “potential to emit” for each regulated pollutant from each emissions point associated with the EU. “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 restrictions on hours of operation or on the type or amount of materials combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable. A list of air contaminants must be provided in units of pounds per hour and tons per year and, if necessary, in units of an applicable standard or reference test method.

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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 the Agency. All data, assumptions, and calculations used in calculating potential emissions must be documented in 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, operational parameters of the emission unit (i.e., production rate, fuel characteristics and usage rate) 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 potential emissions.
4. Additional applicability documentation, such as operational requirements, should be submitted in narrative form.

Attach additional pages/rows as necessary.

CAM Applicability:

The applicant should indicate whether or not an emissions unit is subject to the Compliance Assurance Monitoring (CAM) Rule (Title 40 Code of Federal Regulations Part 64). Units not subject to CAM will be subject to periodic monitoring.

The applicability determination for this rule starts with the question of what is the potential to emit for the unit if no control device were present? (40 CFR 64.2, Applicability, is copied below.) Please enter this amount for each pollutant into the third column. The last column is for indicating whether or not CAM is required for the unit. This determination needs to be made for each pollutant. It is probable that for a particular emissions unit, one pollutant would be subject to periodic monitoring and another pollutant would be subject to CAM. The applicability section of the CAM rule should be read carefully and be prepared to defend any determination you make.

§ 64.2 CAM Applicability.

- a) General applicability. Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:
 - 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

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- 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in § 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

b) Exemptions—

- 1) Exempt emission limitations or standards. The requirements of this part shall not apply to any of the following emission limitations or standards:
 - i. Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.
 - ii. Stratospheric ozone protection requirements under title VI of the Act.
 - iii. Acid Rain Program requirements pursuant to sections 404, 405, 406, 407(a), 407(b), or 410 of the Act.
 - iv. Emission limitations or standards or other applicable requirements that apply solely under an emissions trading program approved or promulgated by the Administrator under the Act that allows for trading emissions within a source or between sources.
 - v. An emissions cap that meets the requirements specified in § 70.4(b)(12) or § 71.6(a)(13)(iii) of this chapter.
 - vi. Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in § 64.1. The exemption provided in this paragraph (b)(1)(vi) shall not apply if the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (such as a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).
- 2) Exemption for backup utility power emissions units. The requirements of this part shall not apply to a utility unit, as defined in § 72.2 of this chapter, that is municipally-owned if the owner or operator provides documentation in a part 70 or 71 permit application that:
 - i. The utility unit is exempt from all monitoring requirements in part 75 (including the appendices thereto) of this chapter;

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- ii. The utility unit is operated for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations and will be operated consistent with that purpose throughout the part 70 or 71 permit term. The owner or operator shall provide historical operating data and relevant contractual obligations to document that this criterion is satisfied; and
- iii. The actual emissions from the utility unit, based on the average annual emissions over the last three calendar years of operation (or such shorter time period that is available for units with fewer than three years of operation) are less than 50 percent of the amount in tons per year required for a source to be classified as a major source and are expected to remain so.

Section 7 – Emission Release Parameters

Provide general stack data for the emission unit, using the emission point numbers specified in Section 1. Specify whether the emission point is a stack (point source), or fugitive. Specify what regulated pollutants are emitted from each point (PM, CO, Sulfur Dioxides, nitrogen oxides, HAP and lead).

Add additional pages and rows as necessary.

Section 8 – Air Pollution Control Equipment

Identify and describe all air pollution control equipment and compliance monitoring devices or activities. Add additional rows and pages as necessary. Provide a flow diagram showing the relationship between emission unit, control device(s), and stack(s). The diagram should include percent apportionment as appropriate (e.g., how much of the flow is routed to each stack, in terms of a percentage). If the emission unit has more than one control device, fill out Section 9 twice – one for each control device.

Section 9 – Applicable Requirements

Cite and describe all applicable requirements from state and federal regulations that pertain to the EU.

Attach additional pages/rows as necessary.

Section 10 – Exemption from Otherwise Applicable Requirements

Identify otherwise applicable requirements that are determined to be exempt to the emission unit, or that are believed to be inapplicable pursuant to WAC 173-401-640(2). Each requirement listed as exempt or inapplicable should include the citation, a brief description of the requirement and the exemption, the information used in determining the applicability of the exemption, and a request to extend the Permit Shield to the exemption.

Attach additional pages/rows as necessary.

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Form B: Emission Unit Information for AOP Application

Complete a separate Form B for each emission unit and/or fugitive emission source.

SECTION 1: EQUIPMENT INFORMATION

| | | | | | |
|--|-------|----------------------------------|------------------------------------|--|--|
| Type of Unit or Process (rotary dryer, boiler, crusher, pelletizer, engine, etc.) | | Emission Unit Number | | Emission Point Number(s) associated with this EU | |
| Make | Model | Installation or Manufacture date | | SIC Code | |
| If applicable, identify and describe alternative operating scenario(s) pursuant to WAC 173-401-650 and identify any alternative emission points associated with the operating scenario. Attach additional pages as needed. | | | | | |
| Capacity (manufacturer's or designer's guaranteed maximum) | | | Operating Capacity (specify units) | | |
| Brief description of operation of unit or process: | | | | | |

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SECTION 2: OPERATING SCHEDULE

| Hours Per Day | Days Per Week | Weeks Per year | Limit on operating schedule | If applicable, Condition# and NOC# which contains the enforceable operating limit |
|---------------|---------------|----------------|---|---|
| | | | <input type="checkbox"/> Y <input type="checkbox"/> N | |

SECTION 3: PRODUCTION RATES (AND THROUGHPUT LIMITS, IF APPLICABLE)

| Raw Material | Process Timeframe | | | Specify Units (tons, Btu, Gal., etc.) | Condition# and NOC# which contains limits (if applicable.) |
|--------------|-------------------|------|------|--|---|
| | Hour | Week | Year | | |
| | | | | | |
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SECTION 4: PRODUCTS OF UNIT OR PROCESS

| Produced Material | Hourly Process Weight (lbs per hour) | | | Average Annual (Specify Units) | Average Hours/Week (For Intermittent Operations Only) |
|-------------------|--------------------------------------|------|------|-----------------------------------|--|
| | Hour | Week | Year | | |
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SECTION 5: FUELS USED

| Fuel Types (Oil, natural gas, etc.) | Primary, Backup, or Emergency? | % Sulfur | Grade No. | Maximum Usage (Specify Units) | Condition# and NOC# which contains limits (if applicable) |
|--|-----------------------------------|----------|-----------|----------------------------------|--|
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SECTION 6: AIR CONTAMINANTS EMITTED

Potential to Emit (PTE) of all regulated air pollutants. If a control device is present, list the emission rate before and after the control device. Attach additional pages as necessary and include calculations used.

| Regulated Pollutants (including greenhouse gases) | Potential Emissions | | | | | Basis of Estimate (AP-42, testing – include reference method, engineering estimate, etc.) | CAM needed? If yes, submit a CAM Plan. |
|--|---------------------|---------|--------|---------|---|--|---|
| | Lbs/hr | Tons/yr | Lbs/hr | Tons/yr | Emissions rate using Other Unit of Measurement (if needed for applicability determination) | | |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |

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SECTION 7: EMISSION RELEASE PARAMETERS

List each Emission Point (as identified in section 1) separately for the EU – Add additional pages if needed

| Emission Point Number | Pollutants Released (HAP, VOC, PM, etc.) | Stack Height (ft) or indicate if it's fugitive | Stack Diameter (ft at exit point) | Exit Flowrate (ACFM) | Exit Temp (deg. F) | Stack Base UTM Coordinates |
|-----------------------|---|--|--------------------------------------|-------------------------|-----------------------|---|
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |

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SECTION 8: AIR POLLUTION CONTROL EQUIPMENT

Fill out the information below. Provide a flow diagram showing the relationship between emission unit, control device(s), and stack(s). The diagram should include percent apportionment as appropriate (e.g., how much of the flow is routed to each stack, in terms of a percentage). Attach additional pages as necessary. If the EU has more than one control device, fill out Section 8 twice – one for each control device.

Type

☐ Multiclone ☐ Wet Scrubber ☐ Baghouse ☐ Electrostatic Precipitator ☐ None ☐ Other – Provide Description: _____

Identify compliance monitoring devices or activities (e.g., CEMS, COMS, etc.):

Name of Manufacturer

Model Number

Date Installed

Pollutants Removed (CAS# for HAP):

Design Efficiency (%):

Operating Efficiency (%): Attach a description of the method used to determine operating efficiency.

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| SECTION 9: APPLICABLE REQUIREMENTS | | | | | | | |
|--|-------------|-------------------------|----------------------------|------------------------|---|---|-------------------|
| Regulation Citation (i.e., WAC, NESHAP, PSD, NSPS, PSCAA Rule, etc.) | Description | Monitoring Requirements | Recordkeeping Requirements | Reporting Requirements | Testing Requirements and Test Method for determining compliance | Applicable Emission Standards (include units) | Compliance Status |
| | | | | | | | |
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SECTION 10: INAPPLICABLE REQUIREMENTS OR EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS

List requirements which are believed to be inapplicable pursuant to WAC 173-401-640(2), or otherwise applicable requirements for which the emission unit is exempt.

| Requirement Citation (i.e. WAC, NESHAP, NSPS, etc.) | Exempt or Inapplicable? | Description of Requirement | Information used to determine exemption or inapplicability | Request to extent the permit shield to this requirement? |
|---|----------------------------|----------------------------|---|--|
| | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |
| | | | | <input type="checkbox"/> Y <input type="checkbox"/> N |

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Form C: Compliance Plan Summary for AOP Application

The compliance plan content specified in this form shall apply and be included in the acid rain portion of a compliance plan for an affected source, except as specifically superseded by regulation promulgated under Title IV of the FCAA with regard to the schedule and method(s) the source will use to achieve compliance with the acid rain emissions limitations.

SECTION 1: COMPLIANCE SCHEDULE AND PLAN

For applicable requirements with which the source is in compliance, provide a general statement that the source will continue to meet such requirements on a timely basis:

For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis:

Identify applicable requirements the source will not be in compliance with at time of permit issuance, and provide a narrative description of how compliance will be achieved:

Provide a schedule of compliance for sources that will not be in compliance with all applicable requirements at the time of permit issuance. The schedule must include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with all applicable requirements for which the source will not be in compliance at the time of permit issuance. Attach additional pages to this application as necessary to provide the full schedule of compliance.

Note: This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based

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SECTION 2: SCHEDULE OF COMPLIANCE CERTIFICATIONS

During the permit term, compliance certifications will be submitted annually, at a minimum. If an applicable requirement requires more frequent submissions, please specify below:

| Certification Parameter | Beginning Date (month/day/year) | Frequency of Submittal (6 mo, quarterly, etc.) |
|-------------------------|------------------------------------|---|
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SECTION 3: MONITORING

A statement indicating compliance status with any applicable monitoring and compliance certification requirements.

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Form D: Insignificant Emission Unit Information for AOP Application

List emission units or activities classified as insignificant for Title V purposes, based on the criteria listed in WAC 173-401-530. Attach additional pages as necessary. 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 established in subsection (4) of WAC 173-401-530.
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 ORCAA Rule 1.4, which are subject to no applicable requirement other than generally applicable requirements of the State Implementation Plan (SIP).

Please note that no emissions unit or activity subject to a federally enforceable applicable requirement (other than generally applicable requirements of the SIP) shall qualify as an insignificant emissions unit or activity. For the purposes of this determination, generally applicable requirements of the SIP are those federally enforceable requirements that apply universally to all emission units or activities without reference to specific types of emission units or activities.

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[illegible]