

Title V Operating Permit Semi-Annual Monitoring Report (SAMR) and Annual Compliance Certification (ACC) Instructions

Contents

Overview	1
Glossary of Terms:	1
Submitting SAMR and ACC Reports	2
Semi-Annual Monitoring Report (SAMR)	2
Part 1M - Facility Information and Certification.....	3
Part 2M - Deviation Verification.....	3
Part 3M - Monitoring Deviation Report	3
Part 4M - Additional Monitoring Reports Summary	3
Annual Compliance Certification	4
Part 1C - Facility Information and Certification.....	4
Part 2C - Compliance Summary	4
Part 3C-1 - Compliance Report (By Emission Unit).....	4
Part 3C-2 - Compliance Report (By Permit Requirement).....	5
Part 4C - Deviation Report.....	5
Part 5C - Additional Reports Summary.....	5
Part 6C - Compliance Schedule.....	6
Appendix A: Sample SAMR.....	7
Example 1: Part 3M	7
Example 2: Part 3M	8
Appendix B: Sample ACC	9
Example 1: Parts 3C-1, Part 4C and Part 5C	9
Example 2: Part 3C-2	11

Overview

This document provides instructions for completing and submitting the Title V Semi-Annual Monitoring Report (SAMR) and the Title V Annual Compliance Certification (ACC). At this time, facilities are not required to use DNR provided forms. If creating forms, please read the DNR instructions and review the DNR forms to ensure all required information is included. DNR provided forms can be found on the [TV Operating Permit Website](#).

All facilities with a final Title V Operating Permit must submit a Semi-Annual Monitoring Report by September 30 and March 31, and an Annual Compliance Certification by March 31, of each year. The ACC and SAMR are the minimum reporting requirements under Iowa's Title V Operating Permit program. The reports inform industry, citizens, and regulatory agencies of the compliance status of Title V facilities, deviations to Title V Operating Permit conditions, and what actions were or will be taken to correct deviations.

Glossary of Terms:

Term	Definition
Annual Compliance Certification	ACC
Iowa Department of Natural Resources	DNR
Semi-Annual Monitoring Report	SAMR
Environmental Protection Agency	EPA
Deviation	Occurs when any permit term is not met, including emission limitations, standards, monitoring, recordkeeping, reporting and other requirements

Submitting SAMR and ACC Reports

The SAMR and ACC must be submitted electronically or mailed to the Air Quality Bureau (aqb) and the appropriate Field Office or local program. The ACC must also be submitted to EPA Region VII. Electronic submissions to EPA Region VII can be made through the [Central Data Exchange \(CDX\)](#).

The DNR provides an electronic submission option through the [Air Quality Records and Reporting \(AQRR\)](#) Compliance Reporting system. AQRR is an easy to use web-based platform that enables facilities to electronically sign and submit compliance reports using their existing forms saved in PDF format.

- AQRR eliminates the need for a wet ink signature by using an EPA-approved method for electronic certification and signature process.
- A single submission in AQRR fulfills the requirement to send reports to both the Air Quality Bureau and the DNR Field Office - no need for separate mailings.
- Using AQRR reduces paper and mailing costs and provides immediate confirmation of submission.

If mailing, the Responsible Official must complete the Statement of Certification of Compliance on Part 1M of the SAMR and Part 1C of the ACC. Each copy mailed must include a wet ink signature. Please visit [DNR Staff Contact](#) webpage for current Field Office and aqb mailing address information.

Semi-Annual Monitoring Report (SAMR)

All facilities with an active Title V Operating Permit (TV Permit) are required to submit a Semi-Annual Monitoring Report by September 30 and March 31 each year. All deviations from monitoring applicable under the Title V permit are required to be reported in the SAMR.

Most monitoring requirements are identified in Section III of the Title V Permit (Emission Point Specific Conditions). Monitoring requirements may also be listed under Section II (Plant-wide Conditions) of the Title V Permit. Examples of monitoring deviations include:

- **Recordkeeping:** Any failure to maintain records required by the Title V Operating Permit.
- **Source (Stack) Testing:** Stack testing that is not performed with the correct methodology, or by the due date required.
- **Continuous emissions and opacity monitoring systems (CEMS and COMS):** Failure to perform continuous monitoring. All CEMS and COMS downtime due to malfunction or other reasons. Failure to conduct CEMS and COMS approved relative accuracy test audit (RATA) as required.
- **Visible Emissions (Opacity) Observations:** Any failure to conduct required opacity readings or failure to meet the requirement that the observer must be a certified EPA Method 9 reader.
- **Observations for No Visible Emissions:** Any failure to conduct required observations for no visible emissions.
- **Operation and Maintenance (O&M) Plans:** Failure to develop or comply with an Agency or Facility O&M. An abnormal condition, as outlined in the O&M Plan, is not a deviation unless the owner/operator does not perform corrective action as required.

The applicable reporting periods for the SAMR are:

Reporting Start - End Dates	SAMR Due Date
January 1 - June 30	September 30
July 1 - December 31	March 31

If an initial Title V permit was issued during a reporting period the reporting period start date is the day the TV permit was issued. If the Title V permit was rescinded during the reporting period the reporting period end date is the day the TV Permit was officially rescinded by the DNR. If a renewal or modified TV Permit was issued during the reporting period both Permits may be included in a single submission or a separate SAMR may be submitted for each TV Permit.

The July-December submittal of the SAMR may be satisfied with the submittal of the ACC. Please check the applicable box on ACC Form Part 1C to notify the Department if the ACC is intended to satisfy the requirement to submit a SAMR for the second half of the year.

The SAMR consist of four parts (1M, 2M, 3M, and 4M). All facilities, regardless of the deviation or compliance status, must complete Part 1M and Part 2M. If deviations occurred Part 3M and/or Part 4M are also required.

Part 1M - Facility Information and Certification

All facilities must complete Part 1M of the SAMR. All data fields are required to be completed. If unsure of the permit issuance date, operating permit number, or facility file number please see the cover page of the Title V Operating Permit.

If the report will be submitted electronically there is no need for a wet ink signature. The responsible official will electronically certify and sign the report during the submittal process in AQRR. If mailing the reports, the responsible official must complete the Statement of Certification of Compliance with a wet ink signature for each copy submitted.

Part 2M - Deviation Verification

All facilities must complete Part 2M of the SAMR. All data fields are required to be completed.

The completed form must indicate whether the facility experienced any monitoring deviations during the reporting period. If the facility did not experience any monitoring deviations, check "no" on the table on Part 2M, and submit forms 1M and 2M. If the facility experienced any monitoring deviations, check "yes" and complete Parts 1M, 2M, 3M and/or 4M.

Part 3M - Monitoring Deviation Report

Part 3M is required if the facility experienced any monitoring deviations during the reporting period that have not previously been reported to the DNR. All data fields are required to be completed for each deviation. If the information requested on Part 3M has been provided in another submitted report, such as an annual NESHAP report or quarterly CEMs/COMs report, Part 4M may be used to reference the submitted report. Part 3M consists of 9 columns of information related to the monitoring deviation.

- Column 1: EP# - Emission Point Number(s)
- Column 2: EU# - Emission Unit(s) (EU) associated with each EP
- Column 3: Pollutant - Associated pollutant information such NO_x, CO, or PM.
- Column 4: Monitoring Method -examples include Recordkeeping (RR), Source Testing (ST), Continuous Emissions Monitoring (CEMS), Continuous Opacity Monitoring (COMS), No Visible Emissions (NVE), Method 9 Opacity Observations (OP), and Operation & Maintenance Plans (OMP).
- Column 5: Monitoring Deviation Description-See Recordkeeping section above for examples.
- Column 6: Deviation Date- Date the deviation occurred
- Column 7: Deviation Duration-Time in days, hours, minutes, or seconds that a deviation occurred.
- Column 8: Suspected Cause of Deviation
- Column 9: Correction Action taken

Part 4M - Additional Monitoring Reports Summary

Part 4M can be used in place of Part 3M to reference previously submitted reports such as

- CEMS and/or COMS reports;
- NSPS, NESHAP and/or MACT reports;
- PSD reporting requirements; or
- DNR Construction Permit reporting requirements

The report(s) referenced on form 4M should include, at a minimum, the information required on form 3M for each monitoring deviation. If the previously submitted report(s) do not contain this information then the deviation should be included on form 3M.

Annual Compliance Certification

All facilities that have been issued a Title V Operating Permit (TV Permit) are required to submit an Annual Compliance Certification (ACC) by March 31 each year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules.

For sources determined to be out of compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. For specific rule citation please see 567 IAC 24.108(15)"e"

The standard reporting period for the ACC starts January 1 and ends December 31. If an initial Title V Permit was issued during a reporting period the reporting period start date is the day the TV Permit was issued. If the Title V Permit was rescinded the reporting period end date is the day the TV Permit was officially rescinded by the DNR. If a renewal or modified TV Permit was issued during the reporting period both TV Permits may be included in a single submission or a separate ACC may be submitted for each TV Permit.

The ACC consist of seven parts (Parts 1C, 2C, 3C-1, 3C-2, 4C, 5C and 6C). All facilities must complete Parts 1C, 2C and 3C-1. If deviations occurred during the reporting period Part 4C and/or 5C are required. Part 6C is required if the facility is not currently in compliance with all TV Permit requirements.

Part 1C - Facility Information and Certification

All facilities must complete Part 1C of the ACC. All data fields are required to be completed. If unsure of the TV Permit issuance date, operating permit number, or facility number please see the cover page of the Title V Operating Permit.

The SAMR for the reporting period of July-December may satisfied by the ACC. Please check the applicable box to notify the Department if the ACC is intended to satisfy the requirement to submit a SAMR for the second half of the year.

If the report will be submitted electronically there is no need for a wet ink signature. The responsible official will electronically certify and sign the report during the submittal process in AQRR and/or CDX. If mailing the reports, the responsible official must complete the Statement of Certification of Compliance with a wet ink signature for each copy submitted.

Part 2C - Compliance Summary

All facilities must complete Part 2C of the ACC. All data fields are required to be completed. Part 2C provides a format for summarizing the facility's compliance status currently and during the reporting year. A series of "Yes" or "No" questions provides guidance regarding which additional forms need to be completed.

Part 3C-1 - Compliance Report (By Emission Unit)

All facilities must complete Part 3C of the ACC. All data fields are required to be completed. This form contains eight columns of information.

- Column 1: EP# - Emission Point Number(s)
- Column 2 EU# - List of the Emission Units (EU) associated with each EP.
- Column 3: Pollutant - Associated pollutant information such NO_x, CO, or PM.
- Column 4: Permit term, condition or applicable requirement. Examples of terms, conditions or applicable requirements include, but are not limited to, the following:
 - Emission limits
 - Opacity limits
 - Operational limits and requirements (i.e. material usage or content limits, process limits, operating hours)

- Monitoring requirements (i.e. recordkeeping, stack testing, CEMS/COMs, visible emissions checks, O&M)
- Reporting requirements
- Plant-wide conditions
- General conditions
- Column 5: Monitoring Method (examples: Recordkeeping (RR), Source Testing (ST), Continuous Emissions Monitoring (CEMS), Continuous Opacity Monitoring (COMS), No Visible Emissions (NVE), Method 9 Opacity Observations (OP), and Operation & Maintenance Plans (OMP). Other Method Used to Determine Compliance including methods that are not required in the TV, but the facility uses to determine compliance with applicable requirements.
- Column 6: Deviations during the reporting year- Yes or NO check box
- Column 7: All deviations indicated in Column 6 must be reported on Part 4C and/or Part 5C.
- Column 8: Is the facility currently in compliance, Yes or No check box. Part 6C must be included for any requirement not currently in compliance.

Part 3C-2 - Compliance Report (By Permit Requirement)

This form may be used if there are a number of emission units subject to the same Permit requirement. In order to use Part 3C-2, the emission units listed must meet all the criterion below:

- Be subject to the same applicable requirement; AND
- Be subject to the same monitoring requirement (or have no monitoring requirements); AND
- Have experienced no deviations from the requirement listed, AND
- Be currently in compliance with the listed requirement.

Please use Part 3C-1 for all emission units that do not meet the criterion above.

Part 4C - Deviation Report

Deviations that occurred during the reporting period must be reported on Part 4C and/or Part 5C. Part 4C must be used if the deviation has not been reported to the Department in an Excess Emissions, NESHAP, NSPS, CEMs/COMs or other report. This form should also be used if the previously submitted report did not include all the information listed in Column 1 through Column 8 below:

- Column 1: Emission Points (EP) (if applicable)
- Column 2: Emission Unit (EU) associated with each EP. (if applicable)
- Column 3: Associated pollutant information such NO_x, CO, or PM (if applicable)
- Column 4: Description of the deviation
- Column 5: Date deviation started
- Column 6: Deviation duration
- Column 7: Suspected cause of deviation
- Column 8: Corrective action taken

Part 5C - Additional Reports Summary

Deviations that occurred during the reporting period must be reported on Part 4C and/or Part 5C. Part 5C may be used to reference written reports submitted by the facility to report deviations. Examples include written excess emissions reports, NESHAP or NSPS reports, or CEMs/COMs reports. In order to report the deviation on Part 5C the submitted report must include all of the following information:

- Emission Point (if applicable)
- Emission Unit (if applicable)
- Associated pollutant information such NO_x, CO, or PM (if applicable)
- Description of the deviation
- Date deviation started
- Deviation duration
- Suspected cause of deviation
- Corrective action taken

Part 6C - Compliance Schedule

Part 6C is required for sources determined not to be in compliance at the time of compliance certification. For sources not currently in compliance, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures.

Please provide the following information for each compliance schedule submitted:

- **Term, condition, or applicable requirement** with which the facility is currently out of compliance;
- **Date** non-compliance with the Permit requirement began;
- **Description** of the non-compliance;
- **Cause** of non-compliance;
- **Corrective actions** taken to bring the facility back into compliance;
- **Schedule**, with specific dates, for submitting progress reports; and
- **Date** by which the facility will be **back in compliance** with this requirement.

Information may be provided on the white space on Part 6C, or the compliance plan may be included as an attachment.

Appendix A: Sample SAMR
(for demonstration purposes only)

Example 1: Part 3M

Title V Requirements:

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description
EP5	EU5	Dryer

Emission Limits:

Opacity = 40%

Agency Operation and Maintenance (O&M) Plan: Visible emissions shall be observed on a weekly basis to ensure no visible emissions occur during the material handling operation of the unit. If visible emissions are observed this would be an excursion not a violation, and corrective action will be taken as soon as possible, but no later than 8 hours. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required in order to continue operation. If an opacity (>40 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If unsuccessful that day due to weather, an observation shall be made the following day.

Facility's Compliance Status

Facility is currently in compliance however visible emissions readings were not taken for three weeks during the reporting period. Management conducted training on O&M Plan and updated the employee daily checklist.

Completing the Semi-Annual Monitoring Report

Facility completed Part 1M, checked the "Yes" box on Part 2M (Deviation Verification) to indicate that the facility did experience deviations, and Part 3M was completed as shown below.

(1) EP#	(2) EU#	(3) Pollutant	(4) Monitoring Method	(5) Monitoring Deviation Description	(6) Deviation Date	(7) Deviation Duration	(8) Suspected Cause of Deviation	(9) Corrective Action Taken
EP5	EU5	Opacity	O&M NVE	Failed to take weekly NVE observations	7/10/24	3 weeks	Staff not trained in NVEs	Conducted training, O&M added to daily checklist

Example 2: Part 3M

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description
EP Gen-1	EU Gen-1	Emergency Generator

Emission Limits:

- Opacity: 40%
- Particulate Matter: 0.1 gr/dscf
- Sulfur Dioxide: 2.5 lb/MMBtu

Operational Limits:

- This generator shall not be operated more than 2,000 hours per rolling twelve-month period.
- Generator is limited to firing on Natural Gas only.

Reporting and Recordkeeping:

- Record the hours this generator operates per month. Calculate rolling twelve-month totals

Facility's Compliance Status

Facility operated the emergency generator for three days (approximately 8 hours/day) during the reporting period, the online tracking system was down and facility personnel did not record the hours of operation. The deviation was identified on a weekly review and management implemented a manual back-up log to be used if the online system is not working.

Completing the Semi-Annual Monitoring Report

Facility completed Part 1M, checked the "Yes" box on Part 2M (Deviation Verification) to indicate that the facility did experience deviations, and Part 3M was completed as shown below.

(1) EP#	(2) EU#	(3) Pollutant	(4) Monitoring Method	(5) Monitoring Deviation Description	(6) Deviation Date	(7) Deviation Duration	(8) Suspected Cause of Deviation	(9) Corrective Action Taken
EP10	EU10	N/A	RR	Failed to record hours generator operated	8/22/24	3 days	Database computer down	Implemented manual log back-up system

Appendix B: Sample ACC
(for demonstration purposes only)

Example 1: Parts 3C-1, Part 4C and Part 5C

Title V Requirements:

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description
EP 3	EU 3	Paint Booth #3

Emission Limits:

- Opacity = 40%
- Particulate Matter = 4.22 TPY, 0.01 gr/dscf

NESHAP Applicability:

40 CFR Part 63 Subpart HHHHH Many emission units at this facility are affected sources under Subparts A (General Provisions, 40 CFR §63.1 - 40 CFR §63.15) and HHHHH [National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, 40 CFR §63.7980 - 40 CFR §63.8105] of the National Emission Standard for Hazardous Air Pollutants (NESHAP).

Operational Limits:

- Paint/solvent throughput limit = 5,000 gallons annually (12-month rolling total)
- Material Content limits = 8 lbs/gallon Volatile Organic Compounds (VOCs)

Reporting and Recordkeeping - Maintain records showing:

- The VOC content (lb/gal) of each material used in the booth
- Annual material usage (gallons) on a 12-month rolling basis

Opacity Monitoring:

- Opacity shall be observed on a weekly basis to ensure no visible emissions. Should visible emissions be observed, corrective action must be taken within eight hours.
- Maintain a written record of the observations and any actions resulting from the observations.

Operation and Maintenance (O&M) Plan: A facility-maintained O&M Plan is required for this emission unit and associated equipment. The O&M Plan must be developed within six (6) months of Permit issuance.

Facility's Compliance Status

Facility is currently in compliance with all of the applicable requirements for this paint booth (EU#3). The facility experienced the following deviations during the reporting period:

- The facility failed to record the VOC content of a new paint it tested.
- Facility observed visible emissions from the paint booth during one of the required weekly observations. The plant manager discovered that the filter had become dislodged. Three days later, a plant operator repaired the filter, and observed no visible emissions after the repair.
- The Facility O&M plan was required to be developed by May 2, however the facility was two weeks late in developing the Facility O&M Plan. After developing the Facility O&M, facility personnel did not follow the inspection provisions in the Facility O&M plan for the first three weeks. Upon discovering this, the plant manager quickly prepared and implemented a recordkeeping system to record the results of the Facility O&M inspections. All deviations related to the Facility O&M were reported in the 1st half Title V Semi-Annual Monitoring Report.

Completing the Annual Compliance Certification

The facility completed Part 1C, 2C, 3C-1, 4C, and 5C. Parts 3C-1, 4C and 5C are shown below.

Part 3C- 1 includes all emission point specific terms, conditions, and requirements under the Title V permit.

1. EP#	2. EU#	3. Pollutant (If appl.)	4. Permit Term, Condition or Applicable Requirement	5. Monitoring Method* or other method used to determine compliance	6. Deviations during reporting period? (If Yes, complete Column 7.)	7. Form deviation is reported on (ACC Form Part 4C and/or 5C)	8. Currently in compliance? (If No, complete ACC Form Part 6C)
EP3	EU3	PM	0.01 gr/dscf and 4.22 TPY	Facility OMP	No		Yes
EP3	EU3	Opacity	40%	NVE	Yes	4C	Yes
EP3	EU3	VOC	5,000 gallons paint and solvent usage limit	RR	No		Yes
EP3	EU3	VOC	0.8 lb/gallon content limit	RR	No		Yes
EP3	EU3	VOC	Maintain records of paint usage and VOC content	N/A	Yes	4C	Yes
EP3	EU3	Opacity	Take weekly observations for No Visible Emissions	RR	No		Yes
EP3	EU3	Opacity	Keep written records of all opacity observations	N/A	No		Yes
EP3	EU3	PM & Opacity	Develop and Maintain a Facility O &M Plan	RR	Yes	5C	Yes
EP3	EU3	HAP	NESHAP 6H	RR	No		Yes

Part 4C: The two deviations that were not reported in the SAMR are reported on Form Part 4C.

EP#	EU#	Pollutant	Deviation Description	Deviation Date	Deviation Duration	Suspected Cause of Deviation	Corrective Action
EP3	EU3	Opacity	Observed VEs, but didn't take corrective action within 8 hrs	10/3/03	2 days	Short-staffed on day VEs observed	Trained staff on need for repair within 8 hrs.
EP3	EU3	VOC	Didn't record VOC content on paint	11/4/03	30 days	New staff not aware of requirement	Staff trained on keeping records

Part 5C: The facility referenced the Title V SAMR that included O&M Plan deviations.

Emission Unit Description	Emission Unit #	Reporting Requirement	Date Report Submitted
Paint Booth	EU #3	Title V SAMR	9/15/24

Example 2: Part 3C-2

Title V Requirements:

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description
EP22	EU22	welding station
EP30	EU30	plasma cutter
EP44	EU44	Raw material storage pile 1
EP45	EU45	Raw material storage pile 2
EP46	EU46	Raw material storage pile 3

Emission Limit:

- Fugitive Dust: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate

Facility's Compliance Status

The Permit does not require any monitoring to demonstrate compliance with this emission limit. During the reporting period, the facility did not observe any fugitive dust from these units crossing the property line.

Facility meets all the conditions for using Part 3C-2 to report on these emission units.

- subject to the same applicable requirement; AND
- subject to the same monitoring requirement (or have no monitoring requirements); AND
- have experienced no deviations from the requirement listed, AND
- are in compliance with the listed requirement.

Completing the Annual Compliance Certification

Facility completed Part 1C, Part 2C, and Part 3C-2 was completed as shown below:

Part 3C-2- Compliance Report (By Permit Requirement)

Pollutant (If appl.)	Permit Term, Condition or Applicable Requirement	Monitoring Method* (if appl.)
Fugitive Dust	Fugitive Dust standard [567 IAC 23.3(2) "c"]	N/A

List emission unit numbers as indicated in the Permit

Emission Unit #	EU22	EU30	EU44	EU45	EU48
-----------------	------	------	------	------	------