Instructions for Completing the Title V Annual Compliance Certification

General Information and Instructions

All facilities that have been issued a Title V permit are required to provide an annual certification of compliance with the terms and conditions in their Title V permit. Starting with the Title V Annual Compliance Certification (ACC) for 2003, Title V facilities are required to certify compliance with each permit term and condition individually. "Permit terms and conditions" include emissions limitations, control equipment requirements, work practice standards, monitoring, recordkeeping, reporting, and any other obligation of the source contained in the permit. Facilities are no longer allowed to make a general compliance certification with the entire permit and provide only information on deviations.

In order to ensure adequate and consistent certifications, the Environmental Protection Division has prepared a three-part form. The use of the Division's three-part form is highly recommended. If you choose to create your own forms, please read these instructions and review the Division's forms to be sure you include all of the required information. ACC submissions that do not contain the minimum information requested in the Georgia forms may not comply with Title V reporting requirements and may result in enforcement action.

The Permittee must report all deviations that occurred during the calendar year in the ACC. Deviations specifically identified in previously (or concurrently) submitted reports do not have to be described in detail in the ACC. However, any deviation not previously reported during the reporting year must be described in detail in the ACC on the Part 3 form. Deviations occur when any permit term or condition is not met, including, but not limited to, terms that establish emission limitations, emission standards, control equipment requirements, work practices, and parameter ranges, and permit terms designed to assure compliance with other permit terms (such as monitoring, recordkeeping, and reporting required by the permit). You must include deviations from permit terms that occur during startup, shutdown, malfunction, and upset conditions (as these terms are defined in the permit) whether excused by the permit or not. Note that an emergency is also considered a deviation subject to prompt reporting requirements, and thus, emergencies must also be included. A deviation is not necessarily a violation. The Division or possibly the US EPA will determine violations.

Currently, the Division cannot accept electronic submission of the ACC. However, electronic version of the forms, instructions, and examples are provided on the EPD web site (https://epd.georgia.gov/forms-permits/air-protection-branch-forms-permits/compliance-reporting/submit-title-v-annual). The ACC must be submitted to both the Georgia Environmental Protection Division (the permitting authority) and the US EPA Region 4 office. The Division's copy should be sent to the Air Protection Branch if an associate of the Air Protection Branch inspects your Facility. If a District Office inspects your Facility, please send the ACC to that Office (addresses are listed below). ACC submittals must be postmarked no later than February 28 of each year. ACC submittals postmarked after the applicable date are considered late and may result in enforcement action.

Georgia EPD
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354

Georgia EPD
Mountain District Office – Cartersville
P. O. Box 3250, 16 Center Road
Cartersville, GA 30120

Enforcement and Compliance Assurance Division
Air Enforcement Branch
U. S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Information submitted in the ACC will, upon request, be made available to the public for inspection and copying. If you wish to request confidential treatment for business information, such information should be submitted separately to the permitting authority along with a claim of confidentiality, as governed by 40 CFR 2, Subpart B. Note that the Part 2 regulations generally do not allow emissions information or information used for compliance purposes to be granted confidential treatment.

You must retain records and other support material used in the preparation of this compliance certification for a period of at least 5 years from the date you submit the certification to the Division.

PART 1 – FACILITY INFORMATION AND CERTIFICATION

The Part 1 form serves as the cover letter for the Annual Compliance Certification (ACC) and as such includes facility identification and contact information. The Responsible Official certifies the truth, accuracy, and completeness of the entire ACC (including attachments) in the space provided. Specific guidelines for each data element are described below.

Period Covered by Report	Normally this period is from January 1 through December 31 of the reporting year. If the initial or renewal Title V permit was issued during the year being reported, the period covered starts on the permit effective date.
Facility Name	Name printed on the cover of the Title V permit.
AIRS Number	The AIRS number is a unique identification number that includes the EPA Region identifier (04), the state code (13), the three-digit county code and the five-digit facility number. Only report the county code and facility number. The AIRS number may be extracted from the permit number. As an example, in Title V Permit 2345-**151-0069**-V-01-0, 151 is the county code and 00069 is the facility number. The AIRS number is **151-<u>0</u>0069**. Note that an extra zero is added to the facility number.
Facility Physical Address, City, Zip	This is the physical (street) address for the facility. No post office box addresses are allowed.
Facility Mailing Address, City, Zip	This is the mailing address where the facility receives its mail.

Responsible Official

Requirements for Responsible Officials are specified in 40 CFR 70.2, and are generally summarized as:

- For a Corporation:
  - Corporate Officer,
  - Other person in charge of a principal business function, or
  - Duly authorized representative responsible for overall operation of a source (e.g., plant manager) if either:
    - At least 250 persons employed or $25 million in sales or expenditures, or
    - Delegation of authority is approved in advance by the Division.

- For a partnership: a general partner.

- For a sole proprietorship: the proprietor.

- For a government agency:
  - Principal executive officer or
  - Ranking elected official.

Environmental Contact

The environmental contact person should be a person familiar with the day-to-day operation of the facility and should be available to be contacted by the Division.

Permit and Amendment Number(s)

Enter the permit numbers for all Title V permits, amendments, and other permit changes enforceable during the reporting period. Pressing the enter key after each permit/amendment will cause the box to expand to accept additional lines of information in the Microsoft Word version.

Permit and Amendment Effective Date(s)

Enter the permit/amendment effective date for each permit/amendment. Other enforceable permit changes are reported by the effective date of the change.

Certification Signature

The Responsible Official must sign the truth, accuracy, and completeness statement. This should be done after all forms are complete and the responsible official has reviewed the information.

Number of pages attached

This is the total number of pages including all forms and other attachments.

PART 2 – COMPLIANCE STATUS

The facility reports the compliance status for each applicable requirement in the facility's Title V permit(s). The compliance status for each permit condition includes a description of the monitoring method and identification of all deviations from the permit condition. Specific guidance for each information block is described below.

Facility Name Same as that reported in Part 1.

AIRS Number Same as that reported in Part 1.

Reporting Period Same as that reported in Part 1.

Permit Number and Condition Number There is no need to summarize the permit condition or attempt to duplicate the permit condition wording in the forms. Permit conditions are reported in a two-part format. The first part identifies the permit document by using the last four characters of the Title V permit number (e.g., V-01-0). The second part of the permit condition identifier is the permit condition number (e.g., 3.3.3). Each separately numbered condition of the permit must be certified individually. Permit section headings (2-digit paragraph numbers – e.g., 3.3) do not need to be listed. The certification for a permit condition must address the compliance status of all requirements in the condition being addressed. An example of how to enter the permit number and condition number is show in Example 1.

Example 1:

Permit Number & Condition Number	Compliance Status	Monitoring Method	Identification of Deviations		
			Previously Reported	Not Previously Reported	Total
V-01-0 3.3.3	☒Continuous ☐Intermittent ☐Not Applicable	RR	0	0	0

Compliance Status	Check the box that summarizes the facility's compliance status for the permit condition for the entire reporting period. The guidance in Table 1 should be used in assigning compliance status for a permit condition. "Continuous compliance" means collection of all monitoring data required by the permit under the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations, except for malfunctions during which compliance is not required. Monitoring data includes information from instrumental (e.g., CERMS, COMS, or parameter monitors) and non-instrumental (e.g., visual observations, inspection, recordkeeping) forms of monitoring. "Intermittent compliance" means any form of compliance other than continuous compliance. "Not applicable" applies to permit conditions that were not enforceable during the reporting year, do not apply to operations at the facility, or do not contain an applicable requirement.

Table 1 Compliance Status Determination Table

Source Meets Required Monitoring Frequency	Data Collected Meets Regulatory Requirement	Compliance Status for Permit Condition
YES	YES	Continuous
NO	YES/NO	Intermittent
YES	NO	Intermittent
Permit condition revoked, not applicable to operations at the facility, or does not contain an applicable requirement.	Not Applicable	

Example 2:

Permit condition 3.3.23 states that "The Permittee shall not combust in boiler B01, fuel oil the sulfur content of which is greater than 0.5 percent sulfur, by weight. All fuel oil burned shall meet the specifications of #1 or #2 fuel oil as defined by ASTM D396."
Compliance is monitored by permit condition 5.2.7 which requires "The Permittee shall obtain and maintain fuel receipts from the fuel supplier which certify that the oil fired in boiler B01 is #1 or #2 fuel oil as defined by ASTM D396."

The Permittee received an appropriately annotated fuel oil receipt with each delivery. The certification for permit condition 3.3.23 would look as follows:

Permit Number & Condition Number	Compliance Status	Monitoring Method	Identification of Deviations		
			Previously Reported	Not Previously Reported	Total
V-01-0 3.3.23	☒Continuous ☐Intermittent ☐Not Applicable	RR (5.2.7)	0	0	0

Example 3:
Permit condition 3.4.2 states that "The Permittee shall limit particulate emissions from cutting operations (Source Nos. CM1, CM2, and CM3) using the following equations:
[391-3-1-.02(2)(e)]

a. $\mathbf{E} = 4.1\mathbf{P}^{0.67}$, for process input weight rate up to and including 30 tons per hour
b. $\mathbf{E} = 55\mathbf{P}^{0.11} - 40$, for process weight rate above 30 tons per hour

Where,
E = emission rate in pounds per hour,
P = process input weight rate in tons per hour."

Compliance is monitored by condition 5.2.2 which states that "The Permittee shall on a weekly basis, perform an inspection of each baghouse (Air Pollution Control Device ID Nos. BH1, BH2, and BH3). The Permittee shall maintain records of each inspection. Any indication of improper operation of the baghouse cleaning systems and/or the need for any maintenance on the cleaning system shall be recorded in the maintenance log along with a description of any corrective action taken and the time to complete the action. These records shall be kept in a form suitable for inspection or submittal to the Division."

No inspection was made during the week the environmental coordinator was on vacation. The deviation was properly reported in the first semiannual compliance report, submitted 7/22/20. The certification for condition 5.2.2 should look as follows:

Permit Number & Condition Number	Compliance Status	Monitoring Method	Identification of Deviations		
			Previously Reported	Not Previously Reported	Total
V-01-0 5.2.2	☐ Continuous ☒ Intermittent ☐ Not Applicable	IN&RR	7/22/20 - 1	0	1

Example 4:
Permit condition 8.25.1 states that "The Permittee shall ensure that each storage tank subject to the requirements of Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.
[391-3-1-.02(2)(vv)(1)]"

The Permittee does not own or operate any storage tanks. The certification for condition 8.25.1 should look as follows:

Permit Number & Condition Number	Compliance Status	Monitoring Method	Identification of Deviations		
			Previously Reported	Not Previously Reported	Total
V-01-0 8.25.1	☐ Continuous ☐ Intermittent ☒ Not Applicable	No storage tanks			

Monitoring Method The Division has developed a list of monitoring codes (see Table 2, below) for your convenience. The use of the monitoring codes in Table 2 will simplify the Division's review and minimize follow-up requests from the Division to define non-standard monitoring codes. The regulated community can use other monitoring codes if the codes are explained, preferably at the end of the Part 2 form.

Table 2 Monitoring Code Table

Monitoring Code	Short Description	Included/Example Activities
RR	Recordkeeping Requirement	- By-delivery fuel certification - Track pollutant (e.g., VOC) content - Calculate rolling emissions total
ST	Stack Testing	- Testing using EPA approved method
CEMS	Continuous Emission Monitoring System	- Continuous emissions monitoring systems.
COMS	Continuous Opacity Monitoring System	- Continuous opacity monitoring systems.
VE	Visible Emissions Monitoring	- Daily visible emissions check - Periodic Method 9 observation
PMS	Parametric Monitoring System	- Record thermal oxidizer operating temperature - Record baghouse pressure drop - Record scrubbant flow rate and pH
OMP	Operations and Maintenance Plan	- Operate equipment in accordance with Manufacturer's recommendation - Periodic replacement of paint booth filters
IN	Inspection	- Periodic inspection of work practices
PEMS	Predictive Emissions Monitoring System	- Predictive NO_x monitor

CERMS	Continuous Emission Rate Monitoring System	- Sulfuric acid plants
BMP	Best Management Practice	- Practices generally recognized as "good operational practice "or published as "best management practice."

Identification of Deviations

Cross-referencing of previously reported deviations is also allowed. Cross-referencing a previously reported deviation only requires you to identify the number of separate deviations and the submittal date of the report. "Previously Reported" deviations include the date of the report containing the deviation report and the number of deviations reported (e.g., 7/16/20 – 5, or 1st Semiannual Report 2020 submitted Jul 16, 2020 – 5 Deviations, or Jan-Jun 2020 Report submitted 7/16/20 – 5 Devs). "Not Previously Reported" includes only the number of deviations that have not been previously reported and includes only the number of deviations reported on the Part 3 form. "Total" is the sum of the deviations that have been previously reported and those deviations that have not been previously reported. A continuous deviation, attributable to the same circumstances, may be reported as a "single deviation" so long as the basis of deviation provides sufficient detail.

Example 5:
For permit condition 3.3.7, the Permittee experienced 4 deviations in the first semiannual reporting period, which was reported 7/25/20 and 2 deviations in the second semiannual reporting period, which was reported 1/22/21. Recordkeeping, required by condition 5.2.3, is used to monitor compliance. The certification for condition 3.3.7 should look as follows:

Permit Number & Condition Number	Compliance Status	Monitoring Method	Identification of Deviations		
			Previously Reported	Not Previously Reported	Total
V-01-0 3.3.7	☐ Continuous ☒ Intermittent ☐ Not Applicable	RR (5.2.3)	7/25/20 – 4 1/22/21 - 2	0	6

Part 3 – DEVIATION REPORT

The facility must report details of deviations identified in Part 2 that have not been previously reported. If the facility did not experience any deviations during the entire reporting period or all deviations were properly reported, the Part 3 form does not need to be submitted. For the purposes of ACC reporting, "properly reported deviations" are those deviations reported in a periodic (semiannual or quarterly) compliance report required by the Title V permit. Deviations reported in prompt deviation reports (usually condition 6.1.2) may also be referenced. Each deviation should be individually addressed on a separate line. A continuous deviation attributable to the same circumstances may be combined into a single line. Information may be cross-referenced when a single event/circumstance causes deviation of multiple permit conditions. Specific guidelines for each type of information are described below.

Facility Name	Same as that reported in Part 1
AIRS Number	Same as that reported in Part 1
Reporting Period	Same as that reported in Part 1
Permit Number and Condition Number	Permit conditions are reported in a two-part format. The first part identifies the permit document by using the last four characters of the Title V permit number (e.g., V-01-0). The second part of the permit condition identifier is the permit condition number (e.g., 3.3.3). Each separately numbered condition of the permit must be certified individually. Permit section headings (2-digit paragraph numbers – e.g., 3.3) do not need to be listed. The certification for a permit condition must address the compliance status of all requirements in the condition being addressed.
Deviation Number	The facility generates a numbering system that assists the compliance engineer in determining that all deviations are addressed.
Deviation Start/End	Enter the date and time that each event starts and ends. Multiple deviations covered on the same line will identify the time period from the start of the first deviation to the end of the last deviation.
Emission Unit(s)	Identify emission unit(s) associated with the deviation.
Basis of Deviation	Describe why the event/data is a deviation from the permit condition.
Cause and Corrective Action	Describe the cause of the deviation, all actions taken to correct the deviation and prevent future occurrences, and how compliance was determined.

Example 6:
The Permittee submitted their 2019 ACC on March 5, 2020, in violation of condition 8.14.1, which requires the ACC to be "postmarked no later than February 28 of each year." Additionally, permit condition 6.1.3 requires the permittee to report any failure to meet or comply with a "requirement not otherwise reported in accordance with conditions 6.1.2 or 6.1.4." The permittee did not report the deviation in their first semiannual compliance report. The Part 3 certification for the late ACC submittal should look as follows:

Permit Number & Condition Number	Deviation Number	Deviation		Emission Unit(s)
		Start – Date & Time	End – Date & Time	
V-01-0 8.14.1 and 6.1.3	1	2/28/20 - 0001	3/5/20 - 1600	Facility

Basis of Deviation	Cause and Corrective Action
The ACC for this facility was submitted March 5, 2020. Condition 8.14.1, which requires the ACC to be "postmarked no later than February 28 of each year." Additionally, permit condition 6.1.3 requires the late ACC be reported. This deviation was not reported in a semiannual compliance report.	The new line-by-line ACC reporting and the electronic format took much longer to prepare than was expected due to the use of an old computer and insufficient computer training. We now have a good computer for preparing the ACC and our environmental coordinator has taken software training that should prevent a recurrence of this problem in the future.

Form Specific Software Features and Limitations
The ACC forms are available in three software formats: Adobe Acrobat, Microsoft Excel, and Microsoft Word.

Adobe Acrobat Comments
The three ACC forms in Adobe Acrobat format are saved as individual computer files. The forms in Adobe Acrobat are protected from change and will require multiple copies of the forms to address all permit terms and conditions (Part 2 Form) and potentially all deviations (Part 3 Form). Additionally, the data entry fields do not expand, but accept all text typed in the data field. Only text that fits inside the data entry field is displayed.

Microsoft Word Comments
The three-part ACC form in the MS Word format is provided as a single file. The forms contain "form fields" such that when the forms are protected, the user can only move to data entry fields and cannot change the basic structure of the form.

This file is protected that allows the user to protect and unprotect the forms without entered data being lost. The table cells will expand to accept all text typed into the cell. The Part 2 form will need to have additional lines added to accommodate all permit terms and conditions. To add lines to a form, the form must be unprotected. To unprotect the form, in the Review tab, click the Restrict Editing icon. Click the Stop Protection button at the bottom of the page. Highlight the appropriate number of rows, copy the rows, highlight the row above which the rows will be pasted, and paste rows. Re-protect the forms by ensuring that the Allow for the Filling in forms is enabled and then Start Enforcing Protection again. If it asks for a password, just click OK – no password is needed. Now, you will once again be able to navigate from entry point to entry point using the tab key or arrow keys. Check boxes are only active while the form is protected. Check boxes may be toggled using the space bar or clicking on the box with the mouse pointer. You should be able to maintain the ACC for a given year in one computer file that is composed of the three forms. The form should be reusable the following year by changing the file name and updating form fields.

Microsoft Excel Comments
The three-part ACC form in the MS Excel format is provided as a single file. The Excel forms do not contain any form fields, linked cells or protection macros as are present in the Word version. The Excel forms obey basic Excel rules and the instructions provided in the Excel Help Menu. The "Compliance Status" check boxes should be marked by typing an "X" in the outlined cell. A separate tab in the workbook has been added to define the Monitoring Codes and other notes you may need to use.

Any questions on form use or data entry should be directed to your Compliance Engineer.