



Form Series AP100 collects general information about the facility. The following forms are included in this series:

Form Number	Description	Page Number
AP101	This form captures administrative details (i.e., facility owner/operator, location address, mailing address, etc.) about the facility and includes the application certification.	1
AP101R	This form is used to certify the accuracy of supplemental information submitted to correct or amend the original application.	2
AP101M	This form is a general form for certifying the accuracy of any information that is not covered by a DEQ form that has a certification.	2
AP102	This form captures physical details about the facility itself (i.e., site area, geographic location, etc.);	3
AP103	This form is completed once for each operating scenario defined for the facility;	3
AP104	This form and AP105 are completed for applications seeking to obtain a compliance extension for applicable MACT standards by demonstrating early reductions. AP104 provides details about the Early Reductions Unit(s).	4
AP105	This form is used to demonstrate Early Reductions.	8
AP106	This form is used for permit renewal applications.	10

AP101 - ADMINISTRATIVE INFORMATION AND CERTIFICATION

Complete this form *once* with the initial permit application for the facility.

1. Enter a site identifier if there is more than one facility in Oregon owned and operated by the same company.
2. Enter the legal name of the facility as it is registered with the Oregon Corporations Division.
3. Provide the mailing address of the facility.
 - PO Box or street and number.
 - City, state, and zip code.
4. Provide the address of the facility, if different than the mailing address.
 - The street address. If the facility is not located on a street, provide other directional information such as nearby cross streets (i.e., northwest of Third Avenue at Howard Street). If the facility is located in an industrial park, provide the name and address of the park.
 - The city, county, and zip code. If the facility is located in an unincorporated area of a county, enter "unincorporated" instead of a city name.
5. Provide the following information about the owner/operator of the facility:
 - Name
 - Area code and phone number
6. Provide the following information about the contact person for the facility and application:
 - Name
 - Title
 - Area code and phone number
 - Email address, if available
 - Area code and facsimile number
7. Provide the following information about the business activity of this facility.
 - A brief description of the type of facility (e.g., "sawmill," "printed circuit board manufacturer").
 - The primary Standard Industrial Classification (SIC) code of this facility, as it is registered with the Secretary of State of the State of Oregon (e.g., 2421 for sawmill).
8. Identify any other permits issued by DEQ for the facility (e.g., National Pollution Discharge Elimination

System [NPDES] Waste Discharge Permit 100797, etc).

Statement of Certification.

Per OAR 340-218-0040(3)(n) and (5), the owners/operator is required to certify the Permit application. Carefully read the Statement of Certification on the answer sheet. The certification should be signed by the official at the facility responsible for the facility's compliance with state and federal air quality regulations and knowledgeable of the truth, accuracy and completeness of the contents of this application.

AP101R – ADMINISTRATIVE INFORMATION AND CERTIFICATION FOR SUPPLEMENTAL INFORMATION

Complete this form *once* when submitting any supplemental information or corrections to the original application.

Provide the following information about the contact person for the facility and application:

- Name
- Title
- Area code and phone number
- Email address, if available
- Area code and facsimile number

Statement of Certification.

Per OAR 340-218-0040(3)(n) and (5), the owners/operator is required to certify the Permit application. Carefully read the Statement of Certification on the answer sheet. The certification should be signed by the official at the facility responsible for the facility's compliance with state and federal air quality regulations and knowledgeable of the truth, accuracy and completeness of the contents of this application.

AP101M – ADMINISTRATIVE INFORMATION AND CERTIFICATION FOR MISCELLANEOUS INFORMATION

Complete this form *once* when submitting any information other than an application or compliance certification. Use AP101, AP101R, AP106, or the appropriate MD900 series form for certifying application materials. Use Forms R1001 and R1002 for annual reports and semi-annual compliance certifications. Use this form when submitting reports and notifications or other information required by the permit or underlying regulation.

Provide the following information about the contact person for the facility and application:

- Name
- Title
- Area code and phone number
- Email address, if available
- Area code and facsimile number

Statement of Certification.

Per OAR 340-218-0040(5), the owners/operator is required to certify the truth, accuracy, and completeness of any application form, report, or compliance certifications. Carefully read the Statement of Certification on the answer sheet. The certification should be signed by the official at the facility responsible for the facility's compliance with state and federal air quality regulations and knowledgeable of the truth, accuracy and completeness of the contents of this application.

AP102 - FACILITY DESCRIPTION

Complete this form *once* for the facility.

1. Provide a description of the facility including the following:
 - a description of the current industrial processes at the facility;
 - a discussion of any modifications made to these processes that have not been addressed through the facility's ACDP, if there is one;
 - a description of any proposed modifications to these processes in the future that the Permit will need to address; and
 - a description of any proposed construction at the facility that the Permit will need to address.
2. Enter the area of the facility site, in acres or square meters.
3. Indicate (yes or no) whether the facility is located in a nonattainment area. If the answer is "yes," specify the name of the area (e.g., Greater Metropolitan Whoville).
4. Enter the number of employees working at the facility.
5. Enter the maximum production or operation capacity, on both hourly and annual bases, for the facility's *primary industrial activity*. This activity is defined by the Standard Industrial Classification (SIC) code identified on Form AP101--that is, the SIC code under which the facility is registered with the Oregon Secretary of State. Specify the units being used to report the capacity (e.g., number of widgets produced per hour and per year).
6. Attach a detailed plot plan drawn to scale. The plot plan should include the following elements:
 - a building layout (blueprint, plan view) for all buildings on site;
 - the location and facility-assigned code for each emissions device/process and emission point. To the extent that these sources of emissions are identified and coded *elsewhere* in the application for other purposes, use those **same** codes here;
 - the location of property lines;
 - the direction "North"; and
 - an explanation of the scale of the plan.
7. Attach a regional or city map depicting the facility location in relation to:
 - the surrounding vicinity (roads or other features);
 - neighboring residential and commercial areas and other sensitive receptors (i.e., hospitals and schools) within a 10 km radius; and
 - the nearest state boundary, if within a 50 mile radius.
8. Attach a United States Geological Survey (USGS) or similar map to illustrate terrain, elevations, and Universal Transverse Meridian (UTM) zone and UTM coordinates.

AP103 – OPERATING SCENARIO DESCRIPTION

For each operating scenario, complete one Operating Scenario Description, Form AP103. Before completing this form, review the discussion of operating scenarios in the *General Guidance*.

1. Enter the name and identification number or label for the the operating scenario.
2. Provide a detailed description of the operating scenario. Include a discussion of the industrial activities associated with this operating scenario. Identify the pollutants emitted from this operating scenario. As described in the discussion of operating scenarios in this book, the owner/operator may define an alternative operating scenario in a way that accounts for planned future changes in the operations or configuration of the facility. If this is an alternative operating scenario that has been defined to accommodate future changes, then indicate that it is *not* an existing operating scenario but instead reflects operations as they will be configured at a point in the future
3. List the emission units involved in this operating scenario. If this scenario is an alternative operating scenario, identify the emissions units that this scenario shares in common with other defined operating scenarios. Identify only those emissions units for which operation or production parameters, in this and the other operating scenario(s) identified, do **not** change in a way that would trigger different applicable requirements

- or alter monitoring requirements. If, through this operating scenario, the operation or production parameters of a particular emissions unit trigger different applicable requirements, then the emissions unit should be assigned a new identification number or label to distinguish it as a unique emissions unit. This information should be conveyed through a new Emissions Unit Summary, Form EU501.
4. Provide the normal (i.e., usual, routine, as anticipated over the 5-year life of the permit) operating schedule for this operating scenario.
 - Enter the normal number of hours per day that this scenario would operate.
 - Enter the normal number of days per week that this scenario would operate.
 - Enter the normal number of weeks per year that this scenario would operate.
 5. Identify any seasonal variation in the operations of this scenario. Express the variation in terms of the percentage of total annual production that occurs in each three-month period of the year. If, for example, operation is held constant year-round, so that there is no seasonal variation, indicate **25 percent** in each three-month period.
 6. Attach a process flow diagram showing emission devices/processes, control devices, and emission points.

EARLY REDUCTIONS APPLICATION

Purpose

The purpose of applying for an alternative emissions limit under the Early Reductions program is for a major source of hazardous air pollutants (HAPs) to obtain a compliance extension for applicable standards issued under section 112(d) of the Federal Clean Air Act. Section 112(d) addresses Maximum Available Control Technology (MACT) standards for industrial source categories. By demonstrating early reductions of HAP emissions, the owner/operator may obtain a six-year extension to comply with the applicable MACT standard. The six-year extension begins from the date the applicable MACT standard becomes effective, typically three years after the date of promulgation. During the six-year compliance extension period, the owner/operator must operate the Early Reductions Unit (ERU) in compliance with alternate emissions limits based on the reductions achieved.

Qualifying for the Early Reductions Compliance Extension

Early reductions are available only to **existing sources**. For purposes of MACT, an existing source is defined as one that is in operation or has begun construction prior to proposal of an applicable MACT standard. A new source, then, is one that begins construction after the date of proposal of an applicable MACT standard.

To obtain the compliance extension, the owner/operator must demonstrate that, *by the date on which EPA proposes the MACT standards for the source category, the facility **already** has achieved a 90 percent reduction in emissions of gaseous HAPs, or a 95 percent reduction in emissions of particulate HAPs, from the Early Reductions Unit (ERU).* The ERU is that part of the facility to which the alternative emissions limit and compliance extension will apply. The ERU may include the entire facility, a group of devices and/or processes, or an individual device or process.

To receive an alternative emissions limit and compliance extension, submit an application that demonstrates how the ERU has achieved or will achieve the reductions. In preparing the application, demonstrate that the HAP emissions from the ERU you defined are significant relative to the source's total HAPs emissions, as follows:

- if the facility's base-year emissions were greater than 25 tons per year of HAPs prior to the reduction, then the ERU, prior to reduction, must have emitted at least 10 tons per year of HAP; or
- if the facility's base-year emissions were 25 tons per year or less of HAPs prior to the reduction, then the ERU, prior to reduction, must have emitted at least 5 tons per year of HAP.

The owner/operator must provide *base-year* emissions calculations for **1987 or later** in the Early Reductions Application. These calculations must represent actual emissions during normal operating conditions.

Defining an Early Reductions Unit

Depending on the circumstances at the facility, the owner/operator may want to identify one or more ERUs. In many

cases, he/she may define the entire facility as the ERU, but this is discretionary. The selection of equipment, processes, and activities to include in the ERU is dependent upon how the reductions in HAP emissions are achieved and upon anticipating, if possible, the applicability of different MACT standards.

After the standards have been issued and once the early reductions compliance extension expires, the devices and processes in the ERU will have to be re-grouped into appropriate emissions units. This will need to be done according to the applicable requirements, particularly the newly applicable MACT standards and any associated compliance demonstration requirements, and pollutants emitted.

Example: Required emissions reductions are achieved by installing a new control device on a surface coating operation and substituting raw materials in a degreasing operation. The owner/operator may choose to define two ERUs--one for the surface coating operation and one for the degreasing operation--if 90 percent reduction can be achieved by each operation and it is expected that separate MACT standards will apply. The owner/operator may, however, choose to group the two operations into one ERU if they can achieve the 90% reduction together but not separately.

Example: A pulp mill has recovery boilers and power boilers. It may be safe to assume that EPA will issue different standards for recovery boilers than for power boilers. The owner/operator of the pulp mill may choose to define the recovery boilers as a separate ERU from the power boilers, because in the future they will be required to demonstrate compliance with the different MACT standards, and the two types of boilers will be in separate emissions units.

Use Form AP104, Early Reductions Application--Unit Summary, with the appropriate device/process forms from Form Series DV200, to define each ERU. Then *summarize* the early reductions data on Form AP105, Early Reductions Application--Reductions Demonstration.

For purposes of complying with all applicable requirements other than the MACT early reductions compliance extension, the device(s)/process(es) grouped in the ERU(s) MUST also be included in "normal" emissions units in this Permit application. Group the devices/processes appropriately into one or more emissions units, as directed in the *General Guidance*. Then complete the appropriate form or forms from Form Series EU500, Emissions Unit Summary. Because all other applicable requirements will be addressed through the appropriate Emissions Unit Summary, no applicable requirements are included in Form AP104, Early Reductions Application--Unit Summary.

Applying for Early Reductions Compliance Extensions

Owners/operators of existing facilities that have not yet applied for a Permit should include Forms AP104 and AP105 with their complete Permit application. All relevant emissions data and applicable requirements forms should be completed for the ERU.

Owners/operators of existing facilities that already have obtained or applied for a Permit and are applying *separately* for the compliance extension should submit Forms AP104 and AP105 with a completed Administrative Information Form AP101R. Attach copies of or refer to pertinent information from the current Permit or Permit application.

AP104 – EARLY REDUCTIONS

Complete this form *once* for *each* Early Reductions Unit (ERU).

Note that this form is divided into two sections--Part A and Part B. These instructions address both parts. The answer sheet also is divided into two sections. To complete this form, the owner/operator will need to complete both files.

Part A

1. Assign an identification number or label to this ERU. This ID should correspond to the ID on the facility plot plan.
2. Describe the ERU. Describe all emission-generating devices and processes included in the ERU (refer to the

- appropriate forms in Form Series DV200 completed for these devices and processes). Describe how the ERU complies with the definition in OAR 340-244-0030 for an ERU.
3. To demonstrate reductions at the ERU, first establish a "HAP baseyear" for pre-reduction emissions, to which DEQ can compare the reduced emissions. Select a year not prior to 1987. The emissions from the chosen HAP baseyear must reflect "normal" operating conditions for the ERU (as opposed to substantially different emissions caused by abnormal--i.e., much higher than usual--operating conditions). In the space provided on the answer sheet, provide the following information.
 - HAP baseyear; and
 - Normal emissions with a demonstration that the emissions in this baseyear were "normal" in the sense that they were not artificially or substantially greater than emissions in other years prior to the implementation of the emissions reduction measures. To demonstrate "normal" emissions, you may use production records, raw material usage data, or other operational/production information about both the baseyear and the surrounding years. Describe the emissions levels in the space provided on the answer sheet. Attach supporting data as appropriate.
 4. To qualify as an ERU, the emissions from the unit must be significant relative to the total emissions from the entire facility (explained in Overview above). The emissions are significant if one of the following are true:
 - The entire facility emitted greater than 25 tons per year of total baseyear emissions of HAPs and the emissions from the ERU were equal to or greater than 10 tons per year; or
 - The entire facility emitted less than or equal to 25 tons per year of total baseyear emissions of HAPs and the emissions from the ERU were equal to or greater than 5 tons per year.Only answer this question if the emissions in question 3 were less than 10 tons per year.

The following refer to the emissions data collected in Part B of this form. To answer these questions, you will need to complete Part B first.

5. Describe how the baseyear was obtained and post-reduction data through which early reductions are being demonstrated. The Early Reductions program encourages the use of source test-verified emission factors for determining baseyear and post-reduction emissions. Other data may be used if source test-verified emissions data are not available, as described below.
 - *If using source test data* as the basis for the emissions calculations, in the answer sheet, identify the baseyear and post-reduction emissions factors obtained. Then describe the test method used and any problems encountered during the test. Also discuss the validity of the test and provide evidence that the test was conducted in accordance with DEQ's Source Sampling Manual.
 - *If not using source test data* as the basis for the emissions calculations, you must justify the use of another method by explaining which of the conditions in OAR 340-244-140(8)(a) through (e) applies to the circumstance. Identify the baseyear and post-reduction emissions factors (if any have been identified) being used. Provide a step-by-step description of calculations, including any assumptions used, a rationale for the validity of the calculation method used, and references for the emission factors used.
6. Provide a thorough description of how the reductions in HAP emissions were achieved. This may include information on any control devices used, raw materials substituted, operating hours or production rates lowered, or any equipment shutdowns.
7. Demonstrate that emission reduction measures were in place and the reductions in HAP emissions were achieved *prior* to the date an applicable MACT standard was proposed. Provide the following information.
 - Identify the date on which the measure was implemented (i.e., installation date of new control device or date certain equipment shutdown in order to achieve lower emissions).
 - Identify the date the applicable MACT standard will be proposed, if known, or is scheduled to be promulgated. This question refers to the applicable MACT standards being developed and promulgated by EPA over the next several years. To answer this question, refer to EPA's UTW web page on the TTN or contact DEQ for the most recent information on the status of a particular standard. In some cases, the owner/operator may have difficulty determining whether a particular MACT standard applies to the source because the standard and the applicability clause have not yet been written. DEQ may refer the owner/operator to the appropriate EPA staff to obtain current information on the applicability of a MACT standard.

- To qualify for early reductions, the implementation date must be *before* the MACT proposal date.**
8. During the six-year compliance extension period for MACT, the owner/operator must continue to operate the facility under the conditions that achieved the newly reduced emissions levels. To reflect this requirement and its enforceability, DEQ must write appropriate permit language and/or emissions limits into the Permit. DEQ recognizes the owner/operator is the most knowledgeable about the measures implemented to achieve the emissions reductions. DEQ requests the owner/operator suggest permit language and/or specific emissions limits for inclusion in the Permit. For example, to demonstrate compliance with the new emissions levels, the owner/operator may be required to comply with:
- An emission concentration limit (i.e., parts per million) coming from the stack; or
 - a certain number of pounds of emissions per unit of production; or
 - a removal and destruction efficiency of control equipment.
- Consider how compliance with the new emissions levels would need to be demonstrated during the six-year MACT compliance extension period and recommend permit language accordingly. The Permit will have to be modified in advance of the expiration of the MACT compliance extension, so that, on the date that the extension expires, new and appropriate permit conditions that reflect the MACT standard is in place.
9. The owner/operator will be required to monitor compliance with the alternative emission limit(s) identified in question **A-11** above. Submit the appropriate form(s) from Form Series CP700 that document how compliance will be monitored. If the owner/operator already has submitted the Permit application, he/she may refer to the compliance forms therein *if they apply to this ERU*; otherwise, submit new monitoring forms at this time. If the owner/operator already holds a Permit that contains compliance conditions appropriate for this ERU, he/she may refer to those conditions. Provide the following information, as appropriate.
- Identify the forms from Form Series CP700 that are being submitted now for this ERU; or
 - Identify the forms from Form Series CP700 that have already been submitted that apply to this ERU; or
 - Identify the monitoring conditions in the existing Permit that apply to this ERU.
10. If this form is not attached to a complete Permit application, then attach a plot plan of the facility that shows the location of the ERU (even if the ERU is the entire facility).

Part B

Note that the answer sheet for Part B is called AP104-B.

For those devices/processes in the ERU that emit **gaseous** HAPs, provide the following **baseyear and post-reduction** emissions data.

- Provide the device/process name and ID number or label. Use the ID assigned to the device/process on the appropriate form from Form Series DV200. Enter the ID into one row in the "Device ID" column.
- List each gaseous HAP emitted from the device/process. This column may be used for multiple pollutants.
- Enter the baseyear annual production/raw material/fuel usage rate for the device/process in question. Specify the units used to convey this rate.
- Enter the post-reduction annual production/raw material/fuel usage rate for the device/process in question.
- Enter the baseyear emission factor. Specify the unit of measure for the factor. Explain the justification of this factor in question 5 of Part A.
- Enter the post-reduction emission factor. Use the same unit of measure as the baseyear emission factor. Explain the justification of this factor in question 5 of Part A.
- Enter the **actual** annual baseyear emissions, in tons per year, as calculated based on the data in the previous columns.
- Enter the **actual** annual post-reduction emissions, in tons per year, as calculated based on the data in the previous columns.
- Enter the appropriate weighting factor. Refer to OAR 340-244-0140 Table 2, "List of Early Reductions High Risk Pollutants." That table identifies those HAPs considered high-risk, for which emissions must be weighted to reflect the risk associated with them. Determine whether any of the gaseous HAPs emitted by the facility in the baseyear are on this list. If none of the facility's HAPs is listed, then enter "NA" and skip to the

next column.

- Enter the **adjusted** annual baseyear emissions, in tons per year. Multiply the baseyear and post-reduction actual emissions by the weighting factor.

For devices/processes in the ERU that emit **particulate** HAPs, provide the following **baseyear and post-reduction** emissions data.

- Provide the device/process name and ID number or label. Use the ID assigned to the device/process on the appropriate form from Form Series DV200. Enter the ID into one row in the "Device ID" column.
- List each particulate HAP emitted from the device/process identified in the first column. This column may be used for multiple pollutants.
- Enter the baseyear annual production/raw material/fuel usage rate for the device/process in question. Specify the units used to convey this rate.
- Enter the post-reduction annual production/raw material/fuel usage rate for the device/process in question. Use the **same units** as the baseyear annual production/raw material/fuel usage.
- Enter the baseyear emission factor. Specify the unit of measure for the factor. Explain the justification of this factor in question 5 of Part A.
- Enter the post-reduction emission factor. Use the same unit of measure as baseyear emission factor. Explain the justification of this factor in question 5 of Part A.
- Enter the **actual** annual baseyear emissions, in tons per year, as calculated using the baseyear production rate and baseyear emission factor.
- Enter the **actual** annual post-reduction emissions, in tons per year, as calculated using the post-reduction production rate and post-reduction emission factor
- Enter the appropriate weighting factor. Refer to OAR 340-244-0140 Table 2, "List of Early Reductions High Risk Pollutants." The table identifies those HAPs considered high-risk, for which emissions must be weighted to reflect the risk associated with them. Determine if any of the particulate HAPs emitted by the facility in the baseyear are on this list. If none of the facility's HAPs is listed, then enter 1.
- Enter the **adjusted** annual baseyear emissions, in tons per year, if applicable. Multiply the baseyear and post-reduction actual emissions by the weighting factor.

AP-105 – EARLY REDUCTIONS APPLICATION, REDUCTIONS DEMONSTRATION

Complete this form *once* for the facility if demonstrating early reductions in HAPs emissions in order to obtain an alternative emissions limit and a compliance extension for MACT.

This form summarizes the early reductions data provided for the Early Reductions Unit(s) (ERUs) in Form AP104. Complete this form *after* completing the appropriate number of Forms AP104 (one for each ERU). A 90 percent reduction for gaseous HAPs and a 95 percent reduction for particulate HAPs must be demonstrated. The owner/operator has the option, for those devices/processes that emit *both* gaseous and particulate HAPs, to *average* the relative reductions of the gaseous and particulate HAPs to achieve an overall acceptable reduction of the gaseous and particulate HAPs combined.

1. Enter the Early Reduction Unit name and identification number or label.
2. Calculate the actual percent reduction achieved for the facility's emissions.

a. Gaseous HAP:

$$RG_A = 100(BG_A - PG_A)/BG_A$$

Where:

$$RG_A = \text{Percent reduction for actual gaseous HAP emissions}$$

$$BG_A = \text{Total actual gaseous HAP emissions – Base year (Form 104-B)}$$

$$PG_A = \text{Total actual gaseous HAP emissions – Post-reduction (Form 104-B)}$$

b. Particulate HAP:

$$RP_A = 100(BP_A - PP_A)/BP_A$$

Where:

- RP_A = Percent reduction for actual particulate HAP emissions
- BP_A = Total actual particulate HAP emissions – Base year (Form 104-B)
- PP_A = Total actual particulate HAP emissions – Post-reduction (Form 104-B)

c. Combined HAP:

$$RC_A = 100(BC_A - PC_A)/BC_A$$

Where:

- RC_A = Percent reduction for combined actual gaseous and particulate HAP emissions
- BC_A = Total actual gaseous and particulate HAP emissions – Base year (Form 104-B)
- PC_A = Total actual gaseous and particulate HAP emissions – Post-reduction (Form 104-B)

3. Calculate the adjusted percent reduction achieved for the facility’s emissions

a. Gaseous HAP:

$$RG_{Adj} = 100(BG_{Adj} - PG_{Adj})/BG_{Adj}$$

Where:

- RG_{Adj} = Percent reduction for adjusted gaseous HAP emissions
- BG_{Adj} = Total adjusted gaseous HAP emissions – Base year (Form 104-B)
- PG_{Adj} = Total adjusted gaseous HAP emissions – Post-reduction (Form 104-B)

b. Particulate HAP:

$$RP_{Adj} = 100(BP_{Adj} - PP_{Adj})/BP_{Adj}$$

Where:

- RP_{Adj} = Percent reduction for adjusted particulate HAP emissions
- BP_{Adj} = Total adjusted particulate HAP emissions – Base year (Form 104-B)
- PP_{Adj} = Total adjusted particulate HAP emissions – Post-reduction (Form 104-B)

c. Combined HAP:

$$RC_{Adj} = 100(BC_{Adj} - PC_{Adj})/BC_{Adj}$$

Where:

- RC_{Adj} = Percent reduction for combined adjusted gaseous and particulate HAP emissions
- BC_{Adj} = Total adjusted gaseous and particulate HAP emissions – Base year (Form 104-B)
- PC_{Adj} = Total adjusted gaseous and particulate HAP emissions – Post-reduction (Form 104-B)

4. Calculate the required reduction for actual combined gaseous and particulate HAP emissions:

$$RR_A = 100(.9BG_A + 0.95BP_A)/(BG_A + BP_A)$$

Where:

- RR_A = Required reduction for combined actual gaseous and particulate emissions
- BG_A = Total actual gaseous HAP emissions – Base year (Form 104-B)
- BP_A = Total actual particulate HAP emissions – Base year (Form 104-B)

4. Calculate the required reduction for adjusted combined gaseous and particulate HAP emissions:

$$RR_{Adj} = 100(.9BG_{Adj} + 0.95BP_{Adj})/(BG_{Adj} + BP_{Adj})$$

Where:

- RR_{Adj} = Required reduction for combined adjusted gaseous and particulate emissions
- BG_{Adj} = Total adjusted gaseous HAP emissions – Base year (Form 104-B)
- BP_{Adj} = Total adjusted particulate HAP emissions – Base year (Form 104-B)

The answers to 2.a and 3.a must be equal to or greater than 90 percent to qualify for an Early Reductions compliance extension.

The answers to 2.b and 3.b must be equal to or greater than 95 percent to qualify for an Early Reductions compliance extension.

The answers to 2.c and 3.c must be equal to or greater than the answers to 4 and 5, respectively, to qualify for an Early Reductions compliance extension.

AP106 – RENEWAL APPLICATION

The owner or operator must submit an application for renewal of the Oregon Title V Air Operating Permit twelve (12) months prior to the expiration date of the permit; unless otherwise directed by DEQ in accordance with OAR 340-218-0040(1)(a)(D). At a minimum, the owner or operator shall submit form AP106, but may also be required to submit new or revised forms from the original application. Below is an overview of the renewal process and instructions for completing form AP106.

Before completing the renewal application assemble the following materials:

- The current permit including the review report and emissions detail sheets;
- Any permit addendums issued since the permit was issued (these may include administrative amendments, minor permit modifications, or significant permit modifications);
- Any off-permit changes (form MD 902); and
- Any 502(b)(10) changes (form MD903).

It may be necessary to submit new or revised application forms from the original application package. If the original application forms cannot be located, DEQ can provide a new set upon request.

After assembling the materials, provide the information requested and answer the questions on form AP106 and attach any additional information. Form AP106 includes a certification that must be signed by the responsible official. Once the renewal application is complete, submit 3 paper copies and 1 electronic copy to DEQ’s Regional office identified on the cover page of the current permit.

If there are no significant changes to the permit, simply submit form AP106 and an edited copy of the current permit to request any administrative or minor permit changes. If there are significant changes due to such things as a proposed

change in operations (e.g., adding a new piece of equipment), plant site emissions increases, or a new regulation that affects the facility (e.g., a MACT standard), the owner or operator will need to answer the appropriate questions and provide additional information. It may be necessary to complete an additional form from the original application packet. In other cases, the information can be provided directly in form AP106. When the information is provided in form AP106, the owner or operator can use any format (e.g., text, tables, spreadsheets, etc.) that may be convenient.

There are two significant regulations that will affect most sources. These are the compliance assurance monitoring rules (40 CFR Part 64) and the accidental release prevention rules (40 CFR Part 68). For the compliance assurance monitoring (CAM) requirements, DEQ developed form CP709 to gather the information necessary for the permit. Complete this form for each emissions unit affected by the new regulations. For the accidental release rules, the owner or operator is only required to state whether the requirements are applicable and list the chemicals that are used in processes at the facility in quantities greater than the threshold levels (the list of substances is attached). In addition, answer questions pertaining to the accident record of the facility.

If the application is deemed incomplete within 60 days after it is received, the owner or operator will be notified of the deficiencies. If the owner or operator is not notified within 60 days, the application will be considered complete by default. The owner or operator is required to immediately amend the application upon becoming aware that the application contains incorrect information or relevant facts were not included.

Instructions for completing form AP106:

Note: Instead of listing all of the requested changes identified in items 10, and 16 through 21, attach an edited copy of the permit showing any requested changes. Each change should be numbered so that the reason for the change can be provided in a list attached to this renewal application form. On form AP106, simply write “see attached permit” for the items that are addressed in the edited permit. The owner or operator must provide the reason for each change.

1. Enter the facility contact person, phone number, fax number, and email address, if available.
2. Enter any requested changes to the information contained on the cover page of the permit, except the Expiration Date and the Information Relied Upon.
3. Were there any off-permit changes during the previous permit term? If so, the owner or operator should have submitted form MD902. Should the off-permit changes be integrated into the new permit? If not, explain why.
4. Were there any section 502(b)(10) changes during the previous permit term? If so, the owner or operator should have submitted form MD903. Should the section 502(b)(10) changes be integrated into the new permit? If not, explain why.
5. Provide the following information about the facility operations as they relate to the next permit term.
 - a. Enter the maximum production or operation capacity on both a short term (hourly, daily, weekly, or monthly) and annual basis for the facility’s primary industrial activity. This activity is defined by the Standard Industrial Classification (SIC) code identified on the cover page of the current permit under which the facility is registered with the Oregon Secretary of State. The owner or operator will have to specify the units being used to report the capacity (e.g., number of widgets produced per hour or year).
 - b. If applicable, enter the maximum amount of each type of fuel that will be used on both a short term (hourly, daily, weekly, or monthly) and annual basis. Include the units of fuel usage (e.g., gallons).
 - c. If applicable, enter the maximum amount of each type of raw material used on both a short term (hourly, daily, weekly, or monthly) and annual basis. Include the units for the raw material usage (e.g. tons).
6. Enter the anticipated maximum operating schedule for the primary industrial activity at the facility. Enter the operating hours per day, days per week, and weeks per year. If the operation is seasonal, enter the months of operation.
7. Enter the number of employees working at the permitted facility.
8. Will there be any new operating scenarios or changes to existing operating scenarios? If yes, describe and attach form AP103. In general, most permits include only one operating scenario so this question can be left blank.
9. Will there be any new, modified, or reconstructed stationary sources or air pollution control equipment? If yes, will the changes trigger new source review (NSR) or prevention of significant deterioration (PSD) because emissions will increase by more than a significant emission rate? (See OAR 340-200-0020 for a list of significant emission rates and Division 224 for the NSR/PSD regulations). If PSD or NSR is triggered, submit an application for a Standard Air Contaminant Discharge Permit (ACDP) for construction approval. If PSD or NSR are not triggered, submit form MD901 and follow the procedures in OAR 340-218-0190 for construction approval.
10. Are the current emissions units correctly identified and defined in the permit? If not, provide any necessary revisions not covered in item 9.

11. Does 40 CFR part 64, the compliance assurance monitoring (CAM) regulation apply to any emissions units? (see form CP709 for a discussion of applicability). If the CAM rule does apply, complete form CP709 for each pollutant-specific emissions unit.
12. Does 40 CFR Part 68, the accidental release prevention regulations, apply to the facility? The accidental release prevention regulations are applicable if a stationary source has more than a threshold quantity of a regulated substance in a process (the list of regulated substances and threshold quantities is enclosed in the renewal application package and 40 CFR 68.115). A “process” is any activity involving a regulated substance, including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. Any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, is considered a single process. The owner or operator of the stationary source must make a reasonable determination as to whether two or more vessels may be involved in the same accident, or whether a release from one vessel may be anticipated to lead to a release from another. Document the decision as to whether the individual vessels do or do not constitute a single process.

If a regulated substance(s) are present in a process in quantities greater than the threshold levels, determine which risk management plan (RMP) program of the regulations is applicable. To ensure individual processes are subject to requirements commensurate with their size and process type, EPA classified them into three categories, or “programs.” Program 3 processes are subject to the most comprehensive requirements and comprise relatively complex chemical processing operations in specified Standard Industrial Classification (SIC) codes and processes already subject to the OSHA process safety management (PSM) standard. Program 2 processes are subject to a streamlined version of the requirements, and include generally less complex operations that do not involve chemical processing and are without a chemical accident in the preceding 5 years. Program 1 processes, subject to minimal requirements, are those from which a worst-case release would not affect the public. Further, since the RMP rule requirements are performance based, owners or operators of stationary sources with processes in Programs 2 or 3 have flexibility under the rule to tailor their programs to best meet their own risk management needs. The Programs are defined as follows:

- a. Program 1: A covered process is eligible for Program 1 provided:
 - i. the process has not had an accidental release of a regulated substance which resulted in offsite death, injury, or response or restoration activities at an environmental receptor in the five year prior to the submission date of the RMP;
 - ii. there are not public receptors within the distance to a toxic or flammable endpoint associated with a worst-case scenario; and
 - iii. emergency response procedures have been coordinated with the local emergency planning committee and response organizations (see 40 CFR 68.10).
- b. Program 2: A covered process is subject to Program 2 requirements if it does not meet the eligibility requirements of either Program 1 or Program 3.
- c. Program 3: A covered process is subject to Program 3 requirements if the process does not meet the requirements of Program 1 and if either of the following conditions are met:
 - i. the process is in SIC code 2611, 2812, 2819, 2821, 2865, 2869, 2873, 2879, or 2911; or
 - ii. the process is subject to the OSHA process safety management standard, 29 CFR 1910.119.

If the accidental release prevention regulations apply, list the applicable substances and identify the applicable program.

13. Are there any other new applicable requirements? (form AR401) If yes, list the applicable requirements and the emissions units (or entire facility) to which they apply. Also identify proposed monitoring for each emissions unit/applicable requirement by submitting the appropriate form from series CP700, including the new form CP709, if applicable.
14. Is the owner or operator requesting any changes to the PSEL? If yes, are changes due to better information such as an emission factor from a recent source test or are the changes due to production increases. For corrections to the PSEL due to better information, submit the applicable form from series ED600 to show changes and references for the new emission factors. For increases due to production increases, show changes on the applicable form(s) from series ED600 and submit an assessment of the air quality impacts if the emission increases are greater than the significant emission rate(s). Any increases due to physical changes at the facility should be addressed in item 9 above.
15. Is the source in compliance with all applicable requirements at the time of submitting the renewal application? If no, identify the applicable requirement and affected emissions unit(s) and include a compliance schedule.

16. Are any changes to the testing conditions being requested? If yes, identify the condition, the requested change, and the reason for requesting the change.
17. Are any changes to monitoring conditions being requested, except those that are being replaced by CAM? If yes, identify the condition, the requested change, and the reason for requesting the change.
18. Are any changes to the recordkeeping conditions being requested? If yes, identify the condition, the requested change, and the reason for requesting the change.
19. Are any changes to the reporting conditions being requested? If yes, identify the condition, the requested change, and the reason for requesting the change.
20. Are any changes to the non-applicable requirement conditions being requested? If yes, identify the condition, the requested change, and the reason for requesting the change.
21. Are there any other changes requested? If yes, identify the permit condition, the requested change, and the reason for requesting the change.