



General Instructions for Completion of ORCAA Air Operating Permit Application Forms

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: ORCAA must receive a complete application within twelve months of your facility becoming subject to the Air Operating Permit Program. Upon receiving an application, ORCAA has 60 days to determine whether it is complete. If ORCAA determines that an application is not complete within 60 days of receiving the application, ORCAA 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. **ORCAA 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.** ORCAA has 18 months from receipt of your complete application to issue a permit. 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 ORCAA.

Submit a complete application to ORCAA and send a copy to EPA.

ORCAA

2940 Limited Lane NW
Olympia, WA 98502

U.S. EPA Region 10

Email to **R10_Air_Permits@epa.gov**

if the documents cannot be emailed due to file size, mail to the address below and send an email to the address above notifying EPA Region 10 that a document was mailed:

Air Permits and Toxics Branch
U.S. EPA Region 10, Mail Stop: 15-H13
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

If the application submitted to ORCAA contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms). Confidentiality can be claimed for information unique to the applicant and/or likely to adversely affect the competitive position of the applicant if released to the public or a competitor. For submitting the copy to EPA, contact the Region 10 office to inquire how to submit confidential business information. Such information will be treated in accordance with the provisions of 40 CFR Part 2.

Your AOP Application must include the following:

Form A: General Information

Form B: Emission Unit Information (*One for each emission unit*)

Section 7 Attachment – Calculations used to complete Form B for each emission unit

Section 7 Attachment – If identified, CAM Plan

Section 9 Attachment – Process Flow Diagrams

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.

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.

Form B – Emission Unit Information

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.

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;
 - (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;
 - (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 8 – 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 9 – 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 10 – 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 11 – 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.

Form C – Compliance Plan Summary

Information regarding the compliance status of your facility must be provided on this form. If the facility is not in compliance with requirements effective at the time of permit issuance or requirements effective during the term of the permit, a compliance plan (indicating how and when the source will comply with an applicable requirement) must be submitted. Additional information may be attached as necessary.

Complete the subsequent sections to explain the methods to be used to certify compliance with an applicable standard. A separate Form C must be completed for each emissions unit at the source for which a standard applies.

Form D – Insignificant Emission Unit Information

Identify all emission units or activities that are designated as insignificant for Title V purposes. Assign the Insignificant Emission Unit (IEU) a unique number, and if applicable, enter data documenting the IEU status. Please note that no emissions unit or activity subject to a federally enforceable applicable requirement (e.g., an applicable requirement from a MACT or Notice of Construction) can be designated as an IEU. Attach additional pages and rows as necessary.