



PART 70 PERMIT REISSUANCE APPLICATION INSTRUCTIONS

(Including Appendices A and B)

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. The requirements of a complete application are detailed in Rule 33.2. These instructions summarize the required forms, documents, and supplemental information required for a complete Title V reissuance application. A complete reissuance application will consist of the following:

1. A General Facility Information Form (**Form TVAF11**) and all required attachments. This form includes the “Certification by Responsible Official,” for the application. Explanations and definitions of line items on Form TVAF11 are included in Appendix A of these instructions.
2. The following tables from the current Part 70 permit:
 - a. Periodic Monitoring Summary (Table No. 1)
 - b. Permitted Equipment and Applicable Requirements Table (Table No. 2)
 - c. Permitted Throughput / Consumption Limit Table (Table No. 3)
 - d. Permitted Emissions Table (Table No. 4)

Include 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. Emissions Reports:
 - a. Criteria Pollutants – Provide an Equipment and Emissions Summary report available from the District that summarizes how the emissions in the Permitted Emissions Table were calculated.
 - b. Toxics – Provide 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.
 - c. Greenhouse Gases – Provide an estimate of CO₂ equivalent emissions (CO_{2e}) based on the permitted throughput / fuel consumption limits for the permit. Emission factors from the *Regulation For The Mandatory Reporting of Greenhouse Gas Emissions*, California Code of Regulations, Title 17, Subchapter 10, Article 2, Sections 95100 to 95133; Appendix A, Table 4, may be used.

4. A Compliance Plan – A Compliance Plan is a description of the compliance status of the source with respect to all applicable requirements (Rule 33.2.A.7). Submit Compliance Plan - Reissuance Form (**Form TVAF35**).
5. A Compliance Certification – A reference to the most recent Compliance Certification for the stationary source that has been submitted to District Compliance Division may be submitted. Submit Compliance Certification – Reissuance Form (**Form TVAF45**).
6. Insignificant Activities List – Provide 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.

An Insignificant Activity is defined (Rule 33.1.13) as any emissions unit that meets the following requirements:

- It is exempt from permitting requirements pursuant to District Rule 23, “Exemptions From Permit”;
- It is not subject to any source-specific federally-enforceable requirement; and
- It emits 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, except greenhouse gases.

All insignificant activities that are exempt because they fall below a certain size or production rate must be included on the insignificant activities list. A list of exemptions that depend on size or production rate is included in Appendix B of these instructions.

7. Compliance Assurance Monitoring (CAM) – See Section 17 of Reissuance Form TVAF11. CAM is a federal monitoring regulation (40 CFR Part 64). Refer to the District Part 70 permit **CAM Plan Instructions** for additional information.
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.
9. The Title V reissuance application shall be accompanied by a filing fee of \$450.00 and a deposit of \$2,000.00 (total of \$2,450.00) pursuant to Rules 42.A and 42.C. **Make all checks payable to the Ventura County APCD.** Permit processing fees (Rule 42.B) will be billed to you upon completion of the District’s review of your application.

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.

Appendix A
General Facility Information Form – Reissuance (Form AF11)
Explanations / Definitions

The General Facility Information Form – Reissuance 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 18: 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 your facility.

- Line 19: Provide proposed replicable procedures and permit terms that ensure the emission trades will be *quantifiable* and *enforceable*. This information will be used by the District to establish a federally-enforceable emission cap independent of any federally-enforceable requirement for any pollutant emitted by the stationary source.
- Line 20: 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 26: 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.).
- Line 27: Provide a brief description of the facility process *currently* in operation. Include separate descriptions for each alternative operating scenario.
- Line 28: The street map should indicate the location of the facility by presenting all adjacent streets as well as nearby major cross streets.
- Line 29: 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.
- Line 30: 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 a device, type of service that the process flow and/or pipeline represents (e.g., liquid, gas), and type of product exiting the device.
- Line 31: The name of the person's signature provided on this line *must* meet the qualifications of a "Responsible Official", as defined above. The signature must also match the person listed as the Responsible Official in Line 5.

Appendix B

VCAPCD Rule 23 Exemptions that depend on size or production rate Refer to Rule 23 for additional details

- 23.A.4 Safety (emergency) flares rated ≤ 1 MMBTU/hr used exclusively for emergency standby for the disposal of process gases in the event of unavoidable process upsets.
- 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 < 1 MMBTU/hr
- 23.C.2 Steam cleaning equipment rated < 1 MMBTU/hr
- 23.D.6 Internal combustion engines with a maximum design power rating of < 50 brake horsepower; and
Gas turbines with a rated full load output of < 0.30 megawatts (300 kilowatts) at ISO Standard Day Conditions
- 23.D.7 Emergency internal combustion engines as follows:
- Spark-ignited internal combustion engines used exclusively for the emergency pumping of water for either fire protection or flood relief. The engines may either drive pumps directly or generate electricity to drive pumps. Such engines may be operated for engine maintenance.
 - Spark-ignited emergency internal combustion engines used only when electrical power line or natural gas service fails. Such engines may be operated for engine maintenance.
 - Portable engines used for emergency purposes. An engine powering a generator connected to a facility's electrical grid in preparation for a future emergency shall not be considered a portable emergency engine.
- Engine maintenance operation is limited to 50 hours per calendar year per engine.
- 23.E.10 Equipment used for the purpose of preparing food for human consumption, except conveyORIZED charboilers and coffee roasting equipment with a maximum capacity greater than 25 pounds, in either eating establishments or retail establishments.
- 23.E.13 Coffee roasting equipment with a maximum capacity of 25 pounds or less.

- 23.F.1 Storage in or loading into any tank with a capacity ≤ 550 gallons equipped with a submerged fill 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 liquids into transportable containers.
- 23.F.10.c Cold cleaners using non-boiling solvent(s) with an initial boiling point (excluding water) greater than 150°C (302°F) having a liquid surface area of less than 1 square meter (10.8 square feet), at any stationary source where $< 1,000$ pounds of ROC are lost to the atmosphere from all such cold cleaners during every rolling period of 12 consecutive calendar months.
- 23.F.10.d Solvent cleaning operations, including cold cleaners, vapor degreasers, wipe cleaning, dip cleaning and flush cleaning, but excluding coating, graphic arts, adhesive/sealant and polyester resin operations, where < 200 pounds each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere from all such activities at the stationary source during any rolling period of 12 consecutive calendar months.
- 23.F.11.b Coating operations, other than mobile vehicle or mobile equipment coating operations, where < 200 pounds each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during every rolling period of 12 consecutive calendar months.
- 23.F.11.c Coatings used in mobile equipment 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 / sealant operations where < 200 pounds ROC each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during every rolling period of 12 consecutive calendar months.
- 23.F.13 Graphic arts operations where < 200 pounds ROC each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during every rolling period of 12 consecutive calendar months.
- 23.F.14 Polyester resin operations using < 240 gallons of polyester resin materials over a rolling period of 12 consecutive calendar months.
- 23.F.15 Other operations not listed above using organic solvents where < 200 pounds ROC each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene are lost to the atmosphere during every rolling period of 12 consecutive calendar months.

- 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 $\leq 1,000$ 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.I.13 Wax burnout kilns with an internal volume of ≤ 0.2 cubic meters (7.0 cubic feet) and a rated capacity of < 1 MMBTU/hr.
- 23.J.14 Any sterilizer or aerator where the amount of ethylene oxide charged to all sterilizers at the stationary source is ≤ 4 pounds per year.
- 23.J.16 Emission units used in agricultural operations, except where the total actual annual emissions exceed the limits specified in Rule 23.J.16.



VCAPCD PART 70 PERMIT REISSUANCE APPLICATION FORM

General Facility Information Form

Form TVAF11

1. Permit Number:

2. Company Name:

3. Company Mailing Address:

4. Company City

Company State:

Company Zip Code:

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

Name:

Title:

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

Facility State:

Facility Zip Code:

10. Title V Permit Contact Person and Title:

Name:

Title:

11. Title V Permit Contact Person Telephone Number and Email:

Telephone Number:

Email:

12. Title V Permit Contact Street Address:

13. Title V Permit Contact City:

Title V Permit Contact State:

Title V Permit Contact Zip Code:

DISTRICT USE ONLY

Amount Paid: \$ _____

Date Received: _____

Receipt No. _____

14. Type of Organization:

<input type="checkbox"/> Corporation	<input type="checkbox"/> Sole Proprietorship
<input type="checkbox"/> Partnership	<input type="checkbox"/> Government

15. Facility Operating Schedule: ___ Hours/Day ___ Days/Week ___ Weeks/Year

16. Facility SIC Code:

CAM (Compliance Assurance Monitoring) Plans

17. Does the current Part 70 Permit for this facility include any CAM Plan(s) as required by 40 CFR Part 64?
Yes No

If yes, list the emissions unit(s) that are required to comply with CAM

If yes, are there any proposed changes to the CAM Plan(s)? Yes No

Provide details of any changes to the CAM Plan(s) as necessary. See the District CAM Plan Instructions for more detail.

Alternative Scenarios – If you answer “yes” to any questions 18 through 20 below, submit supplemental information as an attachment to the application. See instructions for more detail.

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

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

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

Miscellaneous Federal Requirements

21. 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.

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

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

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

Permit Shields

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

If yes, list the emissions unit(s) with shields and the regulation they are shielded from _____

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.

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

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

27. Facility Process Description

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

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

30. A Process Flow Diagram That Traces the Processes Throughout All Permitted Equipment from Start to Finish.

31. 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 of Responsible Official:	Date:
<small>Please use the Adobe Fill & Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	
Title of Responsible Official:	

Ventura County Air Pollution Control District
PART 70 PERMIT APPLICATION FORM
Compliance Plan - Reissuance
Form TVAF35

A Compliance Plan is a description of the compliance status of the source with respect to all applicable requirements. See Rule 33.2.A.7 for further information. Review the current Part 70 Permit Table 1, "Periodic Monitoring Summary" and Table 2, "Permitted Equipment and Applicable Requirements." These requirements include all applicable VCAPCD Rules (specific and general), California ARB ATCMs, and/or federal NSPS or NESHAP regulations. As directed in the Reissuance Instructions, provide changes to these tables as necessary.

1. Current Requirements: Is the source operating in compliance with all applicable requirements as listed and/or referenced in the current Part 70 Permit Table 1 and Table 2?
- Yes No

Will the stationary source continue to comply with all applicable requirements as listed and/or referenced in the current Part 70 Permit Table 1 and Table 2?

- Yes No

2. Requirements with a future effective date : Are there any applicable requirements that will become effective during the Part 70 Permit five year term?
- Yes No

If yes, provide a narrative of such requirement(s) and a statement that the source will meet such requirements on a timely basis.

3. Current Requirements - not in compliance:
 Are there any applicable requirements for which the stationary source is not operating in compliance?
- Yes No

If yes, provide a narrative description of the compliance status and how compliance will be achieved.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this Compliance Plan (with references to the current Part 70 Permit Tables 1 and 2) are true, accurate, and complete.

Signature of Responsible Official:	Date:
<small>Please use the Adobe Fill & Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	
Title of Responsible Official:	

Ventura County Air Pollution Control District
PART 70 PERMIT APPLICATION FORM
Compliance Certification - Reissuance
Form TVAF45

A Compliance Certification shall identify each applicable requirement or condition of the Part 70 Permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, and the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. (Rule 33.9.B)

A reference to a Compliance Certification that has been submitted to the District Compliance Division no more than 18 months prior and no less than 6 months prior to the expiration date of the current permit may be submitted to fulfill this requirement.

- This application references the most recent Compliance Certification for the stationary source that was submitted to the VCAPCD Compliance Division. The most recent Compliance Certification was submitted on:

____ / ____ / _____ (Most recent Compliance Certification submittal date)

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this Compliance Certification Cover Sheet are true, accurate, and complete.

Signature of Responsible Official:	Date:
<small>Please use the Adobe Fill & Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	
Title of Responsible Official:	