

Title V - Do's and Don'ts

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Background

- Created as part of the federal Clean Air Act Amendments in 1990.
- Title V permit compiles air quality regulations placed upon industry through state and federal rule requirements.

Title V Applicability

MAJOR SOURCE THRESHOLDS	
Pollutant	Threshold
Particulate Matter (PM2.5) (Aerometric Diameter < 2.5 Microns)	100 tons per year
Particulate Matter (PM10) (Aerometric Diameter < 10 Microns)	100 tons per year
Sulfur Dioxide (SO2)	100 tons per year
Nitrogen Oxides (NOx)	100 tons per year
Volatile Organic Compounds (VOCs)	100 tons per year
Carbon Monoxide (CO)	100 tons per year
Lead	100 tons per year
Any Single Hazardous Air Pollutant (HAP)	10 tons per year
All HAPs combined	25 tons per year

Potential to Emit

- Potential to emit is calculated assuming the equipment is running at maximum capacity while operating at the maximum hours of operation under its physical and operational design.
 - Usually, maximum hours of operation are 8760 hours per year.
 - Do you have enforceable emission limitations?

Title V Fees

- Know your states fee schedule.
- Can be expensive!
- Be prepared to pay for all fees incurred for activities related to the application and annual emission fees.

Due Dates

- Prepare and submit application early.
- Due date for new Title V sources is within 12 months of becoming subject to Title V program.
- A renewal application must be submitted at least 6 months, but not more than 18 months, prior to the date of expiration of the current Title V Permit.
- Make sure you get your Application Shield.

Title V Permitting is Complicated!

- Don't underestimate level of effort.
- Get familiar with the forms.
- Incomplete information causes delays.
- Include a cover letter with additional details or clarification.

Submittal requirements

- Understand your states' submittal requirements.
- Online vs. on paper.
- Attend trainings.
- Do more than the minimum!

Title V Modifications

- Is it an Administrative Amendment?
- Minor Modification?
- Major Modification?
- When are they required?

Know Your Forms

- Can vary by state.
- Specific requirements for each submittal.
- Know which optional forms apply to you.

Know Your Facility

- Develop a detailed process flow diagram
- Verify equipment in operation
- Monitoring and recordkeeping requirements?
- Stack testing requirements?
- Compliance Assurance Monitoring (CAM)?

Know Your Acronyms

- BACT - Best Available Control Technology
- LAER - Lowest Achievable Emission Rate
- MACT - Maximum Achievable Control Technology
- NAAQS - National Ambient Air Quality Standards
- NESHAP - National Emission Standards for Hazardous Air Pollutants
- NSPS – New Source Performance Standards
- PSD – Prevention of Significant Deterioration
- NSR – New Source Review
- CAM – Compliance Assurance Monitoring

Stay Current With Regulations

- Major MACT to Area (MM2A)
- NSPS and NESHAP
- Environmental Justice
- Subscribe to your state eNewsletters, Federal Register for regulation updates.
- Attend conferences.

Permit Writers Can Be Your Friends!

- Talk to your permit writer if you have concerns
- Meet with them early in the renewal process to discuss your approach
- Your headaches are their headaches

Check Your Draft Carefully

- Read the final draft carefully
- It is much easier to fix a problem **BEFORE** the final permit is issued!

Monitor Title V Requirements

- Get familiar with new permit requirements.
- Monitoring can be extensive!
- Important to continuously monitor your Title V requirements.
- Make a checklist.
- Continuous Emissions Monitoring System (CEMS), stack testing, leak detection and repair records, fuel records, inspections, maintenance, VOC and HAP content usage, etc..

Call An Expert

- Environmental consultants work hard to know what's going on so that you don't have to.

Questions?

Contact me with questions

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