

Title V Application - COMPLIANCE PLAN
INSTRUCTIONS (TVFORM-004)

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For each permitted emissions unit follow the instructions for filling out the Compliance Plan table Columns #1 through Column #5.

Column 1. PERMIT NUMBER - reference the District permit by permit number or you may abbreviate by using only the equipment number (e.g. for S-1234-6-0 write in '6') for the equipment for which you are quantifying emissions.

Column 2. CITE APPLICABLE REQUIREMENTS - List all applicable requirements (defined below) by name and number (e.g. "40 CFR 60.321" or "District Rule 4701, 5.1", etc.). If there are multiple requirements in an applicable rule or regulation, each section should be listed separately. On separate lines, list the monitoring, recordkeeping, and reporting standards, and, if present, any emissions limit, from the applicable requirement. For permit units qualifying to use model general permit or templates, simply reference the model general permit or template ID number and attach the Qualification Form of the referenced general permit or template. Citing of each individual applicable requirement covered by the general permit or general permit template is not required. The applicable requirements not covered as a part of a general permit or general permit template must be listed on this form.

Applicable requirement means all of the following as they apply to permitted emissions units at a source subject to Rule 2520 (including requirements that have been approved or promulgated by EPA through rulemaking at the time of permit issuance, but have future effective compliance dates).

- (1) Any standard or other requirement contained in the EPA approved State Implementation Plan (SIP)

The EPA approval of the District Rules and Regulations and their inclusion in the SIP is a time consuming process. In many cases, the District's latest rules have not yet been approved by the EPA. A listing of the EPA approved rules and the latest corresponding District rules can be obtained from the District.

The District rules that are awaiting EPA approval, on their own, are not federally enforceable. Therefore, the applicants are not required to address these rules as applicable requirements in their Title V applications. However, in certain cases, it may be beneficial to the applicant to cite the District's latest rule in lieu of the outdated SIP approved version. The applicant may choose from the following options:

- a) *Cite the outdated SIP-approved version of the District rules that apply to the facility. If this option is chosen, then future permit modifications may be required to incorporate provisions from newly EPA approved District rules.*
- b) *Cite the latest District rule. The Title V permit may be issued based on the latest District rule if it can be shown that the latest rule is more stringent than the outdated SIP approved version, or if the latest rule is approved by EPA*

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prior to permit issuance. If EPA disapproves the District's latest rule, then the application will have to be revised to address the EPA approved requirements.

For detailed guidance on these options, refer to District policy TV-4, "Outdated SIP Rules".

- (2) Any term or condition of any preconstruction permit issued pursuant to regulations approved or promulgated through rulemaking under title I, including parts C or D, of the Federal Clean Air Act (CAA) (*any term or condition of any Authority to Construct permit issued through District Rule 2201, and of any preconstruction permit issued through a Prevention of Significant Deterioration (PSD) program*);
- (3) Any standard or other requirement under section 111 of the CAA (New Source Performance Standards - summarized in Rule 4001), including section 111(d);
- (4) Any standard or other requirement under section 112 of the CAA (National Emissions Standards for Hazardous Air Pollutants -summarized in Rule 4002 - and Maximum Achievable Control Technology given in 40 CFR Part 63), including any requirement concerning accident prevention under section 112(r)(7) of the CAA;
- (5) Any standard or other requirement of the acid rain program under title IV of the CAA, or the regulations promulgated thereunder;
- (6) Any requirements established pursuant to section 504(b) or section 114(a)(3) of the CAA;
- (7) Any standard or other requirement governing solid waste incineration, under section 129 of the CAA;
- (8) Any standard or other requirement for consumer and commercial products, under section 183(e) of the CAA;
- (9) Any standard or other requirement for tank vessels, under section 183(f) of the CAA;
- (10) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under title VI of the CAA, unless the Administrator has determined that such requirements need not be contained in a title V permit; and
- (11) Any national ambient air quality standard or increment or visibility requirement under part C of title I of the CAA, but only as it would apply to temporary sources permitted pursuant to section 504(e) of the CAA.

Column 3. COMPLIANCE STATUS - Give the compliance status of the permitted unit with respect to the applicable requirement.

YES - If the permitted unit is in compliance at the time of permit issuance, and will continue to comply, with the applicable requirement answer **YES** in this column. Attach or reference evidence upon which the statement of compliance is based (i.e. test data, monitoring, or recordkeeping data).

NO - If the permitted unit is not in compliance with the applicable, answer **NO** in this column and attach a **Compliance Schedule** to this form. The compliance schedule shall contain a narrative description of how the source will achieve compliance with such requirement. The compliance schedule shall also contain a schedule of remedial measures, including an enforceable sequence of actions with milestones leading to compliance with the applicable federal requirement. If the source

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is subject to any judicial consent decree, Hearing Board order, or an administrative order, then the compliance schedule shall resemble and be at least as stringent as that contained in the judicial consent decree, Hearing Board order or administrative order to which the source is subject.

EXEMPT - If the permitted unit is exempt from the applicable requirement, answer **EXEMPT** in this column and attach a narrative explaining how the permitted unit qualifies for the exemption.

SUBSUMED - In certain cases the same device or operation may be subject to multiple applicable requirements aimed at reducing the same pollutant. To minimize redundant or conflicting requirements, an applicant may propose to streamline requirements by consolidating multiple requirements. If an applicable requirement is being absorbed or replaced by a more stringent applicable requirement, answer **SUBSUMED** in Column 3. When this option is chosen, attach appropriate documentation containing a comparative analysis of the applicable requirements being streamlined. For detailed guidance on streamlining of multiple requirements, see District policy TV-5, "Streamlining of Applicable Requirements".

Column 4. HOW WILL YOU COMPLY...? - Describe how you will comply with the requirement cited in Column 2. For instance, if the applicable requirement poses an emission limit, describe the expected emissions from the equipment and the manner by which the emissions limit will be met. For monitoring, recordkeeping, and reporting requirements, describe the monitoring, recordkeeping and reporting practices that you will utilize to comply with the requirement. You may reference terms and conditions from existing valid operating permits issued by the District to demonstrate how you will comply with an applicable requirement (e.g. "condition #6"). The source may propose to streamline overlapping or redundant requirements into a single set of permit conditions. For example, if two or more overlapping emission limits apply to the same pollutant on the same piece of equipment, a single "streamlined" permit condition may be used to assure compliance with both the overlapping limits.

For detailed guidance on streamlining multiple requirements, refer to District policy TV-5, "Streamlining of Applicable Requirements".

Column 5. FUTURE EFFECTIVE DATE - For applicable requirements that have been promulgated and have effective dates during the permit term, which is five years, list the date on which the requirement will become effective.