# **Part 70 Annual Compliance Reporting Instructions:**

# Form A:

#### A.

Enter the number of each 9.B and 9.C condition and subpart of a condition on a separate row in column **A**, and include a brief overview of the condition (e.g., Emission limits specified in Tables 5.1-3 and 5.1-4, Gaseous Fuel Sulfur limit, etc.). For each equipment group in the 9.C conditions, use a separate Form A with the applicable "Equipment Category" entered in the box at the top of the form.

Note: If column **E.** states no deviations have occurred for a particular condition, then columns **F** through **H** do not have to be completed for that condition.

#### B.

Enter the compliance status for each condition or condition subpart in column **B**. Write "C" if the facility was in continuous compliance with the permit condition or condition subpart. Write "I" if the facility was in intermittent compliance with the condition or condition subpart. **Continuous compliance** ("C") can only be designated if all required monitoring was performed for the reporting period, and no deviations occurred. Intermittent compliance ("I") is designated when all required monitoring was not performed, or when all required monitoring was performed but a deviation occurred. Deviations should be noted in column E. For emission units with CAM requirements, an excursion beyond the specified indicator range indicates potential non-compliance with an emission standard, so continuous compliance could not be claimed.

At a minimum, the owner/operator shall use all applicable information obtained from the testing, monitoring, and recordkeeping requirements in the permit as the basis for determining the compliance status. In addition, the owner/operator shall consider any other available information, such as tests conducted in addition to those required in the permit and a general knowledge of the process, as a basis for determining the compliance status during the reporting period.

### C.

Enter the monitoring method(s) in column  $\mathbf{C}$  (e.g., ASTM #, source test method, CEM, fuel meter, hour meter, manometer pressure differential, etc.), as applicable, used for determining compliance with each condition. Cross-reference the page numbers from the Semi-Annual Compliance Verification report which contain the monitoring data. If no specific monitoring requirement is given in the Part 70 permit for a condition, enter N/A (not applicable) for that condition.

- D. Enter the emissions unit identification code (Part 70 permit ID#) in column **D** for each emission unit covered in the condition.
- E. State whether a deviation occurred during the reporting period for the condition/applicable requirement specified in column A. Enter "yes" or "no" in column E. A deviation means a situation in which an emissions unit fails to meet a permit term or condition (includes emission limitations, and operational and monitoring requirements).
- F. Enter "EE" in column  $\mathbf{F}$  if the permit deviations noted were excess emissions. EE deviations include mass emission limits, BACT limits, and any other applicable emission standards.  $\mathbf{EE}$

deviations also include monitoring or work practice deviations with the potential to cause excess emissions that were not directly measured. Enter "non-EE" if the permit deviations did not cause excess emissions. If both "EE" and "non-EE" types occurred for a single condition, please note both in this column and provide the subtotals (e.g. , 3 "EE"/ 2 "non- EE"). Enter the total (5) in column  $\mathbf{G}$  (see below).

G. Enter the total number of permit deviations in column G for each permit condition or condition subpart.

H.

Enter the APCD Breakdown # and Report date in column **H** if previously submitted for the deviation(s). List all applicable Breakdown #'s if more than one deviation occurred. If no breakdown report was filed, then list the emission unit ID # associated with the deviation and then complete Form B ("Summary of Permit Deviations").

Note: All information required under the section 9.C "Reporting" conditions of each Part 70 permit must be submitted in conjunction with Form A.

# **Instructions for Form B:**

Note: Form B only needs to be completed if a deviation was reported on Form A and if an APCD Breakdown **Report** form was not previously submitted (i.e., not referenced in column H on Form A).

a.

Enter the condition in column **a**, as identified in the owner/operator's Permit.

b.

Enter the Part 70 permit ID number of the emissions unit in column **b**. (If the deviation applied to the entire facility, enter "F")

c.

Enter the probable cause of the deviation. If the deviation is due to an exceedance of a pollutant/parameter limit, enter the appropriate two-letter code from the list of "Pollutant/Parameter/Work Practice Deviation." If the deviation is due to monitoring data/downtime or insufficient monitoring/recordkeeping, enter the appropriate two-letter code from the list of "Monitoring Deviation."

Pollutant/Parameter/Work Practice Deviation		Monitoring/Recordkeeping Deviation	
pa	control equipment failure	Ma	Inadequate Calibration or Maintenance
pb	cleaning, soot-blowing	Mb	Non-CEM equipment malfunction
рс	fuel problems	Mc	CEM equipment malfunction
pd	process problems	Md	CEM or Ambient monitor downtime
pe	startup/shutdown	Me	Process monitor down time
pf	other: specify (attach explanation)	Mf	Failure to monitor or inadequate frequency
	•	Mg	Failure to keep records
		Mh	Incorrect procedure
		Mi	other: specify (attach explanation)

- d. Enter the date and time that the deviation period began. Enter the date as month and day (mm/dd). Enter the time in military time (e.g., 2:00 pm is 1400).
- e. Enter the date and time that the deviation period ended. Enter the date as month and day (mm/dd). Enter the time in military time (e.g., 2:00 pm is 1400).
- f.
  For EE type deviations, enter the excess emissions (lb/hr) of each applicable pollutant. If excess emissions were not directly quantified but potential for emissions could have resulted from a monitoring or work practice deviation, excess emissions must be estimated (using applicable

emission factors and/or best assumptions). In cases in which mass emission limits are not exceeded but concentration limits are (e.g., a BACT standard), enter the excess ppmv above the standard. For other types, enter the deviation as measured (e.g., if the parameter is opacity, the limit is 20 percent, and the deviation was an opacity reading of 50 percent, enter "50 percent" in the answer space). The owner/operator should attach all calculations and equations used to answer this question.

g. Identify any corrective actions and/or preventative measures taken as a result of the deviation to contain the deviation and/or prevent a recurrence. If additional space is needed, the owner/operator may attach the explanation. The attachment should clearly identify what deviation is being addressed.