

Instructions for Completing the Title V Annual Compliance Certification

General Information and Instructions

All facilities that have been issued a Title V permit are required to provide an annual certification of compliance (ACC) with the terms and conditions in their Title V permit. Title V facilities are required to certify compliance with each permit term and condition individually. “Permit terms and conditions” include emissions limitations, control equipment requirements, work practice standards, monitoring, recordkeeping, reporting, and any other obligation of the source contained in the permit.

In order to ensure adequate and consistent certifications, the Allegheny County Health Department Air Quality Program (Program) has prepared a three-part form. The use of the Program’s three-part form is highly recommended. If you choose to create your own forms, please read these instructions and review the Program’s form to be sure you include all of the required information. ACC submissions that do not contain the minimum information requested may not comply with Title V reporting requirements and may result in an enforcement action.

The Permittee must report all deviations that occurred during the reporting period of the ACC. Deviations specifically identified in previously (or concurrently) submitted reports do not have to be described in detail in the ACC, but must still be identified. However, any deviation not previously reported during the reporting period must be described in detail in Part 3 of the ACC form.

Deviations occur when any permit term or condition is not met. For example, submittal dates, terms that establish emission limitations, emission standards, control equipment requirements, work practices, parameter ranges, and permit terms designed to assure compliance with other permit terms (such as monitoring, recordkeeping, and reporting required by the permit). You must include deviations from permit terms that occur during startup, shutdown, malfunction, and upset conditions (as these terms are defined in the permit). A deviation is not necessarily a violation.

ACC submittals postmarked after the due date stated in your permit (condition III.12) are considered late and may result in an enforcement action.

The ACC must be submitted to both the ACHD Air Quality Program at AQReports@alleghenycounty.us or the below address and the EPA Region 3 office at R3_APD_Permits@epa.gov or the below address.

Enforcement Chief
Allegheny County Health Department
301 39th Street, Building #7
Pittsburgh, PA 15201-1811

Enforcement Programs Section (3AP12)
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Information submitted in the ACC will, upon request, be made available to the public for inspection and copying. If you wish to request confidential treatment for business information, such information should be submitted separately to the Program along with a claim of confidentiality, as governed by 40 CFR 2, Subpart B. Note that 40 CFR 2 regulations do not allow emissions data used for compliance purposes to be granted confidential treatment.

You must retain records and other support material used in the preparation of this compliance certification for a period of at least 5 years from the date you submit the ACC to the Program.

PART 1 – FACILITY INFORMATION AND CERTIFICATION

Part 1 of the ACC form serves as the cover letter and as such includes facility identification and contact information. The Responsible Official certifies the truth, accuracy, and completeness of the entire ACC (including attachments) in the space provided. Specific guidelines for each data element are described below.

Period Covered by Report	This period is specified in condition III.12 of your Title V Permit.
Facility Name	Name printed on the cover of the Title V permit or as otherwise updated by properly notifying the Program of facility name changes.
Facility Physical Address	This is the physical (street) address for the facility. No post office box addresses are allowed.
Facility Mailing Address	This is the mailing address where the facility receives its mail.
Responsible Official	<p>This responsible official should be the official on record at the Program. Please ensure the Program is informed of updates or changes as necessary. Requirements for Responsible Officials are specified in 40 CFR 70.2, and are generally summarized as:</p> <p>For a Corporation:</p> <ul style="list-style-type: none">- Corporate Officer;- Other person in charge of a principal business function; or- Duly authorized representative responsible for overall operation of a source (e.g., plant manager) if either:<ul style="list-style-type: none">o At least 250 persons employed or \$25 million in sales or expenditures; oro Delegation of authority is approved in advance by the Program. <p>For a partnership: a general partner. For a sole proprietorship: the proprietor. For a government agency: Principal executive officer or Ranking elected official.</p>
Environmental Contact	The environmental contact person should be the contact on record at the Program and familiar with the day-to-day operation of the facility and should be available to be contacted by the Program.

Permit Number	Enter the operating permit number.
Permit Issuance Date	Enter the operating permit issuance date.
Certification Signature	The Responsible Official must sign the truth, accuracy, and completeness statement. This should be done after all forms are complete and the responsible official has reviewed the information.
Responsible Official Title	Title of the Responsible Official signing the ACC.
Compliance Statement	Only one of the options may be checked. If some permit conditions were continuously compliant and others had deviations, the second option is to be used.

PART 2 – COMPLIANCE STATUS

The facility reports the compliance status for each applicable requirement in the facility’s Title V permit. The compliance status for each permit condition includes a description of the monitoring method and identification of all deviations from the permit condition. Specific guidance for each information block is described below. Part 2 of the ACC is to be repeated as many times as necessary for all permit conditions to be listed.

Facility Name	Same as reported in Part 1.
Period Covered by Report	Same as reported in Part 1.
Permit Condition	There is no need to summarize the permit condition or attempt to duplicate the permit condition wording in the forms. Permit conditions are referred to by full citation of the condition’s position in the permit. For example consider the first condition in the General section of your permit, it reads as follows:

III. GENERAL CONDITIONS - Major Source

1. Prohibition of Air Pollution (§2101.11)

It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;

- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

You would refer to the last condition by “III.1.c”. Above is an example of subsections which can be combined into one permit condition line if the method of ensuring compliance and the compliance statuses are the same. If these three subsections were combined, the permit condition box would read “III.1.a, III.1.b, and III.1.c”. Each separately numbered condition of the permit must be certified individually. The certification for a permit condition must address the compliance status of all requirements in the permit condition being addressed. In the following permit condition, subsections cannot be combined because the method of ensuring compliance and compliance status may be different from one condition to another:

1. Restrictions:

- a. Flare #2 shall be an enclosed ground type which is shrouded with no visible flame.
- b. The flare shall be operated at a minimum temperature of 1500°F or the minimum temperature at which 98% destruction efficiency was demonstrated during the most recent stack test, whichever is greater, and shall have a residence time of at least 0.5 seconds at all times.
- c. Flare #2 shall be equipped with an automatic pilot ignition source using only propane or natural gas as an auxiliary fuel.
- d. The gas control system shall include a condensate knockout pot and flame arrestor prior to the flare.
- e. Flare #2 shall be operated with a flame present at all times during operation. The flare shall be equipped with an automatic shut-off mechanism designed to immediately stop the flow of gases when a flame-out occurs. During restart or start-up, there shall be sufficient flow of auxiliary fuel to the burners such that un-burnt landfill gasses are not emitted to the atmosphere.

Compliance Status

Check the box that states the facility’s compliance status for the permit condition for the entire reporting period. The guidance in Table 1 below should be used in assigning compliance status for a permit condition. “Continuous compliance” means collection of all monitoring data required by the permit which meets the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations. Monitoring data includes information from instrumental (e.g., CEMS, COMS, or parameter monitors) and non-instrumental (e.g., visual observations, inspection, or recordkeeping) forms of monitoring. “Intermittent compliance” means any form of compliance other than continuous compliance. “Not applicable” applies to permit conditions that

were not enforceable during the reporting year, do not apply to operations at the facility, or do not contain an applicable requirement.

Table 1 - Compliance Status Determination Table

Source Meets Required Monitoring Frequency	Data Collected Meets Regulatory Requirement	Compliance Status for Permit Condition
YES	YES	Continuous
NO	YES/NO	Intermittent
YES	NO	Intermittent
Permit condition revoked, not applicable to operations at the facility, or does not contain an applicable requirement.		Not Applicable

Example 1:

Permit condition V.A.1.a, states that “The Permittee shall not combust fuel oil where the sulfur content is greater than 0.0015 percent sulfur, by weight. All fuel oil burned shall meet the specifications of #1 or #2 fuel oil as defined by ASTM D396.” Compliance is monitored by permit condition V.A.3.b, which states “The Permittee shall obtain and maintain fuel receipts from the fuel supplier which certify that the oil fired is #1 or #2 fuel oil as defined by ASTM D396.”

The Permittee received an appropriately annotated fuel oil receipt with each delivery. The certification for permit condition V.A.1.a would look as follows:

Permit Condition	Compliance Status	Monitoring Method	Identification of Deviations	
			Previously Reported	Not Previously Reported
V.A.1.a	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent <input type="checkbox"/> Not Applicable	RR (V.A.3.b)	0	0

Example 2:

Permit condition V.A.1.d, states that “The Permittee shall limit particulate emissions from cutting operations using the following equations:

- a. $E = 4.1P^{0.67}$, for process input weight rate up to and including 30 tons per hour
- b. $E = 55P^{0.11} - 40$, for process weight rate above 30 tons per hour

Where,

E = emission rate in pounds per hour,
 P = process input weight rate in tons per hour.”

Compliance is monitored by condition V.A.3.c, which states “The Permittee shall on a weekly basis, perform an inspection of each baghouse. The Permittee shall maintain records of each inspection. Any indication of improper operation of the baghouse cleaning systems and/or the need for any maintenance on the cleaning system shall be recorded in the maintenance log along with a description of any corrective action taken and the time to complete the action. These records shall be kept in a form suitable for inspection or submittal to the Program.”

No inspection was made during the week the environmental coordinator was on vacation. The deviation was properly reported in the first semiannual compliance report, submitted 7/22/16. The certification for condition V.A.1.d, should look as follows:

Permit Condition	Compliance Status	Monitoring Method	Identification of Deviations	
			Previously Reported	Not Previously Reported
V.A.1.d	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent <input type="checkbox"/> Not Applicable	IN&RR (V.A.3.c)	7/22/16 - 1	0

Example 3:

Permit condition V.B.1.a states that “The Permittee shall ensure that each storage tank subject to the requirements of §2105.12 “Volatile Organic Compound Storage Tanks” is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.”

The Permittee does not own or operate any storage tanks. The certification for condition V.B.1.a should look as follows:

Permit Condition	Compliance Status	Monitoring Method	Identification of Deviations	
			Previously Reported	Not Previously Reported
V.B.1.a	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent <input checked="" type="checkbox"/> Not Applicable	No storage tanks		

Monitoring Method

The Program has developed a list of monitoring codes (see Table 2 below) for your convenience. The use of the monitoring codes in Table 2 will simplify the Program’s review and minimize follow-up requests from the Program to define non-standard monitoring codes. The regulated community can use other monitoring codes if the codes are explained, preferably at the end of the Part 2 form.

Table 2 Monitoring Code Table

Monitoring Code	Short Description	Included/Example Activities
RR	Recordkeeping Requirement	- Delivery fuel certification - Track pollutant (e.g., VOC) content - Calculate rolling emissions total
ST	Stack Testing	- Testing using EPA approved method
CEMS	Continuous Emission Monitoring System	- Continuous emission monitoring system
COMS	Continuous Opacity Monitoring System	- Continuous opacity monitoring system
VE	Visible Emissions Monitoring	- Daily visible emissions check - Periodic Method 9 observation
PMS	Parametric Monitoring System	- Record thermal oxidizer operating temperature - Record baghouse pressure drop - Record scrubber flow rate and pH

OMP	Operations and Maintenance Plan	- Operate equipment in accordance with manufacturer's recommendations - Periodic replacement of paint booth filters
IN	Inspection	- Periodic inspection of work practices or equipment
BMP	Best Management Practices	- Practices generally recognized as "good operational practice" or published as "best management practice."

Identification of Deviations

Cross-referencing of previously reported deviations is also allowed. Cross-referencing a previously reported deviation only requires you to identify the number of separate deviations and the submittal date of the report. "Previously Reported" deviations include the date of the report containing the deviation report and the number of deviations reported (e.g., 7/16/15 – 5, or 1st Semiannual Report 2015 submitted Jul 16, 2015 – 5 Deviations, or Jan-Jun 2015 Report submitted 7/16/15 – 5 Devs). "Not Previously Reported" includes only the number of deviations that have not been previously reported and includes only the number of deviations reported on Part 3 of the form. Multiple deviations or a continuous deviation, attributable to the same circumstances, may be reported as a "single deviation" so long as the basis of deviation provides sufficient detail.

Example 4:

For permit condition V.C.1.d, the Permittee experienced 4 deviations in the first semiannual reporting period, which was reported 7/25/15 and 2 deviations in the second semiannual reporting period, which was reported 1/22/16. Recordkeeping, required by condition V.C.4.a, is used to monitor compliance. The certification for condition V.C.1.d should look as follows:

Permit Number & Condition Number	Compliance Status	Monitoring Method	Identification Permit Number & of Deviations	
			Previously Reported	Not Previously Reported
V.C.1.d	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent <input type="checkbox"/> Not Applicable	RR (V.C.4.a)	7/25/15 – 4 1/22/16 - 2	0

Part 3 – DEVIATION REPORT

The facility must report details of deviations identified in Part 2 that have not been previously reported. The facility must submit Part 3 of the form. If the facility did not experience any deviations during the entire reporting period or all deviations were previously reported, Part 3 of the form should be submitted with only the "facility name" and "period covered by the report" parts completed. For the purposes of ACC reporting, properly reported deviations are those deviations reported in a periodic (semiannual or quarterly) compliance report required by the Title V permit. Deviations reported in breakdown reports may also be referenced. Each deviation should be individually addressed on a separate line. Multiple deviations or a continuous deviation attributable to the same circumstances may be combined into a single line. Information may be cross-referenced when a single event/circumstance causes deviation of multiple permit conditions. Specific guidelines for each type of information are described below.

Facility Name Same as reported in Part 1 and Part 2.

Period Covered by Report Same as reported in Part 1 and Part 2.

Permit Condition Same as reported in Part 2.

Deviation Start/End Enter the date and time that each event started and ended. Multiple deviations covered on the same line will identify the time period from the start of the first deviation to the end of the last deviation.

Emission Unit(s) Identify emission unit(s) associated with the deviation.

Basis of Deviation Describe why the event is a deviation from the permit condition.

Cause and Corrective Action Describe the cause of the deviation, all actions taken to correct the deviation and prevent future occurrences, and how compliance was reestablished.

Example 5:

The Permittee submitted a semi-annual report on December 2, 2016 in violation of condition III.15.d, which requires the semi-annual report to be submitted no later than October 31 of each year. The Part 3 deviation report for the late ACC submittal should look as follows:

Permit Condition	Deviation		Emission Unit(s)
	Start – Date & Time	End – Date & Time	
III.15.d	November 1, 2016 – 0001hrs	December 2, 2016 – 1400hrs	Facility
Basis of Deviation		Cause and Corrective Action	
The semi-annual report for this facility was submitted December 2, 2016. Condition III.15.d requires a semi-annual report to be submitted no later than October 31 of each year.		The permittee’s tracking system had an incorrect due date for the semi-annual report and it was discovered after the report was already a month late. The date in the tracking system has been corrected and all other dates were reviewed. In addition to the tracking system, the permittee now has a paper copy showing all required due dates. These actions should prevent a recurrence of this problem in the future.	

Any questions on form use or data entry should be directed to Najeeb Basher:
Najeeb.Basher@alleghenycounty.us or 412-578-8135.