

San Luis Obispo County Air Pollution Control District Guidelines for Part 70 Permit Application Forms

A. INTRODUCTION

These instructions are intended to introduce and explain the Part 70 (Title V) application forms. Applicants need to identify all federal air program requirements using these forms, so that those requirements can be implemented and enforced through the Title V permit. District and state air program requirements need not be included on these forms.

Applicants are encouraged to rely to the maximum extent possible on existing information. However, That information must be current, available to the public, and certified to be true, accurate, and complete by the responsible official. To the extent that such information exists, the following types of information may be referenced:

- a. Rules, regulations, and published protocols
- b. Criteria pollutant emission inventories, hazardous air pollutant (HAP) emission inventories, and their supporting calculations
- c. Emission monitoring reports, compliance reports, and source tests
- d. Process and control equipment lists and descriptions
- e. Current permit and authority to construct terms and conditions
- f. Permit application materials previously submitted
- g. District performed engineering analyses
- h. Compliance and inspection plans previously submitted and approved.

District Rule 216 defines an "applicable requirement" as any federal, state, or District air pollution requirement. These can be further classified as being either specific or generic. Only applicable federal requirements (specific or generic) that establish emission, monitoring, reporting, recordkeeping, notification, operational standards, and work practice standards are intended to be included in the Title V permit application. Administrative requirements, such as permitting procedures (Regulation II), should not be considered applicable requirements for the purposes of Title V.

An applicant may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to evaluate the permit fees required.

1. Specific Requirements

For initial applications, any existing District permit term or condition should be considered an applicable federal requirement. However, the applicant is encouraged to identify those existing terms and conditions that they feel should be considered obsolete, extraneous, or environmentally insignificant. This should be done in an attachment to the application. Should the District deny all or any portion of that request, the applicant will need to amend the application to indicate the compliance status with those terms involved in the denial.

An example of an "obsolete" requirement might be a condition that was intended to regulate construction activity that is now complete. An "environmentally insignificant" requirement might be based on an authority to construct condition that was not required by federal law. The definition of "federally-enforceable requirement," as it appears in District Rule 216, Part 70 Permits, is the best

example of what requirements could not be considered environmentally significant in an existing permit. Consequently, existing conditions that are not based on a federal New Source Performance Standard (NSPS), a federal Acid Rain Program requirement, a federal Maximum Achievable Control Technology (MACT) requirement, or a SIP approved District prohibitory rule (e.g., Rule 417, Fugitive Emissions) might be considered insignificant for Title V purposes.

Through this process, requirements may be categorized as either (1) federally-enforceable or (2) District-only enforceable, or (3) not included in the part 70 permit at all. Those terms and conditions that are acknowledged by the applicant to be applicable federal requirements and/or federally-enforceable requirements should be included on all forms where applicable requirement information is requested. Those terms and conditions that the applicant proposes to be considered obsolete, extraneous, or environmentally insignificant need only appear in an attachment to the permit. Those terms and conditions that are District-only enforceable will appear in the Title V permit but need not be included in the application.

2. Generic Requirements

Generic requirements are those that are applied and are enforced in the same manner for all subject units or activities. The following list of requirements will be accepted as applying without justification that they are generic. The applicant may claim additional requirements as being generic but in doing so must also include an explanation.

Table I - Generic Applicable Requirements

Federally-Enforceable (but may still be considered environmentally insignificant)

SLO State Implementation Plan (SIP) Rule 401.A, Visible Emission, approval date 8/4/78

SLO SIP Rule 111, Nuisance, approval date 9/22/72

SLO SIP Rule 113.1 and 113.4, Particulate Matter, approval date 5/31/72

SLO SIP Rule 114, Gaseous Contaminants, approval date 5/31/72

SLO SIP Rule 404.E, Sulfur Content of Fuels, approval date 8/4/78

SLO SIP Rule 405.A.2, Fuel Burning Equipment, adoption date 11/13/84

SLO SIP Rule 406, Carbon Monoxide Emission Standards, adoption date 11/13/84

SLO SIP Rule 407.H.2, Metal Surface Coating Thinners and Reducers, approval date 6/18/82

SLO SIP Rule 407.H.3, Architectural Coatings, approval date 6/18/82

Title 40, Code of Federal Regulations, part 82 (40CFR82), Protection of Stratospheric Ozone

State of California

Health and Safety Code (H&SC) 41700, Nuisance, adopted 1975

H&SC 41701, Visible Emissions, adopted 1975

H&SC 44300 (et seq.), Air Toxics "Hot Spots" Act, adopted 1987

California Code of Regulations (CCR) 92000 (et seq.), Abrasive Blasting, dated June 1, 1991

San Luis Obispo County Air Pollution Control District

SLO APCD Rule 401.A, Visible Emissions, adopted 8/2/76

SLO APCD Rule 402, Nuisance, adopted 8/2/76

SLO APCD Rule 403.A, Particulate Matter, and C, Combustion Contaminants, adopted 8/2/76

SLO APCD Rule 404.A, Sulfur Compounds, D, Fuel Burning Equipment, and E, Sulfur Content of Fuels, revised 12/6/76

SLO APCD Rule 405, Nitrogen Oxides Emission Standards, revised 11/16/93

SLO APCD Rule 406, Carbon Monoxide Emission Standards, revised 11/13/84

SLO APCD Rule 407.D.2, Metal Surface Coating Thinners and Reducers, revised 7/12/94

SLO APCD Rule 407.D.3, Architectural Coatings, revised 7/21/94

B. INSTRUCTIONS THAT APPLY TO ALL FORMS

Each page of an application should be numbered, including all attachments. The original application for a new or reissued permit should be submitted to the District, including the \$100.00 filing fee, and a copy should be sent to:

Gerardo Rios, Chief
Permits Office
U.S. Environmental Protection Agency
75 Hawthorne Street (Air-3)
San Francisco, California 94105-3901

Where sufficient space is not available on an application form, additional information should be attached.

Multiple copies of some forms may be necessary. The use of computer generated spreadsheets as an alternative to multiple entry forms is allowed so long as at least one copy of the form is submitted with a reference to the spreadsheet and so long as all information requested by the form is included on the spreadsheet.

The applicant may cross-reference existing information, such as permit conditions or equipment descriptions from current permits, in lieu of providing the information directly on an application form. For example, a cross-reference of the work practice requirements identified in two hypothetical permits would be accomplished as follows: “work practice requirements - condition #s 22 and 23 from District permit to operate (PTO) Z-1234-A-1 and condition #s 1 through 8 from District PTO Z-1234-B-1.”

The District may request additional information, after the application is deemed complete, for the purposes of developing the Title V permit. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in an application should, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant should amend their application as necessary to include any requirements that become applicable to the source after the date of application filing but prior to the release of a draft permit. The applicant is also obligated to update their application if equipment or processes change at their facility after the application is submitted and before a permit is issued.

An applicant may claim that any portion of the information submitted is a "trade secret" but should include a justification accordingly. A "trade secret" is defined in Section 6254.7 of the California

government code. It includes, but is not limited to, "any formula, plan, pattern, process, tool, mechanism, compounds, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or service having commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it". Should a claim to "trade secret" be made, the District may also require the source to submit a copy of such information directly to the EPA.

C. SPECIFIC FORM INSTRUCTIONS

There are six basic forms. Each is designed to give the applicant the opportunity to submit the information necessary for the District to evaluate the applicant's proposal or request. Including all of the information requested by these forms is designed to result in a complete application for evaluation purposes.

1. Permit Application Form. This acts as the mandatory cover page for all applications and gives the applicant the opportunity to identify themselves and their project.
2. Process Forms. This is a series of process specific forms designed to gather detailed design and operational equipment information, as applicable. References to existing permit information are allowed. Forms are provided for the following process types.
 - abrasive blasting
 - concrete processing
 - degreasing operations
 - drycleaning
 - fuel combustion
 - fuel dispensing
 - organic liquid storage
 - surface coating
 - general process
3. Applicable Requirements Form. The applicant should use this mandatory form to indicate the reason for their Title V application, the air contaminant emissions from their facility, and the requirements that apply to their operation.
4. Operational Flexibility Form. This form is optional and gathers information for three specific operational flexibility provisions in the Title V program: alternative operating scenarios, Clean Air Act section 502.B.10 changes that do not require a permit revision, and emissions trading under an emissions cap.
5. Compliance Plan and Certification Form. This is a mandatory form designed to gather information concerning the basis for a compliance determination or claim. It also provides a forum for the applicant to self-certify their compliance with all applicable requirements.
6. Annual Compliance Certification Form. This is a mandatory form for annual compliance certifications and gathers status of compliance information and basis for that claim.

The forms that should be submitted for the more common Title V permit actions are indicated in the following table.

Table II - Title V Forms to Be Submitted for Common Applications

Application/Submittal	Permit	Process	Applicable Requirement	Operational Flexibility	Compliance Plan/Cert.	Annual Cert.
Initial or Reissuance	X	X	X	(optional)	X	
Administrative Amendment	X	(as needed)				
Non-Federal Change	X	(as needed)				
Minor or Significant Modification	X	(as needed)	X	(optional)	X	
Annual Certification						X

Acid rain sources (see 40 CFR Part 72.6 for applicability criteria) must complete and submit EPA-approved Acid Rain permitting forms as part of the Title V application. These forms are available from the District. Where any requested information is duplicated between the Acid Rain and Title V application forms, the information need only be provided once on the Acid Rain forms and then referenced on the Title V forms.

Applications for a new general Part 70 permit should include the same information as that identified here for a new Title V permit, except that an Applicable Requirements form and information concerning alternative operating scenarios need not be included. In addition, the application should contain any information necessary to determine the qualification for, and to assure compliance with, a general Part 70 permit.

1. Permit Application Form

Items 3. and 4. These are the primary identification fields for the facility.

Item 6. Describe the facility's process(es) and product(s). The applicable Standard Industrial Classification (SIC) Code is used in Title V to differentiate between separate facilities for permit purposes. The facility's North American Industry Classification System (NAISC) code may also be given but should be identified as such.

Items 10. and 12. The application, and all attendant certifications, should be signed by the responsible official for Title V purposes as defined in District Rule 216 (see Attachment B).

2. Process Forms

The process specific forms are intended to gather equipment description information. Those aspects that make an individual piece of equipment subject to a specific applicable requirement should be included on these forms. For example, if a petroleum storage tank is subject to an NSPS because of its construction or modification date, that information should be included somewhere here. Application forms need not be submitted for equipment subject solely to generic applicable requirements. For example, a form need not be submitted for painting equipment that is only subject to the architectural coating limitations of District Rule 407.D.3.

Equipment descriptions should be provided for all equipment affected by an applicable federal requirement. The applicant can provide equipment descriptions for each piece of equipment using the process specific forms or provide a cross-reference to the descriptions contained in existing permits to operate. Additionally, and in reference to District Rule 216.L.2.c, equipment descriptions should be provided for equipment not currently subject to an applicable requirement, but that will become subject to one in the future during the permit term (e.g., a MACT requirement).

Typically, the description of primary equipment (such as a boiler or storage tank), should include, at a minimum, a basic description of equipment, equipment make and model, maximum design process rate or throughput and, if applicable, any associated pollution control equipment. Descriptions for pollution control equipment should also be provided. Solvent use should be described in terms of the chemical makeup of the solvent and the annual usage. The applicant should consult the applicable requirement to determine the necessary amount of description.

3. Applicable Requirements Form

The applicable requirements form is intended to gather information for both specific and generic applicable federal requirements. Those terms and conditions that the applicant proposes to be considered District-only enforceable and those that are not to be included in the Title V permit need not be included on this form, even though such a requirement already appears on an existing permit, as discussed earlier. They need also not be included on the compliance form described later.

Generic applicable requirements can be addressed with minimal reference to specific emission units or activities. The emission units/activities subject to a generic requirement can be grouped together regardless of whether the activities are considered trivial or insignificant, if enforceability does not require a specific listing of subject units.

The applicant should attempt to identify, to the best of their knowledge, the applicable SIP requirements that affect the source. A good faith estimate will be enough to support both a valid compliance certification and a "completeness" determination. Copies of the District's SIP are available from the District upon request. If review by the District, EPA, or the public identifies additional requirements, the application shield (see District Rule 216.L.1.a) need not be affected as long as the applicant updates their certification to account for the newly identified requirements.

Short-term activities, which occur infrequently and for a short duration at the source, may still be subject to an applicable federal requirement even though they are considered temporary and not subject to District permit. The application should document the applicability of any applicable requirements to short-term activities at the facility and describe the facility's compliance status with respect to these requirements. Short-term activities that are not subject to an applicable federal requirement can be treated as an insignificant or trivial activity and, therefore, need not be included in the application.

Item 1. Indicate the reason for submittal of the current application. Note that the option of "administrative amendment" is not offered because this form would not normally be submitted for that action. If an administrative change is requested to increase the frequency of a monitoring or reporting applicable federal requirement (see Rule 216.C.2.c), this form along with a compliance plan form should be included.

Item 2. Indicate the emission information to be used for the facility. Actual emissions should be presented, as opposed to potential emissions. This information is not necessary if the applicant stipulates that they are a major source or that they are subject to an applicable requirement.

The applicant should supply annual emission estimates for the following: all air pollutants that the source emits in excess of the major source thresholds specified in Rule 216 (see Attachment A) and those air pollutants regulated by a provision of an applicable federal requirement that applies to the source. Unless emitted in excess of major source thresholds, emissions estimates are not required for those pollutants listed only as Clean Air Act (CAA) section 112(r) substances. Additional emission estimates may be required for plant-wide emission limits or if the source proposing to avoid an applicable federal requirement.

Similar emissions information should be provided for each alternative operating scenario that is proposed. Alternative operating scenarios should be proposed for each operating mode that will be subject to different applicable requirements.

Items 3&4. The indicated information should be supplied for each applicable federal requirement.

Items 3&4.a. The reason that a requirement applies must be provided because it is not necessarily always obvious. For example, a New Source Performance Standard (NSPS) reporting requirement may apply to a source even though that standard itself does not, because another regulation that does apply references the NSPS rather than place the requirement itself.

Items 3&4.b. Any reference concerning the Code of Federal Regulations should be as specific as possible (i.e., down to the subsection level).

Item 6. Insignificant activities are defined as those that do require a permit under the District's permit exemption Rule 201. Note the distinction here: Rule 201 identified sources do not require a District permit under Rule 202, but are subject to permit as an insignificant activity in the federal permit issued under Rule 216. Those emission units that are insignificant due to their emission rate, size, or production rate need to be included on this form. Those insignificant activities that are subject to a specific applicable federal requirement also need to be included. Insignificant activities that are subject to generic applicable requirements need not be included.

Similar equipment that are insignificant due to their emission rate, size, or production rate may be grouped by equipment type. Different equipment types should not be grouped solely because they are insignificant due to their emission rate (e.g., Rule 201.A.1, less than two pounds per day).

The actual emission rate, individual equipment rating, or individual equipment production rate need not be included unless that information is necessary to determine the applicability of a specific applicable requirement.

Table III - Rule 201 Insignificant Activities Due to Emission Rate, Size, or Production Rate

- A.1, uncontrolled emissions of two pound per day (lb/day) or less
- B.1, internal combustion engines rated at 50 brake horsepower (bhp) or less, aggregated by process
- B.2, combustion equipment rated at less than two million British thermal units per hour (mmBtuh), aggregated by process
- B.3, standby electrical power engines operated less than 100 hours per year
- E.1, cooling towers with a circulation rate of less than 10,000 gallons per minute
- F.1, printing equipment using no more than two gallon per day (gpd)
- G.2, bakery ovens producing less than 1,000 lb/day
- G.4, smokehouses less than 20 ft² in size
- H.1, foam, fiberglass, or plastics operations using less than five gpd
- I.1, unheated organic liquid containers of 250 gallons capacity or less
- I.4, unheated underground storage containers of 6,077 gallon capacity or less that store organic liquids with a vapor pressure of 1.5 psi or less
- I.9, gasoline storage tanks with a capacity of less than 1,500 gallons
- J.2, unheated, non-conveyorized cleaning equipment:
 - a. with a surface area of 10.8 ft² or less, internal volume of 92.5 gallons or less, and using organic liquids with a boiling point of 302°F or more; or
 - b. emitting less than 25 gallons per year or less
- J.3, surface coating using one gpd or less
- M.1, comfort air conditioning systems with 50 lb or less of refrigerant
- M.2, refrigeration units with 50 lb or less of refrigerant

There may be other types of activities that occur at facilities that are not regulated by the District and are considered trivial. Those activities that may considered trivial are listed in Attachment C and can be omitted from the application entirely unless they are included in an existing District permit.

4. Operational Flexibility Form

This form is optional and gathers information for three specific operational flexibility provisions in the Title V program: alternative operating scenarios, Clean Air Act section 502.B.10 changes that do not require a permit revision, and emissions trading under an emissions cap.

Alternative operating scenarios may be proposed for each operating mode that will be subject to different applicable federal requirements. Sufficient information should be included to ensure that each alternative operating scenario complies with all applicable requirements. Include a detailed description of all alternative operating scenarios that the source proposes to operate under. Alternative operating scenarios include the use of alternative fuels, solvents, coatings, or a change in process.

Section 502.b.10 of the federal Clean Air Act allows the operator to makes changes within their facility without having to revise their permit, if the changes meet all of the following criteria. A 30-calendar day notification to the District and EPA is required prior to implementing the change.

- a. The change will not violate any applicable requirement, including Rule 204, Requirements.
- b. The modification does not involve any addition, deletion, or revision to a Part 70 Permit condition under Section 112(g) of Title I of the CAA or under EPA regulations promulgated pursuant to Title I of the CAA, including 40 CFR Parts 51, 52, 60, 61, and 63.

- c. The change does not result in exceeding the emissions allowable under the Part 70 permit whether expressed as a rate of emissions or in terms of total emissions.
- d. The change will not contravene federally-enforceable Part 70 permit conditions that are monitoring, including test methods; recordkeeping; reporting; or compliance certification requirements.

The applicant may request a federally-enforceable emissions cap independent of any federally-enforceable requirement. The request should contain procedures to ensure that the emissions trades will be quantifiable and enforceable. A 30-calendar day notification to the District and EPA is required prior to implementing the change. Any such trade must meet the following criteria.

- a. The emissions trade will not violate any applicable requirement, including Rule 204, Requirements.
- b. The modification does not involve any addition, deletion, or revision to a Part 70 Permit condition under Section 112(g) of Title I of the CAA or under EPA regulations promulgated pursuant to Title I of the CAA, including 40 CFR Parts 51, 52, 60, 61, and 63.
- c. The emissions trade does not result in exceeding the emissions allowable under the Part 70 permit whether expressed as a rate of emissions or in terms of total emissions.
- d. The emissions trade will comply with all Part 70 permit conditions.

5. Compliance Plan and Certification Form

The first section of this form should be completed for each applicable federal requirement, while the second section need only be completed once for each application.

Item 1.b. Indicate the facility's compliance status with each requirement at the time of application filing.

A generic applicable federal requirement should be addressed in the application by indicating that there is a facility-wide requirement and describing the compliance status of the facility as a whole. However, where the provisions of an applicable requirement apply to a particular source or piece of equipment at the facility, that source's compliance status must be individually addressed (e.g., the opacity requirements of an NSPS).

For each applicable federal requirement for which the facility does not comply with at the time of application submittal, the applicant must attach a discussion of the circumstances for the noncompliance and how the source will achieve compliance. The applicant must attach a compliance schedule for each applicable federal requirement the source will not comply with at the time of permit issuance. If the facility is operating under a variance and the variance is in effect for more than 90 days, the compliance schedule is typically the schedule contained in the variance issued by the Hearing Board. Whether a compliance schedule is required or not required, the applicant is still required to submit a discussion regarding circumstances for noncompliance.

Item 1.c. The applicant must indicate on this form the monitoring, test methods, recordkeeping, and reporting required to demonstrate compliance with any given applicable requirement. Requirements include emission limits, operational limits, and work practice requirements. Where these methods are not specified in the applicable requirement, the applicant must still indicate the methods that will be used to demonstrate compliance (gap-filling).

Emissions data to establish compliance are needed to support certification of compliance but can be simply emission numbers and critical assumptions. No data are needed to support a non-compliance stipulation.

Item 2. The Responsible Official must certify to the truth, accuracy, and completeness of the application submittal. Compliance certifications need only address the source's current compliance status based on the most recent cycle of compliance data.

A compliance plan is required for acid rain sources, except as specifically superseded by 40CFR72 requirements with regard to the schedule and method(s) the source will use to achieve compliance with the acid rain emissions limitations.

6. Annual Compliance Certification Form

This form should be used for periodic compliance certifications as required by a Title V permit. This form need not be submitted with an initial application. The compliance status with any given requirement must be evaluated on two different levels: (1) whether or not compliance was continuous or intermittent during the reporting period, and (2) whether or not the data used to make that determination was continuous or intermittent. While the debate over what constitutes continuous or intermittent compliance or data is on-going, certifications at this time should follow this guidance:

- continuous emission (or parameter) monitoring be may considered a continuous source of data
- periodic compliance testing should be considered an intermittent source of data
- intermittent compliance should not be considered indicative of non-compliance

D. ATTACHMENTS TO APPLICATION

The following should be included as attachments with the application:

1. Permit Shield

If a permit shield is requested (reference District Rule 216.L.6), the application must specifically request that coverage. An attachment should be included that provides the citation and description of all applicable requirements that do not apply and for which the shield is requested. That information should include a thorough justification for the non-applicability of any requirement. A separate permit shield attachment may be used for clarity for streamlined requirements as discussed below.

2. Streamlining

An applicant may propose to streamline multiple requirements applicable to a source into a single set of permit terms and conditions. The compliance certification should be based on the streamlined applicable requirement proposal. EPA's White Paper Two, March 5, 1996, has more detailed guidance on this point.

A source violating a streamlined emission limitation in the part 70 permit may be subject to enforcement action for a violation of one (or more) of the subsumed applicable emission limits if a violation of that subsumed limit is documented. A source would not be subject to an enforcement action for any failure to meet monitoring, recordkeeping, or reporting requirements that are applicable requirements subsumed within the streamlined requirement and specified under the permit shield. These requirements would no longer be independently applicable.

If a subsumed requirement is an applicable federal requirement, the streamlined requirement becomes an applicable federal requirement by default. This is still the case even if the streamlined, or most stringent, requirement was originally a District-only requirement.

A proposal for streamlined requirements should be contained in an attachment and the following procedure used for its development:

Step One - Provide a side-by-side comparison of all requirements included in the streamlining proposal that are currently applicable and effective for the specific emissions units of a source. Distinguish between requirements that are emissions and/or work practice standards, and monitoring and compliance demonstration provisions.

Step Two - Determine the most stringent emissions and/or performance standard (or any hybrid or alternative limits as appropriate) consistent with the streamlining principles as indicated in EPA's White Paper Two and provide the documentation relied upon to make this determination. This process should be repeated for each emissions unit pollutant combination for which the applicant is proposing a streamlined requirement.

Step Three - Propose one set of permit terms and conditions (i.e., the streamlined requirements) to include the most stringent emissions limitations and/or standards, appropriate monitoring and its associated recordkeeping and reporting (see section II.A.2.e. to EPA's White Paper Two), and such other conditions as are necessary to assure compliance with all applicable requirements.

Step Four - Certify compliance with applicable requirements. EPA recommends that a source certifying compliance only with the streamlined limit indicate this in an attachment to the certification, so that it is clear that the certification is being made with respect to a set of terms and conditions that the source believes "assure compliance" with all applicable requirements. In any event, a source may only certify compliance with a streamlined limit if there is source compliance data on which to base such a certification. Such data should be available where the streamlined requirement is itself an applicable requirement and may be available if the streamlined limit is an alternative limit, e.g., a previously District-only emissions limitation. If there is no compliance data, then certifications must instead be made relative to each of the applicable requirements judged to be less stringent and must be based on data otherwise required under them to make this point clear.

Step Five - Develop a compliance schedule to implement any new monitoring/compliance approach relevant to the streamlined limit if the source is unable to comply with it upon permit issuance. The recordkeeping, monitoring, and reporting requirements of the applicable requirements being subsumed would continue to apply in the permit (as would the requirement for the source to operate in compliance with each of its emissions limits) until the new streamlined compliance approach becomes operative.

Step Six - Indicate in the application submittal that streamlining of the listed applicable requirements under a permit shield is being proposed and propose the establishment of a permit shield that would state that compliance with the streamlined limit assures compliance with the listed applicable requirements. All emission and/or performance standards not subsumed by the streamlined requirements must be separately addressed in the part 70 permit application.

3. Non-Compliance

For sources that are out of compliance with an applicable requirement, an attachment that discusses the circumstances for the noncompliance for each requirement the source will be out of compliance with at the time of application submittal, how the source will achieve compliance with requirements the source is violating, and, if necessary, a Schedule of Compliance.

4. Current Permits

The facility's current permits, including any permits issued through federal New Source Review (NSR) or Prevention of Significant Deterioration (PSD) programs. These are required to be attached if the applicant chooses to cross-reference information in these permits and also to document what the applicable requirements are from these permits.

5. Emission-Point Diagrams

An engineering schematic(s) that identifies all emission unit(s) and points of emissions. Existing information in District files may be referenced.

Attachments to Instructions:

- A - List of Pollutants
- B - Definition of Responsible Official
- C - List of Activities That May Be Treated As "Trivial"

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