

# INSTRUCTIONS FOR ANNUAL COMPLIANCE CERTIFICATION

ORCAA

The purpose of this form is to consolidate information that comprehensively describes the status of compliance with respect to terms and conditions in an Air Operating Permit. Once completed, the Annual Compliance Certification contains all the information required for compliance certifications under WAC 173-401-630(5), except for the certification by the Responsible Official. Certification by the responsible official may be accomplished by completing ORCAA's standard Certification of Reports by a Responsible Official and attaching it to the front of the Annual Compliance Certification.

## **Column 1: Permit Condition**

Conditions with similar compliance monitoring means may be grouped together as one line item in the Annual Compliance Certification provided that continuous compliance was assured for all conditions in the grouping and provided that there were no periods where the compliance status was unknown. The condition numbers should be entered as they appear in the permit.

## **Column 2: Condition Title**

Enter the condition title as it appears in the permit. For groups of conditions, either pick a title that describes the group (e.g. "Standard Reporting Conditions") or enter the word "group".

## **Column 3: Compliance Status**

- Enter "continuous" if compliance was assured continuously over the reporting period for the condition or group of conditions. It is important to note that the compliance monitoring requirements in the permit have been approved as the means for assuring continuous compliance with applicable requirements, even though they may be periodic or intermittent in nature. Therefore, "continuous" compliance can be certified based on periodic monitoring records provided that:
  - 1 Results from required periodic monitoring indicate that compliance was assured; and
  - 2 There is no "other credible evidence" indicating that a permit deviation has occurred.
- Enter "intermittent" if any permit deviations occurred during the reporting period as indicated by required monitoring or any other credible evidence. For intermittent compliance, the following attachments should be included:
  - 1 Permit deviation reports for associated permit deviations
  - 2 Monthly Summary Reports when a continuous monitoring system was used as the basis for the compliance certification.
  - 3 Equipment Malfunction report if the deviation was a result of an equipment breakdown.
  - 4 An Unavoidable Excess Emissions Report if seeking relief under the Unavoidable Excess Emissions provisions under WAC 173-400-107 or Emergency provisions under WAC 173-401-645.
- The term "other credible evidence" simply means any credible evidence supporting a compliance determination beyond that generated from the monitoring required by the permit. Some examples of "other credible evidence" includes:
  - 1 Method 9 readings performed by ORCAA
  - 2 Results from voluntary stack tests
  - 3 Results from stack tests using newly approved Reference Test Methods

## **Column 4: Unknown Periods**

- Enter "yes" in the fourth column if there were any periods when the required monitoring for a particular condition was not met and there was no back-up compliance monitoring means to assure compliance with the condition.
- If the monitoring requirements were met during the entire reporting period, then "no" may be entered.

## **Column 5: Compliance Determination Methods**

List all the compliance determination methods that were used as the basis for the compliance certification including those methods that are not required by the permit. Monitoring required by the permit can simply be listed by condition number.

## **Column 6: Attachments**

Identify any attachments that are necessary to support information in the Compliance Status Report Form.

## ANNUAL COMPLIANCE CERTIFICATION

Company Name: Example, Facility/Source Name: Example

Facility Location: \_\_\_\_\_

Environmental contact person for this submittal: \_\_\_\_\_, Contact Phone Number: \_\_\_\_\_

Compliance Status Report Period: 1/1/99 through 12/31/99, Date Report Completed: 1/15/2000

Permit Condition(s)	Condition Title	Compliance Status	Unknown Periods: Any periods when compliance status was unknown?	Compliance Determination Methods	Attachments
1.1 – 1.18	Permit Administration Conditions	continuous	none	Permit administration records required by the permit.	none
2.1 – 2.8	Standard Record Keeping Conditions	continuous	none	Monitoring records required by the permit.	none
3.1 – 3.7	Standard Reporting Conditions	continuous	none	Records of reports submitted as required by the permit.	none
4.1 – 4.3	Permit Shield Conditions	not applicable	not applicable	not applicable	none
5.1 – 5.21	Facility-Wide General Applicable Requirements	continuous	none	Results from required monitoring.	none
6.1a – 6.1s except for: 6.1e - 6.1g and 6.1j –6.1k	Emission Unit Specific Requirements for EU1	continuous	none	Records from required monitoring.	none
6.1e – 6.1g	EU1 Opacity Limits	continuous	yes	Records from required monitoring.	1. Monthly Summary COMS Reports 2. Equipment Malfunction Report for COMS
6.1j – 6.1k	EU1 COMS Requirements	intermittent	none	Records from required monitoring .	1. COMS breakdown report. 2.
6.2a – 6.2f	Requirements Specific to EU2	continuous	none	Records from required monitoring.	none
6.3a – 6.3k except for 6.3e – 6.3g	Requirements Specific to EU3	continuous	none	Records from required monitoring.	none
6.3e – 6.3g	EU3 Opacity Limits	intermittent	none	Records from required monitoring. OAPCA Method 9 reading results for 11/3/99.	1. Permit Deviation report 2. Copy of OAPCA Method 9 reading.
7.1 – 7.12	Additional Monitoring Conditions	continuous	none	Records from required monitoring.	none

