



BUREAU OF AIR QUALITY TITLE V ANNUAL COMPLIANCE CERTIFICATION

A. GENERAL INFORMATION	
1. Identifying Information	
Source or Company Name	ABC Company
Mailing address: Street or P.O. Box	123 Compliance Lane
City	Columbia
State	SC
ZIP	29201
Contact Person	Farklin Eyre
Title	Environmental Coordinator
Telephone	803-123-4567
Extension	1111
Fax	803-123-4568
Part 70 Permit Number	1910-0006
2. Reporting Period	
Period Beginning to Period Ending	4/1/02-3/31/03

B. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS	
1. Responsible Official	
Last Name	Smith
First Name	Mary
Middle Name	Jane
Title	President
Street or P.O. Box	P.O. Box 2600
City	Columbia
State	SC
ZIP	29201
Telephone	803-954-1356
Extension	100
Fax	803-954-1357
2. Certification of Truth, Accuracy and Completeness	
I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.	
Name (signed)	<i>Mary J. Smith</i>
Name (printed or typed)	Mary J. Smith
Date	5/1/03

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION & METHODS USED TO DETERMINE COMPLIANCE

Use the table below to indicate the compliance status of each permit term or condition and the methods used to determine compliance. Copy this page as many times as needed to cover all permit terms or conditions.

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 1.0, Sections A-D (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 2.0 (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 3.0, Sections A-C (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 3.0, Section D	Facility Wide		X	A check for permit fees was mailed to the Department on 8/15/02. The certified mail receipt was received by ABC Company indicating the Department received the check on 8/17/02.
Part 3.0, Section E	Facility Wide		X	The Department did not make any requests for submittal of information beyond what was required by the permit during this reporting period.
Part 3.0, Sections F-H (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 3.0, Section I	Facility Wide		X	Record review.
Part 3.0, Sections J-K (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 3.0, Section L	Facility Wide		X	Record review.
Part 3.0, Sections M-P (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 3.0, Section Q	Facility Wide		X	Department representatives are allowed access to the premises at all times. The District EQC office conducted an inspection of the facility on 11/18/02.
Part 3.0, Section R	Facility Wide	X		Record review.
Part 3.0, Section S	Facility Wide		X	This facility was not required to submit a compliance schedule during this reporting period.
Part 3.0, Section T (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 3.0, Section U	Facility Wide		X	This facility provided the EPA and the Department with written notification as required by SC Regulation 61-62.70.7(e)(5) of the 502(b)(10) change for construction permit 1910-0006-CC on 3/1/03.
Part 4.0, Section A, Table 4.1, Row 1	Facility Wide	X		Record review.
Part 4.0, Section A, Table 4.1, Row 2	Facility Wide		X	Review of consumption records.
Part 4.0, Section A, Table 4.1, Row 3	Facility Wide		X	Record review.
Part 4.0, Section A, Table 4.1, Row 4	Facility Wide		X	Record review.
Part 4.0, Section A, Table 4.1, Row 5	Facility Wide		X	Record review.
Part 4.0, Section A, Table 4.1, Row 6	Facility Wide		X	Record review.
Part 4.0, Section A, Table 4.1, Row 7	Facility Wide		X	Record review.

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Part 4.0, Section A, Table 4.1, Row 8	Facility Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.1	Facility Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.2	Facility Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.3	Facility Wide	X		Record review.
Part 4.0, Section B, Condition 4.B.4	Facility Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.5	Facility Wide	X		Record review.
Part 4.0, Section B, Condition 4.B.6	Facility Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.7	Facility Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.8	Facility-Wide		X	Record review.
Part 4.0, Section B, Condition 4.B.9	Facility Wide		X	Review of consumption records.
Part 5.0, Sections A-C (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Part 5.0, Section D, Table 5.12, Row 1	01-02		X	Based on the Method 24 results for these units conducted on 8/24/02.
Part 5.0, Section D, Table 5.12, Row 1	03	X		Based on the Method 24 results for these units conducted on 8/24/02.
Part 5.0, Section D, Table 5.12, Row 2	01-03		X	Based on Method 9 visible emissions observations conducted by the District EQC office on 2/19/03.
Part 5.0, Section D, Table 5.12, Row 3	04		X	Review of CEM records.
Part 5.0, Section D, Table 5.12, Row 4	04		X	Based on the annual stack test conducted 6/1/02 using Reference Method 5 as required in condition 6.B.5.
Part 5.0, Section D, Table 5.12, Row 5	04		X	Review of CEM records.
Part 5.0, Section D, Table 5.12, Row 6	04		X	Based on COM data and Reference Method 9 readings.
Part 5.0, Section E, Condition 5.E.1	01-03		X	A review of records indicated that units 01-03 burned only natural gas as fuel during this reporting period.
Part 5.0, Section E, Condition 5.E.2	01-03		X	Based on Method 9 visible emissions observations conducted by the District EQC office on 2/19/03.
Part 5.0, Section E, Condition 5.E.3	01-02		X	Based on the Method 24 results for these units conducted on 8/24/02.
Part 5.0, Section E, Condition 5.E.3	03	X		Based on the Method 24 results for these units conducted on 8/24/02.
Part 5.0, Section E, Condition 5.E.4	04		X	Based on COM data and Reference Method 9 readings.
Part 6.0, Section A, Table 6.1, Row 1	01-03		X	Monthly records of the operating hours of the drying ovens were maintained. A twelve month rolling sum was calculated for the operating hours. Quarterly reports of the operating hours were submitted to the Department on 7/15/02, 10/15/02, 1/15/03, and 4/15/03.
Part 6.0, Section A, Table 6.1, Row 2	Facility Wide		X	Monthly consumption records of materials containing VOCs & HAPs were maintained. VOC and HAP emissions were calculated on a monthly basis and a twelve month rolling sum was calculated for total VOC and HAP emissions. Quarterly reports of VOC & HAP emissions were submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 6.0, Section A, Table 6.1, Row 3	01-03		X	Monthly records of natural gas consumption were maintained. An annual report was submitted to the Department on 4/15/03.
Part 6.0, Section A, Table 6.1, Row 4	01-03		X	Daily visual inspections were conducted for monitoring opacity limits. The results of these observations were recorded in a log and an annual report of these records was submitted to the Department on 4/15/03.
Part 6.0, Section A, Table 6.1, Row 5	04		X	A source test was conducted for PM as specified in conditions 6.B.5, 6.B.6, 6.B.7, and 6.B.8.
Part 6.0, Section A, Table 6.1, Row 6	04		X	A CEM was used to continuously monitor SO ₂ . Quarterly reports indicating the 24 hour block average sulfur emission rates in lb/mmBTU were submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.
Part 6.0, Section A, Table 6.1, Row 7	04		X	A COM was used to continuously monitor opacity. Quarterly reports indicating integrated six minute opacity readings were submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.
Part 6.0, Section A, Table 6.1, Row 8	04		X	Monitoring & reporting for SO ₂ , NO _x , CO ₂ , and heat input was conducted as specified in condition 6.B.13.
Part 6.0, Section B, Condition 6.B.1	Facility Wide		X	Monthly consumption records of materials containing VOCs & HAPs were maintained. VOC and HAP emissions were calculated on a monthly basis and a twelve month rolling sum was calculated for total VOC and HAP emissions. Quarterly reports of VOC & HAP emissions were submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.
Part 6.0, Section B, Condition 6.B.2	01-03		X	Monthly records of the operating hours of the drying ovens were maintained. A twelve month rolling sum was calculated for the operating hours. Quarterly reports of the operating hours were submitted to the Department on 7/15/02, 10/15/02, 1/15/03, and 4/15/03.
Part 6.0, Section B, Condition 6.B.3	01-03		X	Monthly records of natural gas consumption were maintained. An annual report was submitted to the Department on 4/15/03.
Part 6.0, Section B, Condition 6.B.4	01-03		X	Daily qualitative visual observations during daylight hours were conducted for monitoring opacity limits during periods of source operation. The results of these observations were recorded in a log and an annual report of these records was submitted to the Department on 4/15/03.
Part 6.0, Section B, Condition 6.B.5	04		X	A source test for PM was conducted June 1, 2002. The source test was conducted in accordance with SC Regulation 62.1, Section IV – “Source Tests”, and applicable Federal requirements. EPA Reference Method 5 was used to determine particulate emissions. The source test report was submitted to the Department on June 23, 2002.
Part 6.0, Section B, Condition 6.B.6	04		X	A COM was used to continuously monitor the three hour block average opacity value for PM.
Part 6.0, Section B, Condition 6.B.7	04		X	The Department was notified of the source test by letter dated April 30, 2002.
Part 6.0, Section B, Condition 6.B.8 (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A

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Part 6.0, Section B, Condition 6.B.9	04		X	Quarterly CEM reports including the 24 hour block average sulfur emission rates in lb/mmBTU, using unbiased data collected from the 40 CFR Part 75 acid rain CEMS were submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.
Part 6.0, Section B, Condition 6.B.10	04		X	EPA Reference Method 9 for opacity was conducted concurrently with required PM emissions testing. The results were submitted to the Department on June 23, 2002.
Part 6.0, Section B, Condition 6.B.11	04		X	Quarterly COM reports containing the information required in condition 6.B.11 were submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.
Part 6.0, Section B, Condition 6.B.12	04		X	Record review.
Part 6.0, Section B, Condition 6.B.13	04		X	Record review.
Part 7.0, Section A	Facility Wide		X	No specific conditions defined.
Part 7.0, Section B	Facility Wide		X	No operating scenarios defined.
Part 7.0, Section C	Facility Wide		X	No compliance schedule defined.
Part 7.0, Section D (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Attachment A (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Attachment B (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Attachment C (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Attachment D	04	X		Review of records indicated the facility submitted a Title IV Certification to the US EPA on 2/15/03. The certification indicated that the facility is meeting the requirements of its compliance plan.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Page 1, Condition 1. (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Page 1, Condition 2.	CC – drying oven #4		X	A notice of construction was submitted to the Department on November 1, 2002. A notice of startup was submitted to the Department along with a 502(b)(10) change on 3/1/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Page 1, Condition 3. (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Page 1, Condition 4. (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part I, Section A (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section A, Row 1	CC – drying oven #4		X	Based on the Method 24 results for these units conducted on 3/20/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section A, Row 2	CC – drying oven #4		X	Not required to conduct Method 9 observations but no evidence of excess emissions.

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		Intermittent Compliance	Continuous Compliance	
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section B (<i>No continuous monitoring requirements defined</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section C (<i>No source test schedule defined</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 1.	CC – drying oven #4		X	A check for permit fees was mailed to the Department on 8/15/02. The certified mail receipt was received by ABC Company indicating the Department received the check on 8/17/02.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 2.	CC – drying oven #4		X	Record Review.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 3.	CC – drying oven #4		X	Record Review.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 4. (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 5.	CC – drying oven #4		X	Record review.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 6.	CC – drying oven #4		X	A written request to operate was submitted to the Department along with a 502(b)(10) change on 3/1/03. Actual date of startup was 3/15/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 7.	CC – drying oven #4		X	Record review.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 8.	CC – drying oven #4		X	Not required to conduct Method 9 observations but no evidence of excess emissions.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 9.	CC – drying oven #4		X	Based on the Method 24 results for this unit conducted on 3/20/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 10.	CC – drying oven #4		X	Monthly consumption records of materials containing VOCs & HAPs were maintained. VOC and HAP emissions were calculated on a monthly basis and a twelve month rolling sum was calculated for total VOC and HAP emissions. A quarterly report of VOC & HAP emissions was submitted to the Department on 4/15/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 11.	CC – drying oven #4		X	Monthly records of the operating hours of the drying oven were maintained. A twelve month rolling sum was calculated for the operating hours. A quarterly report of the operating hours was submitted to the Department on 4/15/03.

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 12.	CC – drying oven #4		X	Monthly records of natural gas consumption were maintained. An annual report was submitted to the Department on 4/15/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03 Part II, Section D, Condition 13.	CC – drying oven #4		X	Daily qualitative visual observations during daylight hours were conducted for monitoring opacity limits during periods of source operation. The results of these observations were recorded in a log and an annual report of these records was submitted to the Department on 4/15/03.
Construction permit 1910-0006-CC 502(b)(10) change dated 3/15/03, Attachment A (<i>Informational term or condition</i>)	N/A	N/A	N/A	N/A

EXAMPLE

D. DEVIATIONS FROM PERMIT TERMS OR CONDITIONS

Use the table below to report deviations from permit terms or conditions. Copy this page as many times as needed to include all deviations. Periodic reports previously submitted to the Department identifying deviations may be cross-referenced provided the report includes all the information listed in the table below.

Specific Permit Condition #	Emissions Unit ID #	Description of each deviation from the conditions of the permit AND the submittal date of any report being cross-referenced	Basis for the determination of the deviation	All dates and times of deviations	Identification of the probable cause for the deviation AND any corrective action or preventative measures taken
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Specific Permit Condition #	Emissions Unit ID #	Description of each deviation from the conditions of the permit AND the submittal date of any report being cross-referenced	Basis for the determination of the deviation	All dates and times of deviations	Identification of the probable cause for the deviation AND any corrective action or preventative measures taken
Part 3.0, Section R.	01-04	The first quarterly reports required by conditions 6.B.1, 6.B.2, 6.B.9 and 6.B.11 were submitted to the Department on 7/15/02. These reports were not certified by the responsible official.	Record review	7/15/02-7/19/02	This was an oversight. These reports were resubmitted on 7/19/02 with a certification by the responsible official. No reports are submitted without without responsible official approval.
Part 3.0, Section R.	04	A source test was performed according to EPA reference method 5. The preliminary test conducted on 5/25/02 before the actual compliance test showed that the facility was out of compliance with the particulate matter limit. (Note: This is an example of "credible evidence.")	Source test results	5/25/02-6/1/02	Field four in the ESP failed due to a bad rectifier. Rectifier was replaced on 5/27/02. Compliance test conducted 6/1/02. Increased inspection frequencies for the ESP.
Part 4.0, Section A, Table 4.1, Row 1 and Part 4.0, Section B, Condition 4.B.3	04	An in house source test was performed according to EPA reference method 6. The test conducted on 5/25/02 indicated SO2 emissions of 15,000 lbs/hr which exceeded the modeled emissions limit.	Source test results	5/25/02-9/15/02	Remodeled emissions and determined Standard 2 was not violated. Petitioned the Department to increase the SO ₂ limit in Attachment A.
Part 4.0, Section B, Condition 4.B.5	01	Raw material metering valve failed which caused the drying oven to become overloaded. This resulted in excessive visual emissions which were not reported to the EQC District office within 24 hours.	Observed failed metering valve during a shift inspection.	10/31/02-12/1/02	Metering valve degradation due to age Replaced metering valve on 12/1/02. The shift supervisor was not aware of the notification requirement. Informed staff about notification requirements.
Part 5.0, Section D, Row 1 and Part 5.0, Section E, Condition 5.E.3	03	Based on the Method 24 results conducted on 8/24/02 for this unit, VOCs were more than 2.9 lbs/gallon of coating used excluding water and exempt solvent for one batch of coating.	Method 24 results	8/24/02-9/24/02	Purchased coatings with higher VOC content than the specifications allowed. Changed suppliers and started using compliant coatings on 9/25/02. Implemented audit program.
Part 6.0, Section B, Condition 6.B.11	04	Opacity exceedances that occurred during startup/shutdown. Please reference the quarterly reports submitted to the Department on 7/15/02, 10/15/02, 1/15/02, and 4/15/03.	<i>[Per Instructions for Completing Form DHEC 3650 (Rev. 06/03) you do not have to complete columns four through six of the table in section D for a particular deviation if you properly cross-reference the deviation in columns one through three, and the original report adequately identified the information required in the table.]</i>		

Specific Permit Condition #	Emissions Unit ID #	Description of each deviation from the conditions of the permit AND the submittal date of any report being cross-referenced	Basis for the determination of the deviation	All dates and times of deviations	Identification of the probable cause for the deviation AND any corrective action or preventative measures taken
Attachment D	04	Failed to submit a copy of the Title IV Certification to the Department as required by SC Regulation 62.72.90(a)	Record review	3/2/03-4/15/03	We were not aware this was a requirement. It was discovered while reviewing the acid rain regulations. A copy was submitted to the Department on 4/15/03. Inform staff about acid rain requirements.

example