INTRODUCTION:

Ventura County Air Pollution Control District (VCAPCD) Rule 33.6 requires permittees to submit an application for reissuance of a Part 70 permit no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date. A complete reissuance application will consist of the following forms and documents, together with appropriate supplemental information, as described in these instructions.

1. A General Facility Information form and all required attachments.

2. The following tables from your current Part 70 permit: the Periodic Monitoring Summary (Table No. 1), the Permitted Equipment and Applicable Requirements Table (Table No. 2) and its attachments (the Title V Equipment List Description Key and the Title V Applicable Requirement Code Key), the Permitted Throughput/Consumption Limit Table (Table No. 3) and the Permitted Emissions Table (Table No. 4). A written statement indicating that the tables have been reviewed and determined to be correct, or a listing of the errors and omissions in the tables, must accompany these tables.

3. An Equipment and Emissions Summary report available from the District that summarizes how the emissions in the Permitted Emissions Table were calculated.

An Air Toxics "Hot Spots" Emissions Summary report available from the District that summarizes the hazardous air pollutant emissions from your facility. This report is not available for facilities on the Outer Continental Shelf. Therefore, these facilities will need to prepare a report characterizing the hazardous air pollutant emissions from their own facilities.

4. A compliance plan.

5. A compliance certification.

6. The list of insignificant activities from your current Part 70 permit. A written statement indicating that the list has been reviewed and is correct, or a listing of the errors and omissions in the list, must accompany the list.

The definition of insignificant activities in VCAPCD Rule 33.1.10 was recently modified. Any emissions unit on the current insignificant equipment list that does not meet the revised definition must be listed separately along with an estimate of the annual emissions from the emissions unit in tons per year.
7. Compliance Assurance Monitoring (CAM) Plans for all emission units at the facility for which CAM Plans are required.

8. For oilfield facilities, the oil well list from your current Part 70 permit. A written statement indicating that the list has been reviewed and is correct, or a listing of the errors and omissions in the list, must accompany the list.

Confidentiality

All information in a Part 70 permit reissuance application is public information except for information entitled to confidential treatment as a trade secret. The Part 70 permit will also be public information.

If you believe that any part of your application is a trade secret, please clearly label it as such. You must also submit written justification to support your claim of confidentiality. Please refer to VCAPCD Regulation IX, Rules 200 - 204 and Section 114(c) of the Clean Air Act when preparing your justification.

In no case can emission data be considered trade secrets. In addition, the contents of the Part 70 permit are not entitled to protection as trade secrets.

If you label any part of your application as a trade secret, the District requires that you submit that part directly to EPA Region IX.

General Facility Information Form

The General Facility Information form requests general information identifying the stationary source. As indicated on the form and discussed in more detail below, an applicant is required to include supplemental information in addition to the form.

Line items on the form which require explanation are addressed below:

Line 1: Please enter the current VCAPCD four digit permit number with a leading zero.

Line 5: The name of the person identified on this line must meet the qualifications of a "Responsible Official", as defined in 40 CFR 70.2 and VCAPCD Rule 33.1. This definition is as follows:

a. 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, 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 Part 70 permit and either:
1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25,000,000 (in second quarter 1980 dollars); or

2. The delegation of authority to such representatives is approved in advance by the District.

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively.

c. For a municipality, state, federal or other public agency: either a principal executive officer or ranking elected official. For the purposes of this rule, 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.

Please also specify the title of the Responsible Official at your facility.

Line 10: The name of the person identified on this line should be the appropriate contact for questions regarding the application.

Line 16: Please provide alternative operating scenario descriptions that contain sufficient emission information for the District to develop reasonable permit conditions for each alternative operating scenario anticipated at the facility.

Line 17: Please provide proposed replicable procedures and permit terms that ensure the emissions trades will be quantifiable and enforceable. This information will be used by the District to establish a federally-enforceable emissions cap independent of any federally-enforceable requirement for any pollutant emitted by the stationary source.

Line 18: If you are proposing to exempt a specific process or piece of equipment from an otherwise applicable requirement, please provide a detailed explanation for the request.

Line 25: Please provide a brief description of the general nature of the business activity (e.g., auto body painting, gasoline storing and dispensing, grain elevator, sand and gravel operations, asphalt/concrete plant, oil production, oil refinery, etc.).

Lines 26-30: You may submit copies of the facility description, street map, facility map and process flow diagram(s) from your original Part 70 permit application to satisfy these requirements if the information is still current.

Line 26: Please provide a brief description of the facility process currently in operation. Include separate descriptions for each alternative operating scenario.
The street map should indicate the location of the facility by presenting all adjacent streets as well as nearby major cross streets.

The facility map should indicate the facility boundaries and the location of the permitted equipment. It is suggested that all major equipment and/or structures be included on this map to clarify the layout of the facility. Examples include buildings, fuel combustion sources (e.g., engines, furnaces, boilers, flares, etc.), storage tanks (e.g., solvent tanks, fuel tanks), coating area, blasting area, etc.

If necessary, multiple maps may be used to show the general location of equipment and/or structures at the facility, and a blown-up view of equipment at a specific location. Please note that this map does not need to be drawn to scale.

Please include a process flow diagram that traces the processes throughout all permitted equipment. The diagram shall indicate the following:

a. All devices associated with an emitting process within the facility shall be represented by blocks labeled with descriptions and capacities of the devices. Examples of devices include: engines, furnaces, boilers, flares, control devices, storage or process tanks or enclosures, etc. For small devices that are similar, you may aggregate them with one block and indicate the number of grouped devices next to the block. Emission points (excluding fugitive emissions) and exhaust stacks should also be indicated.

b. Interconnections between the blocks should show sufficient information pertaining to emissions or their reportable characteristics. Examples include: type of fuel/chemical going into the device, type of service that the process flow and/or pipeline represents (i.e., liquid, gas), and type of product exiting the device.

The name of the person's signature provided on this line must meet the qualifications of a "Responsible Official", as defined in 40 CFR 70.2 and VCAPCD Rule 33.1. This definition is described in detail under Line 5.

Please also specify the title of the Responsible Official at your facility.

Compliance Plan

Submit a compliance plan with the reissuance application using the Compliance Plan forms attached. The instructions for the forms are on Compliance Plan Cover Sheet.

Compliance Certification

An annual compliance certification that has been submitted to the District no more than 18 months prior to the expiration date of the Part 70 permit and no less than 6 months prior to the expiration date of the Part 70 permit may be referenced to satisfy the reissuance application compliance
certification requirement. The reference must include date of compliance certification and the dates of any submittals that supplemented the compliance certification.

**Insignificant Activities List**

Under the District's Title V program, insignificant activities have been defined to be emissions units that are exempt from permitting requirements pursuant to VCAPCD Rule 23. On April 10, 2001, the definition of insignificant activity in VCAPCD Rule 33.1.10 was modified to require insignificant activities to meet two additional criteria: the emissions unit cannot be subject to any source-specific federally-enforceable requirement (a requirement for which emissions unit-specific information is required to determine applicability); and the emissions unit can emit no more than 0.5 tons per year of any EPA hazardous air pollutant and no more than 2 tons per year of any regulated air pollutant.

Any emissions unit included on your current insignificant equipment list that does not meet the revised definition must be removed from the list and listed separately. Internal combustion engines rated less than 50 brake horsepower and internal combustion engines used during an emergency are examples of formerly insignificant activities that should be reviewed in light of the revised definition. The new, separate list of emissions units that are no longer defined as insignificant activities must include an estimate of the annual emissions from each emissions unit in tons per year and the data used to calculate the emissions estimate.

All insignificant activities that are exempt because they fall below a certain size or production rate must be included on your insignificant activities list. The list below identifies the exemptions in Rule 23 that depend on size or production rate.

**TITLE V INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT) LIST**

23.B.7 Abrasive blast cabinet with internal volume ≤ 50 cubic feet

23.B.8 Batch mixer rated working capacity ≤ 5 cubic feet

23.C.1 Boilers and heaters rated < 1 MMBTU/hr

23.C.2 Steam cleaning equipment rated < 1 MMBTU/hr

23.D.6 Internal combustion engine with a maximum design power rating of < 50 brake horsepower

23.D.7 Emergency internal combustion engine operated during an emergency (e.g., electrical power or natural gas failure, water pumping for fire protection or flood relief, or a portable engine used for emergency purposes) or during maintenance of the engine where maintenance operation is < 50 hours per calendar year per engine

23.F.1 Storage in or loading into any tank with a capacity ≤ 550 gallons equipped with a submerged pipe and not required to have a vapor recovery system
23.F.2 Equipment for loading and storing of an ROC liquid into any stationary storage tank having a capability of holding ≤ 250 gallons

23.F.3 Equipment for loading of an ROC liquid into transportable containers of ≤ 100 gallons

23.F.4 Equipment for loading of ≤ 500 gallons per calendar day of ROC liquid into transportable containers

23.F.10.c Cold cleaners using non-boiling organic solvents with an initial boiling point > 150 °C (302 °F) and having a liquid surface area of < 1 square meter (10.8 square feet) at any stationary source where < 1000 pounds of ROC are lost to the atmosphere from all such cold cleaners during a rolling 12-month period

23.F.10.d Cleaning activities where < 200 lb each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere from all such activities during a rolling 12-month period

23.F.11.b Coating operations, other than mobile vehicle or mobile equipment coating operations, where < 200 lb each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere from all such activities during a rolling 12-month period

23.F.11.c Coatings used in mobile automotive touch-up operations where application is done using an air brush with a cup that holds no more than 4 ounces of paint

23.F.12 Adhesive operations where < 200 lb each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during a rolling 12-month period

23.F.13 Graphics arts operations where < 200 lb each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during a rolling 12-month period

23.F.14 Polyester resin operations using < 20 gallons per month of polyester resin materials containing ROC

23.F.15 Other operations not listed above using organic solvents where < 200 lb each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during a rolling 12-month period

23.I.1 Porcelain enameling furnaces/ drying ovens, vitreous enameling furnaces/drying ovens with heat input of ≤ 1 MMBTU/hr

23.I.2 Kilns used for firing ceramic ware with heat input of ≤ 1 MMBTU/hr
23.I.3  Equipment used exclusively for heat treating or sintering glass or metals or for case hardening metals with heat input of ≤ 1 MMBTU/hr

23.I.11  Crucible, pot, or induction furnaces with a capacity of ≤ 1000 pounds and from which only specific molten metals listed in the exemption are used

23.I.12  Crucible, pot, or induction furnaces with a brimful capacity of ≤ 450 cubic inches of any molten metal

23.J.14  Any sterilizer or aerator where amount of ethylene oxide charged to all sterilizers at the stationary source is ≤ 4 lb/yr

Reissuance Application Instructions (May 22, 2002)
General Facility Information
Part 70 Permit Reissuance Application Form

1. Permit Number: __________ Date: __________

2. Company Name:

3. Company Mailing Address:

4. Company City, State Zip Code:

5. Responsible Official and Title (as defined in 40 CFR 70.2 and VCAPCD Rule 33.1):

6. Responsible Official Telephone Number:

7. Facility Name (Usually Same As Company Name):

8. Facility Street Address (or Lease Name/Field Name):

9. Facility City, CA Zip Code:

10. Title V Permit Contact Person and Title:

11. Title V Permit Contact Person Telephone Number:

12. Type of Organization:

   □ Corporation   □ Sole Proprietorship

   □ Partnership   □ Government

13. Facility Operating Schedule: ___ Hours/Day ___ Days/Week ___ Weeks/Year
CAM (Compliance Assurance Monitoring) Plans

15. Are you required to submit a CAM plan for any emissions unit at this facility?  □ Yes  □ No

If yes, submit a CAM plan for each emissions unit as an attachment to the application. See the District CAM plan instructions for more detail.

If you answer yes to any of questions 16 through 18 below, submit supplemental information as an attachment to the application. See instructions for more detail.

16. Does this application request alternative operating scenarios pursuant to Rule 33.4.B?  □ Yes  □ No

17. Does this application request voluntary emission caps pursuant to Rule 33.4.C?  □ Yes  □ No

18. Does this application include any proposed exemptions from otherwise applicable requirements pursuant to Rule 33.2.A.5?  □ Yes  □ No

Miscellaneous Federal Requirements

19. Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68?  □ Yes  □ No

If yes, has the federal Risk Management Plan been submitted to the implementing agency?  □ Yes  □ No

If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application.

20. Does this facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82?  □ Yes  □ No

21. Is this facility subject to the acid rain requirements in 40 CFR Part 72 through 40 CFR Part 78?  □ Yes  □ No

22. Is this facility subject to the federal outer continental shelf air regulations in 40 CFR Part 55?  □ Yes  □ No

Permit Shields

23. Does the current Part 70 permit for this facility include any permit shields?  □ Yes  □ No

If yes, is the basis for each permit shield still correct?  □ Yes  □ No

If the current Part 70 permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application.
New Generally Applicable Requirement

24. Rule 74.11.1 requires that new large water heaters and new small boilers with a rated heat input capacity greater than or equal to 75,000 BTU per hour and less than or equal to 2,000,000 BTU per hour be certified by the manufacturer to meet certain nitrogen oxide emission standards. Are you complying with the requirements of Rule 74.11.1 by purchasing and installing only certified units? □ Yes □ No

If no, provide a detailed explanation as an attachment to the application.

Facilities Must Submit Process Descriptions, Plot Plans, and Process Flow Diagrams That Provide the Following:

25. General Nature of Business (e.g., Autobody Painting, Gasoline Storage & Dispensing, Oil Production, etc.)

26. Facility Process Description

27. A Street Map or Road Map That Shows the Location of the Facility in Ventura County.

28. A Facility Map That Clearly Indicates the Facility Boundaries and the Location of Permitted Equipment.


30. Certification by Responsible Official (as defined in 40 CFR 70.2 and VCAPCD Rule 33.1)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information provided for this Part 70 Permit Application are true, accurate, and complete.

Signature and Title of Responsible Official: ____________________________  Date: ____________________________

General Facility Information (May 22, 2002)
Compliance Plan Cover Sheet
Part 70 Permit Reissuance Applications Forms

Instructions

A compliance plan, signed by the responsible official, must be attached to each application for reissuance of a Part 70 Permit. To complete the compliance plan, attach the following to this sheet:

1. A completed compliance plan form for all applicable requirements that are currently effective and that apply to an emission unit at your facility or to your entire facility. Only one form that refers to all currently applicable requirements needs to be completed.

2. A completed compliance plan form for each applicable requirement that will become effective during the term of your permit and that will apply to an emission unit at your facility or to your entire facility. One form for each applicable requirement with a future effective date must be completed.

3. A narrative description of how each emission unit at your facility that does not comply with an applicable requirement will achieve compliance with the requirement.

A compliance schedule, approved as part of an order issued by the District Hearing Board, must be attached for each emission unit that is not in compliance with an applicable requirement. Each compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the applicable requirement. The 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.

A schedule for submission of certified progress reports on the compliance schedule no less frequently than every six months must also be attached.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance plan are true, accurate, and complete.

Signature and Title of Responsible Official: ____________________________ Date: ____________

Compliance Plan Cover Sheet (May 22, 2002)
Compliance Plan
Applicable Requirements That Are Currently Effective

Compliance Schedule

Except for the specific applicable requirements and emission units listed below, the facility that is the subject of this application complies with all currently applicable requirements and will continue to comply with all currently applicable requirements.

Exceptions to This Declaration

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Compliance Plan Currently Effective (May 22, 2002)

Permit No. 0_______ Compliance Plan Page 2 of ___
Compliance Plan
Applicable Requirements With a Future Effective Date

Applicable Requirement

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<th>Citation:</th>
<th>Description:</th>
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Compliance Schedule

The requirement cited and described will be applicable to my entire facility or to emission units at my facility.

Except for the specific emission units listed below, the facility that is the subject of this application will comply in a timely manner with the applicable requirement listed above and in accordance with the compliance schedule, if any, contained in the applicable requirement.

Exceptions to This Declaration

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Compliance Plan Future Effective (May 22, 2002)

Permit No. 0_ _ _

Compliance Plan Page __ of __
Compliance Assurance Monitoring (CAM)  
CAM Plan Instructions

Introduction

EPA responded to a statutory mandate in the Clean Air Act Amendments of 1990 by promulgating new regulations to implement compliance assurance monitoring (CAM) for major stationary sources of air pollution required to obtain Part 70 federal operating permits. This regulation appears in 40 CFR Part 64 – Compliance Assurance Monitoring. CAM establishes criteria that define what monitoring of existing emission control devices, and associated recordkeeping and reporting requirements, are necessary to provide reasonable assurance of compliance with applicable emission limits and standards.

This document provides a general discussion and summary of federal CAM requirements and applicability. This summary should not be used independently of Part 64 in understanding CAM requirements. Other more specific or detailed information may apply. Please refer to Part 64 for more detailed information. Also, if you believe your facility is subject to CAM requirements, you are encouraged to review materials available on EPA’s TTN website (http://www.epa.gov/tnn/emc/cam.html).

CAM Applicability

Part 64’s CAM requirements apply to any pollutant specific emission unit (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies all of the following criteria:

- The unit is subject to an emission limitation or standard for an applicable regulated air pollutant
- The unit uses a control device to achieve compliance with any such emission limitation or standard
- The unit has a pre-control device potential to emit (uncontrolled emissions) of the applicable regulated air pollutant equal to or greater than:

  25 tons per year of ROC, or  
  25 tons per year of NOX, or  
  100 tons per year of PM10, or  
  100 tons per year of SOX, or  
  100 tons per year of CO

A PSEU refers to an emission unit treated separately for each regulated air pollutant. In determining the pre-control device potential to emit from a PSEU, limits on hours of operation, throughput, or fuel consumption may be used provided that the limit is contained in a Part 70 permit condition.
CAM Exemptions for Emission Limitations or Standards

Part 64 contains a number of exemptions that Part 70 permit holders should review. Notable examples of emission limitations or standards explicitly exempt from CAM requirements include:

- Ones proposed by EPA after November 15, 1990, including NSPS and MACT standards
- Ones for which a Part 70 permit already specifies a continuous compliance determination method, as defined in 40 CFR Part 64.1
- An emission cap that meets the requirements specified in 40 CFR Part 70.4(b)(12)
- Acid Rain Program requirements of Title IV

Control devices equipped with continuous emissions monitors required by Ventura County APCD Rule 59, Rule 74.23, or Rule 103 are exempt from CAM under the continuous compliance determination method exemption.

Definition of Control Device

CAM requirements apply only if a control device is used to meet an applicable emission limitation or standard. 40 CFR Part 64.1 defines "control device" as:

*Equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. The types of equipment that may commonly be used as control devices include, but are not limited to, fabric filters, mechanical collectors, electrostatic precipitators, inertial separators, afterburners, thermal or catalytic incinerators, adsorption devices (such as carbon beds), condensers, scrubbers (such as wet collection and gas absorption devices), selective catalytic or non-catalytic reduction systems, flue gas recirculation systems, spray dryers, spray towers, mist eliminators, acid plants, sulfur recovery plants, injection systems (such as water, steam, ammonia, sorbent or limestone injection), and combustion devices independent of the particular process being at an emission unit (e.g., the destruction of emission achieved by venting process emission streams to flares, boilers or process heaters). For purposes of this part, a control device does not include passive control measures that act to prevent pollutant from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feed stocks, or the use of combustion or other process design features or characteristics. If an applicable requirement establishes that particular equipment which otherwise meets this definition of a control device does not constitute a control device as applied to a particular pollutant-specific emission unit, then that definition shall be binding for purposes of this part.*

Based on the above definition, a number of control devices potentially subject to CAM requirements currently operate at Part 70 permit facilities in Ventura County. These include:

- Catalytic convertors on rich burn natural gas fired engines for the control of NOx
- Water injection systems and selective catalytic reduction (SCR) systems on gas turbines
- Flue gas recirculation (FGR) systems on boilers, steam generators and process heaters
- Carbon adsorption systems
- Baghouses

CAM Plan Instructions
There are a number of air pollution control strategies in operation at Part 70 permit facilities in Ventura County that do not fit the above definition of control device. These include:

- Low NOx burners (without FGR) on boilers, steam generators and process heaters
- Lean burn technology on natural gas fired engines
- Floating roof tanks
- Low sulfur fuels
- Low vapor pressure and low ROC content requirements
- Vapor recovery systems on storage tanks that comply with Rule 71.1.B.1.a by directing all vapors to a fuel gas system, a sales gas system, or to a flare; as there is not an associated emission limitation
- Vapor recovery and disposal systems on glycol dehydrators that comply with Rule 71.5.B.1 by directing all vapors to a fuel gas system or a sales gas system, or to a flare, incinerator, thermal oxidizer, or reboiler; as there is not an associated emission limitation

**CAM Submittal Requirements**

Part 70 permit holders must submit the information required pursuant to 40 CFR Part 64.4 (Submittal Requirements), as part of their application for reissuance of a Part 70 permit. However, if a source proposes a significant permit revision under Part 70 prior to its permit expiration date, the source must submit the required CAM information as part of the application for the significant permit revision.

**What CAM Information is Required in the Reissuance Application for a Part 70 Permit?**

Part 70 permit holders subject to CAM requirements must submit specific information with their application for Part 70 permit reissuance or their application for significant permit revision. Listed below is a general summary of what information must be submitted. This information is commonly known as a “CAM Plan”. Please refer to 40 CFR Part 64.4 for a more detailed explanation.

Pursuant to 40 CFR Part 64.4, for each PSEU subject to CAM, permit holders must submit:

- Monitoring that satisfies the design requirements in 40 CFR Part 64.3. This includes the indicators of emission control device performance to be monitored along with an appropriate range for the indicator such that operation within the range provides a reasonable assurance of ongoing compliance with the emission limitation or standard
- A justification for the proposed elements of the monitoring
- Control device operating parameter data obtained during a compliance or performance test conducted under conditions specified by an applicable requirement (see 40 CFR Part 64.4(c)(1)). This data is required to help justify any of the elements of monitoring proposed (such as ranges for indicators of compliance) in the application for permit reissuance. As an example, consider a boiler equipped with a flue gas recirculation system (FGR) and subject to CAM. A source test would be necessary in establishing the monitoring approach for indicators of compliance such as fuel flow rates, boiler exhaust oxygen concentration and/or FGR damper position
• If existing data from unit specific compliance performance testing is not available, Part 70 permit holders must submit:
  
  • A test plan and schedule for obtaining such data in accordance with 40 CFR Part 64.4(e), or
  • Compliance indicator ranges that rely on engineering assessments and other data as specified in 40 CFR Part 64.4(d)(2)

What is Monitoring?

A definition for the term “monitoring” is provided in 40 CFR Part 64.1. In general, “monitoring” means any form of collecting data on a routine basis to determine or otherwise assess compliance with emission limitations or standards. Specified forms of monitoring include recordkeeping, recurring compliance source tests, continuous emissions monitoring systems (CEMS), continuous opacity monitoring systems (COMS), or other parametric monitoring procedures, including predictive emission monitoring systems (PEMS), emission calculation procedures, visible emissions observations, or any other form of measuring, recording, or verifying on a routine basis emissions, process parameters, capture system parameters, control device parameters or other factors relevant to assessing compliance with emission limitations or standards.

As detailed in 40 CFR Part 64.3 (Monitoring Design Criteria), Part 70 permit holders must design the monitoring and data acquisition to meet certain performance criteria including:

• Data must be representative of the emissions or parameters being monitored
• Verification procedures must be implemented to confirm the operational status of monitoring prior to the date at which monitoring must legally begin
• Quality assurance and control practices must be implemented to ensure the validity of all data
• The monitoring must have specifications for (1) the frequency of conducting the monitoring, (2) the data collection procedures (e.g., computerized data acquisition, alarm sensors, etc.), and, (3) if applicable, the period over which discrete data points will be averaged for the purpose of determining the occurrence of an exceedance or excursion
• The Part 70 permit holder must design the period over which data are obtained. This interval must be consistent with the period over which a change in control device performance that would require action by the owner or operator to return operations within normal ranges or designated conditions is likely to be observed. In addition, for emission units subject to CAM that have a potential to emit (with the control device installed) of equal to or greater than 100% of the amount required for a source to be classified as a major source, Part 70 permit holders must collect four or more data points equally spaced over each hour and average the values over the applicable averaging period. For other emission units, the frequency of data collection may be less than the above, but the monitoring must include some data collection (not necessarily data showing compliance with an emission limitation or standard) at least once per 24-hour period.

Note: Part 70 permit holders are encouraged to review 40 CFR Part 64.3 for further information on this subject.
Approval of Monitoring Submittal

Pursuant to 40 CFR Part 64.6, the District will approve or disapprove the monitoring submitted by Part 70 permit holders as part of their reissuance application. Approved monitoring may be conditioned to require additional data on the indicators to be monitored to confirm the ability of the monitoring to provide data that are sufficient to satisfy the requirements of Part 64 and to confirm the appropriateness of an indicator range or designated conditions proposed to satisfy 40 CFR Part 64.3. Once the monitoring is approved, the Part 70 permit will generally specify the following:

- An approved monitoring approach
- The means by which the owner or operator will define an exceedance or excursion for the purpose of responding to and reporting exceedances or excursions
- A requirement specifying the permit holder's obligation to conduct the monitoring
- If appropriate, a minimum data availability requirement for valid data collection for each averaging period

If the District disapproves the proposed monitoring, the Part 70 permit shall include:

- Monitoring that satisfies the requirements of 40 CFR Part 70.6(a)(3)(i)(B), and
- A compliance schedule for the source owner to submit monitoring that satisfies Part 64 within 180 days from the date of issuance of the permit

Operation of Approved Monitoring

If a source is subject to CAM, then the Part 70 permit holder shall:

- Commence monitoring upon reissuance of the Part 70 permit or by a later date specified in the permit
- Properly maintain the monitoring
- Keep the monitoring in operation at all times the emissions unit is operating, except for monitoring malfunctions, repairs and required quality assurance and control activities
- Restore operation of the emissions units, including the control device, as expeditiously as practical in accordance with good air pollution control practices, upon detecting an excursion or exceedance,
- Notify the District and submit a proposed revision to the Part 70 operating permit, if:
  - The owner identifies a failure to achieve compliance with an applicable standard for which the approved monitoring did not provide an indication of exceedance while providing valid data, or
  - The results of compliance or performance testing document a need to modify the existing indicator ranges.

CAM Plans Instructions (May 22, 2002)