



CITY OF PHILADELPHIA
DEPARTMENT OF PUBLIC HEALTH
PUBLIC HEALTH SERVICES
AIR MANAGEMENT SERVICES

Air Management Services
321 University Avenue
Philadelphia PA 19104-4543
Phone: (215) 685-7572
FAX: (215) 685-7593

Instructions for Alternative Operating Scenarios

A.1 Addendum 2: Alternative Operating Scenarios (Optional)

Alternative Operating Scenarios are different modes of operation in which a facility can foresee or anticipate, and should be included in the Title V Operating Permit Application. By including these different modes of operation in the permit, the facility would not have to apply for permit amendments when switching between operating modes. Therefore, it is extremely important for a Title V applicant to consider variations that their processes have historically gone through, any changes that may be expected in the future, and the capabilities of the process equipment.

Examples of alternative operating scenarios follow:

- 1) A utility has installed flue gas desulfurization equipment to meet Title IV acid rain requirements dealing with sulfur dioxide allowances. The equipment is not required to be operated at all times. When the SO_x controls are operated, the emissions exit a shorter “cold” stack. When the SO_x control equipment is not being operated, the emissions exit a tall “hot” stack. The applicable requirements vary depending upon whether the controls are needed to meet SO_x allowances.

Alternate operating scenarios are not needed for a boiler that is capable of using several different fuels. In this case, the permit would merely list the applicable requirements that apply when each of the fuels is being used. The permit would require that appropriate fuel use measurements and/or records be maintained and reported. The applicant can then switch fuels at any time so long as the change is logged and reported as required by AMS.

- 2) Another example is where a process line is capable of producing two or more different products and the different production modes are subject to different applicable limitations. Applicable limitations for each operational mode are specified in the operating permit and the permittee is allowed to switch to any of the approved modes if the change is logged and reported as required.

Specific Instructions:

The format for this addendum is similar to the overall Title V application and is presented in a compressed form. All of the required information is requested in the following order:

- Section A: General Information
Section B: Alternative Operating Scenario Description

Notes:

- The alternative operation for a source must encompass the entire operation of the source.
- Only one alternative operation per source is allowed to be active at a time.
- This addendum addresses only one source per scenario at a time. If there is more than one scenario for this source or for any other source(s), duplicate this addendum and complete accordingly.

- Addendum 1, “*Method of Compliance Worksheet*”, must also be completed for each alternative applicable requirement listed in this form.

Section A: General Information

This section asks for certain identifying information about the source and directs the applicant to complete one or more additional sections within this addendum. The applicant needs to complete only those sections that are applicable to the proposed scenario.

Plant Information

The following items are requested in this section:

- Federal Tax ID
- Firm Name
- Plant ID
- Plant Name

Source Description

In this section, assign a name for this proposed alternative operating scenario. Also provide the corresponding Source Name and Unit ID for this source. Indicate the source type by checking the appropriate box provided and briefly describe the proposed alternative operating scenario. Explain how it is different from the standard operation.

Operational Flexibility Request

Check all possible alternative changes for this scenario. Note that for each corresponding change checked, different sections within this addendum need to be completed.

Section B: Alternative Operating Scenario Description

There are eight (8) sub-sections within this section. Complete only those sections that are applicable to you. Note that the section titled “Applicable Requirements” is to be completed for all Alternative Scenarios. Following is the sub-Sections headings for this section:

- Exhaust System Component
- Source Classification Code (SCC) Listing
- Maximum Fuel Physical Characteristics
- Limitations on Operation (Optional)
- Process Description
- Applicable Requirements

Because of the similarity of these sub-sections when compared to the main application, detailed instructions will not be provided for some sub-sections within this Addendum. Refer to instructions given previously for more detailed information.

Exhaust System Component

Complete this sub-section if this alternative operating scenario involves a change from the standard exhaust system configuration. Complete the given table as requested.

Source Classification Code (SCC) Listing

Give a complete listing of all fuels burned, products produced by a process, or waste incinerated for this alternative operating scenario in the table provided.

Note: Do not place a limitation and/or restrictions in this section. All proposed restriction and/or limitations should be done in Sub-Section titled ***“Limitations on Operation”***.

Maximum Fuel Physical Characteristics

Complete as required. See instructions for completing a Title V application for more details.

Limitations on Operation (Optional)

This section is optional and is to be completed only for cases where a lower limitation and/or restriction is proposed for this alternative scenario. See instructions for completing a Title V application for more details.

Process Description

See instructions for completing a Title V application for more details.

Applicable Requirements

Complete the table as requested. Include only those applicable requirements that are applicable to this alternative operating scenario. Please note that a separate Compliance Method Worksheet must be completed for applicable requirements listed.