Title V Permitting

January 18, 25 and 27, 2011

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and
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Supervising Permit Services Engineer
SJVAPCD



Workshop Web Attendees

Can send questions or comments during workshop via e-mail to:

webcast@valleyair.org
Add "Title V" in subject line

- About 5 minute delay before e-mail shows up in our e-mail inbox
- Webcast e-mail available only during workshop webcast



Meeting Agenda

- Basics of Title V
 - Applicability
 - Exemptions
 - Initial Application, Modifications and Renewals
- Timelines
- Discuss Initial Application Forms
- Examples



What is Title V?

- Title V is a federally mandated operating permit program which requires major sources to maintain permits which can be enforced by the EPA or individual citizens.
- District Rule 2520 Federally Mandated Operating Permits
- There is additional monitoring and reporting compared to the "District Only" permit which you are accustomed to.



What is Title V?

- Title V permits are issued for up to a five-year period.
- Currently ~200 sources in the valley are subject to Title V
- Recently, the major source thresholds for NOx and VOC were lowered, subjecting more sources to Title V



Applicability

- Sources with Potential to Emit greater than major source thresholds:
 - NOx: 25 tpy prior to 6/10/10, 10 tpy after
 - VOC: 25 tpy prior to 6/10/10, 10 tpy after
 - PM10: 70 tpy
 - SOx: 70 tpy
 - CO: 100 tpy
 - GHG: 100 tpy (mass) and 100,000 tpy (CO2e), as of 7/1/11
- Fugitive emissions don't count unless listed in source categories of 40 CFR 70.2



Options to avoid Title V

- Restrict your facility potential to emit to below the major source thresholds
- Go under Rule 2530 "Federally Enforceable Potential to Emit" and keep your actual emissions less than ½ the major source thresholds – you must request this in writing and keep records of actual emissions



Title V Timelines

- 6/10/2010: EPA approved the District's lower Major Source threshold, giving sources 1 year to submit applications
- 4/10/2011 or 6/10/2011: major sources must submit a complete <u>Initial</u> Title V application (Staggered due dates based on District derived criteria).



Types of Title V Applications

- Initial application to initially apply for a Title V permit
- Modifications 4 types, to make changes to the Title V permit (including incorporating Authorities to Construct)
- Renewal application permit is renewed every 5 years, source must submit an application 6 to 18 months before current permit expires



Modifications at Title V sources

- Administrative Amendment
- Minor Modification
- Significant Modification
- Section 6.4.4 Modification
- Authority to Construct with Certificate of Conformity (ATC w/COC)



What is Title V Monitoring and Reporting?

- More frequent monitoring of operating parameters to demonstrate that adequate operating control equipment is functioning correctly.
- Every six months, a facility submits a Report of Required Monitoring (RRM) demonstrating compliance has been attained.
- Annually a facility submits a report of Annual Compliance Certification (ACC).



Initial Application Process

- Upon submittal of a Title V application, a
 determination of completeness will be made. This will
 be sent in the form of a letter with an estimate of
 maximum processing hours.
- The District must process the application within 18 months from completeness date.
- An Engineering Evaluation will be prepared with Draft Title V permits sent to the applicant, EPA and ARB.
 All hourly time spent processing will be invoiced on a calendar quarterly basis.



Application Process continued

- The applicant, ARB and the public will have 30-days to comment on the draft permits.
- The public may request to have a public hearing.
- The EPA shall have 45-days to comment on the draft permits.
- The District shall make appropriate changes based on comments received.
- The final permit will be sent to the applicant with copies to ARB, EPA, and anyone who commented.



Application Forms

- Title V application has 5 parts (TVFORMmain through TVFORM-005)
- Responsible Official must sign TVFORM-005
 - Responsible official is the owner, president, general manager, CEO, or a person having overall responsibility for regulatory compliance for the facility.



Application Forms

- Complete TVFORM-main
 - Check Initial Application on the top of the form.
 - Complete the rest of the form as indicated for the facility.



San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For: INITIAL TITLE V PERMIT - First Federal Title V Operating Permit

[] RENEWAL OF TI [] NEW TITLE V PE		- Federal Title V O - New Stationary S			After June 1	5, 1995
1. PERMIT TO BE ISSUED TO:						
2. MAILING ADDRESS: STREET/F.O. BOX: CITY:		STATE	Ŀ;	9-DIGHT ZIP CODE:		
3. LOCATION WHERE THE EQUIPME STREET:	INT WILL BE OPERA	гво:епту:		I	C. CODE(S) O	F RACILITY
	TOWNSHIP	RANGE				
4. GENERAL NATURE OF BUSINESS:				•		
5. DESCRIPTION OF BQUIPMENT FO. uze additional sheets, if necessary.:	R WHICH APPLICATI	ON IS MADE, Inch	de Permit Nun	ibers, a separate C	AM plan if ap	plicable and
Optional Section 6. CHBCK WHETHER YOU ARE A	[]Yes [TH AIR LIVING"]No	HEAUNT	"INSI" []Yes []N	PBCT"	jujiré. ^{ng}
PARTICIPANT IN BITHER OF THES VOLUNTARY PROGRAMS:	E []Send in	fo	LIVINE	[]Send info		V
7. TYPE OR PRINT NAME OF APPLIC	ANT:			TITLE OF APP	LICANT:	
8. SIGNATURE OF APPLICANT:		DATE:		PHONE #: (FAX #: (B-MAIL:)	
FOR APCD USB ONLY:						
DATE STAMP	FILING FRE RECEIVED: DATE PAID	\$		CHBCK #:		
	PROJECT #:			FACILITY ID:		

IVFORM-main

Application Forms

- Complete TVFORM-001 or TVFORM-002
 - Use TVFORM-001 to report actual annual emissions (emission Inventory), or
 - Use TVFORM-002 to report maximum permitted emission levels
 - FORM-001: either submit last approved emission statements for all permit units, or complete the form with actual emission per permit unit
 - FORM-002: state the maximum annual emissions allowed per the operating conditions of the existing permit unit. If HAP emissions are greater than 10 tpy for a single compound (or 25 tpy for combined HAP) they must also be calculated.



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Title V Application - ACTUAL EMISSIONS REPORT

Refer to the attached instructions for more information.

COMPANY NAME: FACIL								FACILITY ID:	-
Instructions). I In certain cases	LIST OF EQUIPMENT AND CALCULATED ANNUAL EMISSIONS - In numerical order, list all permitted equipment and describe the emissions (See Instructions). If more space is required, use additional forms. Attach sample calculations. In certain cases (See Instructions), previously approved emissions statements or inventory reports may be attached and submitted in lieu of this form. If this option is chosen, do not list permitted equipment described in those emissions inventory statements or reports on this form.								
Column 1 Permit Number	Permit Specific Specific								
		NOx	VOC	PM_{10}	SOx	со	Other:	Other:	Other:

Emissions for year ending:

TVFORM-001



San Joaquin Valley Unified Air Pollution Control District

Title V Application - POTENTIAL EMISSIONS REPORT

Refer to the attached instructions for more information.

COMPANY N	COMPANY NAME: FACILITY ID: -							-	
LIST OF EQUIPMENT AND POTENTIAL ANNUAL EMISSIONS - In numerical order, list all permitted equipment and describe the emissions (See Instructions). If more space is required, use additional forms. Attach sample calculations. In certain cases (See Instructions), actual emissions may be reported in lieu of potential emissions. If this option is chosen report actual emissions on TVFORM-001 and do not list emissions here.									
Column 1 Permit Specific Source of Emissions (if applicable) Column 3 Potential Annual Pollutant Emissions in tons per year (one pollutant per column) List the pollutant(s) for which the facility is a major source:									
		NOx	VOC	PM_{10}	SOx	со	Other:	Other:	Other:

TVFORM-002



Application Forms

- Complete TVFORM-003
 - Identify insignificant activities that occur at the facility.
 - Place a checkmark for any of the activities listed that occur at the facility.



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Title V Application - INSIGNIFICANT ACTIVITIES

Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.

Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	4
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unwented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 ar 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1		Portable tanks used exclusively to store produced fluids	6.6.10	
Piston-type i.c.engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2		for ≤ six months Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum beat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥0.8251	6.7.1.1	
Space heating equipment other than boilers Cooling towers with a circulation rate less than 10,000	6.1.4		Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity > 0.8762	6.7.1.2	
gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	-		Equipment used exclusively for the transfer of refined labricating oil	6.7.2	
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft ² open area; using solvents with initial boiling	6.9	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		point ≥ 248 F; and < 25 gal/yr. evaporative losses Brazing, soldering, or welding equipment	6.10	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1		Fugitive emissions sources assoc. with exempt equipment	6.12	
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2		Pits and Ponds as defined in Rule 1020	6.15	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store org- anic material where the actual storage temperature <150 F	6.6.4		Emissions less than 2 lb/day from units not included above	6.19	
Containers used to store unheated organic material with an initial boiling point ≥ 302 F	6.6.5		Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7		Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)



Application Forms

- Complete TVFORM-004
 - List each permit unit in column 1.
 - Identify rules each permit unit is subject to in column 2.
 - Identify compliance status in column 3.
 - Describe how compliance is achieved in column 4.
 - If there is a future compliance date from an applicable rule state that in column 5.

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Title V Application - COMPLIANCE PLAN

In numerical order list all permitted equipment that are subject to one or more applicable requirements. List all requirements for a permit, each in a separate box, before moving on to the next permit number. Refer to the attached instructions for more information.

each in a separate box, before moving on to the next permit number. Refer to the attached instructions for more information.						
COLUMN 1	COLUMN 2	COLUMN 3	COLUMN 4	COLUMN 5		
	Cite Applicable Requirement(s)	Compliance Status:	How Will You Comply With The Applicable Requirement?			
	Specify the applicable Rule, Regulation, & Section number.	YES	Describe operational requirements and limitations, and/or monitoring,	Future Effective Date		
Permit Number	Regulation, & Section number.	NO	recordkeeping, & reporting protocol to assure compliance with the applicable requirements. See instructions for further details.	(List future effective dates of the applicable		
		EXEMPT	applicable requirements. See instructions for further details. If SUBSUMED, leave this column blank.	requirement, if any.)		
	See Instructions		II SOBSOMED, leave this continu orana.	requirement, ir any.)		
		SUBSUMED				
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San Joaquia Valley Unified Air Pollution Control District

Title V Application - COMPLIANCE PLAN

In numerical order list all permitted equipment that are subject to one or more applicable requirements. List all requirements for a permit, each in a separate box, before moving on to the next permit number. Refer to the attached instructions for more information.

COLUMN (COLUMN 2	COLUMNS	COLUMN 4	COLUMN 5
	Cite Applicable Requirement(s)	Compliance Status:	How Will You Comply With The Applicable Requirement?	
	Specify the applicable Rule.	YES	Describe operational requirements and limitations, and/or menitoring,	Future Effective Date
Permit Number	Regulation, & Section annabar.	NO	recent keeping. & repenting protocol to assare compliance with the	(List future effective dates)
		EXEMPT	applies ble requirements. See instructions for further details.	of the applicable
	See histructions	SUBSUMED	LCSUBSUMEO, leave this column block.	requirement, if any)
8-1131-73	District Bures 2526, 9.3.2 and 4305. 8.3.2	YES	Existing permit condition #26 : cocumentation and review of group testing maintenance and tune-up records	N/A
S 1101.72	District Rules 2520, 9.3.2 and 4335,	YÉŚ	Existing permit condition #27 : documentation and review of group testing	N/A
	8.3.2		fuel firing records	
8-1131-77	District Bute 2520, 9.3-2	YES .	Existing permit condition ≠28 : cocumentation and review of source	N/A
•			testing records	
S-1131-73	District Rule 2520, 12.2	YES	Existing permit condition #29 : reference condition - no action required	N/A
S 1121 73	Elistrio: Rule 2520, 13.2	YES	Existing permit condition #50 : reference condition - no action required	N/A
S-1131-77	District Rules 2520 9.2.2 and 4305	YES	Existing permit condition #1 : documentation and review of monitoring	N/A ·
			records	
S-112 ¹¹ -77	District Rule 2520, 9.5-2, 9.4-2, and	YES .	Edaling permit condition #2 documentation and review of moritoring	N/A
	4305		recorps	
S-1131 77	District Rules 2520 9.2.2 and 4206	YES .	Existing permit condition (3), documentation and review of monitoring	N/A
		ļ	records	
S-1121-77	District NSR Rule, Rules 4305 and	YES	Existing permit condition #4 if documentation and review of ap-42, or	N/Á
	435		monitoring, source teeling, analytical, and operational data	
8-1131-77	District NSR, Bule and 4406	YES	Existing permit condition #5 : documentation and review of fuel analyses records	MA
S-1131-77	District NSR Rule and 4409	YES	Existing permit condition #6 : documentation and review of source testing records	N/A
S-1131-77	District NSR Rule	YES	Existing permit condition #7 , popumentation and review of combustion equipment operation records	N/A
			coopilist cope alor records	

Application Forms

- Complete TVFORM-005
 - Initial the circles of each truthful statement
 - Have the Compliance Certification form signed by the Responsible Official as described in the instructions.
 - -For Initial TV Applications, leave the Compliance Certification dates blank



San Joaquin Valley Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

I.	TYPE OF PERMIT ACTION (Check appropriate box)
[]	INITIAL TITLE V PERMIT [] PERMIT RENEWAL [] NEW TITLE V PERMIT
CO	DMPANY NAME: FACILITY ID: -
1.	Type of Organization: [] Corporation [] Sole Ownership [] Government [] Partnership [] Utility
2.	Owner's Name:
3.	Agent to the Owner:
4.	Compliance Certifications will be submitted on:
	year 1:/ year 2:/ year 3:/ year 4:/ year 5:/
Ot	her dates <u>if required</u> by regulations or compliance schedule:
П.	COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle for confirmation):
	Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) which the source is in compliance as identified in the Compliance Plan.
	Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with application federal requirement(s) that will become effective during the permit term as identified in the Compliance Plan, on a timely basis.
	Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance at th time of permit issuance with the applicable federal requirement(s), as identified in the Compliance Plan, and I have attached a compliance schedule.
	Ocrrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
	Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.
Ιd	eclare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:
-	in the CP was 11 Official Principle
3	ignature of Responsible Official Date
N	ame of Responsible Official (please print)
T	itle of Responsible Official (please print)

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TVFORM-005

Application Forms

 Available at: http://www.valleyair.org/busind/pto/ptoforms/

titlevidx.htm



General Permit Templates

- General Permit Templates are permits that have been developed by the District with input from EPA that includes all applicable conditions.
- The District has developed a facility-wide "Umbrella" template to include all administrative requirements.
- A facility will need only to submit a Template Qualification Form (last) page of #SJV-UM-0-3.
- There is a standard set of conditions.
- Public cannot comment on the conditions, only the source's qualification to use the template.



	Templ	late	SJ	V-!	U١	Л-	0 - 3
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<u>Title V General Permit Template Qualification Form</u> <u>for</u> <u>Facility-wide Umbrella General Permit Template</u>

District facility ID #	
To use this template, remove this sheet and attach this template will be placed on your Title V permit.	to application. The conditions outlined in
Any facility may use this facility-wide template as part of	f its Title V application.
Based on information and belief formed after reas this form is true and correct and 2) the facility cer permit conditions.	
Signature of Responsible Official	Date
Name of Responsible Official (Please Print)	



General Permit Templates

 All other general permit templates have been out-dated because the prohibitory rule requirements have changed frequently. However they may be used as a "guide" to address applicable requirements.



Streamlining Procedure

- Provide a side-by-side comparison of the applicable requirements to be streamlined by listing key provisions from each requirement.
- 2. Based on the side-by-side comparison in step 1, select the most stringent emission limit or requirement.
- 3. Propose one set of permit conditions, called the streamlined requirements, which is to be placed on the Title V permit, assuring compliance with the most stringent emission limit; and contains appropriate monitoring recordkeeping, and reporting requirements.



Streamlining Example

Type of Requirement	Title of Requirement 1	Title of Requirement 2	Alternative Proposed Requirement
Emission Limit			
Work Practice Standard			
Monitoring			
Recordkeeping			
Reporting			
Test Methods			



Streamlining Example

Type of Requirement	District Rule 2201	40CFR60 Subpart KKKK & Rule 4702	Alternative Proposed Requirement
Emission Limit	2.5 ppmv NOX @ 15% O2	25 ppmv NOX @ 15% O2	2.5 ppmv NOX @ 15% O2
Work Practice Standard	Fired only on PUC regulated natural gas	Fired on PUC quality natural gas	Fired on PUC regulated natural gas
Monitoring	Continuous Emission Monitoring System (CEMS)	Water-to-fuel ratio and mass flowrate, or CEMS	Continuous Emission Monitoring System (CEMS)
Recordkeeping	Keep records for 5 years	None	Keep records for 5 years
Reporting	None	None	None
Test Methods	EPA Method 7E, 20, ARB Method 100	EPA Method 7E or 20	EPA Method 7E, 20, or ARB Method 100



Proposed Conditions

- Emission rates from the CTG, except during startup or shutdown periods, shall not exceed any of the following limits: NOx (as NO2) - 8.03 lb/hr and 2.5 ppmvd @ 15% O2.[Rule 2201 and 4703]
- The owner or operator shall install, certify, maintain, operate and qualityassure a Continuous
 - Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO and O2 concentrations. [Rule 2201, 4703, and 40CFR60.4400(1)(i)]
- The owner/operator shall perform a relative accuracy test audit (RATA) for the NOx, CO, and O2 CEMs as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. [District Rule 1080]
- Results of the CEM system shall be averaged over a one-hour period for NOx emissions and a three-hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13. [District Rule 4703,5.1,6.4 and 40CFR60.13]
- Turbine shall only be fired with PUC regulated natural gas. [District Rule 4102]

Example 1

Automotive Paint Spray Operation limited to less than 150 pounds VOC per day (27.3 TPY).

Options:

- 1. Can take a voluntary limit of 20,000 pounds per year
 - Submit ATC application requesting annual emissions be limited to less than 20,000 pounds per year.
 - Monthly records must be kept tracking annual emissions
- 2. Can keep original high potential limit but track actual emissions less than ½ Major Source threshold:
 - Must submit a written request to use this Rule 2530 option
 - Must keep records on a 12-month rolling inventory of emissions
 - Records must be retained on site for inspection.



Options, continued

3. Can keep high PTE and actual emissions by submitting a completed Title V application. The application must demonstrate compliance with applicable prohibitory requirements (in this example Rule 4612, Motor Vehicle and Mobile Equipment Coating Operations-Phase 2) and New Source Review (Rule 2201).



Example 2

Printing and gluing operations limited to less than 150 pounds VOC per day (27.3 TPY). Facility wants to maintain high PTE levels.

- The facility can keep high PTE and actual emissions by submitting a completed Title V application.
- Application must demonstrate compliance with applicable prohibitory requirements (Rule 4607, Graphic Arts) and New Source Review (Rule 2201).
- Review the prohibitory rule and add any requirement that is applicable to your particular printing process:



Permit Conditions

- Flexographic ink shall be less than 1.88 lb VOC/gal by volume. [4607, 5.1]
- No more than 2 gal/day of specialty ink may be used nor 120 gal/year. [4607, 5.2]
- Fountain solution shall be used with less than 5% VOC.
 [4607, 5.1]
- Cleaning solvent shall be less than 25 gm/liter (0.21 lb VOC/gal) of material. [4607, 5.8]
- Record, on a monthly basis, the type and amount of each coating, ink, adhesive, wash primer, and solvent (including cleaning solvent) used. [4607, 6.1.2]



Permit Conditions, continued

- Maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include a material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [4607, 6.1.2]
- Facility shall calculate monthly VOC emissions by summing all coatings consumed over an entire month. [District NSR Rule]
- Daily emissions are calculated by dividing monthly emissions by operating days. [District NSR Rule]



Title V Timelines

- 6/10/2010: EPA approved the District's lower Major Source threshold, giving sources 1 year to submit applications
- 4/10/2011 or 6/10/2011: major sources must submit a complete <u>Initial</u> Title V application (Staggered due dates based on District derived criteria).



Additional Information

Please call any of our regional Small Business Assistance (SBA) hotlines:

North: (209) 557-6446

Central: (559) 230-5888

South: (661) 392-5665

Jim Swaney: jim.swaney@valleyair.org

Martin Keast: martin.keast@valleyair.org

(559) 230-5900

