

INSTRUCTION MANUAL FOR
PERMIT APPLICATION FORMS

40 CFR PART 71
FEDERAL OPERATING PERMITS PROGRAM

US EPA
FEBRUARY, 2004

**Instructions For Completing Part 71
Operating Permit Application Forms
(In Accordance With 40 CFR Part 71)**

Who Must Apply for a Permit

This application package must be completed for each part 71 source required to apply for and obtain a federal operating permit under regulations promulgated at 40 CFR part 71 and under the authority of title V of the Clean Air Act (the Act). Please refer to § 71.3 for detailed information on which sources are subject to these requirements. The forms must be signed by a responsible official attesting to the truth, accuracy, and completeness of the information in the forms and attachments. These forms can be used to apply for the initial operating permit, renewals, and permit revisions for part 71 sources and, in certain cases, revisions or re-openings to part 70 permits.

Addresses of Regional Offices

The attached forms should only be used to apply for permits that will be issued by the United States Environmental Protection Agency (EPA) or a State permitting authority that has been delegated authority to issue part 71 permits. Permitting agencies delegated authority to perform certain duties under part 71 may have approval to provide applicants with other application forms that are equivalent to the forms in this package. When applying for an operating permit under 40 CFR part 70, contact the State, local or tribal environmental agency with authority to issue permits in the area where the facility is located for the proper application forms.

If you have any questions about the forms, whether you need to apply for a part 70 or 71 permit, or you are uncertain about who is administering the program in effect at your location, please call the following EPA regional offices:

REGION I

Part 71 Permit Contact, Air Management Division,
U.S. Environmental Protection Agency,
John F. Kennedy Federal Building,
Boston, Massachusetts, 02203,
Phone: (617) 565-3800.
Connecticut, Maine, Massachusetts, New Hampshire,
Rhode Island, and Vermont.

REGION II

Permitting Section, Air Programs Branch,
U.S. Environmental Protection Agency,

290 Broadway
New York, New York 10007-1866,
Phone: (212) 264-2301.
New Jersey, New York, Puerto Rico, and Virgin
Islands.

REGION III

Part 71 Permit Contact,
Air, Radiation and Toxics Division,
U.S. Environmental Protection Agency,
841 Chestnut Building,
Philadelphia, Pennsylvania 19107,
Phone: (215) 566-9390.
Delaware, District of Columbia, Maryland,
Pennsylvania, Virginia, and West Virginia.

REGION IV

Chief, Operating Source Section,
Air & Radiation Technology Branch, APTMD,
U.S. Environmental Protection Agency,
61 Forsyth Street S.W.,
Atlanta, Georgia 30303,
Phone: (404)-562-9099
Alabama, Florida, Georgia, Kentucky, Mississippi,
North Carolina, South Carolina, and Tennessee.

REGION V

Air Programs Branch, Air and Radiation Division,
U.S. Environmental Protection Agency,
77 West Jackson Boulevard (AR-18J),
Chicago, Illinois 60604-2000,
Phone: (312) 353-2212.
Illinois, Indiana, Minnesota, Ohio, and Wisconsin.

REGION VI

Part 71 Permit Contact,
Air, Pesticides and Toxics Division,
U.S. Environmental Protection Agency,
First Interstate Bank Tower at Fountain Place,
1445 Ross Avenue,
Dallas, Texas 75202-2733,
Phone: (214) 655-7200.
Arkansas, Louisiana, New Mexico, Oklahoma, and
Texas.

REGION VII

Air, RCRA, and Toxics Division,
Air Permitting and Compliance Branch,
901 N. 5th Street, Kansas City, KS 66101
Phone: (913) 551-7020.

Iowa, Kansas, Missouri, and Nebraska.

REGION VIII

Part 71 Permit Contact, Air and Toxics Division,
U.S. Environmental Protection Agency,
999 18th Street,
Denver, Colorado 80202-2405,
Phone: (303) 293-0946.

Colorado, Montana, North Dakota, South Dakota,
Utah, and Wyoming.

REGION IX

Part 71 Permit Contact, Air and Toxics Division,
U.S. Environmental Protection Agency,
75 Hawthorne Street,
San Francisco, California 94105,
Phone: (415) 744-1219.

Arizona, California, Hawaii, Nevada, Guam, and
American Samoa, and the Northern Mariana Islands.

REGION X

Part 71 Permit Contact, Air and Toxics Division,
U.S. Environmental Protection Agency,
1200 Sixth Avenue,
Seattle, Washington 98101,
Phone: (206) 553-4152.

Alaska, Idaho, Oregon, and Washington.

Additional Application Forms

If your facility is required to submit a permit application under phase II of the acid rain program, the proper application forms can be obtained by contacting the appropriate EPA regional office or the permitting authority delegated authority by EPA to permit acid rain sources. Submittal of acid rain permit applications may occur by different deadlines than those for submittal of initial part 71 permit applications. For more information on the acid rain program, you may either call the above listed EPA regional offices or the Acid Rain Hotline at 202-233-9620.

Where To File the Application Forms

The completed application should be mailed to the EPA

regional office responsible for permitting in the State where your facility is located (See above list of regional offices). When a State or other permitting agency has been delegated the part 71 program, your application should be mailed to that agency.

When To File the Application Forms

A part 71 source is subject to the requirement to submit an application on the effective date of the program or when the source commences operation, whichever occurs later. If a part 71 source is operating at the time that the part 71 program is established and has a current part 70 permit, the source is not required to apply for a part 71 permit until their part 70 permit expires. Once required to submit an application, a source has up to 12 months to do so. If a source is required to submit the application earlier than 12 months after the part 71 program is established, they will be notified in advance by the permitting authority (EPA or the delegated agency) of this requirement. In no case will this notice be given less than 6 months in advance of the submittal date. Methods used to notify the source may be a letter sent by EPA or delegate agency or a public notice in a local newspaper. If a source is renewing a part 71 permit, the application must be submitted within the timeframe required in the existing permit (between 6 and 18 months prior to the date of permit expiration).

Payment of Fees

Part 71 sources are required to submit information concerning actual emissions and pay annual fees consistent with a national fee schedule (promulgated at §71.9), or any other fee schedule promulgated by EPA for a State, local, or tribal area in effect where the facility is located. In addition, part 71 fees may be suspended where a part 71 program is fully delegated and EPA incurs no administrative costs. Each part 71 source must submit an initial fee calculation worksheet for the preceding calendar year by the deadlines specified in §§ 71.9(f) and (g). These deadlines may or may not coincide with the deadlines for application submittal. After initial submittal, the fee calculation worksheet must be submitted on an annual basis by the deadline specified in § 71.9(h). Appropriate penalties and interest will be billed to sources that submit fee calculation worksheets and pay fees after the required deadline.

Availability of Information To The Public and Confidential Treatment of Information.

Information contained in the permit application will, upon request, be made available to the public for inspection and copying. If sources wish to request confidential treatment for business information, such information should be submitted separately to the permitting authority along with a claim of

confidentiality as provided in 40 CFR part 2, subpart B. The applicant may be required by the delegate agency to provide a copy of the permit application directly to the Administrator. All business confidentiality claims will be processed by the permitting authority following the procedures found in that subpart.

Information Collection Burden Estimates

The OMB has approved the information collection requirements of the final rule as reflected in this application package under the provisions of the Paperwork Reduction Act, 44 U.S.C. 3501 *et. seq.* and has assigned OMB control number 2060-0336. At present, OMB is reviewing a renewal of the information collection request, which also has the OMB control number 2060-0336.

The information is planned to be collected to enable EPA to carry out its obligations under the Act to determine which sources are subject to the Federal Operating Permits Program and what requirements should be included in permits for sources subject to the program. Responses to the collection of information will be mandatory under § 71.5(a) which requires owners or operators of sources subject to the program to submit a timely and complete permit application and under §§ 71.6(a) and (c) which require that permits include requirements related to recordkeeping and reporting.

The annual average burden on sources for the collection of information is approximately 269,000 hours per year, or 85 hours per source. The annual cost for the collection of information to respondents is \$2.7 million, assuming the part 71 program is in effect in 38 State and local jurisdictions. The annual average burden on State and local agencies as delegated agencies is \$3.9 million. The annual cost to the Federal government is \$4.2 million (assuming part 71 programs are delegated), which is recovered from sources through permit fees. Thus, the total annual cost to sources would be \$10.8 million. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

Record Retention

Applicants must retain records, materials, worksheets, or other support material used in the preparation of the permit application for a period of at least 5 years from the date of application or, for emissions data used to calculate fees, for 5 years following the year in which emissions data is submitted [see §§ 71.6(a)(3)(ii), 71.6(e) and 71.9(i)]. This would, for example, include records used to determine fee payment or compliance with applicable requirements.

Assistance On Completing Application Forms

In addition to obtaining assistance from the regional offices, the following hotline services also may be contacted:

The Technology Transfer Network (TTN) is a network of computer bulletin boards providing information and technology exchange in many areas of air pollution control, ranging from emissions test methods to regulatory air pollution models. It is located on the internet at <http://www.epa.gov/ttn>. Information concerning Title V of the Clean Air Act (operating permits) can be accessed through the OAR Policy and Guidance (OARPG) web site on the TTN. This web site is designed to provide access to rules, policy, and guidance documents produced by the US EPA Office of Air and Radiation (OAR). This web site is located at <http://www.epa.gov/ttn/oarpg>.

For information on the Clean Air Act and regulations, Federal air pollution control standards, and air pollution control technologies, contact the Control Technology Center at 919-541-0800.

For information on air emissions testing methods, emissions monitoring methods, and Federal testing and monitoring requirements, contact the Emissions Measurement Technical Information Center at 919-541-1060.

For information on pollution prevention methods, contact the Pollution Prevention Information Clearinghouse at 703-821-4800.

For information regarding ozone protection requirements under the Clean Air Act, contact the Stratospheric Ozone Information Hotline at 800-296-1996.

Small businesses may also contact the Federal Small Business Assistance Program located at the Control Technology Center's Hotline or the Small Business Ombudsman's Office at 800-368-5888.

Organization of Application Forms

The application package is composed of the following forms:

GIS	General Information and Summary
EUD-1	Emissions Unit Description for Fuel Combustion Sources
EUD-2	Emissions Unit Description for VOC Emitting Sources
EUD-3	Emissions Unit Description for Process Sources
IE	Insignificant Emissions
EMISS	Emissions Calculations
PTE	Potential to Emit Summary
FEE	Fee Calculation Worksheet
FF	Fee Filing Form
I-COMP	Initial Compliance Plan and Compliance Certification
CTAC	Certification of Truth, Accuracy, and Completeness

The following forms are designed to contain information related to the entire part 71 source: **GIS, IE, PTE, FEE, and FF**. In addition, forms **EMISS** and **I-COMP**, as well as the emissions unit description forms, **EUD-1, EUD-2, and EUD-3** are designed to contain information pertaining to individual emissions units located at the facility or individual applicable requirements that apply to emissions units at the facility.

Form **GIS** is provided to report general information and to summarize other relevant information contained in other parts of the form or attachments, consistent with the requirement in § 71.5(a)(2) to submit information sufficient to evaluate the subject source and its application and to determine all applicable requirements. Note that some of the information requested in certain sections of this form may not be known until the other forms have been completed.

Emissions unit description forms (**EUD-1, EUD-2, and EUD-3**) are included in this package to assist applicants in describing individual significant emissions units that do not qualify for streamlined or insignificant treatment, consistent with the general requirements of §§ 71.5(c)(2) through (7). Form **EUD-1**, emissions unit description for fuel combustion sources, is best used to describe fuel burning equipment such as boilers, steam generators, stationary internal combustion engines, gas turbines, and similar sources. Form **EUD-2**, emissions unit description for volatile organic compound (VOC) emitting sources, is best used to describe VOC emitting sources such as spray coating sources, automotive refinishing, printing, semiconductor manufacturing, or similar type of sources that use coatings or solvents. Form **EUD-3**, emissions unit description for process sources, is appropriate for most other types of sources.

Form **IE** is designed to list emission units eligible for insignificant treatment under § 71.5(c)(11)(ii).

Forms **EMISS** and **PTE** are designed to assist sources with meeting the requirements of § 71.5(c)(3) to submit emissions information. Form **EMISS** is provided to help applicants organize data and calculate emissions for each significant emission unit. Form **PTE** is provided to summarize potential to emit for applicability purposes for the entire part 71 source.

Form **FEE** is provided to calculate actual emissions for fee purposes and to calculate the fee amount for the facility. Form **FEE** may be used as the initial and annual fee calculation worksheet, consistent with §§ 71.5(c)(3) and 71.9. Form **FF** is sent along with fee payment (initially and annually thereafter) to EPA's "lockbox" bank address so that the bank handling the fee account can notify EPA that payment has been received. Form **FF** (along with fee payment) is the only form that is not sent directly to the permitting contacts in the EPA regional offices.

Form **I-COMP** is designed to meet the requirements of § 71.5(c)(8) and (9) concerning compliance plans and compliance certifications. Form **I-COMP** is designed for the source to describe each individual applicable requirement, including a statement of its current compliance status, to identify which emissions units are subject to each requirement, to reveal which methods for determining compliance were used to determine the compliance status of each applicable requirement, to state their expectations concerning future compliance status, and to provide detailed schedules of compliance for requirements not in compliance by time of permit issuance and for future-effective requirements that will not be in compliance by the effective date (when that date falls after permit issuance).

Form **CTAC** is provided for the responsible official to certify that the application forms and attachments, as well as other documents, are true, accurate, and complete, consistent with § 71.5(d). In addition, this form may be used to satisfy the requirements of § 71.6(c)(1) for the responsible official to certify documents required by a part 71 permit.

Applications for permit revisions need only supply information related to the proposed change. Attachments may also be needed to address any additional application requirements of the revision procedures of § 71.7 or of the applicable requirements themselves.

If you have questions concerning the appropriate forms to submit for a particular type of facility or application type, or need other assistance in filling out the forms, please contact the appropriate regional office identified on page 1 and 2 of

the instructions.

Application Completeness

In general, applications will be found complete by the permitting authority if they contain enough information for them to begin to process the application. A determination of completeness is important for sources because the submittal of a timely and complete application shields the source from enforcement action for operating without a permit [see provisions for this "application shield" at §§ 71.7(b) and 71.5(a)(2)]. Sources are also ultimately required to submit enough information for the permitting authority to be able to draft a comprehensive, enforceable permit. The level of detail required in the application to meet this requirement is usually much higher than that required for purposes of the completeness determination. Permitting authorities may allow for the phased submittal of the forms in this application package to accomplish these goals. For example, sources scheduled for permitting in years two and three of the permitting transition period might be allowed to submit a subset of forms for purposes of the completeness determination, and then allowed, at a later date, to submit the remaining information necessary to draft a permit. Although EPA is committed to offering applicants as much flexibility as possible in respect of the streamlined submittal of applications, specific completeness requirements for all sources subject to part 71 are beyond the scope of this document, as these requirements will be tailored for each locality where a part 71 program will be implemented. This flexibility to tailor completeness requirements for each locality will help to provide for a harmonious transition to a part 70 program. For more information on when a particular source is scheduled to be permitted, whether a phased approach to application submittal is being implemented, which forms or information should be submitted to ensure a determination of completeness, and which forms or information must be submitted to allow the permitting authority to draft a permit, please contact the permitting authority. For further information on application streamlining, please see the two part 70 "white papers," (being implemented for part 71 purposes as well): White Paper for Streamlined Development of Part 70 Permit Applications, issued July 10, 1995, and White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, issued March 5, 1996.

For purposes of the initial application submittal, the permitting authority must notify applicants that their forms are incomplete within 60 days of submittal, along with a request for additional information, or the forms will be automatically deemed complete.

Applicants must update their application, after submittal but

prior to release of the draft permit, to address any applicable requirements that become applicable to the source after it files a complete application. At any time after the application is administratively complete, the permitting authority may request additional information in writing, giving a reasonable time for response. It is also the responsibility of applicants who fail to submit relevant facts or submit incorrect information in an application to promptly submit supplementary facts or corrected information.

In addition to the submittal of information as provided for on the standard application forms, applicants may need to submit supplemental information on attachments. If the space provided on the form is insufficient or not appropriate for an adequate description, attachments may also be utilized. To indicate that each section has been considered, enter "NA" for "not applicable" or indicate that it is applicable but the information will be submitted at a later date and indicate the date it will be submitted (either in the space provided or on an attachment).

If you have previously submitted information to EPA or to an approved State agency that is required to be submitted in these application forms, you may either repeat the information in the space provided or cross-reference the relevant materials or documents. Cross-referencing is allowed for materials that are currently applicable and available to the public and the permitting authority. If the materials do not meet this standard they must be submitted as an attachment to this form. All cross-referenced materials will be placed in the public docket on the permit action, unless they are published and/or readily available.

Specific Instructions For Each Form

Please type or print in blue or black ink.

FORM GIS - GENERAL INFORMATION AND SUMMARY

Use this form to provide general and summary information about the part 71 source and to indicate the permitting action requested.

This form should be submitted once for each part 71 source (facility or plant). Since this form asks for summary information, several sections may need to be completed after the rest of the forms in this forms package.

Section A - Enter the facility's official or legal name. Do not use a colloquial name. Next, enter the complete mailing address for the facility and the name, telephone number, and facsimile number (if desired) for the contact person. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or other individual, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

Section B - Indicate whether the source is a temporary source. Temporary sources must provide information on each location and should use section C of this form to provide information on the first location and attachments to describe the other locations. If different from the mailing address, include the plant site location. If the plant site lacks a street address, provide the most accurate alternative geographic description in the plant site location field (e.g., township, range, and section, or a narrative description of its location in relation to easily identifiable features, such as towns or roadways). See page 1 and 2 of the instructions to determine the EPA region where the source is located and enter the number of the region in the space provided. Indicate whether the source is located on Indian lands, in outer continental shelf waters, or in a nonattainment area, and enter the pollutants for which the area is nonattainment. If the facility is within 50 miles of an "affected State" under the definition of § 71.2 check "yes" and enter the abbreviation or name of the affected State(s).

Section C - Enter the name, address and telephone number of the owner of the facility. If there is more than one owner, list the other owners on an attachment. For example, the owner(s) could be an individual, a partnership, a company, a parent company, or a corporation, or any combination of these.

Section D - Enter the name, address, and telephone number of

the operator. For example, the operator may be an individual or a company. In some cases the owner and operator may be the same individual or company.

Section E - Mark the appropriate box to indicate whether the application is for initial permit issuance, renewal or revision. Mark initial permit issuance if you are applying for a part 71 permit for the first time. Also, if applying initially, please provide the date that operations commenced. Mark renewal only if a part 71 permit is being renewed and include the date that the existing permit expires in the space provided. For revisions, mark the appropriate box to indicate the type of revision [described in § 71.7(e)]. For all types of permit revisions, applicants must provide a brief narrative description of the changes to occur.

Section F - Check the appropriate boxes to indicate the applicable requirements that apply to the part 71 source (facility) or to any specific emissions units at the facility. The definition of applicable requirements in § 71.2 will help you to understand some of the applicable requirements described on the form.

If the facility is required to register a risk management plan, indicate whether or not a plan has been registered and if so, the name of the regulatory agency.

If the facility has applicable requirements of phase II of the acid rain program, indicate whether or not a phase II acid rain application has been submitted separately from this application and enter the name of the permitting agency. In addition to the requirement to submit an acid rain application under 40 CFR part 72, part 71 sources with acid rain applicable requirements must submit a part 71 permit application addressing acid rain requirements in the same manner as other applicable requirements of the Act.

Section G - This section can be used for two purposes:

(1) to cite and describe any emission-limiting requirements that apply to the facility as a whole, such as facility-wide limitations on operational schedule. This space may also be used to request that such terms or conditions be placed in the permit independent of any requirement to do so.

(2) to cite and describe "generic applicable requirements" that apply broadly to the facility. Such generic requirements include requirements that apply identically to all emission units at a facility, general housekeeping requirements, and requirements that apply identical emission limits to small units. These are normally SIP requirements, such as state-wide opacity requirements, and do not include any NSPS, NESHAP, MACT, or other source-specific requirements. Generic requirements described here do not have to be described again with respect to each emission unit, except

when a generic requirement applies or must be complied with in a unique way at a particular emissions unit. (Please see section II.B.4 of the first white paper concerning generic grouping of emission units and activities.)

Section H - List, in descending order of priority when more than one, the 4-digit standard industrial classification (SIC) code(s) that best describes your facility in terms of its principal products or processes, and provide a narrative description for each classification. Also list any processes, products, and SIC codes associated with any alternative operating scenario listed in section I below if different from those for normal operation. For a listing of SIC codes, see the Standard Industrial Classification Manual, 1987 edition or later, prepared by the Executive Office of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington DC.

Section I - Assign a unique emissions unit identifier (unit ID) under the "emissions unit ID" column and provide a text description for each significant emissions unit at facility. A "significant emissions unit" in this context is any emissions unit that does not qualify for insignificant treatment under § 71.5(c)(11) or is a trivial activity (as described initially in the first white paper, section II.B.3, or identified later in subsequent EPA guidance). Significant emissions units that only have generic applicable requirement that apply to them should also be described here, however, unit IDs need only be assigned if they will be referenced in subsequent portions of the application. Also, EPA notes that the list of significant emissions units should include fugitive emission sources, as well as those that emit through a stack or equivalent opening.

You may group emissions units, activities, or pieces of equipment together and assign a single unique unit ID when the emission units or activities are subject to the same applicable requirement(s) and will have the same monitoring, recordkeeping, and reporting requirements in the permit.

You may choose any numbering system you wish to assign unit IDs. You may use any combination of letters and numbers, however, please use numbers in consecutive order. If an emissions unit has previously been assigned an unit ID, use the same ID. If this is an application for a permit revision, each originally permitted emissions unit should already have an unit ID. If the unit is a new unit, assign a unit ID consistent with the existing unit IDs.

In the space for description, provide a brief description of the emissions unit, equipment or activity. For example, this description may include the type of equipment, the function of the activity or equipment, or any other descriptive information that will help the permitting authority to understand generally

its uses and emissions.

In addition, describe and assign a unique unit ID for each alternative operating scenario and each piece of pollution control equipment. When possible, assign these numbers so as to show with which emissions units or processes these scenarios or control devices are associated. For example, if an emissions unit ID is 001, then the first piece of control equipment might be assigned ID 001-C01, the second piece of control equipment for the same emissions unit might be 001-C02, and so on. For alternative operating scenarios, describe the emissions units with which it is associated (if not clear from the unit ID), and the difference in process or applicable requirements that constitutes the alternative operating conditions. To describe control devices, indicate the emission units with which it is associated (if not clear from the unit ID) and the type of control device (e.g. baghouse, wet scrubber, or fabric filter).

Applicants wishing to minimize the possibility of delays caused by requests for additional descriptive information by the permitting authority may opt to attach a block diagram or process flow diagram for the facility. These diagrams help to show how emission sources are related to each other and to the processes occurring at the facility and are helpful, in general, in understanding the applicable requirements and emissions from a source. Such diagrams are often submitted as part of a preconstruction review permit and if so, could be cross-referenced as a source of additional information during initial application submittal.

Section J - Show the total emissions for the part 71 source in terms of PTE for applicability purposes for each air pollutant listed below and the total actual emissions for fee purposes. Applications for permit revisions should report PTE after the change for the emissions units affected by the change.

Completion of form **PTE** is recommended prior to the entry of PTE information in this section, as form **PTE** will help you to organize emissions information and determine the total for each pollutant.

The term "NO_x" is an abbreviation for nitrogen oxides, "VOC" for volatile organic compounds, "SO₂" for sulfur dioxide, "PM₁₀" for particulate matter with an aerodynamic diameter of 10 micrometers or less, and "CO" for carbon monoxide. The space for lead refers to elemental lead regulated by a NAAQS, while compounds of lead are HAP. Each HAP on the list of 189 included in section 112(b) of the Act is a separate regulated air pollutant. Indicate the total PTE for the single HAP emitted in the greatest amount and the aggregate of all HAP for the facility. Include fugitive emissions when reporting the PTE of these pollutants to the

extent that they count toward major source applicability. All fugitive emissions of HAP count toward major source applicability. For additional information on when fugitive emissions are counted in major source applicability determinations refer to the definition of major source in §71.2 and EPA guidance on this issue available on the TTN. Source may also stipulate to major source status for the pollutants indicated on the form by entering "Major" in the space provided for PTE values.

If you are submitting form **FEE** at the same time as this form, include the total for actual emissions in the space provided. This total can be obtained from section F, line 5, of form **FEE**. When totaling actual emissions, include all emissions, including fugitive emissions, regardless of whether they count for applicability purposes.

Section K - Indicate the permit number, permit type, and permitting authority for any existing federally-enforceable air pollution control permits in the spaces provided. If more than one, submit this information on an attachment.

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Section L - If any emissions unit within your facility is applying, has applied, or currently has a general permit, identify the emissions unit ID and name of the unit, consistent with section I of this form. Also indicate whether an application has been submitted or whether general permit coverage has already been granted. If granted, identify the general permit (permit number and brief description) and enter the date that the general permit expires.

Section M - if the application cross references information from other applications or documents, such as NSR applications, check "yes" in the appropriate box. Attach copies of cross referenced documents that are not publicly available or otherwise available to the permitting authority.

FORM EUD-1 - EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

This form is designed to describe emissions units that combust solid or liquid fuels, **such as boilers, steam generators, electric generating plants, stationary internal combustion engines, gas turbines, and other commercial and domestic fuel combustion units.**

This form may be used for each significant emissions unit with "specific applicable requirements" that is a fuel combustion source identified in section I of form **GIS**. Specific applicable requirements are requirements such as MACT, NSPS, NESHAP, RACT, BACT, LAER or other source-specific requirements, but not generic applicable requirements. This form will help you to collect and organize technical information, including operational characteristics, applicable requirements, compliance terms, and emissions for each emissions unit. Please copy as many **EUD-1** forms as needed so that each form contains information on a unique emissions unit.

Section A - Provide the emissions unit ID and description consistent with section I of form **GIS**. Enter the four-digit SIC code for the unit. Note that this SIC code may be different than that listed in section H of form **GIS** regarding the SIC code for the products and processes of the facility. In addition, complete the source classification code (SCC), if known or readily available. Entry of the SCC code is not mandatory but is useful because it identifies a specific process, the pollutant(s) from that process, and related emissions factors (for purposes of calculating emissions).

Section B - Describe the primary use for the emissions unit in terms of its products or processes, whether or not the unit is a temporary source, the manufacturer, model, and serial number, and the installation date of the equipment. For boilers, indicate the type of boiler by checking one of the appropriate boxes. If the "other" box is checked, fill in the boiler type in the space provided. Provide horsepower rating and boiler steam flow. For coal burning equipment, check the appropriate box for the type of solid fuel burning equipment. If you check "other," enter the type of equipment. Provide the maximum and average heat input in million British thermal units (MM BTU) per hour.

There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would include information needed to adequately identify the emissions unit and to determine compliance with applicable requirements or the requirements of part 71. See §§ 71.5(c)(2) through (7) for a more thorough description of

the types of additional information that may be needed.

Section C - Describe the primary fuel type that the unit will use during the majority of its operating hours and list any standby fuel types. Types of fuels include coal, fuel oil, natural gas, byproducts of fuels, liquified petroleum gas, wood, coke, refinery gas, etc. In the table list the fuel type, including the classification of the fuel (e.g., bituminous or lignite coal, number 2 fuel oil). Include the maximum weight percent sulfur content of the fuel, the percent ash content of the fuel, and the heat content or BTU value (per cubic foot, gallon, or pound, for example) of the fuel. Your fuel supplier should be able to provide such information. If the supplier provides a range of values, use the highest or worst-case value. Attach documentation from the supplier, if available, or describe how these values were determined.

Section D - For each fuel type listed in section C, state the actual usage and maximum usage. Actual fuel usage will be used to calculate actual emissions for purposes of calculating fees. Maximum usage will be used to calculate PTE. If your fuel is a combination of several fuel types, indicate the average percentage of each fuel on an hourly and yearly basis in the appropriate column or on an attachment.

The basis of this fuels usage data must be explained on an attachment. For example, actual fuel consumption could be established from purchase records or records of fuel consumption over the preceding calendar year or for sources that have not yet operated for a full year, from estimations of actual usage.

Section E - Identify and describe any associated air pollution control device. If more than one control device is used, include additional information on attachments. Provide the device type (e.g., baghouse, wet scrubber or flue gas desulfurization), the regulated air pollutants controlled by the equipment (e.g., NO_x or SO₂), the manufacturer, model number, serial number, and installation date of the equipment. Indicate the control efficiency and the efficiency estimation method (the vendor, AP-42, or the permitting authority may be consulted for further information). Attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were determined.

Section F - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. Provide the stack height in feet above ground level, the inside stack diameter of the top of the stack in feet, and the exit gas temperature in degrees Fahrenheit. In addition, provide the design (or maximum) stack flow rate and actual (or average) stack flow rate in actual cubic feet per minute (ACFM). Also provide the exit gas velocity in feet per

second.

Sources required to complete this section will likely need to provide attachments showing other information, data and calculations sufficient to address requirements of the NAAQS, increment, or visibility requirements under part C of title I of the Act.

FORM EUD-2 - EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES

This form is designed to describe emissions units that consume, process, store or produce substances containing VOC and that primarily emit VOC, such as painting or coating operations, printers, storage tanks, chemical reactors, and solvent degreasing (cleaning) operations.

This form may be used for each significant emissions unit with "specific applicable requirements" that is primarily a source of VOC emissions identified by a unit ID in section I of form **GIS**. In addition, this form may also be useful for certain HAP emitting sources. Specific applicable requirements are requirements such as MACT, NSPS, NESHAP, RACT, BACT, LAER or other source-specific requirements, but not generic applicable requirements. The purpose of this form is to help you collect and organize technical data, including operational characteristics, applicable requirements, compliance terms, and emissions. Please copy as many **EUD-2** forms as needed so that each form contains information on a unique emissions unit.

Section A - Provide the emissions unit ID and description consistent with section I of form **GIS** in the space provided. Enter the four-digit SIC code for the unit. Note that this SIC code may be different than that listed in section H of form **GIS** regarding the SIC code for the products and processes of the facility. In addition, enter the Source Classification Code (SCC), if known or available. Entry of the SCC code is not mandatory but is useful because it identifies a specific process, the pollutant(s) from that process, and related emissions factors (for purposes of calculating emissions).

Section B - Describe the equipment type, whether the unit is a temporary source, the manufacturer, model and serial number of the unit. For coaters and degreasers, describe the articles being coated or degreased. Describe the coating or degreaser application method. For example, coating operations can be a toll or captive surface coating method, base coat/clear coat topcoating system, utilize conventional spray, hot airless spray, or rotogravure, flexographic, or offset lithographic printing processes. For degreasers, the method might be a maintenance cold cleaner, dip tank manufacturing cold

cleaner, or open top vapor degreaser. Enter the percent overspray of the surface coating operation. For degreasers, describe the degreaser application method and the tank capacity in gallons. In addition, for both coaters and degreasers, explain the drying method and the number of dryers.

There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would include information needed to adequately identify the emissions unit and to determine compliance with applicable requirements or requirements of part 71. See §§ 71.5(c)(2) through (7) for a more thorough description of the types of additional information that may be needed.

Section C - Identify and describe any associated air pollution control device. If more than one control device is used, include the information on attachments. Provide the device type (e.g., activated carbon, substitute powder coating, or catalytic or thermal incinerator), the air pollutant controlled by the equipment (e.g., VOC and/or HAP), the manufacturer, model number, serial number, and installation date of the equipment. Indicate the control efficiency, capture efficiency and efficiency estimation method (the vendor, AP-42, or the permitting authority may be consulted for further information). Attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were determined.

Section D - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. Provide the stack height in feet above ground level, the inside stack diameter of the top of the stack in feet, and the exit gas temperature in degrees Fahrenheit. In addition, provide the design (or maximum) stack flow rate and the actual (or average) stack flow rate in actual cubic feet per minute (ACFM). Also provide the exit gas velocity in feet per second.

Sources required to complete this section will likely need to provide attachments showing other information, data and calculations sufficient to address requirements of the NAAQS, increment, or visibility requirements under part C of title I of the Act.

Section E - For each substance containing VOC consumed, processed, stored, or produced that results in air emissions, provide the chemical or brand name of the substance. If providing a brand name, also include the name of the manufacturer for the substance. Include the Chemical Abstract Service (CAS) number, if available. The "substance type" column is provided to describe the type or use of a

substance (for example, clean-up solvent, ink, topcoat, or clearcoat). Provide the actual usage in gallons per year for each substance. Provide the maximum usage for the unit in terms of gallons per day and gallons per year. Provide the VOC content in pounds per gallon. These VOC content and usage values are typically used to calculate emissions. Actual usage will be multiplied by VOC content to calculate actual emissions, while maximum usage will be multiplied by VOC content to calculate PTE. Explain the basis for the usage and VOC content values on an attachment. For example, VOC content might be supplied by the manufacturer, be found on Materials Safety Data Sheets (MSDS) for the product, or determined by the applicant. EPA Reference Method 24 found at 40 CFR part 60, Appendix A can also be used to determine VOC content. When VOC Content is determined through testing or calculation by the applicant, the applicant must attach test data and calculations to the application.

FORM EUD-3 - EMISSIONS UNIT DESCRIPTION FOR PROCESS SOURCES

This form is designed to describe emissions units for processes for which forms EUD-1 or EUD-2 are not appropriate. For example, sources such as rock crushers and asphalt batch plants.

This form may be used for each significant emissions unit with "specific applicable requirements" for which the other EUD forms are not appropriate and that are process emissions units identified in section I of form **GIS**). Specific applicable requirements are requirements such as MACT, NSPS, NESHAP, RACT, BACT, LAER or other source-specific requirements, but not generic applicable requirements. This form will help you to collect and organize technical information, including operational characteristics, applicable requirements, compliance terms, and emissions for each emissions unit. Please copy as many **EUD-3** forms as needed so that each form contains information on a unique emissions unit.

Section A - Provide the emissions unit ID and description consistent with section I of form **GIS** in the space provided. Enter the four-digit SIC code for the unit. Note that this SIC code may be different than that listed in section H of form **GIS** regarding the SIC code for the products and processes of the facility. In addition, complete the Source Classification Code (SCC), if known or available. Entry of the SCC code is not mandatory but is useful because it identifies a specific process, the pollutant(s) from that process, and related emissions factors (for purposes of calculating emissions).

Section B - Describe the primary use or equipment type [e.g.,

scrap aluminum melted, cement manufacturing (dry-process)], whether the unit is a temporary source, the manufacturer, model, serial number, and installation date of the equipment. List all raw materials used in the process and the finished products.

There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would include information needed to adequately identify the emissions unit and to determine compliance with applicable requirements or requirements of part 71. See §§ 71.5(c)(2) through (7) for a more thorough description of the types of additional information that may be needed.

Section C - Enter the amount of raw materials that are processed and/or the number of activities performed. These are values that are typically multiplied by emissions factors to calculate PTE and actual emissions. Provide actual activity or production rates on an annual basis. Also provide the maximum rate of activity or production rate on an hourly and annual basis. Explain the basis of this data on an attachment.

Section D - Identify and describe any associated air pollution control device. If more than one control device is used, include the information on attachments. Provide the device type (e.g., catalytic or thermal incinerator, or baghouse), the air pollutant controlled by the equipment, the manufacturer, model number, serial number, and installation date of the device. Indicate the control efficiency, capture efficiency and efficiency estimation method (the vendor, AP-42, or the permitting authority may be consulted for further information. Attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were determined.

Section E - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. Provide the stack height in feet above ground level, the inside stack diameter of the top of the stack in feet, and the exit gas temperature in degrees Fahrenheit. In addition, provide the design (or maximum) stack flow rate and the actual (or average) stack flow rate in actual cubic feet per minute (ACFM). Also provide the exit gas velocity in feet per second.

Sources required to complete this section will likely need to provide attachments showing other information, data and calculations sufficient to address requirements of the NAAQS, increment, or visibility requirements under part C of title I of the Act.

FORM IE - INSIGNIFICANT EMISSIONS

Use this form only if you have any equipment, emissions units, or emitting activities at your facility that qualify for insignificant treatment due to insignificant emissions levels.

Section 71.5(c)(11) adopts certain exemptions from the permit application content requirements of § 71.5(c)(2) through (9) for insignificant activities and emissions levels. This form is provided to list emissions units or activities that qualify for insignificant treatment under the insignificant emissions limit provisions of § 71.5(c)(11)(ii). For insignificant activities identified in § 71.5(c)(11)(i), no information need be listed or included in this form.

In addition, attach to this form information concerning equipment, activities, or emissions units that are exempted from an otherwise applicable requirements (e.g. emissions units grandfathered from requirements of a NSPS). Such exemptions are only valid if they are authorized under a Federally-approved implementation plan (SIP, FIP, or TIP) or other applicable requirement. On the attachment, describe the exempted equipment, emissions unit, or activity and the basis for the exemption (you may cite the State administrative code or Federal regulation).

Section § 71.5(c) provides that information needed to determine the applicability of, or to impose any applicable requirement must not be omitted from the permit application. In addition, note that neither the definition of major source in § 71.2 nor § 71.5(c) exempts units eligible for insignificant treatment from major source applicability determinations. These provisions mean that there are limited situations when more information than generally required by this form for insignificant emissions unit or emissions may need to be provided. For example, if you are already a major source before you consider the emissions of insignificant activities, then these emission has no bearing on the determination of major source status and therefore, may be left off the application. Please contact the permitting authority if you think you might need to consider these emissions. If more information is needed, submit the information on an attachment.

The description provided in the table must generally identify the source of emissions. The "number" column is provided to indicate the total number or units or activities grouped together under one description, for example, equipment such as valves and flanges. However, units or activities that are similar should be listed separately in the form when the descriptions differ in a meaningful way, such as when capacities or sizes differ and this information is relevant, for example, to an

applicability determination.

Two columns are provided for applicants to mark to indicate the type of pollutants (HAP and regulated pollutants except HAP) for the insignificant emissions. This is necessary for the permitting authority to assess which emissions-level criteria apply.

FORM EMISS - EMISSIONS CALCULATIONS

This form is designed to assist applicants in quantifying emissions for each significant emissions unit.

This form is designed to quantify emissions for each significant emissions unit identified in section I of form **GIS**. It is recommended that this form be completed prior to forms **PTE** or **FEE**. Consistent with the white papers and with EPA's desire to harmonize the transition between part 70 and part 71 programs, all sources may not need to submit this form, however, all sources will find it useful in organizing emissions data used later in forms **PTE** and **FEE**. Do not complete this form for any units or activities listed as insignificant on form **IE**, unless omitting their emissions would interfere with the determination or imposition of applicable requirements, or the determination that the source is a major source [see § 71.3(a), the definition of major source in § 71.2, and § 71.5(c)(11)]. Sources applying for permit revisions only need complete this form for each emissions unit affected by the change.

Section A - Include the emissions unit ID (from section I of form **GIS**) for the emissions unit being described.

Section B - Applicants should review the definitions of the terms: "major source," "regulated air pollutant, and "regulated pollutant (for presumptive fee calculation) as defined in § 71.2, and the definition of "actual emissions" in § 71.9(c)(6) before proceeding further. Several documents available on the TTN bulletin board system provide additional guidance in understanding these terms. In addition, the white papers provide flexibility for applicants to limit the amount of emissions information submitted for permitting purposes.

First, list on a separate line each regulated air pollutant emitted at this unit that is regulated by any applicable requirement (list each HAP separately in this step). Also list each additional regulated air pollutant or air pollutant listed in section 112(b) of the Act for which the unit or the entire facility is a major source. Second, for fee purposes, list any regulated pollutant (for fee calculation) emitted by the unit that has not already been listed for other purposes. For fee purposes, air pollutants emitted solely as fugitives must be listed the same as air

pollutants emitted solely as stack emissions. Hazardous air pollutants that are only listed for fee purposes and that have not already been listed in the previous steps may be simply listed as "HAP." Also note that for fee purposes, carbon monoxide, Class I or II substances under title VI of the Act, and pollutants regulated solely by section 112(r) of the Act should not be listed.

Next, calculate actual emissions for the purpose of determining fees. Only calculate actual emissions for the air pollutants that you have listed that are "regulated pollutants (for fee calculation)," including fugitives without regard as to whether they count for applicability purposes [see § 71.9(c)(6)].

Actual emissions are calculated based on the unit's actual operating hours, production rates, and in-place control equipment, types of materials processed, stored, or combusted during the preceding calendar year [see § 71.9(c)(6)]. Sources that have been issued part 70 or part 71 permits shall compute actual emissions using compliance methods required by the permit, such as monitoring or source test data. If actual emissions cannot be determined using the compliance methods in the permit, the emissions should be determined using other federally recognized procedures (see explanation of this

term on the next page). Sources that commenced operation during the preceding calendar year shall estimate emissions for the current calendar year [see § 71.9(e)(2)]. Section 71.9(f)(2) also identifies certain sources that have the option to estimate their emissions for the preceding calendar year in lieu of submitting actual emissions data. The instructions for form **FE** contains additional information on how to calculate actual emissions for fee calculation purposes. In general, applicants need not calculate actual emissions for CO or unregulated HAP, since these pollutants are not regulated pollutants (for fee calculation). With respect to emissions from any affected unit under section 404 of the Act, during the years 1995 through 1999, no emissions-based fee is required to be paid [see § 71.9(d); therefore, do not include actual emissions for these sources.

When entering this information on the form, you may round the actual emissions values to the nearest ton or use greater precision if you believe it will result in a lower fee. The first white paper allows emission estimates to be based on generally available information rather than new source testing or studies not already required by a permit. If you have listed a pollutant but are unable to calculate its actual emissions without conducting new source testing or extensive studies, enter "UN" (for "unknown") in the space provided.

Next, calculate PTE for each regulated air pollutant that is regulated at the unit on an hourly (pounds per hour) and

annual basis (tons per year), and enter resulting values in the space provided. For pollutants listed simply because they are present in major quantities (when the pollutants are not specifically regulated at this emission unit), do not calculate PTE in pounds/hour. The second white paper allows considerable streamlining for emission information in applications by not requiring applicants to perform PTE calculations for air pollutants when the applicant stipulates that the source is a major source for that particular pollutant. For these major pollutants, PTE quantification is not required unless it would resolve potential disputes concerning applicability or major source status, or if it is needed in the permit for some other reason. If you are not quantifying PTE for pollutants emitted in major amounts, stipulate that the unit alone triggers major source status for this pollutant by entering "MU" in the space provided for annual PTE values. Stipulate that the unit does not trigger major source status, but that the aggregate facility emissions or another unit triggers major source status by entering "MS" in the space provided for annual PTE values. Do not calculate PTE values for emissions that are not counted for major source applicability purposes or for emissions listed solely for fee purposes, however, enter "NA" for "not applicable" in the space provided for PTE values for these emissions. If you are unable to calculate PTE values for air pollutants counted for applicability purposes without conducting new source testing or extensive studies, enter "UN" (for "unknown") in the space provided. Within applications for permit revisions, PTE should be calculated assuming the proposed change has occurred.

Potential to emit is defined in § 71.2 as "the maximum capacity of a stationary source to emit any pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator. This term does not alter or affect the use of this term for any other purposes under the Act, or the term "capacity factor" as used in title IV of the Act or the regulations promulgated thereunder." Additional guidance on PTE and options for restricting maximum capacity is available on the TTN Bulletin Board system or by contacting the permitting authority.

Enter values for PTE by rounding to the nearest ton in the space for tons/year or to the nearest pound in the space for pounds/hour. Greater precision may be needed or desired by the applicant in certain circumstances (e.g., when more precision would resolve a potential dispute concerning applicability or major source status). In these cases, it would be advisable to not round these values until you calculate the total on form **PTE**.

Provide the chemical abstract service number (CAS No.), if available, for each HAP listed on the form.

The first white paper allows the information submitted concerning calculations to consist of examples that illustrate the methodology used. Such examples should include the formulas used, assumptions made to solve these formulas, and an indication of the source of the formulas or assumptions (e.g., AP-42, engineering calculations, source testing, monitoring data, or MSDS). Consistent with the first white paper, there is no need to submit extensive amounts of supporting information with the initial application in order for the application to be found complete. Applicants should contact the permitting authority if they have questions concerning the appropriate calculation methods for a particular pollutant at a particular emissions unit. In general, federally-recognized procedures for determining or calculating emissions include, the use of emission factors, source testing or monitoring data, and engineering calculations, among others. EPA has compiled and published air pollution emissions factors for various industrial sources in a document called AP-42. Emissions factors are values of air pollution per unit of activity. When these values are multiplied by activity rates, such as those reported in section C of form **EUD-3**, the result is an amount of air pollution.

FORM PTE - POTENTIAL TO EMIT SUMMARY

Use this form to calculate the total PTE for each air pollutant at the facility for purposes of determining major source applicability.

On each line (row) in the table provided, enter the emissions unit ID and the quantity of emissions for each air pollutant listed on the form. If form **EMISS** was prepared previously, simply copy the emission values (or stipulations to major source status) contained on those forms to this form. Round values for PTE to the nearest ton. Greater precision may be needed or desired by the applicant in certain circumstances (e.g., when more precision would resolve a potential dispute concerning applicability or major source status). In these cases, it would be advisable to not round these values until you calculate the total as described below.

Applicants may stipulate to major source status for an air pollutant and, thereby, avoid detailed PTE calculations for that air pollutant. If an emissions unit emits an air pollutant in quantities that qualifies the facility for major source status, enter "MU" in the column for that air pollutant. If the facility is a major source for a pollutant but the emissions unit in question does not trigger major source status, enter "MS" in the space provided. If a listed pollutant is emitted at a unit but

PTE cannot be calculated based on readily available information, enter "UN" (for "unknown") in the space provided. If the source is a major source for air pollutants not represented by columns on this form, please provide an attachment stipulating major source status or the calculation of the total for that air pollutant. The column for lead is for elemental lead regulated by a NAAQS under title I of the Act, while compounds of lead are HAP.

The total line is provided at the bottom of each column to enter the total facility-wide PTE for applicability purposes (or stipulations to major source status) for each air pollutant reported above. Enter these totals, as well as the total PTE and the name of the HAP emitted in the greatest amount, in section J of form **GIS**.

Only include emissions or emissions units on form **PTE** that count toward major source applicability. Some of the emissions units for which form **EMISS** may have been prepared may not have emissions that count towards major source applicability (please see the definition of major source in § 71.2 and relevant guidance on the TTN), or may have been included in order to calculate fees. In particular, fugitive emissions are not always included in major source applicability determinations under the section 302(j) definition of major source. However, for major source determinations under section 112, all fugitive HAP at all emissions units must be included in the total for the facility.

FORM FEE - FEE CALCULATION WORKSHEET

Use this form to initially or thereafter on a yearly basis, report actual emissions and calculate fees.

Each part 71 source must complete and submit an initial fee calculation worksheet and pay part 71 fees [§71.9(e)(1)]. Form **FEE** and a photocopy of the fee payment check should be sent to the appropriate EPA Regional permitting contact listed on pages 1 and 2 of these instructions. However, fee payment checks should be sent to EPA's "lockbox" bank address, along with form **FF**. [Form **FF** is described and "lockbox" addresses are listed in a separate section below]. Do not submit form **FEE** or pay fees if part 71 fees have been suspended because the program has been fully delegated and EPA incurs no administrative costs.

Consistent with § 71.9(f), the deadline for initial submittal of the fee calculation worksheet and payment of fees is usually the same deadline as the deadline for submittal of initial permit applications. If EPA withdraws approval of a part 70 program, initial part 71 fee calculation worksheets and payment of fees are due in accordance with a schedule based upon a source's primary SIC Code [see §§ 71.9(f)(1)(i) through (iv)]. When a part 71 program is established that does not replace an approved part 70 program or sources become subject to the part 71 program after the program's effective date, part 71 sources must initially submit this form and pay fees when submitting their permit applications [see §§ 71.9(f)(3) and (4)]. On the other hand, sources that are required to obtain part 71 permits because of an unresolved EPA objection to the State's part 70 permit are required to submit initial fee worksheets and pay fees three months after the part 71 permit is issued [see § 71.9(g)].

Section 71.9(h) requires part 71 sources to submit annual emissions reports and fee calculation worksheets (fee worksheets) on a yearly basis, subsequent to submittal of the initial fee worksheet. Completion of section D of this form satisfies the requirement to submit an annual emissions report. For most sources, the deadline for submittal of the annual fee worksheet will be the anniversary date of submittal of the initial fee worksheet. Sources required to submit initial fee worksheets between January 1 and March 31 must submit their annual emissions reports and fee worksheets by April 1 of each year [see §71.9(f)(2) and §71.9(h)(1)].

Section A - All sources must complete this section to indicate the type of fee calculation worksheet being prepared (initial or annual), the deadline for submittal, and for initial fee worksheets, the basis of the emissions data included in the form. In addition, for initial fee worksheets, the source is required to enter the date that the facility commenced

operations.

Section B - Complete this section only if you are preparing this form for submittal at a different time than for the other portions of the permit application. Include the mailing address and the name of a contact person at the source that can be contacted for telephone inquiries or correspondence related to fees. In addition, if a part 71 permit has been issued, include the permit number.

Section C - Title V application forms, fee calculation worksheets, and any document required by a permit must be signed by a responsible official certifying truth, accuracy and completeness of the information included in the forms and attachments. The definition of responsible official can be found at § 70.2. The responsible official must sign the form and enter the date of the signature. This should be done after the fee calculation worksheet has been completed and the responsible official has reviewed the information. If completing this form for annual fee payment purposes do not submit a separate form **CTAC**.

Section D - This section is provided to report or estimate actual emissions of regulated pollutants (for fee calculation), except for HAP, on a calendar-year basis for the facility (section E is provided to report emissions of HAP). In the space provided, enter the year corresponding to the calendar year for the data included in this section. If more than one year of data is being submitted with the fee calculation worksheet, copy this page and complete a separate table for each year. Sources preparing this form for submittal with a permit application may use the values previously reported for actual emissions on form **EMISS** to complete this section. Sources must submit attachments to this form that show, at a minimum, examples of the calculations used to determine these values. Attachments to form **EMISS** showing the calculation of these values will be sufficient for this purpose.

On each line (row) in the table, enter an emissions unit ID and summarize the emissions of each listed pollutant. When entering this information on the form, you may round the actual emissions values to the nearest ton or use greater precision if you believe it will result in a lower fee. "Lead" is elemental lead regulated by a NAAQS. The column for "other" is for other regulated pollutants (for fee calculation) not already listed on the form, such as fluorides or hydrochloric acid regulated by NSPS. Only use the "other" column if there is a single additional air pollutant to report. Write in the name of the pollutant to the right of the "other" column. If more than one such pollutant, show the pollutants, and the totals on an attachment.

As required by § 71.9(c)(6), actual emissions must be

calculated using actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted over the preceding calendar year. Section 71.9(e)(2) concerning initial fee calculation requires sources that have been issued part 70 or part 71 permits to compute actual emissions using compliance methods required by the permits, such as monitoring or source testing data. If actual emissions cannot be determined using the compliance methods in the permit, the emissions should be determined using other federally recognized procedures. In addition §71.9(e)(2) allows Part 71 sources that commenced operation during the preceding calendar year to estimate actual emissions for the current calendar year. When EPA withdraws approval of a part 70 program and implements a part 71 program, section 71.9(f)(2) allows sources that are required to submit initial fee calculation work sheets between January 1 and March 31 the option of estimating their emissions for the preceding calendar year in lieu of submitting actual emissions data. Section 71.9(f)(2) also allows sources that are issued part 71 permits following an unresolved EPA objection to a part 71 permit this option if they are required to submit their initial fee calculation work sheets between January 1 and March 31. Sources exercising this option will have to submit 2 years of actual emissions data when submitting their first annual fee worksheet and, thus, complete section D and E separately for each year. In this case, these sections must be completed for the year preceding annual fee worksheet preparation, as well as the year preceding initial fee worksheet submittal.

Include all fugitive emissions in the calculation of actual emissions, including those that do not count for applicability purposes [see § 71.9(c)(1)]. Do not include any insignificant emissions identified on form **IE** [see § 71.5(c)(11) and § 71.9(c)(5)(iii)]. With respect to emissions from any affected unit under section 404 of the Act, during the years 1995 through 1999, no emissions-based fee is required to be paid [see § 71.9(d)]; therefore, do not include actual emissions for these sources for fee purposes on this form. Applicants need not include actual emissions of CO, since CO is not a regulated pollutant (for fee calculation).

The subtotal line is provided at the bottom of each column to enter total facility emissions for each pollutant reported above. If any subtotal exceeds 4,000 tons, enter 4,000 tons. Any necessary adjustments for double counting of emissions will be performed in section F of this form.

Section E - This section of the form is provided to list the actual emissions of each individual regulated HAP emitted by each emission unit. Unregulated HAP need not be included because they do not meet the definition of regulated pollutant (for fee calculation). In the space provided, enter the year

corresponding to the calendar year for the data included in this section. If more than one year of data is being submitted with the fee calculation worksheet, copy this page and complete a separate table for each year.

Additional detailed instructions concerning how to calculate actual emissions for purposes of this section are included in the instructions for section D of this form.

This section is composed of two tables. Use the first table to identify each HAP emitted at the facility, including the CAS number, if available. Assign a unique identifier for use in the second table for each HAP. Copy this form if you need to identify more than eight HAP or report actual emissions for more than 14 emissions units. When assigning identifier codes, please use "HAP1" for the first, "HAP2" for the second, and so on.

In the second table, report the actual emissions of each individual HAP emitted by each emissions unit at the facility. Use the identifiers assigned in the first table to label the column headers for each HAP. You may round these emissions to the nearest ton or use greater precision if you believe doing so will result in a lower fee. Sum the values in each column and enter the subtotals at the bottom of the table. If the subtotal is greater than 4,000 tons for any column, enter 4,000 for that column.

Section F - This section is provided to calculate the total fee. In this section, sources will total actual emissions from sections D and E, credit sources for double counting of emissions, reconcile the initial fee paid when the initial emission calculations were based on estimated emissions, adjust for fee assessment errors, and determine the final fee amount. You must remit the total fee with this form.

This section of the form is separated into four parts: (1) Emissions Calculation, (2) Reconciliation of Estimated Against Actual Emissions (When Initial Estimates Were Based on the Current Calendar Year), (3) Reconciliation of Estimated Against Actual Emissions (When initial Estimates Were Based on the Preceding Calendar Year), and (4) Fee Calculation. The following discussion addresses each part of the fee calculation worksheet. Detail is provided on specific areas where there is likely to be confusion.

Actual Emissions Calculation

The totals for each pollutant calculated in sections D and E are added together to calculate a total for actual emissions (measured in tons per year) across the facility. This value is adjusted for double counting and is rounded (if not already rounded) to the nearest ton.

Section 71.9(c)(5)(ii) excludes the actual emissions already included in fee calculation from being counted twice (double counting). For example, if a source emits 30 tons of VOC and 10 tons of these VOC are also HAP, 10 tons have been counted twice, and 10 tons would be entered on line 4. If you enter a number on this line, attach supplementary information identifying the emissions units where double counting has occurred and explain why double counting has occurred.

Reconciliation of Estimated Emissions Against Actual Emissions (When Initial Estimates Were Based on the Current Calendar Year)

This section of the form should only be completed by sources preparing the first annual fee worksheet when the initial fee worksheet included estimates of emissions for the current year emissions. Section 71.9(e)(2) requires sources that commenced operation during the preceding calendar year to estimate actual emissions for the current calendar year when preparing the initial fee calculation worksheet. These sources are also required by § 71.9(h)(4) to reconcile the fees owed when they submit their first annual emissions report. This reconciliation is accomplished by computing the actual emissions for the calendar year preceding preparation of the annual fee worksheet and comparing this value to the estimate of actual emissions previously reported on the initial fee calculation worksheet. This comparison will result in a calculation of overpayment or underpayment relative to the initial fee calculation worksheet. In the fee calculation portion of the form (discussed below), the underpayment will be added to, or the overpayment subtracted from, the annual fee otherwise due.

Reconciliation of Estimated Emissions Against Actual Emissions (When Initial Estimates Were Based on the Preceding Calendar Year)

This section of the form should only be completed by sources preparing the first annual fee worksheet when the initial fee worksheet included estimates of emissions for the preceding calendar year emissions. If a source is required to submit its initial fee calculation work sheet between January 1 and March 31, and a part 71 permit is required because either: (1) EPA withdrew approval of the part 70 program, or (2) there is an unresolved EPA objection to the sources' part 70 permit, then § 71.9(f)(2) allows the source the option of estimating their emissions for the preceding calendar year, in lieu of submitting actual emissions data. Sources that use this option are required by § 71.9(h)(4) to reconcile the fee owed when they submit their first annual emissions report. This reconciliation is accomplished by computing the actual emissions for the calendar year preceding the preparation of the initial fee calculation worksheet and comparing this value

to the estimate of actual emissions previously reported on the initial fee calculation worksheet. This comparison will result in a calculation of overpayment or underpayment relative to the initial fee calculation worksheet. In the fee calculation portion of the form (discussed below), the underpayment will be added to, or the overpayment subtracted from, the annual fee otherwise due.

Sources required to complete this part of the form are required to submit 2 years of actual emissions data in sections D and E. This includes actual emissions for the year preceding initial fee worksheet preparation (for reconciliation purposes), and the year preceding annual fee worksheet submittal (for annual fee calculation purposes).

Fee Calculation

This portion of the form is provided to calculate the total fee amount that must be paid by the required deadline. In certain cases, adjustments will have to be made to account for reconciliation (described above) or to credit an account for fee assessment errors which result in overpayment.

Fee assessment errors occur when the permitting authority determines that the source has completed the fee calculation worksheet incorrectly and notifies the source of the error [see § 71.9(j)]. All fee assessment errors resulting in overpayment that have occurred since the last fee calculation worksheet was submitted will be credited against the fee owed on the next fee calculation worksheet. In the case of fee assessment errors resulting in underpayment, the permitting authority will bill the source for the corrected fee and the source will have 30 days after receipt of the invoice to remit the amount [see § 71.9(j)(2)]. An owner or operator who thinks that the assessed fee is in error has to pay the fee but may submit a written explanation of the alleged error to the permitting authority [see § 71.9(j)(3)]. The permitting authority has 90 days from receipt of the correspondence to review the data and determine whether the assessed fee was in error. If the error is confirmed, the overpayment will be credited to the account of the applicant

Fee payments must be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency [see § 71.9(k)].

Penalties and Interest

The permitting authority will bill sources for appropriate penalties and interest. Interest will be assessed on payments received later than the due date [see § 71.9(l)(1)]. Penalties shall be assessed if payment is not paid within 30 days of the

due date [§ 71.9(1)(2)]. For sources issued part 70 or 71 permits penalties and interest shall be assessed for excessive underpayment of the annual fee amount [§ 71.9(1)(3)].

FORM FF - FEE FILING FORM

Use this form to identify the facility for which fees are being paid. Send this form along with fee payment to EPA's "lockbox" bank address.

Fee payment in the part 71 program is performed using a "lockbox" bank account system. Facilities should send one of these fee filing forms with fee payment to Region's lockbox bank account. (See list of addresses where fee payment should be sent below).

REGION I

U.S. EPA - Region I
P.O. Box 360197M
Pittsburgh, PA 15251

REGION II

U.S. EPA - Region II
P.O. Box 360188M
Pittsburgh, PA 15251

REGION III

U.S. EPA - Region III
P.O. Box 360515
Pittsburgh, PA 15251-6515

REGION IV

U.S. EPA - Region IV
Nationsbank
P.O. Box 100142
Atlanta, GA 30384

REGION V

U.S. EPA - Region V
P.O. Box 70753
Chicago, IL 60673

REGION VI

U.S. EPA - Region VI
P.O. Box 360582M
Pittsburgh, PA 15251

REGION VII

Mellon Bank
U.S. EPA - Region VII
Box 360748M
Pittsburgh, PA 15251-6748

REGION VIII

Mellon Bank
Attn: Part 71 Permit Accounting
Lockbox 360859
Pittsburgh, PA 15251-6859

REGION IX

Mellon Bank
U.S. EPA - Region IX
P.O. Box 360863M
Pittsburgh, PA 15251

REGION X

U.S. EPA - Region X
P.O. Box 360903M
Pittsburgh, PA 15251

All other permit application forms, including the fee calculation worksheet (form **FEE**) should be sent directly to the appropriate EPA Regional Office, along with a photocopy of the fee payment check. The photocopy of the check will show EPA that the fee has been paid while EPA waits for the bank to officially notify it of payment. This is important because, in most cases, fee payment is necessary to obtain a determination that the application is complete. Note that if the source becomes subject to the part 71 program because a State or local agency has not responded appropriately to an EPA objection to a proposed part 70 permit, fees are not due with the part 71 application, but are due 3 months following the date of the issuance of the part 71 permit. [§ 71.9(g)]. In such cases, the failure to pay fees at the same time that the permit application is submitted would not be a reason to find the application incomplete.

Section A - Enter the facility's official or legal name. Do not use a colloquial name. This name should match the name used on other forms in this package as closely as possible.

Section B - Enter the complete mailing address for the facility and the name, and telephone number of the contact person. The contact person should be a person familiar matters related to the payment of fees, who can be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

Section C - Enter the total amount of the fee payment remitted (in United States dollars).

FORM I-COMP - INITIAL COMPLIANCE PLAN AND CERTIFICATION

Use this form to describe each applicable requirement, indicate its current compliance status, describe the methods you used to determine the compliance status, make compliance plan statements, and provide schedules of compliance.

On the first page of the form, complete sections A, B, and C as a group for each unique individual applicable requirement. If the control requirements and/or methods of compliance for an individual requirement vary from emissions unit to emissions unit, complete sections A, B, and C as a group for each unique combination of requirements, compliance methods, and emission units. This page may be used to document two separate unique sets of requirements.

Section A (Compliance Status of Each Applicable Requirement)

Identify and describe in detail each individual applicable requirement in the table provided. The term “individual applicable requirement” means each unique emissions limitation, control equipment requirement, work practice standard, or other specific requirement of a Federal standard or other air pollution control requirement (e.g., MACT, NESHAP, NSPS, NSR, and FIP/TIP/SIP requirements). For each applicable requirement that is based on a Federally-approved regulation, include a regulatory citation. Usually this citation will be a low-level citation (e.g., below the subpart level) that unambiguously identifies the specific requirement. If the requirement originates in a federally-enforceable permit, include a cross-reference to the permit that unambiguously identifies the requirement (e.g., a permit number, who issued it, and a condition or paragraph number, if available). If the applicable requirement is expressed as a numerical limitation or range of values, the description should identify the specific numerical limit or range. If the requirement is future-effective (it has already been promulgated or approved by EPA through rulemaking at the time of application but has compliance dates that are effective in the future), include the date when it will become effective.

This section must also specify which emissions unit or units are subject to the individual applicable requirements. This is essential because emissions control standards are often designed to apply to a wide variety of industrial equipment, with the result that different individual requirements of the standard, or different emission limitations, may apply to some units at a facility and not others. In addition, standards sometimes allow the source to select from a menu of control options. Thus, similar equipment at a source may be subject to

vastly different control options or compliance methods of the same standard. Provide the emissions unit ID(s) defined in section I of form **GIS** to identify the unit or units to which the applicable requirement applies. If the applicable requirement, including the compliance methods, apply in the same way to each unit, you may list multiple units for a specific applicable requirement.

Indicate compliance status for each individual applicable requirement in the column provided by marking either “in compliance” or “not in compliance.” For application purposes, you must indicate initial compliance status for each requirement on the basis of its compliance status as of the time this certification is submitted to EPA. Note that this is different from the annual compliance certification, where the determination of compliance status is an evaluation of the compliance status over the entire one-year period preceding the certification.

Current regulations require you to use all available information or knowledge that you have when evaluating your compliance status under title V of the Act. You may have information or knowledge determined through the use of compliance methods (including compliance methods required by applicable requirements and permits) and through “other credible evidence” (e.g., non-reference test methods and other information “readily available” to you). The EPA has recently completed a rulemaking (the “credible evidence” rule) that clarifies that non-reference and reference test methods must be used to evaluate compliance. The term “readily available information” refers to information that is readily available and already being utilized, such as engineering calculations, indirect emissions estimates, and direct measurement by various means, whether this information is required to be collected by a regulation or permit, or for some other purpose (this information also constitutes “credible evidence”).

Section B (Methods Used to Determine Compliance)

This section of this form includes a table for you to report the compliance methods used to determine the compliance status at time of application submittal for each applicable requirement described in Section A. Compliance methods include monitoring (instrumental and non-instrumental), recordkeeping and reporting requirements, test methods, or other methods. Such methods may be required by an applicable requirement (e.g., federally-approved regulations and federally-enforceable permit), or be performed for other reasons. If the underlying applicable requirement requires certain methods for assuring or determining compliance with limitations, standards, or other requirements imposed by the applicable requirement, these methods must be included in this section.

To describe monitoring methods used to determine compliance, indicate the type of monitoring device, the parameter or air pollutant being monitored, the averaging time, the period or dates over which the monitoring occurred, and include a citation or cross-reference to the applicable requirement that requires this monitoring. The regulatory citation or cross-reference to permit terms must be detailed enough to unambiguously identify the specific monitoring requirement. If the monitoring is required by a federally-enforceable permit term, list the permitting authority who issued it, the permit number (or similar identifier), and identify the specific permit condition (if possible). Also, describe the origin and authority of any other monitoring you used to determine compliance [e.g., voluntary methods or methods based on State-only enforceable requirements], and indicate if you propose such monitoring to be used as periodic monitoring in the permit. An example of an adequate monitoring description would be: "Hourly averages of SO₂ concentration using Method 19 CEMS, data collected over last 12 months, as required by 40 CFR § 60.47a(b)"].

For recordkeeping methods used to determine compliance, describe the records kept, the frequency of collection, when the recordkeeping occurred, and include either a citation to the Federal regulation, a cross-reference to the Federally-enforceable permit term (as described above), or a description of the origin or authority of any other (non-Federally required) recordkeeping, and indicate if you propose to use this as periodic monitoring in the permit [e.g., "Visual determination of opacity recorded at noon each day over the last 12 months, proposed as periodic monitoring in permit"].

For reporting methods used to determine compliance, describe what was reported, when the reporting occurred, and include either a citation to the Federal regulation, a cross-reference to the Federally-enforceable permit term, or a description of the origin or authority of any other recordkeeping, and indicate if you propose to use this as periodic monitoring in the permit [e.g., records of visual determination of opacity, reports submitted every 6 months, beginning 4/15/98, as required by NSR permit # CO123421, condition I(A)(3)(b)"].

One applicable requirement that will be the basis for many compliance methods required by part 71 permits is "Compliance Assurance Monitoring" or CAM (40 CFR part 64), which requires major stationary sources that obtain operating permits under title V to monitor the operation and maintenance of their control equipment to evaluate equipment performance and report whether or not the underlying emission standards are met. The CAM rule establishes criteria that define the type and frequency of monitoring that should be conducted to provide a reasonable assurance of compliance with emission limits and standards.

Several times in these instructions, we have referred to "periodic monitoring." Periodic monitoring is required in permits by § 71.6(a)(3)(i)(B). Periodic monitoring may consist of instrumental or non-instrumental monitoring (such as recordkeeping) designed to serve as monitoring. Part 71 states that periodic monitoring "must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with its permit, and must assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement." Consistent with a recent Court decision, permitting authorities may create periodic monitoring terms in a title V permit to enhance the monitoring and testing provisions of existing applicable requirements included in permits, but only when the applicable requirement "requires no periodic testing, specifies no frequency, or requires only a one-time test."

Section C (Compliance Plan Statements) --

This section is designed to be completed for each individual applicable requirement described in section A. Respond to only one of the three statements provided.

1st Statement: If you marked "in compliance" in the compliance status column of Section A, check "yes" or "no" in the first column of this section to indicate whether compliance will continue. If you answer "yes" to this statement, you may skip sections D and E. If you answer "no," you may skip section D, but you must complete the remaining sections of this form.

2nd Statement: If you marked "not in compliance" in the compliance status column of Section A, check "yes" or "no" in the second column of this section to indicate whether compliance will be achieved by the expected date of permit issuance, and indicate what date you are assuming to be the expected date of permit issuance. For compliance plan purposes, assume permit issuance will occur by March 22, 2001, unless you are not required to submit an application until after March 22, 2000, in which case you should assume that permit issuance will occur no later than 18 months after you submit your application. If you answer "yes" to this statement, you must complete Section D to explain the actions that will be taken between now and permit issuance to achieve compliance, but you may skip section E. If you answer "no," you can skip section D, but you must complete the remaining sections of this form.

3rd Statement: For future-effective applicable requirements (requirements that have been promulgated or approved by EPA through rulemaking at the time of application but have compliance dates that are effective in the future), check "yes"

or "no" to indicate whether you will meet this requirement on a timely basis. If you answer "yes," you can skip both sections D and E, and complete the remaining sections of the form. If you answer "no," you can skip section D, but you must complete section E and all other sections of this form.

Section D (Additional Information for Compliance Plan Statement #2)

Complete this section only if you answered "yes" to the second statement in Section C above. Identify the applicable requirement here using the same information you supplied in Section A. Then provide a narrative description of the actions that will be taken to achieve compliance by the time of permit issuance. Break down the actions into intermediate steps and provide estimated dates for the completion of each, include a date for compliance. If substantial progress is not made on meeting these goals by the time of draft permit issuance, as shown by updates to the application, which you may be required to provide, EPA may decide to include a detailed schedule of compliance in your permit to ensure that compliance is achieved during the permit term.

Section E (Schedule of Compliance)

Complete this section if you answered "no" to any of the compliance plan statements in section C (in other words, if the source will not continue to be in compliance, the source will not be in compliance by time of permit issuance, or the source will not meet the future-effective requirement on a timely basis). In addition, regardless of how you answered the questions in section C, complete this section if the applicable requirement itself requires a detailed schedule of compliance, or if a judicial consent decree or administrative order has been issued to the source that includes a schedule of compliance.

Identify the applicable requirement using the same information you used in section A. Provide a brief explanation of why the source is not (or will not) be in compliance with this requirement (e.g., "do not have control device required as BACT," or "excessive equipment breakdowns prevent continuous compliance with emissions limitation"). Next, provide a brief description of what the detailed schedule of compliance included below is trying to achieve (e.g., "installing the control device required by NSR and bringing it into full operation" or "implementing a regimen of improved maintenance and equipment inspection and maintenance for control equipment"). Then in the table provided, include a detailed schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the applicable requirement. This schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which

the source is subject. Any such schedule of compliance must be supplemental to, and not sanction noncompliance with, the applicable requirements on which it is based. For each remedial measure, provide the date by which the action will be completed. This schedule or one approved by the permitting authority will be placed in the permit and must be met or the source will not be in compliance with the permit. Lastly, attach a copy of any judicial consent decrees or administrative orders that you are subject to and that are relevant to any applicable requirement for which you need to provide a schedule of compliance.

Section F (Schedule for Submission of Progress Reports)

If you must submit one or more schedules of compliance (specified in section E), or if one or more applicable requirements require the submittal of a progress report, you must complete this section. The progress report will describe your facility's progress in meeting the milestone dates for each remedial measure or action required by the schedule of compliance. Part 71 requires progress reports to be submitted at least every 6 months, but specific applicable requirements may require them to be submitted more frequently (e.g., every 3 months). One progress report may include information on one or more schedules of compliance. Also note that you may want to propose to submit multiple progress reports (depending on specific progress report submittal requirements contained in applicable requirements). Describe the contents of the progress report, provide the date that your facility will begin submitting these progress reports and provide the frequency with which you will submit progress reports to the permitting authority.

Section G (Schedule for Submission of Compliance Certifications)

All applicants must complete this section once. Provide the frequency with which you plan to submit compliance certifications to the permitting authority. This frequency must be on an annual basis unless the applicable requirement or the Administrator requires more frequent submittals. Also provide the date when the first compliance certification will be sent.

Section H (Compliance Status for Enhanced Monitoring and Compliance Certification Requirements)

All applicants must complete this section once. In the space provided, indicate whether the source is in compliance or not in compliance with any enhanced monitoring requirements and compliance certification requirements of the Act. The completion of this section does not satisfy the requirement for the responsible official to submit a certification of truth, accuracy, and completeness (met by completing form CTAC

and attaching it to the other forms you send to EPA). Indicate the compliance status for the requirement as a whole. To certify compliance with the requirement as a whole, you must be able to certify compliance with each individual requirement that can be categorized under this designation. Note that “Enhanced Monitoring,” refers to the requirements of Compliance Assurance Monitoring (40 CFR part 64) and any Periodic Monitoring required by §71.6(a)(3)(i)(B). The Compliance Certification requirements of the Act at this time include those promulgated under §71.5(c)(9) and §71.6(c)(5). If you have fully completed sections A - G of this form, you will be in compliance with §71.5(c)(9). If you do not have a part 71 permit at this time, you can assume you are in compliance with the monitoring requirements of §71.6(a)(3)(i)(B) and §71.6(c)(1), and the compliance certification requirements of §71.6(c)(5).

FORM CTAC - CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

This form is designed for the responsible official to certify that submitted documents (i.e., permit applications, updates to application, reports, and any other information required to be submitted as a condition of a permit) are true, accurate, and complete.

This form should be completed and submitted with each set of documents sent to the permitting authority. It may be used at time of initial application, at each step of a phased application submittal, for application updates, as well as to accompany routine submittals required as a term or condition of a permit.

Section A - Federal law requires that title V permit applications be signed by a responsible official. The definition of responsible official can be found at § 70.2. Provide the name, title, address, telephone number, and, if desired, the facsimile machine number for the responsible official.

Section B - The responsible official must sign and date the certification of truth, accuracy and completeness. This should be done after all application forms are complete and the responsible official has reviewed the information. Normally this would be the last form completed before the package of forms are mailed to the permitting authority.