



TITLE V OPERATING PERMIT INSTRUCTIONS

Overview of the Instructions

This guide is intended to assist the applicant in completing, updating or renewing a Title V Operating Permit Application. Please print clearly when completing or correcting the forms. If the information required is more than space allows, attach additional paper and label each section and question appropriately.

There are two (2) parts in this guide:

1. **Part A, “General Information”**, is designed to provide the applicant with general requirements and information such as the fees, number of copies required and the completeness requirements determination.
2. **Part B, “Title V Application Structure and Instructions”**, is provided to explain the design of the Title V application and its format. Depending on the complexity of each section within the application, either a brief description or detailed instruction will be provided.

Part A: General Information

A. Overview

This part is intended to provide general information to potential applicants who might be subjected to the Title V Operating Permitting requirements. Topics included in this part are as follows:

- Who must apply for a Title V Operating Permit?
- Number of applications required?
- The Application Fees
- Certification Requirements
- Where to submit the Application?
- Completeness Review
- Confidentiality

A.1 Who must apply for a Title V Operating Permit?

All facilities that exceed the potential threshold as defined below will need to submit a Title V Operating Permit application.

Potential threshold for Title V facilities:

1. 10 tons per year or more of a specific hazardous air pollutant or 25 tons per year of a combination of hazardous air pollutants.
2. 100 tons per year of any other criteria contaminant (exceptions noted below). Fugitive emissions need not be included in the calculation to determine applicability unless the facility is one of the categories listed in Paragraph (ii) of the definition of “Title V facility”.
3. 25 tons per years of VOCs and NOx.

A facility must include all those sources located on one (1) or more contiguous or adjacent properties under common control and belonging to a single major industrial grouping [two (2) digit Standard Industrial Classification (SIC) code].

A.2 When to renew the application?

All applications for permit renewals shall be submitted at least SIX (6) and not more than 18 months before the expiration of the existing permit.

A.3 Number of copies required

Submit the completed application package in **triplicate** to:

Chief of Source Registration
Air Management Services
321 University Avenue
Philadelphia, PA 19128.

A.4 Application Fees

The following processing fees schedule is to be used when submitting this application. The check should be made payable to the "City of Philadelphia".

1. Six hundred fifteen dollars (\$615) for applications filed during the 2000-2004 calendar year.
2. Seven hundred fifty dollars (\$750) for applications filed during the years beginning in 2005.

A.5 Certification

This application must be signed by a **responsible official** in Sections 1 and 12 of the application, "Certification of Truth, Accuracy, and Completeness", and "Certification of Compliance with all Applicable Requirements", respectively.

"Responsible Official" is defined as follows:

- A. For a corporation: a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production or operating facilities applying for or subject to a permit and either:
 1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 2. The delegation of authority to such representative is approved in advance by AMS;
- B. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- C. For a municipality, State, Federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this paragraph, a principal

executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of EPA); or

D. For affected sources:

1. The designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the Clean Air Act or the regulations promulgated thereunder are concerned; and
2. The designated representative for any other purposes under 40 CFR Part 70.

A.6 Completeness Review

Besides complying with Items A.2, A.3, and A.4 above (relating to number of copies, fees, and certification requirements), all questions in this application must be answered. If a question does not fit the circumstances or characteristics of your facility, indicate "NA" for "Not Applicable". Incomplete forms will not be accepted and will be returned. This will delay the processing of your application.

Within 60 days from receipt of the application, AMS will determine if the application is complete. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official. Although an application may be accepted as complete, be aware that additional information and/or documentation may be required during AMS's review to fully evaluate the application.

Also, Section 127.505(c) of Title 25 provides that if the application is submitted within the time frame required and AMS fails to issue a permit through no fault of the applicant, the Title V facility may continue to operate if the fees required by Subsection I of Chapter 127, Title 25, have been paid and the source is operated in conformance with State and Federal laws and the regulations promulgated thereunder. The terms and conditions of an existing operating permit issued to a source continue, pending the issuance of a permit under Title V. As Section 127.505(e) notes, an applicant meeting the requirements of § 127.505(a) and (c) has an **application shield**. This application shield shall cease if the source

fails to provide information requested by AMS that is necessary to evaluate the Title V Operating Permit application.

A.7 Confidentiality

Sections 127.12(d) and 127.411(d) of Title 25 provides for the confidential treatment of information submitted as part of a plan approval or an operating permit application. These sections provide that, upon cause shown by any person that the records, reports or information, or a particular portion thereof, but not emission data, to which AMS has access under the provisions of the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to adversely affect the competitive position of that person by revealing trade secrets, including intellectual property rights, AMS will consider the record, report or information or particular portion thereof confidential in the administration of the Air Pollution Control Act. AMS will implement this section consistent with Sections 112(d) and 114(c) of the Clean Air Act. Nothing in this section prevents the disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of Administration of Federal, State or local air pollution control laws, or when relevant in any proceeding under the Air Pollution Control Act. These provisions of the regulation mirror those found in Section 13.2 of the Air Pollution Control Act.

A.8 Questions

For questions regarding the Title V operating permit application or operating permit requirements, please call the AMS Source Registration Unit at 215-685-7572.

Part B: Title V Application` s Structure and Instructions

B. Overview

The Title V Operating Permit application consists of the following major sections and addendum:

- Section 1: General Information
- Section 2: Applicable Requirements for the Site
- Section 3: Site Inventory List

- Section 4: Sources Grouping
- Section 5: Combustion Information
- Section 6: Incinerator Information
- Section 7: Process Information
- Section 8: Control Device Information
- Section 9: Stack and Flue Information
- Section 10: Fuel Material Location Information

- Section 11: Compliance Plan for the Site
- Section 12: Compliance Certification

Addendum 1: Method of Compliance Worksheet

Addendum 2: Alternative Operating Scenarios

B.1 Section 1: General Information

This section gives general information about the site as a whole and is only filled out once per application. There are four (4) basic parts in this section:

1.1 Application Type:

Indicate the type of permit for which this application is made for. Check only one (1) of the following boxes:

- **Initial** is for the initial Title V Operating Permit Application submittal.
- **Renewal** is for the renewal of an existing Title V Operating Permit application.
- **Application Revision** is to be used for cases where additional information and/or revision is to be supplemented or updated with the original application. If this box is checked, please provide either the submittal date of the original Title V Operating Permit Application or the Title V Operating Permit, if applicable.

1.2 Plant Information:

This section provides general information about the plant. The following information is requested and must be completed and/or corrected:

- **Federal Tax ID:** This number is unique for a facility and is used to track information for a site.
- **Firm Name:** The name of the company.

- **Plant ID:** Do not fill out this ID if you are completing this application for the first time. This ID is assigned by AMS and is used to separate multiple sites that belong to a facility. This number along with the Federal Tax ID would directly point to a specific site location.
- **Plant Name:** The name of the plant for which the application is made.
- **SIC Code:** This is the Standard Industrial Classification (SIC) Code for the main activity at this site.
- **Description of SIC Code:** Provide a brief description of the SIC Code given.
- **UTM Zone, UTM North and UTM East:** Provide the Universal Transverse Mercator (UTM) for this plant as a whole.
- **Method of Obtaining UTM:** Explain the method used in obtaining the above UTM. For example, from topographical map or global positioning satellite (GPS).

1.3 Contact Information:

The information given here should be the main contact person for all questions regarding this application.

1.4 Certification of Truth, Accuracy, and Completeness:

This certification must be signed by a responsible official. Refer to Part A, Item A.5, "Certification" of this guide for a definition about "responsible official".

Warning: Please note that applications without a signed certification in both Sections 1 and 11 will be returned as incomplete and are not eligible for the application shield.

B.2 Section 2: Site Applicable Requirements:

This is where the facility lists all applicable requirements that apply to the entire site or to all sources within the site. An example of this would be the requirement that no fugitive emissions are allowed beyond the property line. For each applicable requirement that is listed here and elsewhere within this application, a

separate worksheet, "Method of Compliance Worksheet", (Addendum 1) must be filled out. This is very important since all applicable requirements must provide a description of or reference to any compliance method to achieve compliance with the stated requirements.

- **Citation No.:** This would either be a federal, state, or local citation or an existing permit condition, if applicable. Applicants do not have to delineate which of these citations are federally enforceable. If needed, AMS will separate these requirements in the permit itself.

Note: Regulations cited in this column must be in a specific format. For Federal Citations, provide the Code of Federal Regulations (CFR) and the appropriate sections and/or subsections. For example, New Source Performance Standards (NSPS), Subpart Dc, would be listed as 40 CFR 60.43c for Particulate Matter.

For State Citations, list the appropriate chapters and sections. For example, a Surface Coating Process subjected to an allowable VOC content stated in Table I of Chapter 129.52, would enter 25 PA Code 129.52(b)(1) in the citation column.

For Local Citations, list the appropriate regulation and sections. For example, a Combustion Unit subject to a limit for Particulate Matter emissions from the burning of fuels for existing units from Air Management Regulation II, Section V, Subsection 1 would enter AMR II, Sec. V.1 in the citation column.

- **Citation Limitation:** Indicate the standard or emission limitation associated with the citation number listed.
- **Limitation Used:** This column is optional and is to be used only if a more stringent limitation is proposed.

Example: A steam generating unit constructed after June 8, 1989, with the maximum design heat input capacity of 85 MM BTU/hr fueled by coal. Some of the applicable requirements would be:

Citation No.	Citation Limitation	Limitation Used (optional)
40 CFR 60.43c	For PM: 0.05 lb/MMBTU	
40 CFR 60.42c	For SOx: 1.2 lb/MMBTU and 90% reduction	

For purposes of complying with the above requirement, ***the Method of Compliance Worksheet*** (Addendum 1) must be completed, indicating that the compliance method for PM would be recording and maintaining of records and Continuous Emission Monitoring (CEM), Method 6B, will be used to show compliance for SOx.

B.3 Section 3: Site Inventory List

This is a listing of all sources (units) that AMS currently has information stored in AIMS. This was provided as an inventory tool only and should be updated as needed. If the facility is new (or not currently in AIMS), then the applicant should provide a summary of all sources here.

- ***Unit ID*** is a unique number used to help identify sources at a facility. If a Unit ID has been assigned to a source in a previous operating permit, this ID should be used in the application. For new source(s), the applicant is free to assign a unique number to these sources as appropriate. This number can include both numbers and characters. However, please be careful to use this number throughout the application.
- ***Company Designation*** is provided for companies to use the existing designation as typically referred to in the plant.
- ***Unit Type*** is the type of the source in question.
- ***CAM*** (✓) identifies the pollutant specific emission unit (PSEU) subjected to Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64.

B.4 Section 4: Source Groups (optional)

This section is provided to assist the applicant in identifying and completing the applicable requirements. If there are a number of identical applicable requirements that apply to several sources, it is possible to group these sources together and only list the appropriate applicable requirements once in this section. Please note that source(s) can belong to different groupings with respect to identifying applicable requirements.

Warning: This section **is not** to be used for grouping of small and similar sources (grouping of similar sources should be identified under the source(s) section(s), see Section 5). The purpose of this section is to list all identical applicable requirements once and not have to repeat throughout the application for each source that this applicable requirement applies.

Also note that this section is optional and does not have to be completed.

There are two (2) parts in this section. They are as follows:

4.1 Source Group Definition:

This is where groups are defined. This section was created for the applicant's convenience. Instead of filling out identical applicable requirements for a number of sources, the applicant can group similar sources that have the same applicable requirements together in this table.

- ***Group No.:*** This is a sequential number for the newly created group.
- ***Unit ID Nos.:*** All source(s) within the group must be identified using the assigned Unit ID.

4.2 Applicable Requirements for Source Groups:

If a group was created in the previous section, this table must be completed.

- ***Group No.:*** Use the group number that was identified in the previous section.
- ***Citation No., Citation Limitation, and Limitation Used:*** These items were

previously defined in Part B, Section 2, of this guide.

B.5 Section 5: Combustion Unit Information

This section should be completed if a facility has a combustion unit located at the site. If there are no combustion units in this facility, do not fill out this section.

There are six (6) sections listed in this section:

1. General Source Information
2. Exhaust System Components
3. Source Classification Code (SCC) Listing
4. Maximum Fuel Physical Characteristics
5. Limitations on Operation (optional)
6. Source Applicable Requirements

Notes:

- This section addresses only one (1) combustion unit at a time. Duplicate this section to enter combustion sources as appropriate.
- It is possible to group a number of small combustion units together. However, be careful not to group a large number of small sources together since AMS will regard a group of sources as an individual source for purposes of determining future applicability with respect to certain future applicable requirements such as Enhanced Monitoring Requirements. For instruction on how to group source(s) together, please refer to next section.

5.1 General Source Information

Information contained or requested in this section is for identification of the source. All required fields are to be completed. If a question does not pertain to your source or if the information requested is not available, please either indicate "NA" for "Not Applicable" or "Not Available".

Grouping of sources: As mentioned earlier, sources may be grouped together if they are relatively small and similar in nature. For example, a refinery facility can group 100 of their valves or 100 flanges together as a source.

In order to group sources together, the applicant must indicate this grouping by providing a brief

description in spaces allotted for ***Source Description***. Once grouping has occurred, this group of sources will be considered as one (1) source and the emission reported must include all sources within this group. Again, be careful not to create a large group (in terms of total emissions emitted) since it may trigger new applicable requirements in the future.

Also, for purposes of grouping, the information relating to ***Manufacturer, Model Number*** and ***Installation Date*** are optional and can be left blank.

5.2 CAM Information

This section determines if CAM is applicable for the pollutant specific emission unit (PSEU).

5.3 Exhaust System Components

This section provides a description of the configuration of the exhaust system components. The following information is requested:

- ***From Unit ID:*** This refers to the starting point of the configuration. Usually, this is a source, a control device or a Fuel Material Location (FML). Answer this question by giving the type of source or component such as boiler, baghouse, or Fuel Material Location (FML) in space provided.
- ***Unit Description:*** Provide a brief description of the Unit ID.
- ***To Unit ID:*** Similarly, indicate the stopping point for which the listed component is configured. This normally represents a control device or a stack.
- ***Percent Flow:*** Provide the percent flow from one component to another.
- ***Begin and End Date:*** Provide the begin and end date for this configuration. If left blank, it will be assumed that this configuration is unchanged throughout the year.

5.4 Source Classification Code (SCC) Listing

In this section, the applicant is asked to complete the following information in a table format:

- **Fuel/Material:** Provide all types of fuel utilized by this source.
- **Associated SCC:** This is the Federal Standard Classification Code that represents a specific type of fuel and/or process. If known, provide this code in the space provided. Otherwise, this can be left blank.
- **Max Throughput Rate:** This would represent the maximum throughput rate in a standard or typical operation. This number would be used to calculate the potential to emit unless a lower limit has been established in Section 5.6, “*Limitations on Operation*”.
- **Firing Sequence:** Indicate how the fuels are being used by the source, sequentially (alternatively) or simultaneously.

This information is for a standard operational year. For a limitation or restriction to any of this information, please complete the table in Section

5.6, “*Limitations on Operation*”. **Do not** attempt to place a restriction on the throughput rate here.

5.5 Maximum Fuel Physical Characteristics

This section asks for the type of fuels and its physical characteristics employed for this source. Information requested is as follows:

- **SCC/Fuel Burned:** See Section 5.4.
- **FML:** FML stands for Fuel Material Location. FML is to be used for cases where a central location such as a fuel tank is being used by multiple sources in a facility. If such a scenario exists in a plant, please complete the Fuel Material Location worksheet in Section 10 of the application and provide the FML number in the space provided. By completing this worksheet once, the applicant does not have to repeat this information throughout the application.

If the concept of FML does not fit your case, leave the FML column blank and fill in the %Sulfur, %Ash, and BTU in spaces provided.

- **% Sulfur, % Ash and BTU Content:** If an FML has been specified, these three (3) items can be left blank. Otherwise, provide the information as requested.

Taking Restrictions on Fuel Characteristics:

If a restriction is desired with respect to fuel characteristics, the following steps must be followed:

1. **For an FML:** If the restriction is taken by either reducing the % Sulfur, % Ash or the BTU value for a specific type of fuel/SCC **AND** this change is effective for all sources that are fed from this FML, then the changes need to be made at the **FML level**. To do this, fill out Section 10, “*Fuel Material Location*” and provide the restricted fuel characteristics in the spaces provided.
2. If the changes are limited to only one source, even though the FML is capable of feeding several other sources, a new FML must be created for this proposed change. Again, complete Section 10, “*Fuel Material Location*” and assign a unique number for this FML.
3. **For other cases:** For all other cases that do not involve a FML, the restrictions can be made directly by providing the lower % Sulfur, % Ash or the BTU value in this section.

5.6 Limitations on Source Operation (optional)

This section is to be completed only if this source is seeking to place a restriction on either the hours of operation and/or the maximum throughput rate. Do not complete this table if this source is accepting the maximum operational hour of 8760 and operates at the maximum throughput rate provided previously in Section 5.4, “*Source Classification Code Listing for Standard Operation*”.

The first column asks for the SCC or the type of fuels used in this source. The next four (4) columns in this table are related to taking a restriction on the hours of operation. The final two (2) columns are for limiting the production or throughput rate.

Restrictions on hours of operation can be taken for the following cases: hours per day, days per week, days per year, and hours per year.

For limiting the throughput rate, provide the restricted throughput rate per unit time; (per hour, day, week, month, year).

Remember, all of these restrictions can then be used to reduce this source's potential to emit.

5.7 Source Applicable Requirements

This section is where all applicable requirements that pertain to this source are listed. This table follows the same format as previously encountered in Part B, Section B.2, "*Site Applicable Requirements*", on Page 4, and Section B.4, "*Group Applicable Requirements*", found on Page 5.

- **Fuel/SCC:** Provide either the SCC or the fuel type for which an applicable requirement is to be completed.
- **Citation No.:** This would either be a federal requirement or a state or local citation. Applicants do not have to indicate which of these citations are federally enforceable.
- **Citation Limitation:** Indicate the standard or emission limitation associated with the citation number listed.
- **Limitation Used:** This column is optional and is to be used only if a more stringent limitation is proposed.

Important: Please note that all applicable requirements listed here and elsewhere throughout this application must be accompanied by a, "*Method of Compliance Worksheet*", provided as Addendum 1 of this application package.

B.6 Section 6: Incinerators Information

This section should be completed if a facility has an incinerator unit located at the site. If there are no incinerator units in this facility, do not fill out this section.

Similarly to the previous section, this section also contains 10 sections. Because of the similarity in these sections, the instructions will not be repeated here. Please refer to previous

section, "*Combustion Information*", for instruction on how to complete this section.

Note:

- This section addresses only **one (1) incinerator unit** at a time. If there are multiple incinerator units, duplicate this section as appropriate.
- It is also possible to group a number of small units together. However, be careful not to group a large number of small sources together since AMS will regard a group of sources as an individual source for purposes of determining future applicability with respect to certain future applicable requirements such as Enhanced Monitoring Requirements. For instruction on how to group source(s) together, please refer to Section 5.1, "*Grouping of Sources*".

B.7 Section 7: Process Information

This section must be completed for all other sources that are not of the combustion unit or incinerator type. If there is more than one (1) process in this facility, duplicate the entire section and complete for each additional process.

Also, since the format of this section is similar to the previous two (2) sections (combustion and incinerator), no additional instruction is provided except for the following three (3) additional items.

7.8 Raw Materials:

This is applicable to a process only. It asks for a listing of raw materials that may have an effect on determining or regulating emissions. This listing does not have to be detailed. It is not a recipe list for a secret formula. If the breakdown of raw materials used does not create a change in

emissions, this question can be left blank.

7.9 Processing Steps:

Again, this question only applies to a process. It asks for steps taken during processing that may be needed for determining or regulating emissions. This is not an instruction manual for a secret recipe. Only information that may affect emissions is requested.

7.10 Request for Confidentiality

The previous two (2) sections can be made confidential if the applicant checks the provided box. However, please note that justification for confidentiality is required. Attach justification for confidentiality immediately following this section. Also refer to Part A, Item A.7, "Confidentiality", on Page 2 of this guide for more information.

B.8 Section 8: Control Device Information

The information requested in this section is designed to capture only the essential information about a piece of control equipment.

8.1 Type of Control Device

The following information is required in this section:

- **Unit ID:** Provide a unique Unit ID for this control device.
- **Company Designation:** Give the name of the control device as designated by the facility.
- **Used by Sources:** List and briefly explain all sources controlled through this piece of control equipment by the Unit ID of the source.
- **Type:** Describe the type of control equipment being used (scrubber, fabric filter, ESP, etc.)
- **Pressure Drop in H₂O:** Provide this information if applicable
- **Capture Efficiency:** This information is optional as long as the applicable standard does not specify a capture efficiency. However, if available, please provide the capture efficiency for this control equipment.
- **Scrubber Flow Rate:** Provide this information if applicable.
- **Manufacturer and Model No.:** Provide this information if available. For grandfathered source(s), these are optional.

- **Installation Date:** Provide this information if available.

Under Item K, "**Control Device Efficiency Estimates for this control device**", the following additional information is required:

- **Pollutant/CAS No.:** Provide the name or CAS Number of the pollutant being controlled.
- **Estimated Control Efficiency:** Provide the estimated control efficiency for the pollutant controlled.
- **Basis for Efficiency Estimate:** Briefly explain the method of calculating the control efficiency.

8.2 Control Device Efficiencies for HAPs

Complete this table if there are any Hazardous Air Pollutants emitted from this site. The following information is contained in this table:

- **Unit ID No.:** Same as previously explained. Refer to Section 3: Site Inventory List for more information
- **Pollutant No. and CAS No.:** Provide the pollutant name and the associated Chemical Abstract Services (CAS) number in the space provided.
- **Estimate Control Efficiency:** Give an estimated control efficiency for this type of pollutant.
- **Basis for Efficiency Estimate:** Briefly explain the method of calculating the control efficiency.

Note: Do not forget to provide supporting method and/or sample calculation for the estimated HAPs efficiencies given in this table.

B.9 Section 9: Stack/Flue Information

Provide all information as requested. Since the information requested in this section is self-explanatory, no detailed instructions are provided, except for a few items.

9.1 General Stack Information

- **Unit ID:** For a stack listed in a previous operating permit, the Unit ID should be the same one listed in the permit. If this is a new stack, assign a unique identifying number for this stack and be sure to use this same ID throughout the application.
- **Company Designation:** This would be the company's designation for this stack.
- **Discharge Type:** An example of discharge type would be vertical and unobstructed opening.
- **UTM:** The UTM is required only if previous modeling was required.

B.10 Section 10: Fuel Material Location Information (FML)

As previously mentioned in Section 5.4, "Maximum Physical Characteristics", the FML is provided to decrease the amount of repetition employed in this application. This section needs to be completed only if applicable.

- **FML ID No.:** For a new FML, assign a unique ID for this FML. (Ex: FML 01)
- **Name:** Provide a name or a description of this FML. (Example: No. 2 Oil Storage Tank)
- **Capacity:** Indicate the capacity of this FML. (Example: 30,000 gallons)
- **Fuel:** Provide the type of fuel this FML stores.
- **% Ash, % Sulfur and BTU:** Give these fuel characteristics according to fuel purchasing specifications.
- **Used by source(s):** List all source(s) by Unit ID that use this FML.

B.11 Section 11: Compliance Plan For The Facility

This section is to be completed once per application. The completion of this section is very important. It provides the applicant a chance to show compliance with all applicable requirements as well as to propose a compliance

schedule for cases where compliance has not yet been achieved. Basically, there are three (3) questions in this section.

11.1 Question 1 asks if the company will be in compliance at the beginning of the Title V Operating Permit issuance and continue during the permit duration.

Check the appropriate box.

11.2 Question 2 asks if the company will be in compliance with requirements that are scheduled to take effect during the term of the Title V Operating Permit. Check the appropriate box.

11.3 Question 3 is a follow up from question number 2 and asks if these requirements will be met by the regulatory required dates.

Again, check the appropriate box.

If any of the above questions were answered "No", the applicant must identify the applicable requirement(s) that the company is not/will not be in compliance with by completing the following table (Section 11.4.1):

11.4.1 Identification Table for Applicable Requirements not in compliance

- **Source ID No.:** In this column, place the Unit ID, Group ID, or SCC number of the applicable requirement that is not in compliance in space provided.
- **Citation No.:** Repeat the Citation Number for the applicable requirement in the Citation Number column.

11.4.2 Briefly describe how compliance is to be achieved

Present an overview of how the company will come into compliance with the stated applicable requirements.

11.4.3 Detailed schedule leading to compliance

This section is intended for the applicant to provide a detailed schedule of how the company will come into compliance. Complete the table by giving the estimated date for which an action

or step is being fulfilled in order to achieve compliance. This should correspond with the overview.

11.4.4 Submittal frequency

Indicate how frequently progress reports will be sent to AMS. Note that the minimum is at least twice a year.

11.4.5 Starting Date

Enter proposed first progress submittal date.

B.12 Section 12: Compliance Plan Certification

A compliance certification must be submitted to AMS throughout the term of the permit. By fulfilling this requirement, the applicant can prove to AMS that all applicable requirements and compliance methods are being adhered to.

This section is mandatory and needs to be complete once per application. Complete the three questions as requested. Note that this section must be signed by a responsible official.