

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR DIVISION

OPERATING (MAJOR SOURCE) PERMIT INSTRUCTIONS

August 2010

INTRODUCTION

Do I need a Title V Operating Air Permit?

You must obtain a Title V Operating Air Permit if your actual emissions are equal to or above the following:

- 100 tons per year or more of carbon monoxide; nitrogen oxides; sulfur dioxide; volatile organic compounds; or PM₁₀;
- 10 tons per year or more of any single HAP;
- 25 tons per year or more of a combination of HAP; or
- Facility is subject to a regulation under 40 CFR Part 60 or Part 63 that requires a Title V permit.

The applicant should review the information provided in the general information supplement. This information will aid the applicant in completing the operating permit application form.

Mail the **original and one copy** of the completed application and required attachments. If the application is a PSD application, mail the **original and four copies**. If the submittal includes confidential information,* mail **one (1) complete (original) confidential** application in addition to the non-confidential original and copies required above.

An electronic version of any or all of the application is not required, but is helpful in processing your permit. Please include with your application or email to AirPermits@adeq.state.ar.us.

Mail permit applications to:	Arkansas Department of Environmental Quality Attention: Air Division 5301 Northshore Drive North Little Rock, AR 72118
Our street address for other delivery purposes is:	5301 Northshore Drive North Little Rock, AR 72118
Phone Number	(501) 682-0744
Fax Number	(501) 682-0753
Our Email Address is:	AirPermits@adeq.state.ar.us

***See Regulation 18, Section 14**

INSTRUCTIONS FOR COMPLETING GENERAL INFORMATION FORM:

The top of the Title V air permit application asks for the “AFIN Number” and “date”. The “date” is the date of the submission of the application. The AFIN number is a unique identifier ADEQ assigns to all facilities. The first two digits indicate the county and the last five are sequence numbers. If the AFIN number is unknown, search for the AFIN at the ADEQ website at <http://www.adeq.state.ar.us/home/pdssql/pds.asp> for an existing AFIN number. All divisions use the same numbering system, so even facilities applying for a new air permit may already have an AFIN issued by another division. If AFIN is unknown, leave this line blank.

The remaining application items are discussed below:

- 1. Facility Physical Information:** This information should indicate the physical location of the facility. The FACILITY NAME should be the same as on the application cover page. The PHYSICAL ADDRESS OR LOCATION must indicate the physical address of the facility. If the facility does not have an address, provide information indicating the physical location (i.e. Hwy 7 north of Pelso). If the facility is not in a city, indicate the nearest city on the CITY, STATE, and ZIP lines. The CONTACT NAME, POSITION should be the name (or job title) of a person ADEQ can contact at the facility where the equipment is located. The PHONE Numbers and FAX Numbers should be for this person. If the phone or fax numbers are unknown at the time the submission of the application, the applicant can supply the phone or fax numbers later. The EMAIL address is the email address for the facility contact.
- 2. Facility Mailing Information:** The address in this table is where ADEQ will mail the draft permit and the original copy of the final permit. The address may be the same as the physical location of the facility or the address may be completely different, such as a corporate headquarters. The CONTACT NAME is the person who signed the application and the rest of the information should pertain to this individual. If the mailing information is the same as the physical information, the facility may so indicate by writing “see above” or drawing an “x” through the mailing information table. The PHONE Numbers and FAX Numbers should be for this person. If the phone or fax numbers are unknown at the time the submission of the application, the applicant can supply the phone or fax numbers later. The EMAIL address is the email address for the contact. [ADEQ requires the facility to keep a copy of the permit on the premises where the permitted equipment is located. The facility is responsible to see that a copy of the permit is at the facility.]
- 3. Invoice Mailing Information:** The address in this table is where ADEQ will mail the permit fee invoice. If blank, ADEQ will send the invoice to the Facility Mailing Information address. The PHONE Numbers and FAX Numbers should be for the invoice contact. If the phone or fax numbers are unknown at the time the submission of the application, the applicant can supply the phone or fax numbers later. The EMAIL address is the email address for the invoice contact.
- 4. Permit Application Contact Information:** In many cases, the person who prepared and is most knowledgeable about the permit application is someone other than the person who signed the application. Information in this table should allow ADEQ to contact this person. If this section is blank and ADEQ requires additional information, ADEQ will contact the person who signed the application. The PHONE Numbers and FAX Numbers should be for permit application contact person. If the phone or fax numbers are unknown at the time the submission of the application, the applicant can supply the phone or fax numbers later. The EMAIL address is the email address for the permit application contact.

5. **Neighboring States:** If the facility location is within fifty miles of a neighboring state, check the appropriate box(es).
6. **UTM Coordinates of Center of Plant:** Indicate the UTM zone and the UTM coordinates to the nearest meter the UTM coordinates of the plants geographic center.
7. **NAICS (North American Industry Classification System) Number and NAICS Facility Description:** The North American Industry Classification System (NAICS) is a system for classifying business establishments. Adopted in 1997 to replace the old Standard Industrial Classification (SIC) system, NAICS is the industry classification system used by the statistical agencies of the United States.
8. **Permitting Options:** Check the appropriate box, indicating the type of application submitted. It is best, though not required, to submit separate applications if the application involves more than one type. If one application contains multiple types, please clearly indicate these in the submittal. To aid in determining the necessary permit action, the table below summarizes the options:

Initial Permit:	This applies to newly constructed facilities.
Initial Permit for Existing Facility	Initial Permit applies to facilities that do not have a Title V air permit. Applies to unpermitted existing facilities.
Significant Modification:	Significant Modification applies to facilities that have current air permits and propose to make modifications that do not qualify as minor modifications or administrative amendments.
Minor Modification:	This applies to facilities having a current air permits and proposing to make modifications meeting the criteria outlined in Regulation 26 §26.1002-1009.
Administrative Amendment:	This applies to facilities having a current Minor Source Permits and proposing to make permit amendments that meet the criteria outlined in Regulation 26, Chapter 9.
Name change	This applies to a name change without a change of ownership.
Transfer of Ownership	This applies to a change of ownership with or without name change.

9. **Construction, Reconstruction, or Operation Dates:** If the facility is a new facility or the modifications to the facility involve construction of new emission units or reconstruction, enter the proposed construction or reconstruction and operation dates. If a modification does not involve construction of new emission units or reconstruction, enter “N/A” or “Not Applicable” for this item. [Note: Permits are generally required before any construction may commence. Contact the Department for more information and exceptions.]
10. **NSPS and NESHAP applicability:** Indicate if the facility is subject to any of the rules found in 40 CFR Parts 60, 61 or 63. If yes, indicate which specific subparts.

11. **PSD Applicability:** If the facility will engage in construction, reconstructions, or modifications requiring a PSD application, please check the appropriate box. The PSD Section of the General Information Supplement contains information related to the PSD program and the requirements of a PSD application. In addition, the applicant can contact the Department for assistance.
12. **112(g) Applicability:** If the facility will engage in construction or reconstruction that will require a 112(g) application, please check the appropriate box. The 112(g) Section of the General Information Supplement contains information related to the 112(g) program and the requirements of a 112(g) application. In addition, the applicant can contact the Department for assistance.
13. **Title VI Applicability:** Items 13, 14, and 15 determine Title VI applicability. Check the appropriate answer box, “yes” or “no” for each item. For item 13, if the refrigeration charge of the unit is unknown, contact the equipment manufacturer or a vendor to obtain this information. In general, household size refrigerators and air conditioners will have a charge of less than 50 pounds per unit.
14. See item 13 instructions.
15. See item 13 instructions.
16. **Accidental Release Applicability:** Indicate if the facility is subject to the Accidental Release Prevention requirements of Section 112 (r) of the Clean Air Act by checking the appropriate box, “yes” or “no”. If unknown whether the facility is subject to these provisions, refer to the “Threshold Levels for Regulated Toxic Substances” (Table A) and the “Threshold Levels for Regulated Flammable Substances” (Table B) provided in the General Information Supplement. If the facility stores, produces, or transfers in excess of the “Threshold Level” of the listed substance, the facility is subject to the requirements outlined in Section 112 (r). Initially affected facilities must submit a Risk Management Plan (RMP) by June 21, 1999.

The Department has not been delegated authority for the 112(r) program and therefore is not currently receiving or reviewing submittals. The Arkansas Department of Environmental Quality, as the permitting authority, must; (1) verify that the source owner or operator has registered and submitted an RMP or a revised plan when required; (2) verify that the source owner or operator has submitted a source certification or in its absence has submitted a compliance schedule; (3) for some or all of the sources, use one or more mechanisms such as, but not limited to, a completeness check, source audits, record reviews, or facility inspections to ensure that the permitted sources are in compliance with the requirements; and (4) initiate enforcement action as appropriate.

17. **Email List:** Indicate if you wish to be added. The service will include information related to air permitting such as regulation updates, important information/guidance, upcoming events, etc.

INSTRUCTIONS FOR COMPLETING ORGANIZATIONAL STATUS OF APPLICANT FORM

1. The facility must properly identify legal organization of the applicant.
2. Indicate if the corporation is a domestic (Arkansas) corporation or a foreign (chartered outside of Arkansas) corporation.
3. Indicate if the corporation is currently registered to do business with the Arkansas Secretary of State.
4. List all the partners' names and addresses of all partners involved.
5. List all the joint venture principles' names and addresses of all principles involved.

INSTRUCTIONS FOR COMPLETING CERTIFICATION OF APPLICATION FORM:

A “Responsible Official” must certify the application. A “Responsible Official” means:

- 1) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 - (ii) the delegation of authority to such representative is approved in advance by the permitting authority;
- (2) For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- (3) For a municipality, State, Federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of EPA).

The preparer of the application must also sign the certification of application form. Include the preparer's name, firm, address, and telephone number.

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Requirements for compliance certification include the following:

- a. A certification of compliance with all applicable requirements by a responsible official consistent with paragraph (d) of 40 CFR Part 70 and section 114(a)(3) of the Act;
- b. A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods;
- c. A schedule for submission of compliance certifications during the permit term, to be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the permitting authority; and
- d. A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act.

The “Responsible Official” is certifying compliance with federal requirements.

INSTRUCTIONS FOR COMPLETING EMISSION RATE TABLE:

The applicant must complete an Emission Rate Table form and calculations for each significant air pollutant emission source located at a facility. The general information supplement includes a list of insignificant activities. An emission source is any point at a facility which emits, or is capable of emitting, an air contaminant into the atmosphere. The definition of an air contaminant is any emission except water vapor, carbon dioxide, oxygen, or nitrogen. Make as many copies as necessary of the attached Emission Rate Table. **Complete a separate emission rate table for each proposed operating scenario**, using the same source number for each emission source.

Facilities with greater than 50 emission sources may submit, on a case-by-case basis, the information required on an emission rate table in an alternative format. The facility will propose a format to the ADEQ and obtain ADEQ approval before submitting information in any alternative format. The applicant should make a request, for an alternative format, at least 120 days before the required submittal date of the application, in order to allow for modifications to the format, at the discretion of the ADEQ, without delaying the application submittal.

1. **STACK DATA** - The stack data is critical since computer modeling uses the stack data. The applicant should ensure that this information is accurate.
 - a. **Emission Source No. (SN)** - Point and Non-Point sources of air emissions should be given a two or three digit number preceded by "SN" (SN-01, SN-02... SN-999). Maintain the source numbers, if feasible, from the existing permit to identify the same sources in the new application.
 - b. **Date Installed, Date of Last Reconstruction or Date Modified** - Denote the initial year of installation of the equipment in question, or the date of the last reconstruction of the equipment.

"Reconstruction" means the replacement of components of an existing facility to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new unit. (This definition is not used to determine whether a permit modification is required, only to determine the date of installation or modification for NSPS applicability determinations).
 - c. **Process Description** - Describe the process unit, which generates the emissions in the space provided (ex. Boiler, natural gas fired - 150 MMBtu/hr). The applicant will describe control equipment in a separate section of the table.
 - d. **SCC8 Code:** - The SCC8 code is a code used in inventory reports. To obtain a code, please go to http://www.adeg.state.ar.us/air/branch_planning/default.htm.
 - e. **Stack Height** - Denote the stack's height above the ground in feet to the nearest foot. If the emissions do not exit a stack (i.e., the emissions are non-point source or fugitive) indicate the height, above ground, where the emissions enter the atmosphere.
 - f. **Stack Dimensions** - Denote the inside stack diameter in feet (for example, 3.25 ft. instead of 3'-3"). For non-circular stacks and area sources, report the dimensions in feet (for example, 2.5' x 1.0'). For non-point source or fugitive emissions, mark this item "Not Applicable" or "N/A".
 - g. **Stack Gas Temperature** - Report the average temperature in degree Fahrenheit (°F) of the stack gas as it enters the atmosphere. If the emissions are at ambient temperature, enter "ambient" or

“amb.” Do not enter a numeric estimate of the ambient temperature.

- h. Stack Gas Velocity** - Report the stack gas exit velocity in feet per second at the exit point of the stack. For non-point source or fugitive emissions, mark this item “Not Applicable” or “N/A”.
- i. Stack UTM Coordinates** - Report the Universal Transverse Mercator (UTM) zone and coordinates of the Stack to the nearest meter using the WGS84 datum. The correct UTM Coordinates are critical for modeling purposes.

2. CRITICAL OPERATING RATES - The critical operating rates define the parameters used in drafting the permit. Listed parameters should be relevant to air emissions.

- a. Maximum Operating Hours** - Enter the proposed maximum operating hours per day, hours per month, and hours per year for the emission point. ADEQ defines “MAXIMUM Operating Hours” as 24-hrs/day, 730 hrs/mo, and 8760 hrs/yr. Using this Maximum Op Hrs to calculate the Potential to Emit (PTE) for all sources is not required BUT it will reduce the facility/source recordkeeping requirements. If the applicant limits the hours of operation as a means of limiting potential to emit, the permit will limit the hours of operation by permit conditions. Monthly hours of operation may provide maximum flexibility for seasonal type operations or for back-up equipment.
- b. PTE Limited by Hours of Operation** - Indicate if the emission calculations use the hours of operation to limit the annual potential emission. Mark “yes” or “no” in the appropriate box.
- c. Maximum Heat Input Capacity** - Denote all heat input from fuel fired equipment associated with this process, if applicable.
- d. Fuel Heat Value** - For each fuel, list the average heat value, as fired, in Btu per unit, if applicable.
- e. Fuel % Sulfur** - For processes that utilize fuels (except for pipeline quality natural gas), list the maximum sulfur content. If applicable, identify the maximum sulfur content in the process description. The permit may limit the fuel sulfur content by permit conditions.

3. Maximum Production/Operation Rates

- a.** Using a separate line for each intermediate and/or finished product removed from the process, list the maximum production rates proposed for the source. Using a separate line for each intermediate or raw material, and each solid, liquid, or gaseous fuel, list the maximum feed rates (process weight rates) proposed for the source. Use the same units (gallons, pounds, cubic feet, etc). for annual as for hourly operating rates. If the permittee uses an operation or production rate below the maximum capability of the equipment to limit the potential to emit, the permit will limit operation to these operating rates by permit conditions. These rates should be in the units normally used by the facility to quantify usage (i.e. paint measured in gallons). Hourly throughput maximums are **rates that are never to be exceeded**. The applicant must provide the rates even if the permittee is not proposing to limit potential to emit through production/throughput limitations; however, if the applicant adequately demonstrates the production/throughput rates have not been relied upon to limit potential to emit, these rates will

not be reflected as permit conditions.

- b. **Emission Rates Limited by Maximum Production/Throughput Rates** - Indicate if the hourly or annual emission rates are limited by the proposed maximum hourly or annual production/throughput rates by answering “yes” or “no”.

4. **AIR EMISSIONS INFORMATION** - This information deals directly with the emissions of air pollutants. The applicant must identify and quantify all regulated air pollutants emitted in significant quantities from the source. (The general information supplement to the application package contains a list of insignificant emission rates). AP-42 or other EPA recognized documents contain the types of pollutants and approximate emission factors for many types of sources. The applicant must provide supporting calculations for the numbers listed in this section with the emission rate table. The permit application must contain an explanation of the method used to calculate the emission rates. Calculations should reference the source of all data used to determine air emissions. The applicant should provide a manufacturer Material Safety Data Sheet or other manufacturer/vendor data, which indicates the volatile organic compounds (VOC) or hazardous air pollutant (HAP) content in weight percent, and which supports the emission rate calculations, for each material that contains VOCs or HAPs.

- a. **Pollutants** - The applicant must list all regulated air pollutants emitted from the source in this column. The most common pollutants are particulate matter (PM), particulate matter less than 10 microns in diameter (PM₁₀), sulfur dioxide (SO₂), volatile organic compounds (VOCs), carbon monoxide (CO), and nitrogen oxides (NO_x). The applicant should list methane separately from non-methane VOCs. If the applicant emits other air contaminants from the source, such as acetone, ammonia, the applicant must identify and quantify each air contaminant. Designate air contaminants as state regulated pollutants. Do not denote water vapor, carbon dioxide, oxygen, and nitrogen.
- b. **Emissions LB/HR** - Denote the maximum (not average) lb/hr for each pollutant. Round up this value to the nearest tenth or report two significant digits for criteria pollutants and should not be rounded for other pollutants. Enter “0” if the pollutant is not emitted. This value must be consistent with the maximum proposed hourly operating rate. If the maximum is not used, additional record keeping maybe required.
- c. **Emissions TPY** - Denote the total tons per year (tpy) for each pollutant (this value does not always correspond directly to the maximum hourly emission rates. In those cases where the two values do not directly correspond, the supporting calculations should clearly denote the reason for the discrepancy). Round this value up to the nearest tenth or report two significant digits for criteria pollutants. Do not round for other pollutants. This value may be limited by hours of operation limits or by throughput/production limits. If this value indicates less than continuous operation at maximum operating rates, the permittee should clearly denote in the supporting calculations the factors (i.e. production limits, or hour of operation limits, etc). used to limit the emission rates. The permit will reflect the limits in the permit conditions. If the facility is proposing to operate on a continuous basis, the applicant should calculate the annual emissions based upon 8,760 hours per year of operation. Enter “0” if the pollutant is not emitted.
- d. **Regulations** - The following is a list of state and federal air pollution programs that may be applicable to a source.

- i. Standards of Performance for New Stationary Sources (NSPS)
 - ii. National Emission Standards for Hazardous Air Pollutants (NESHAP)
 - iii. State Implementation Plan (SIP)
 - iv. Arkansas Air Pollution Control Code (Code)
 - v. Prevention of Serious Degradation (PSD)
 - vi. New Source Review (NSR)
 - vii. “N/A” if the pollutant is not emitted.
- e. **Control Equipment** - Describe any pollution control equipment (cyclone, baghouse, scrubber, afterburner, etc). Also, indicate the critical operating parameters of the control equipment (minimum scrubbing liquor flow for scrubbers, minimum temperature for afterburner, etc). Complete the control equipment operating parameters form for each control device.
- f. **Manufacturer and Model Number** - The manufacturer's name and model number of the control equipment, must be included in the Emission Rate Table.
- g. **Percent Control Efficiency** - Indicate the control efficiency of the air pollution control equipment for the pollutant in question.

INSTRUCTIONS FOR COMPLETING HAP EMISSION RATE TABLE

The applicant must complete a Hazardous Air Pollutant (HAP) Emission Rate Table form for each emission source capable of emitting a significant quantity of HAPs. The applicant must complete a separate HAP Emission Rate Table for each emission source. Some listed HAPs are general names for groups of compounds. In such case, list the actual emitted compound.

The emission source number, the year installed or last modified, the process description and SCC8 should correspond to the information provided on the Emission Rate Table.

Provide the pollutant name, CAS number, and relative toxicity for each pollutant emitted from the source. The General Information Supplement contains CAS numbers on the list of HAPs or in table for the relative toxicity. List all HAPs separately.

Emissions lb/hr Denote the maximum (not average) emission rate in pounds per hour (lb/hr) all HAPs. Do not round this value. List emission rates for each HAP separately. Provide supporting calculations for each emission rate. The Title V instructions provide example calculations.

Emissions TPY Denote the total tons per year emitted. Do not round this value. List emission rates for each HAP separately. The hours of operation limitations or throughput/production limitations can limit the emissions. If this value indicates less than continuous operation at maximum operating rates, the permittee should clearly denote in the supporting calculations the factors (i.e. production limits, or hour of operation limits, etc). used to limit the emission rates. The permit will reflect these limits in the permit conditions.

Some compounds are not assigned a relative toxicity because of their acute toxicity or other special properties. If emitting one of these compounds, write “acute” or “special” in the relative toxicity column. A permittee may not increase the emissions of these compounds, or emit an unpermitted compound, without going through the appropriate permit modification procedure.

Relative Toxicity The applicant can use relative toxicity value to determine appropriate reporting levels for HAPs emissions. The criterion for reporting is the product of multiplying the sum total pound per hour emission rate of the pollutant from all sources by 4.4. If this figure is greater than the relative toxicity rating, the facility should report the emission rate of that HAP from all sources at the facility. If the product is less than the relative toxicity, reporting is not required. The *GENERAL INFORMATION SUPPLEMENT FOR COMPLETING PERMIT APPLICATIONS* contains a list of all the HAPs and the relative toxicity of each.

For compounds listed as “acute” or “special,” employ the same method described in the paragraph above to calculate a de minimis value.

Emission Control Equipment Describe any pollution control equipment (cyclone, baghouse, scrubber, afterburner, etc). Also, indicate the critical operating parameters of the control equipment (minimum scrubbing liquor flow for scrubbers, minimum temperature for afterburner, etc). Complete the control equipment operating parameters form for each control device.

Percent Control Efficiency - Report the control efficiency of the air pollution control equipment for the pollutant in question.

Insignificant Activities List

Complete the tables for the insignificant activities at your facility. For the insignificant activities categories that have a maximum emission, the tpy sum cannot exceed the maximum emission rate. In the cell named “**Emission Factor Source**”, enter the source of the emission factor (AP 42, Mass balance, etc).

**INSTRUCTIONS FOR COMPLETING CONTROL EQUIPMENT OPERATING PARAMETERS
FORM:**

1. Identify the emission point number with which the control equipment is associated. This number should correspond to the number provided on the emission rate table.
2. Provide the year installed or reconstructed for each baghouse, electrostatic precipitator, mechanical collector, or scrubber located at the facility.
3. Provide a separate form for each piece of control equipment.
4. Provide manufacturer information to support the information provided. This includes not only the physical piece of control equipment, but also the manufacturer information on parameters such as scrubber media, required media flow rate, etc.
5. For control equipment not listed on the Control Equipment Operating Parameters Form, provide any information deemed relevant to the proper operation of the control equipment and provide manufacturer information associated with the control equipment.
6. The applicant may supply additional information proposing appropriate monitoring parameters for the subject control equipment. This information is in addition to the required information. This information will be considered during the technical review, but the Department will make the final determination for parameters to monitor control equipment based on all information submitted.

INSTRUCTION FOR COMPLETING STORAGE TANK INFORMATION FORM:

Complete the Storage Tank Information Form for all storage tanks emitting regulated pollutants that are not Insignificant Activities.

Provide the information requested on the Storage Tank Information Form.

INSTRUCTIONS FOR SUBMITTING APPLICATION FORM ATTACHMENTS

Use the checklist at the end of this section as a guide to determine the appropriate attachments to submit with the application form. Failure to submit the appropriate attachments may result in an administratively incomplete application.

A description of the information to provide with each type of attachment is below:

1. **PROCESS FLOW DIAGRAM** - The process flow diagram must be in sufficient detail to understand the general process. The process flow diagram must clearly identify all relevant processes or pieces of equipment. All points where raw materials and/or chemicals are introduced into the process and all points where intermediate and/or finished products are removed from the process must be clearly identified with quantities of materials shown. The process flow diagram should show material flow between processes (if any) and the applicant should identify the source number (SN) on the diagram.
2. **PROCESS DESCRIPTION** - A written description of the process by NAICS number must accompany each application. This must include a description of each relevant piece of equipment and process. The description must be in sufficient detail to provide the permit engineer an understanding of the process. The applicant should place special emphasis on any process or equipment with the potential to emit any pollutants to the atmosphere. The process description should describe material flow between processes (if any) and the stack (SN) to which each process is vented should be identified in the narrative. The applicant should describe any work practice standards used to control emissions
3. **USGS MAP & Legal Description** - Please submit one original U.S. Geological Survey topographic map (7.5-minute series) with the location of the facility indicated. The applicant may obtain maps from the US Geological Survey, Denver, CO 80225 or the Arkansas Geological Commission, 3515 West Roosevelt Road, Little Rock, AR 72204, (501) 663-9741. A legal description of the property must accompany the area map.
4. **PLOT PLAN** - Show the property, to scale, indicate the location of the property boundaries with the applicable scale, the location of all sources of any air pollutants (identified by source number), true north direction, and any other information deemed relevant by the applicant.
5. **OPERATING SCENARIOS** - Describe all alternate operating scenarios the applicant desires for this emission source. Submit a complete set of attachments (i.e. process flow diagrams, process description, emissions calculations, emission rate tables, etc). for each desired operating scenario. Note: The permittee may implement any alternative operating scenarios allowed by the permit without incurring a permit modification, thus minimizing delays in production. The permit will allow only those operating scenarios specifically described in the application. Alternate operating scenarios may include the desire to permit two fuels, such as natural gas and No. 2 fuel oil, for a boiler or it may involve the option to produce product X or product Y from the same manufacturing line.
6. **EQUIPMENT SPECIFICATIONS** - Include engineering drawings, operating parameters, manufacturer's specifications, and other information as requested for each piece of equipment directly related to the emission of pollutants to the atmosphere. It is not necessary to submit specifications for equipment not relevant to air pollution.

7. **COMPLIANCE PLAN & SCHEDULE** - Provide the requested information concerning current and future compliance plans and schedules of the facility with applicable requirements.
- (1) For applicable requirements with which the facility is in compliance, a statement that the facility will continue to comply with such requirements.
 - (2) For applicable requirements that will become effective during the permit term, a statement that the facility will meet such requirements on a timely basis. A statement that the facility will meet in a timely manner applicable requirements that become effective during the permit term shall satisfy this provision, unless a more detailed schedule is expressly required by the applicable requirement.
 - (3) A schedule of compliance addressing all applicable requirements for which the facility is not in compliance at the time of permit issuance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance 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 shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
 - (4) Provide a schedule for submission of certified progress reports no less frequently than every 6 months for sources required to have a schedule of compliance to remedy a violation.
 - (5) For each source subject to the acid rain provisions, requirements specified in this section shall apply and shall be included in the acid rain portion of a compliance plan. The plan shall identify the schedule and method(s) the source will use to achieve compliance with the acid rain emissions limits.
8. **ADDITIONAL INFORMATION** - Provide the requested additional information concerning current facility operations.
- (1) **Continuous Emissions Monitoring Systems** - List all Continuous Emissions Monitoring Systems (CEMS) currently used for determining compliance with regulatory requirements. Additionally, list all existing periodic testing requirements currently used or proposed for determining compliance with regulatory requirements (for example, EPA Method 7E to be used for testing NO_x emissions annually). This list should contain the appropriate source number for which the CEMS and/or periodic testing requirements pertain, the pollutant(s) for which the requirement is applicable, the required testing frequency or reporting frequency, and any other relevant information.
 - (2) **Specific Information** - Give other specific information necessary to implement and enforce other requirements of the Clean Air Act or to determine the applicability of such requirements (i.e., if the permittee is aware of a requirement which applies to the facility operations, and the forms and information requested by this application do not directly request this information, the facility shall provide this information to the Department as

part of the Additional Information submittal).

- (3) **Detailed Explanation** - Give a detailed explanation, including a regulatory citation, for any proposed exemptions from otherwise applicable requirements.

9. **DISCLOSURE STATEMENT** - Act 454 of 1991 requires all permit applicants for a new facility or a transfer of ownership submit a disclosure statement. The disclosure statements should be submitted separately from any application package. The disclosure statement should be accompanied by a cover page which states in large letters, preferably in red: "DISCLOSURE STATEMENT – CONFIDENTIAL." No other application documents except the cover page and the Disclosure Statement should be included.

- (1) **Publicly held Companies** - A publicly held company required to file periodic reports under the Securities and Exchange Act of 1934, or a wholly-owned subsidiary of a publicly-held company, will submit the most recent annual and quarterly reports required by the Securities and Exchange Commission, which provide information regarding legal proceedings in which the applicant has been involved.
- (2) **All Other Facilities** - All applicants that are not publicly-held companies or wholly-owned subsidiaries shall submit a written disclosure statement. Please contact the Department to obtain the disclosure statement form if the application is for a new facility or a transfer of ownership.

GENERAL INFORMATION FOR TITLE V

Compliance Assurance Monitoring (CAM) contained in 40 CFR Parts 64, 70, and 71.

Compliance assurance monitoring (CAM) applies to major stationary sources of air pollution required to obtain a Title V operating permit. The CAM rule requires owners or operators of such sources to conduct monitoring satisfying particular criteria established in the rule to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act. The CAM rule aims to have owners and operators maintain control devices at the levels that assure compliance. Monitoring will focus on emissions units that rely on pollution control device equipment to achieve compliance with applicable standards. The rule allows owners and operators to design CAM plans on current requirements and operating practices; to select representative parameters upon which compliance can be assured; to establish indicator ranges or procedures for setting the indicator ranges for the parameters; to use performance testing and other information to verify the parameters and ranges; and to correct control device performance problems as expeditiously as practicable.

Acid Deposition Control contained in 40 CFR Part 72.

The intent of the acid deposition control regulations is to reduce the adverse effects of acid deposition (acid rain) through reductions in annual emissions of sulfur dioxide of ten million tons from 1980 emission levels and reductions in nitrogen oxides emissions of approximately two million tons from 1980 emission levels. These regulations apply to utility units (i.e. units serving generators that produce electricity for sale). Additional application forms will be required of any source subject to 40 CFR Part 72. These forms will be sent directly to facilities known by the Department to be effected by these regulations or the forms can be requested from the Department.

Prevention of Significant Deterioration (PSD) contained in 40 CFR 52.21.

ADEQ adopted the federal PSD regulations, 40 CFR 52.21, with minor revisions and additional requirements, as part of the SIP. The intent of the PSD regulations is to prevent the deterioration of air quality in areas where air quality is better than the National Ambient Air Quality Standards through preconstruction review of sources.

A new source is defined as major, and therefore subject to PSD review, if its “potential to emit” any pollutant (for PSD purposes this is equivalent to the proposed maximum annual emissions, after the application of control equipment) exceeds 100 tons per year of any pollutant regulated under the Clean Air Act, if the source is included in any of 28 named source categories, or 250 tons per year if the source is not included in any named source category. A modification is major, and therefore subject to PSD review, if the net emissions increase of any regulated pollutant, by itself, would meet the above definition of a new major source. If an existing source is already major for any regulated pollutant, as defined above, a modification is major, and therefore subject to PSD review, if the net emissions increase of any regulated pollutant exceeds the significance level for that pollutant, as defined in the PSD regulations.

Sources that may be subject to PSD review should review the regulations and the EPA Prevention of Significant Deterioration Workshop Manual (1990), available from the Department, to determine applicability and analyses required. ADEQ recommends a pre-application meeting. The applicant should meet with the Air Division technical staff before an application submittal.

If a source is subject to PSD review, the following information will be required:

1. Information necessary to determine compliance with all SIP, NSPS, and NESHAP applicable emission limitations.
2. Information necessary to determine application of the best available control technology (BACT) to the emissions of all applicable pollutants.
3. An ambient air impact analysis that includes modeling using USEPA approved computer models and techniques in conformance with guidance from the USEPA.
4. Information as required to perform visibility and additional impact analysis.
5. Ambient air quality data for applicable pollutants, subject to the exemptions contained in the PSD regulations. Up to one year of ambient air quality monitoring may be required to be conducted by the applicant before an application can be considered complete. A monitoring plan shall be submitted to the Department for approval before initiation of monitoring.

112(g) (case-by-case MACT) contained in 40 CFR Part 63 Subpart B

For major stationary sources, when no applicable federal emission limitation has been promulgated, the Clean Air Act requires the state permitting authority to determine a MACT emission limitation on a case-by-case basis. This rule assures that effective pollution controls will be required for new major sources of air toxics during the period before EPA can establish a national MACT standard for a particular industry. Section 112(g) applies to the owner or operator of a constructed or reconstructed major source of hazardous air pollutants (HAPs). Section 112(g) requires MACT-level control of air toxics when a new major source of HAP is constructed or reconstructed.

The application requirements for a case-by-case MACT determination are outlined in 40 CFR 63.43(e). If a source is subject to 112(g) review, the following information will be required:

- 1) A brief description of the major source to be constructed or reconstructed and identification of any listed source category or categories in which it is included.
- 2) Any federally enforceable emission limitations applicable to the constructed or reconstructed major source.
- 3) ADEQ may ask for the maximum and expected utilization of capacity of the constructed or reconstructed major source, and the associated uncontrolled emission rates for that source, to the extent ADEQ needs this information to determine MACT.
- 4) ADEQ may ask for the controlled emissions for the constructed or reconstructed major source in tons/yr at expected and maximum utilization of capacity, to the extent ADEQ needs this information to determine MACT.

A recommended emission limitation for the constructed or reconstructed major source consistent with the principles set forth in 40 C.F.R. 63.43(d). The provisions of 40 CFR 63.43(d) are below.

Principles of MACT determinations: The following general principles govern preparation by the owner or operator of each permit application or other application requiring a case-by-case MACT determination concerning construction or reconstruction of a major source, and all subsequent review of and actions taken

concerning such an application by the Department:

The MACT emission limitation or MACT requirements recommended by the applicant and approved by the Department shall not be less stringent than the emission control achieved in practice by the best-controlled similar source, as determined by the Department.

Based upon available information, as defined below, the MACT emission limitation and control technology (including any requirements under paragraph (3)) recommended by the applicant and approved by the Department) shall achieve the maximum degree of reduction in emissions of HAP achievable by utilizing those control technologies identifiable from the available information, taking into consideration the costs of achieving such emission reduction and any non-air quality health and environmental impacts and energy requirements associated with the emission reduction.

The applicant may recommend a specific design, equipment, work practice, or operational standard, or a combination thereof, and the Department may approve such a standard if the Department specifically determines that it is not feasible to prescribe or enforce an emission limitation under the criteria set forth in section 112(h)(2) of the Act.

If the Administrator has either proposed a relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or adopted a presumptive MACT determination for the source category that includes the constructed or reconstructed major source, then the MACT requirements applied to the constructed or reconstructed major source shall have considered those MACT emission limitations and requirements of the proposed standard or presumptive MACT determination.

The selected control technology to meet the recommended MACT emission limitation, including technical information on the design, operation, size, estimated control efficiency of the control technology (and the manufacturer's name, address, telephone number, and relevant specifications and drawings, if requested by the Department).

Supporting documentation including identification of alternative control technologies considered by the applicant to meet the emission limitation, and analysis of cost and non-air quality health environmental impacts or energy requirements for the selected control technology.

Any other relevant information that may be required.

According to 40 CFR 63.41, available information means, for purposes of identifying control technology options for the affected source, information contained in the following information sources as of the date of approval of the MACT determination by the permitting authority:

A relevant proposed regulation, including all supporting information;

Background information documents for a draft or proposed regulation;

Data and information available for the Control Technology Center developed pursuant to section 113 of the Act;

Data and information contained in the Aerometric Informational Retrieval System including information in the MACT database;

Any additional information that can be expeditiously provided by the Administrator; and

For the purpose of determinations by the permitting authority, any additional information provided by the applicant or others, and any additional information considered available by the permitting authority.

Checklist/Application Mailing

The following are required information for an application:	Initial Permit (New or existing Facility)	Renewal	Significant or Minor Modifications	Administrative Amendment
General Information Forms	Yes	Yes	Yes	Yes
Emission Rate Tables	Yes	Yes	Yes	No
Calculations	Yes	Yes	Yes	Maybe
Control Equipment Operating Parameters	Yes	Yes	Yes	Not Applicable
Process Flow Diagram	Yes	Yes	Yes	No
Process Description	Yes	Yes	Yes	No
Area (USGS) Map & Legal Description	Yes	Yes	Maybe ¹	No
Plot Plan	Yes	Yes	Maybe ¹	No
Operating Scenarios	Yes	Yes	Yes	No
Equipment Specifications	Yes	Yes	Maybe ¹	No
Compliance Plan and Schedule	Yes	Yes	Yes	No
Additional Information	Yes	Yes	Yes	No
List of Exempted Activities	Yes	Yes	Yes	No
Disclosure Statement	Maybe ²	Maybe ²	Maybe ²	No

1 - Modifications involving new construction or modification of the manner in which the current process operates will require this attachment. Modifications involving production increases, hour of operation increases, etc. (i.e. do not involve the addition of any new equipment units or modification of the manner in which the current process operates) will not require this attachment.

2 - Disclosure statements are required for all new facilities and all transfers of ownership. If a disclosure statement has been previously submitted to the Air Division or any other Division, it is not necessary to submit another one unless there have been changes to the information contained therein. The disclosure statements should be submitted separately from any application package. The disclosure statement should be accompanied by a cover page which states in large letters, preferably in red: "DISCLOSURE STATEMENT – CONFIDENTIAL." No other application documents except the cover page and the Disclosure Statement should be included.