



## Annual Compliance Certification (ACC) and Semi-annual Monitoring Report (SAMR) Frequently Asked Questions (FAQs)

These FAQs have been prepared by the Iowa Department of Natural Resources (DNR) to provide information regarding Title V Compliance Reporting and how to submit the reports electronically using the Air Quality Records and Compliance Reporting (AQRR) system. This document is intended solely as guidance, cannot be used to bind the DNR and is not a substitute for reading applicable statutes and rules.

### 1. What is the purpose of the TV Annual Compliance Certification (ACC) and Semi-Annual Monitoring Report (SAMR)?

The ACC and SAMR are the minimum reporting requirements under Iowa's Title V Operating Permit program. These 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.

Deviations occur when any permit term is not met, including emission limitations, standards, monitoring, recordkeeping, reporting and other requirements. The ACC requires all deviations to any applicable requirement under the Title V Operating Permit to be reported and the SAMR requires that all monitoring deviations required under the Title V Operating Permit to be reported.

### 2. Is there a way to submit compliance reports electronically?

The DNR offers electronic air compliance reporting via the Air Quality Records and Reporting (AQRR) Compliance Reporting System. AQRR is a web-based application which allows industry to electronically sign and submit compliance reports to the DNR while utilizing your current forms in PDF format.

AQRR eliminates the requirement to have a wet ink signature by utilizing an EPA approved electronic certification and signature. A single submission by the Responsible Official in AQRR Compliance Reporting will satisfy the requirement to mail separate signed reports to the Air Quality Bureau and the DNR Field Office. Visit the [AQRR website](#) or the [DNR eAir Services webpage](#) for more information.

EPA accepts electronic reporting through [the Central Data Exchange \(CDX\)](#). Visit the EPA CDX website for more information.

### 3. Are the DNR provided forms required?

At this time, facilities are not required to use the DNR forms. If you choose to create a form, please review the DNR provided forms and the ACC and SAMR instructions to ensure all required information is provided. DNR provided forms and instructions are posted on the [DNR Compliance webpage](#).

### 4. When are the ACC and SAMR due?

All facilities with an active 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. DNR is not granted authority to provide an extension to these dates.

### 5. Are the ACC and SAMR required if the Title V facility has not been issued a Title V Permit yet?

No, there is no requirement to submit an ACC or SAMR if a Title V Operating Permit has not been issued yet. All TV facilities are subject to TV Emissions Inventory and TV Emissions Fee regardless of if a Title V Operating Permit has been issued.

**6. Are the ACC and SAMR required if the TV Operating Permit was rescinded during the reporting year?**

Yes, the facility will be required to submit an ACC/SAMR that covers the timeframe the facility was operating under a Title V Operating Permit. The facility is also subject to TV Emissions Inventory and TV Emissions Fees for the time period the facility was subject to Title V.

**7. There have been changes to applicable requirements due to NESHAP/NSPS rule changes and/or Construction Permit issuance that have not yet been incorporated into a Title V Operating Permit. How is compliance certified in this situation?**

General Condition G1. Paragraph 6 states *"For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. 567 IAC 24.108(15)"c"*.

In general, if an underlying requirement changes due to construction permit issuance; NSPS or NESHAP rule changes; or some other enforceable requirement, the source should comply with the current requirement. If the new requirement became effective within a reporting period, compliance should be certified for the previous requirement for the timeframe the previous rule was applicable and for the new requirement for the timeframe the new rule was applicable. For example, if requirements from an updated NSPS are effective on September 13 compliance would be certified for the previous NSPS requirements from January 1 - September 12 and the updated NSPS requirements beginning September 13 - December 31.

Continuous compliance may be certified if there is no evidence of noncompliance for permit terms that were not effective or not applicable yet, such as requirements included in construction permits for equipment that has not yet been installed and/or operated or stack testing that is not yet due.

**8. How is compliance certified if the facility is currently in good standing with a compliance plan with the DNR due to ongoing violations at the facility?**

The ongoing violations are required to be included in the ACC and SAMR reports. The deviations should be indicated on Part 2C and reported on Part 3C, Part 4C and/or Part 5C, and Part 6C that includes the compliance plan or a reference to the submitted compliance plan. If the ongoing violations are related to monitoring, the violations should be indicated on Part 2M and reported on Part 3M and/or 4M of the SAMR.

**9. The facility operated under a variance during this reporting year. Should that information be included in on Part 3C ACC?**

Yes, specify the terms and duration of the facility's approved variance on Part 3C of the ACC. Operating within these approved terms does not constitute non-compliance or a deviation from the relevant Construction Permit condition or rule.

**10. The facility is subject to NESHAP and/or NSPS that has many requirements, does each requirement need to be listed on Form 3C of the ACC?**

Facilities may certify compliance with a NESHAP or NSPS as a whole. However, any deviations that occurred must be indicated and provide the individual requirement, description of the deviation, date deviation started, deviation duration, suspected cause of the deviation, and corrective action taken.

**11. A Renewal or Modification was issued during the reporting period, are separate ACC and SAMR reports required for each version of the TV Operating Permit?**

The facility must verify compliance with all TV Operating Permit terms and conditions that were applicable during the reporting period. There are two options when submitting the ACC and SAMR.

Option1: Submit a single report that lists both TV Operating Permit numbers and the respective start and end dates of the TV Operating Permits. The certifications reports must include all terms and conditions from the previous and the renewed or modified TV Operating Permit.

Option 2: Submit separate certification reports for each TV Operating Permit that was effective for the reporting year.