

Iowa Department of Natural Resources
Air Quality Bureau

Title V Operating Permit
ANNUAL COMPLIANCE CERTIFICATION
&
SEMI-ANNUAL MONITORING REPORT

INSTRUCTIONS

(Version: February 2014)

This document contains instructions for completing the **Annual Compliance Certification** and **Semi-Annual Monitoring Report** required under the Iowa Title V Operating Permit Program. The instructions are designed to accompany the Iowa Department of Natural Resources (DNR) forms for these reports. The DNR forms for completing these reports are available for downloading on the DNR Air Quality website at www.iowadnr.com/air/ (at the index along the left side, under the Professional Site heading, click on the Operating Permits link, and then click on the bullet entitled "Annual Compliance Certification & Semi-Annual Monitoring Report").

NOTE: These instructions were updated in **February 2014**. Changes made include updates to DNR web pages, phone numbers and office addresses. Clarification regarding what to include on the **Compliance Certification** and what forms to submit if facility information on **Part 1M or 1C** has changed have been added. A reminder that Compliance Assurance Monitoring plans, if applicable, are reportable conditions of a permit.

CONTENTS

This document contains three main sections. Section I. **Overview** (pages 1-3) provides basic information about the Title V reporting requirements. Section II. **Completing the Semi-Annual Monitoring Report** (pages 3-6) contains specific instructions for preparing and submitting this report. Section III. **Completing the Annual Compliance Certification** (pages 7-11) provides directions for completing his report. These sections also include responses to Frequently Asked Questions (FAQs).

You will also find two appendices at the end of this document. **Appendix A** (page 12) lists the program office addresses and phone numbers. **Appendix B** (pages 13-16) provides some example facility scenarios and mock-up DNR reports. Since each section contains useful information, the DNR recommends that facilities carefully read this document, in its entirety, before completing either the Semi-Annual Monitoring Report or the Annual Compliance Certification.

I. OVERVIEW

Abbreviations

Throughout this document, these terms will be abbreviated as follows:

Iowa Department of Natural Resources = **DNR**
Title V Annual Compliance Certification = **Compliance Certification**
Title V Semi-Annual Monitoring Report = **Monitoring Report**
Title V Operating Permit = **Permit**

What are the Annual Compliance Certification and Semi-Annual Monitoring Report?

The **Title V Annual Compliance Certification** (hereafter referred to as the **Compliance Certification**) and the **Semi-Annual Monitoring Report** (hereafter referred to as the **Monitoring Report**) are the basic, minimum reporting requirements under Iowa's Title V Operating Permit program. These reports allow industry, citizens, and regulatory agencies to be informed when a facility fails to meet the Title V Permit conditions, and what action is being taken to correct these problems.

All facilities subject to Title V requirements must also submit annual emission inventories and submit Title V fees. Your facility may also have additional reporting requirements specified in your Permit.

What do the Compliance Certification and Monitoring Report require?

You are required to begin submitting these reports once your facility has been issued a final Title V Operating Permit. Every six months, you must provide a report describing any **deviations** from your Title V Permit. **A deviation is any failure to meet a Title V Permit term, condition, or applicable requirement.** You must also give a brief explanation of the suspected cause of the deviation, and the corrective action taken to address the deviation. Even if your facility had **no** deviations during the reporting period, and is currently in compliance with all Permit requirements, you must still submit a report verifying your facility's status.

On the **Monitoring Report**, you must describe any **monitoring** deviations that took place during the reporting period. Monitoring required under a Title V Permit typically includes, but is not limited to, recordkeeping, stack testing, visible emissions observations, and operation and maintenance (O&M) plans.

On the **Compliance Certification**, you must report **all** deviations occurring over the previous calendar year (including the deviations previously reported in the Monitoring Report for the first half of the year). This includes explaining any monitoring deviations, as well as reporting any deviations from operating conditions, emission limits or reporting requirements. You must also certify your facility's current compliance status with each term, condition and applicable requirement contained in the Title V Permit.

When are these reports due, and where do I send them?

The **Monitoring Report** is due every **September 30** and every **March 31**. The Monitoring Report for the period covering the first half of the calendar year (January 1 – June 30) is due by September 30. The Monitoring Report for the period covering the second half of the previous calendar year (July 1 – December 31) is due by March 31.

You must send a complete, signed copy of your **Monitoring Report** to the **DNR Air Quality Bureau** and to the **DNR Field Office** that serves your facility. If your facility is located in **Polk** or **Linn** county, you will send the local program office a copy of your report instead of the DNR Field Office. Addresses for these offices are located in Appendix A (page 12), and at the end of your Permit.

The **Compliance Certification** is due every **March 31**, and covers the previous calendar year (January 1 – December 31). You must send a signed, complete copy of your report to the **DNR Air Quality Bureau**, your **DNR Field Office** (or Linn or Polk county office, if applicable), and **EPA Region VII**. The EPA Region VII address is also located in Appendix A, and at the end of your Permit.

If you do not know which DNR Field Office serves your facility, you can view an Iowa map with links to field office information at <http://www.iowadnr.gov/InsideDNR/DNRStaffOffices/EnvironmentalFieldOffices.aspx>

Am I required to use the DNR forms when submitting these reports?

You are not required to use the DNR forms at this time. However, the vast majority of facilities find it easier to use the DNR forms. The forms are available in Word and PDF format on the Air Quality Bureau website. Feel free to manipulate the DNR forms to accommodate your information. If you need to revise the forms, please be sure to keep a clean copy for reference. If you choose to create your own forms, please carefully read these instructions and review the DNR forms to be sure you include all of the required information.

Can I submit my reports electronically?

Currently, the DNR **cannot** accept electronic submittal of the Monitoring Report or Compliance Certification. However, the DNR forms are available on our website in Word format so that your facility can complete the forms electronically. The DNR hopes to have a system capable of accommodating electronic submittal within the next couple of years.

Why must I complete two, different reports? Can't these reports be combined?

A Monitoring Report (for the previous July – December reporting period) and a Compliance Certification (covering the previous calendar year) are both due by March 31 of each year. The DNR forms are designed so that the two reports can be combined for the **March 31** submittal. Check the box on **Form 1C** of the DNR Annual **Compliance Certification** forms to combine the Compliance Certification and the Monitoring Report. A Monitoring Report covering the first half of the year is also due by **September 30** of each year, and **cannot** be combined with the Compliance Certification.

The Monitoring Report and Compliance Certification require you to provide similar information about your facility. The Compliance Certification entails a more detailed examination of your facility's current compliance status, as well as the compliance history, for the previous calendar year. Because the reporting requirements are closely related, however, the DNR recommends that facilities review the requirements for completing the Compliance Certification **and** the Monitoring Report before attempting to complete either report.

II. How to Complete the Semi-Annual Monitoring Report

This section describes what information you must provide in your **Monitoring Report**. The DNR Monitoring Report forms consist of four parts (Parts 1M, 2M, 3M, and 4M). Please refer to the DNR Monitoring Report forms as you read these instructions. Since the DNR forms for the Monitoring Report and Compliance Certification look very similar, be sure to look for the report name, and a form number followed by the letter "**M**," across the top of the Monitoring Report forms.

All facilities that have been issued a Title V Operating Permit must submit a Monitoring Report. You must report any deviation from the **monitoring** required in the Permit. Even if you had no deviations during the reporting period, you must still submit a report stating this fact. However, the DNR forms are designed so that you only need to complete two forms if you had no monitoring deviations.

Deviation means the failure to meet **any** Permit term, condition, or applicable requirement. You should know that **any** deviation from a Title V Permit requirement is a non-compliance event, and can be considered a violation. Your Permit may also indicate that particular deviations are automatically considered to be violations. If the DNR determines that a violation, a deviation, or series of deviations are serious, the DNR may issue a Notice of Violation (NOV) to the facility, and may assess a monetary penalty.

Part 1M - Facility Information and Certification

*All facilities must complete **Part 1M** of the Monitoring Report form.*

What is my reporting period?

Your Monitoring Report, due every six months, will include either the first or the second half of a calendar year. Please be sure to indicate the correct reporting period on **each** form of your Monitoring Report. The applicable reporting periods for the Monitoring Report are:

January 1 through June 30 = Monitoring Report due by **September 30**

July 1 through December 31 = Monitoring Report due by **March 31**

If your facility is submitting its **first** report under these requirements, the reporting period extends from the date the Permit was **issued** until the end date of the applicable reporting period.

Example

Permit issued:	October 2, 2001
First Reporting Period:	October 2 through December 31, 2001
First Report Due:	March 31, 2002
Next Reporting Period:	January 1 through June 30, 2002
Next Report Due:	September 30, 2002

What if my facility information has changed recently?

Please indicate in the appropriate check box (Yes or No) whether the facility information on Part 1M is **different** from what was indicated on your last Title V report (i.e. your last annual emissions inventory, Annual Compliance Certification, etc). If this information **has** changed, please submit a Title V – Part, form 1.0 and a signed Part 3 (<http://www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/FormsInstructions.aspx>) or contact the DNR Air Quality Bureau at 515-725-8200 (facilities located in Linn or Polk county should contact their local program office). You may need to submit additional forms to update your Permit.

How do I check the boxes with the names of the different program offices?

The office names and check boxes are included on Part 1M to remind facilities where to **send** copies of the Monitoring Report. You must send one copy of your Monitoring Report to the **DNR Air Quality Bureau** and one copy to the appropriate **DNR field office** (or **local program office**).

For each copy of your Monitoring Report, you should **check** the appropriate box indicating the office to which that particular copy will be sent. The addresses and phone numbers for these offices are listed in Appendix A (page 12) of this document, as well as at the end of your Permit. If you do not know which DNR Field Office serves your facility, you can view an Iowa map with links to field office information at <http://www.iowadnr.gov/InsideDNR/DNRStaffOffices/EnvironmentalFieldOffices.aspx>

What is the Statement of Truth, Accuracy and Completeness?

The **Responsible Official** for your facility must sign and date each copy of your Monitoring Report under the Statement of Truth, Accuracy and Completeness. Only the person designated as your facility's Responsible Official can sign the certification. This certification statement and signature are required under 567 Iowa Administrative Code (IAC) 22.107(4).

Part 2M – Deviation Verification

*All facilities must complete **Part 2M** of the Monitoring Report form.*

On Part 2M, you must indicate whether your facility experienced any monitoring deviations during the reporting period by checking “Yes” or “No”.

If your facility had no monitoring deviations, simply check "**no**" on the table on Part 2M, and submit only forms **1M** and **2M**. If your facility experienced **any** monitoring deviations, check "**yes**" and complete Parts 1M, 2M, 3M and/or 4M.

What is a monitoring deviation?

Most monitoring requirements are identified in Section III of the Permit (Emission Point Specific Conditions). Your facility may have additional monitoring requirements listed under Section II (Plant-wide Conditions).

Required monitoring may include, but is not limited to:

Recordkeeping: Recordkeeping is a type of monitoring. Any failure to maintain the records required by the Permit must be reported as a deviation in your Monitoring Report.

Source (Stack) Testing: When source testing is required, it must be conducted in accordance with the method described in the Permit. If the required test is not performed with the correct methodology, or by the due date required in your Permit, you must report this as a deviation.

Continuous emissions and opacity monitoring systems (CEMS and COMS): Operation of CEMS and COMS must be conducted in accordance with the Code of Federal Regulations (CFR), the Iowa Administrative Code (IAC), or the manufacturer's instructions, as stated in the Permit. If you fail to perform continuous monitoring in such a manner, a deviation must be reported.

CEMS and COMS are generally required to be operational at all times that an emissions source is operating. If a CEMS or COMS experienced downtime due to malfunction or other reasons, this must be reported as a deviation. CEMS and COMS must be certified through DNR observed and approved relative accuracy test audit (RATA). If RATA certification was not conducted timely, this must be reported as a deviation.

Visible Emissions (Opacity) Observations: The Permit may require the owner/operator of a facility to take visual readings of stack opacity at certain intervals. If the Permit requires opacity readings, the observer must be a **certified** EPA Method 9 reader. If the designated opacity reader is not certified, or has let his or her certification lapse, this must be reported as a deviation. Additionally, any failure to conduct required opacity readings must be reported as a deviation.

Observations for No Visible Emissions: The Permit may require that an owner/operator confirm, at specified intervals, that no visible emissions occurred from a particular source. Unlike opacity observations, the observer does **not** need to be EPA Method 9 certified. Any failure to conduct required observations for no visible emissions must be reported as a deviation.

Operation and Maintenance (O&M) Plans: The Permit may require either an Agency or a Facility O&M Plan for monitoring process or control device parameters. An Agency O&M Plan is one that is included in the Permit. If a Facility O&M Plan is required, the facility must develop, maintain and follow its own O&M Plan. Failure to follow **any** requirement in an O&M Plan included in the permit must be reported as a deviation.

An abnormal condition, as outlined in the O&M Plan, is not a deviation from the Permit unless the owner/operator does **not** perform corrective action. Any deviation from the corrective action required by the O&M Plan must be reported as a deviation.

Part 3M – Monitoring Deviation Report

*This form is required **only** if your facility experienced monitoring deviations during the reporting period. If you already submitted a written report for a deviation, you may be able to use Part 4M to reference that report.*

Part 3M contains a table specifying what information you must provide for each deviation. Fill in all of the required information that applies to your deviation(s). Appendix B contains some example scenarios that may be helpful to you.

What if my facility had a deviation from a Plant-wide monitoring requirement?

If your facility had a deviation from a Plant-wide monitoring requirement, simply indicate “Plant-wide” in the EU and EP columns.

What if a column is not applicable to the particular deviation?

If particular columns are not applicable to the deviation, please indicate **N/A** rather than leaving the column blank.

What should I indicate under column (4) - “Monitoring Method”?

Under the column “Monitoring Method,” indicate the monitoring requirement from which your facility **deviated**. For example, if you failed to keep records of paint usage, you should indicate “RR” for recordkeeping under this column. The abbreviations for monitoring methods are included at the bottom of form 3M.

Part 4M – Additional Monitoring Reports Summary

*This form is **optional**. You can use this form to reference **other** monitoring deviation reports submitted for this reporting period.*

If, during the applicable reporting period, you already submitted a written report of a monitoring deviation to the DNR Air Quality Bureau (or the Linn or Polk county program office) you can use form 4M to reference that report. You must complete the table on 4M to summarize other report(s) submitted for this reporting period. The form for Part 4M lists examples of the types of reports that you may have submitted.

The other report(s) referenced on form 4M should include, at a minimum, the information required on form **3M** for each monitoring deviation. If these reports do **not** contain this information, you must describe the deviation on form 3M.

Where can I see examples of how to complete the DNR Semi-Annual Monitoring Report forms?

Appendix B (pages 13-16) contains a few examples of facility scenarios and mock-ups forms. The DNR also has examples of completed Monitoring Report forms on our Air Quality Bureau website.

III. Completing the DNR Annual Compliance Certification forms

This section provides more details on what information you must include in your **Compliance Certification**. Please refer to the DNR forms while reading these instructions. You can distinguish the DNR Compliance Certification forms from the Monitoring Report forms by looking for the report name, and the form number followed by the letter “C,” on the top of each form.”

On the Compliance Certification, you must provide information on your facility's compliance status with all Title V Permit terms, conditions, and applicable requirements. This includes explaining any monitoring deviations, as well as reporting any deviations from operating conditions, emission limits or reporting requirements. You must also certify your facility's current compliance status with each Permit requirement.

The DNR Compliance Certification forms consist of seven parts (Parts 1C, 2C, 3C-1, 3C-2, 4C, 5C and 6C). All facilities, regardless of the deviation or compliance status, must complete Parts **1C**, **2C** and **3C-1**.

Part 1C - Facility Information and Certification

*All facilities must complete **Part 1C** of the Compliance Certification forms.*

What is my reporting period?

The Compliance Certification is an annual report that covers a full calendar year (January 1 through December 31). The Compliance Certification is due by **March 31** of the following year. If you are submitting your first report, your reporting period begins on the date your permits was **issued**, and ends on December 31. Each subsequent Compliance Certification will span a full calendar year. Please be sure to indicate the correct reporting period at the top of **each** Compliance Certification form.

What if my facility information has changed recently?

Please indicate in the appropriate check box (Yes or No) whether the facility identification you completed is different from what was indicated on your last Title V report (i.e. your last annual emissions inventory, Semi-annual Monitoring Report, etc). If this information has changed, please submit a Title V – Part, form 1.0 and a signed Part 3 (<http://www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/FormsInstructions.aspx>) or contact the DNR Air Quality Bureau at 515-725-8200 (or the Linn or Polk county air program office). You may need to submit additional forms to update your Permit.

Should I check the “Yes” box to combine the Compliance Certification and Monitoring Report?

The DNR forms for the Compliance Certification are designed so that the two reports can be combined for the **March 31** submittal. Most facilities choose to combine their reports to save time and minimize the number of forms to be submitted. Check the “**Yes**” box if you choose to combine the Compliance Certification and the Monitoring Report (for the July – Dec. reporting period **only**). A Monitoring Report for the Jan. – June reporting period is a **separate** report that is due by **September 30** of each year.

How do I check the boxes with the names of the different program offices?

The office names and check boxes are included on Part 1C to remind facilities where to send copies of the Compliance Certification. You must send one, complete copy of your Compliance Certification to the **DNR Air Quality Bureau**, your **DNR Field Office** (or Linn or Polk county air program office), and **EPA Region VII**.

When you make each copy of your Compliance Certification, you should **check** the appropriate box indicating the office to which that particular copy will be sent. The addresses and phone numbers for these offices are listed in Appendix A (page 12) of this document, as well as at the end of your Permit. If you do not know which DNR Field Office serves your facility, you can view an Iowa map with links to field office information at <http://www.iowadnr.gov/InsideDNR/DNRStaffOffices/EnvironmentalFieldOffices.aspx>

What is the Statement of Certification of Compliance?

The **Responsible Official** for your facility must sign and date all three copies of your Compliance Certification under the Statement of Certification of Compliance. Only the person designated as your facility's Responsible Official can sign the certification. This certification statement is required under 567 Iowa Administrative Code (IAC) 22.107(4).

Part 2C – Compliance Summary

All facilities must complete Part 2C of the Compliance Certification forms.

Part 2C provides a format for summarizing the facility's compliance status and deviation activity. A series of "Yes" or "No" check boxes allows the facility to determine which additional forms need to be completed. All facilities must submit the forms for Parts **1C**, **2C**, and **3C-1**. Refer to the form for Part 2C to determine which additional forms you must submit.

NOTE: The **Question #4** checkbox was added to Part 2C form in **January 2004**. Beginning with the 2003 Annual Compliance Certification (due by March 31, 2004), Question #4 **must** be completed. Directions for properly answering Question #4 are explained below.

For Question #4, how do I determine whether my facility's compliance status was "continuous" or "intermittent" during the reporting period?

How you answer this question will depend on how you answered questions 1-3 on Part 2C. If your facility experienced **any** deviations from any permit terms, conditions or applicable requirements during the reporting period, you must check that compliance was "**intermittent**." If you did not experience any deviations, you may check that compliance was "**continuous**." Please see the instructions and forms for Part 3C-1 below for more information on determining your compliance status.

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

All facilities must complete Part 3C-1 of the Compliance Certification forms.

Use Part 3C-1 to describe and certify the compliance status of **each** term, condition and applicable requirement listed under the Emission Point Specific Conditions section (Part III) of the Permit. Additionally, if your Permit contains Plant-wide Conditions (Part II) that require **monitoring** (including recordkeeping), you should list these requirements on Part 3C-1.

What should I include under column (4) "Permit terms, conditions or applicable requirements?"

Terms, conditions or applicable requirements that may be contained in the Permit include, but are not limited to, the following:

- **EMISSION LIMITS**
- **OPACITY LIMITS**
- **OPERATIONAL LIMITS AND REQUIREMENTS** (see description below)
- **MONITORING REQUIREMENTS** (see description below)
- **REPORTING REQUIREMENTS**
- **PLANT-WIDE CONDITIONS**
- **GENERAL CONDITIONS.**

Operational limits and requirements are often surrogates for demonstrating compliance with emission limits. These can include, but are not limited to, restrictions on material usage, material content, process limits, and operating hours.

Required monitoring may include, but is not limited to, the following:

- RECORDKEEPING
- SOURCE (STACK) TESTING
- CONTINUOUS EMISSIONS MONITORING SYSTEMS (CEMS)
- CONTINUOUS OPACITY MONITORING SYSTEMS (COMS)
- OBSERVATIONS FOR NO VISIBLE EMISSIONS
- VISUAL EMISSIONS (OPACITY) OBSERVATIONS
- OPERATION AND MAINTENANCE (O&M) PLANS
- COMPLIANCE ASSURANCE MONITORING (CAM) PLANS

NOTE: Please see **page 5** of this document for more detailed explanations of required monitoring.

Do I need to list all of the Permit requirements for each emissions unit under column (4)? What about the Plant-wide and General Conditions?

You should already have checked the appropriate box for the status of your Plant-wide and General Conditions on the form for **Part 2C**. You do not need to list Plant-wide or General Conditions on Part 3C-1. The only exception is if you have Plant-wide conditions that include **monitoring**. These must be listed on Part 3C-1. Simply indicated "**Plant-wide**" across the Emission Unit (EU) and Emission Point (EP) column for these conditions.

Next, you should review your permit to determine if you have a number of emission units subject to the **same** requirement. You may be able to use the form for **Part 3C-2** to report some of your applicable requirements. To decide if you can use Part 3C-2, see the DNR form for Part 3C-2, as well as the instructions beginning on page 10. Then, identify and list the applicable requirements for each EU/EP on the form for Part 3C-1.

If I have an O&M Plan, must I separately list each requirement of the Plan?

No, you do not need to separately list each requirement contained in the O&M Plan. Simply indicate "O&M Plan" as the applicable requirement under column (4) of Part 3C-1. Please carefully check your records, however, to ensure that your facility conducted **all** of activities required under the O&M Plan. If your facility deviated from the O&M Plan, you must describe the deviation(s) on Part 4C.

What is a deviation?

Deviation means the failure to meet **any** Permit term, condition, or applicable requirement . You should know that **any** deviation from a Title V Permit requirement is a non-compliance event, and can be considered to be a violation. Your Permit may also indicate that particular deviations are automatically considered to be violations. If the DNR determines that a violation, a deviation, or series of deviations are serious, the DNR may issue a Notice of Violation (NOV), and may assess a monetary penalty.

You must report **any** deviation that occurred during the reporting period. If you had a deviation from any applicable requirement, you must check "**Yes**" under column (7) - "**Deviations?**" of Part 3C-1. You must also complete the form(s) for Part **4C** and/or Part **5C** to describe the deviation(s).

What do I list under the column (5) - Monitoring Method?

You must indicate a monitoring method in this column if your Permit requires monitoring to demonstrate compliance with an emission limit, opacity limit, or operational limit. Remember that **recordkeeping** can be a required monitoring method. If the Permit does **not** require any monitoring for a particular emission limit, opacity limit, or operating condition, simply indicate “**N/A**” in column (5).

What do I put in the “Other Method Used to Determine Compliance” column (6)?

This column will generally not be applicable for most facilities. You should use this column, however, if your Permit does not require monitoring to demonstrate compliance, but your facility uses its own method to determine compliance with applicable requirements. In certifying compliance, your facility is required to consider **all** information at its disposal to determine whether any deviations occurred during the reporting period, and whether the facility is currently in compliance with the Permit.

How do I complete column (8) – “If Deviation(s), note which forms(s) contain information?”

You would only complete this column if you indicate “**Yes**” under the Deviations column (7). If you had no deviations from the particular requirement, just indicate “**N/A**” under column (8).

If you had deviations, the DNR needs to know which form you are using to describe the deviation. If you have **not** previously reported the deviation, you must complete Part 4C. In that case, you would simply note **4C** in column 8. If you previously reported the deviation, you may be able to use Part 5C to reference your report. If you use Part 5C, you would then indicate **5C** in column (8). If you have a number of deviations from a particular applicable requirement, and you only previously reported some of the deviations, you will probably need to complete both 4C and 5C, and should indicate **4C & 5C** in column 8.

If I had a deviation from a Permit requirement, do I need to mark “No” under the “In Compliance?” column (9)?

You only need to mark “No” in column 9 if your facility is **currently** out of compliance with the Permit requirement. That means, on the date you signed your Compliance Certification, you **remain** out of compliance with that Permit requirement. If this is the case, you must submit a Compliance Schedule (Part 6C) with your Compliance Certification. If, however, you had a deviation or deviations, but your facility is back **in compliance**, you can mark “Yes” under column 9.

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

*This form is an **optional** form that may be useful to you if you have a number of emission units subject to the same Permit requirement.*

Before listing emission units and applicable requirements on the form for Part 3C-1, you may want to note any emission units that are subject to the same applicable requirement to see if you can use Part 3C-2. See the form for Part 3C-2 for the list of **conditions** for using this form. You must use **Part 3C-1** to describe any emission units that do **not** meet these conditions. You may attach an additional page with the emission unit numbers, rather than listing these on the table included on Part 3C-2. If you include an attachment, please indicate “see attached” on the form. The example in Appendix B may be helpful to you in deciding whether to use this form.

Part 4C – Deviation Report

*This form is required **only** if deviations from the Title V Permit occurred during the reporting period. If you already submitted a written report for a deviation, you may be able to use **Part 5C** to reference that report. See the instructions for Part 5C below, and the DNR form for Part 5C, for details.*

You must describe any deviations from emission limits, operating limits, monitoring requirements, required reporting, and any additional requirements. Page 5 of this document describes the types of **monitoring** deviations that could occur, and need to be reported. The examples included in Appendix B may also be helpful to you.

Part 5C – Additional Reports Summary

*This is an **optional** form. Use this form to reference any additional deviation or exceedance reports that you submitted.*

If, during the applicable reporting period, you already submitted a written report of deviations or exceedances to the DNR Air Quality Bureau (or to the Linn or Polk county program office) you can use form 5C to reference that report. You must complete the table on 5C to summarize other reports submitted for this reporting period. The form for Part 5C includes examples of the types of reports that you may have submitted.

NOTE: The other reports referenced on Part 5C should include, at a minimum, the information required on Part 4C. If these reports do **not** contain this information, you must use Part 4C to describe the deviation(s).

Part 6C – Compliance Schedule

*This form, or the equivalent information, is required only if the facility is **currently** out of compliance with the Title V Permit.*

If, at the time of signing and submitting your Compliance Certification, your facility is out of compliance with a requirement in your Permit, you must submit a compliance schedule. Please refer to Part 6C for a description of Compliance Schedule requirements. You can either use the white space on Part 6C to type in your compliance schedule(s), or you may include an attachment containing your compliance schedule(s).

Where can I see examples of how to complete the DNR Annual Compliance Certification forms?

Appendix B contains example facility scenarios and mock-ups forms. The DNR also posts examples of completed forms on our Air Quality Bureau website.

Appendix A – Contact list

The current address and phone number for reports and notifications to the Department (DNR Air Quality Bureau) is:

Air Quality Bureau
Iowa Department of Natural Resources
502 E 9th St
Des Moines, IA 50319
(515) 725-8200

The current address and phone number for reports and notifications to the **EPA Region VII** is:

EPA Region VII
Air Permits and Compliance Branch
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7020

Reports or notifications to the **DNR Field Offices** or the **local programs** should be directed to the supervisor at the appropriate field office or local program. If you do not know which DNR Field Office or local program office serves your facility, please contact the Air Quality Bureau. Current addresses and phone numbers are:

Field Office 1
909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2
P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3
1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4
1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5
502 E 9th St
Des Moines, IA 50319
(515) 725-0268

Field Office 6
1023 W. Madison
Washington, IA 52353
(319) 653-2135

Polk County Public Health
Dept. Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.
Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

Appendix B

Sample Monitoring Report and Compliance Certification Scenarios

(for demonstration purposes only)

Appendix B contains several example scenarios. Scenario #1 contains the most detailed scenario. Although it contains mock-up forms for only the Compliance Certification, the types of deviations described should be helpful in preparing a Monitoring Report, as well. Several examples of facility reports will also be posted on Air Quality Bureau website.

Scenario #1 (Annual Compliance Certification)

Facility A has several paint booths (emission units). According to the Permit, one of the paint booths (**EU #3**), which vents to stack EP#3, is subject to the following **Emission Point Specific Conditions**:

Emission Limits:

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

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 A's Compliance Status

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

- ◆ The facility failed to **record** the VOC content of some new paint it tested.
- ◆ Facility A also 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 was two weeks **late** in implementing its required Facility O&M Plan. After implementation, facility personnel did **not** follow the inspection provisions in the 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 maintenance inspections. **NOTE:** The O&M Plan deviations occurred **prior** to June 30 of the previous year. Facility A had **previously** reported these deviations in its Title V Semi-Annual Monitoring Report for that reporting period.

Completing the Compliance Certification

The next page shows how Facility A would complete **Parts 3C-1, Part 4C** and **Part 5C** for EU #3 **only**. Please refer to the applicable **DNR forms** when reviewing the example, because the example does not show the forms in their entirety.

Appendix B – (Continued)

Scenario #1 - Annual Compliance Certification (continued)

Part 3C- 1 (entire form not shown): For EU3, Facility A would include the information below.

EP#	EU#	Pollutant (If appl.)	Permit Term, Condition or Applicable Requirement	Monitoring Method (if appl.)	Other Method Used to Determine Compliance	Deviations? (Y) or (N)	If Deviations, note which form(s) contain information ⁺	In Compliance? (Y) or (N)
EP3	EU3	PM	0.01 gr/dscf and 4.22 TPY	Facility OMP	N/A	No		Yes
EP3	EU3	Opacity	40%	NVE	N/A	Yes	4C	Yes
EP3	EU3	VOC	5,000 gallons paint and solvent usage limit	RR	N/A	No		Yes
EP3	EU3	VOC	0.8 lb/gallon content limit	RR	N/A	No		Yes
EP3	EU3	VOC	Maintain records of paint usage and VOC content	N/A	N/A	Yes	4C	Yes
EP3	EU3	Opacity	Take weekly observations for No Visible Emissions	RR	N/A	No		Yes
EP3	EU3	Opacity	Keep written records of all opacity observations	N/A	N/A	No		Yes
EP3	EU3	PM & Opacity	Develop and Maintain a Facility O &M Plan	RR	N/A	Yes	5C	Yes

Part 4C (entire form not shown): Facility A must also complete Part 4C to include the two deviations that were **not** reported on previous submittals to the DNR Air Quality Bureau.

EP#	EU#	Pollutant	Deviation Description	Deviation Date	Deviation Duration	Suspected Cause of Deviation	Corrective Action
EP #3	EU #3	Opacity	Observed VEs, but didn't take corrective action within 8 hrs	10/3/03	2 days. (approx.)	Short-staffed on day VEs observed	Trained staff on need for repair within 8 hrs.
EP #3	EU #3	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 (entire form not shown): Facility A elected to complete Part 5C to reference the report on which they had **previously** reported the O&M Plan deviations. By doing this, Facility a does **not** need to include this deviation information on **Part 4C**.

Emission Unit Description	Emission Unit #	Reporting Requirement	Date Report Submitted
Paint Booth	EU #3	Title V Semi-Annual Monitoring Report	9/15/03

Scenario #2 (Semi-Annual Monitoring Report – Form 3M)

Facility B has a paint booth (EU5). Facility B's Title V Permit indicates that EU5 has an opacity limit of 40%. The Permit contains an Agency **O&M Plan** that requires the owner/operator to take **weekly** observations for visible emissions. Facility B failed to take visible emissions readings for three weeks during the reporting period. On Facility B's Monitoring Report, the owner/operator must check the "Yes" box on **Part 2M** (Deviation Verification) to indicate that the facility **did** experience monitoring deviations. Facility B must also complete **Part 3M** to describe the deviation.

Facility B would complete **Part 3M** for this deviation, as follows (entire form not shown):

(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	7/10/03	3 weeks	New staff not trained in NVEs	Implemented training procedures.

Scenario #3 (Semi-Annual Monitoring Report – Form 3M)

Facility C has a 2,000-hour operational limit on an emergency generator (EU10). The Permit requires the facility to keep records of the hours of generator operation. Facility C operated the emergency generator for three days (approximately 8 hours/day) during the reporting period, but facility personnel neglected to record the hours of operation. Facility C must check the "Yes" box on Part 2M (Deviation Verification) to indicate that the facility did experience deviations. Facility C must also complete Part 3M.

Facility C would complete **Part 3M** for this deviation, as follows (entire form not shown):

(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	8/22/03	3 days (24 hrs)	Database computer down	Implemented manual log back-up system

Scenario #4 (Annual Compliance Certification – Form 3C-2)

Facility D has a number of emission units that are all subject to the same applicable requirement. A welding station (EU22), plasma cutter (EU30), and three raw material storage piles (EU44, 45, and 48) have only **Fugitive Dust** listed as the regulated pollutant. The only applicable requirement is: **Emission Limit:** *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.*

The Permit does **not** require any monitoring to demonstrate compliance with this emission limit. During the reporting period, Facility D did **not** observe any fugitive dust from these units crossing the property line. Facility C could therefore certify that these units had no deviations from the fugitive dust limit, and are currently in compliance with this requirement. Consequently, Facility C meets all the conditions for using Part 3C-2 to report on these emission units.

Facility C would complete **Part 3C-2**, as follows (entire form not shown):

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

Additional Examples

Please check our website at www.iowadnr.gov/InsideDNR/RegulatoryAir/Compliance/ComplianceFormsGuides.aspx for additional examples of these reports.