

INTRODUCTION TO ALASKA TITLE V PERMITTING

Owner/operators of Alaska major stationary sources that meet one or more criteria defined by Alaska Statute (AS) must submit an application for an Alaska Title V operating permit within one year after the initial startup of the stationary source.

Except for sources exempted or deferred by AS 46.14.120(e) or (f), AS 46.14.130(b) lists three categories of sources that require an operating permit:

- A major source;
- A stationary source including an area source subject to federal new source performance standards under Section 111 of the Clean Air Act or national emission standards under Section 112 of the Clean Air Act;
- Another stationary source designated by the federal administrator by regulation.

The Alaska Department of Environmental Conservation has developed standard Title V application forms for stationary sources required to submit an initial Title V application as well as a renewal or modification. Five series of forms (A through E) and their accompanying instructions are provided for your use in completing an initial or renewal application. For an initial permit, all form series should be completed as indicated by the instructions for each Form Series. The owner/operator or other individual completing the forms should complete each Form Series in sequence, beginning with Form Series A. Once the permit application is complete, follow the instructions provided for submittal to the Department and EPA.

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.

If this application is for a renewal or modification, follow the guidance provided for permit renewal beginning on Page 10 of these Form Series A instructions. The renewal guidance will assist you in determining which forms and supporting documentation must be provided.

The permit application, whether initial or renewal, shall not incorporate reference to any previous permit applications. **Each application shall be a complete stand-alone document with all required information.** However, once the Permittee has completed an initial, modification, or renewal permit application using the standard forms, pages containing information that has not changed from a previous submission may be copied and inserted in subsequent renewal applications to create a complete permit application package.

Notify the Department if any portions of the permit application are considered confidential as allowed. Records, reports, and information, and parts of records, reports, and information, other than emission data, in the Department's possession or control are considered confidential records and shall be kept confidential and in separate files if the owner and operator have certified under oath to the department or authorized local program that public disclosure would tend to affect adversely the owner's and operator's competitive position; and the records, reports or information, or parts of the records, reports, or information, would divulge production figures, sales figures, processes, production techniques, or financial data of the owner and operator that are entitled to protection as trade secrets under AS 45.50.910 – 45.50-945. Except as provided in AS 46.14.520, permits, permit application, emissions and monitoring reports compliance reports, certifications, and monitoring, reporting, and quality assurance plans in the Department's possession or control are available to the public for inspection and copying.

Form Series A Instructions – Stationary Source

Form Series A collects general information about the stationary source. The following forms are included in this series:

Form Number	Description	Page Number
A1	This form captures administrative details (e.g., stationary source owner/operator, location address, mailing address, etc.) about the stationary source and includes the application certification.	3
A1-R	This form is used to certify the accuracy of supplemental information submitted to correct or amend the original application.	4
A2	This form captures physical details about the stationary source itself (e.g., site area, geographic location, etc.).	5
A3	This form is completed once for each operating scenario defined for the stationary source.	6
A4	This form is used for permit renewal applications.	9

Note that “not applicable” or “N/A” may be an appropriate response to some of the data elements presented in these forms. However, the intent of standard application forms is to provide a template that prompts the applicant for all of the information necessary to fully describe a stationary source, emission units, control devices etc. Some information that may not be needed to determine specific regulatory applicability will assist the permit drafter to fully understand the stationary source and emission units and will preclude a possible information request at a later date. Information included on other application forms within the current application may be referenced.

FORM A1 – STATIONARY SOURCE (GENERAL INFORMATION)

Complete this form *once* with the initial permit application for the stationary source. For subsequent renewals or modifications, this form is required only if changes to the Form A1 data are necessary.

1. Provide the legal name of the Permittee (permit applicant).
Provide the Permittee's mailing address.
 - PO Box or street and number.
 - City, state, and zip code.
2. Provide the name of the stationary source as defined in the current Title V Permit, Permit-to-Operate, or current Alaska Title I permits. *Note that you will enter this name at the top of all Title V application forms completed for this stationary source in the blank provided.*
3. Provide the address of the stationary source, if different than the Permittee's mailing address.
 - The street address. If the stationary source 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 stationary source is located in an industrial park, provide the name and address of the park.
4. Provide the location - latitude and longitude of the stationary source.
 - Latitude in degrees, minutes, and seconds: ##° ##' ##" North
 - Longitude in degrees, minutes, and seconds: ###° ##' ##" West
5. Provide the stationary source primary Standard Industrial Classification (SIC) and description, as well as primary North American Industry Classification System (NAICS). A list of SICs and corresponding descriptions are available on OSHA's website: <http://www.osha.gov/>. Information on NAICS are available on the Census Bureau's website: <http://www.census.gov/eos/www/naics/>.
6. Indicate the current or previous Title V air permit number (if applicable). If this application is for the stationary source's initial Title V permit, enter the stationary source ID number as defined in the Permit-to-Operate or current Alaska Title I permits. *Note that you will enter this number at the top of all Title V application forms completed for this stationary source in the blank provided.*
7. Check the appropriate box to indicate whether or not the application contains confidential data.
8. Check the box indicating the nature of the Title V application.
9. Provide the following information about the contact person or persons for the stationary source:
 - Name
 - Title
 - Mailing address
 - Phone number including area code (where indicated)
 - E-mail address (where indicated)
10. Statement of Certification. Per 18 AAC 50.326(c) and 18 AAC 50.205, the owner/operator is required to certify the permit application. Carefully read the Statement of Certification. The certification should be signed by the official at the stationary source responsible for the stationary source's compliance with state and federal air quality regulations and knowledgeable of the truth, accuracy and completeness of the contents of this application.

FORM A1-R – STATIONARY SOURCE SUPPLEMENTAL INFORMATION OR APPLICATION REVISION

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 stationary source and application:

- Name
- Title
- Mailing address
- Area code and phone number
- E-mail address, if available
- Brief description of supplemental information or application revision

Statement of Certification.

Per 18 AAC 50.326(c) and 18 AAC 50.205, 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 stationary source responsible for the stationary source's compliance with state and federal air quality regulations and knowledgeable of the truth, accuracy and completeness of the contents of this application.

FORM A2 - STATIONARY SOURCE DESCRIPTION

Complete this form *once* for the stationary source. For subsequent renewals or modifications, this form is required only if changes to the Form A2 data are necessary.

1. Provide a description of the stationary source including the following:
 - a description of the current industrial processes at the stationary source;
 - a discussion of any modifications made to these processes that have not been addressed through the stationary source's permit-to-operate or subsequent minor permit;
 - 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 stationary source that the permit will need to address.
 - Other suggested items include: location, property area, number of employees, maximum capacity, operating schedule, and primary emission-generating activities.
2. Indicate (yes or no) whether the stationary source is located in a nonattainment area. If the answer is "yes," specify the name of the area and the pollutant (e.g., Eagle River, AK – PM-10).
3. Does 40 CFR Part 64, the compliance assurance monitoring (CAM) regulation apply to any emissions units? For each affected pollutant-specific emissions unit, the owner/operator must develop a CAM plan. The CAM plan is designed to identify indicators of control device performance, corrective action trigger levels, monitoring equipment, monitoring performance criteria, data collection criteria, and implementation schedules, if necessary. Depending on the emission unit, applicable requirement, and control equipment, there are several monitoring approaches that will satisfy CAM. These include actual emissions monitoring, predictive emissions monitoring systems, visible emissions monitoring, control device parameter monitoring, process monitoring, inspection and maintenance activities, or a combination thereof. The owner/operator will have to decide which is most appropriate for their situation. EPA has developed a CAM Technical Reference document that includes examples of CAM for different types of emissions units and control devices. Once the CAM plan is approved, elements of the plan will become permit conditions.
4. Does 40 CFR Part 68, the accidental release prevention regulations, apply to the stationary source? 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" means 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. The owner/operator should document the decision as to whether the individual vessels do or do not constitute a single process.

If a regulated substance or substances are present in a process in quantities greater than the threshold levels, the owner or operator will have to determine which risk management plan (RMP) program of the regulations is applicable. To ensure that individual processes are subject to requirements commensurate with their size and process type, EPA has 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 different Programs are defined as follows:

- a. Program 1: A covered process is eligible for Program 1 provided:

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- 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. See <http://www.epa.gov/emergencies/index.htm> on the internet for more complete guidance.

5. 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 emission unit ID number for each emissions unit and emission point (stack).
 - the location of property lines;
 - the direction "North"; and
 - an explanation of the scale of the plan.
6. Attach a regional or city map depicting the stationary source location in relation to:
 - the surrounding vicinity (roads or other features);
 - neighboring residential and commercial areas and other sensitive receptors (e.g., hospitals and schools) within a 10 km radius; and
 - the nearest state boundary of Alaska, if within a 50 mile radius of the stationary source.
7. Attach a United States Geological Survey (USGS) or similar map to illustrate terrain, elevations, and Universal Transverse Meridian (UTM) zone and UTM coordinates.

FORM A3 – OPERATING SCENARIO DESCRIPTION

For each operating scenario, complete one Operating Scenario Description, Form A3. Before completing this form, review the following discussion of operating scenarios below.

An **operating scenario** is a unique combination of conditions, including emission unit configurations and process parameters, under which a stationary source operates at any given time. For example, at a given point in time, a particleboard manufacturer may have in operation the following emission units: predryers, boilers, dry dryers, and press lines, in addition to saws, reject lines, shredders, dust bins, and the like. These various emission units and processes in combination emit certain regulated air pollutants and trigger a series of applicable requirements.

To obtain an Alaska Title V Operating Permit for these industrial activities, the owner/operator must describe in the permit application the emission units and processes, the requirements applicable to them, and the pollutants they emit. This comprehensive description is essentially the **base operating scenario**--i.e., that configuration of operations from which all other configurations vary. The description of the base operating scenario should be broad enough to include the wide range of emission unit configurations, process parameters, and raw materials and fuels used at the stationary source. *Many owners/operators should be able to describe the base operating scenario at their facilities generically enough to avoid defining “alternative operating scenarios,”* described below.

If the owner/operator uses its equipment or operates its processes in a manner that changes the way in which compliance must be demonstrated, or causes different pollutants to be emitted, then the owner/operator may identify these collective new operating conditions as an **alternative operating scenario**. For example:

A boiler designed to burn more than one type of fuel (e.g., coal and natural gas) may be subject to different applicable requirements for the different types of fuels. For example, while burning coal, New Source Performance Standards (NSPS) rules may apply to the boiler; and while burning natural gas, NSPS rules may not apply. The NSPS rules may require recordkeeping and monitoring that may not otherwise be required of the boiler when burning natural gas. In this case, it may be advantageous for the owner/operator to define the two fuel burning conditions as different operating scenarios, such that the NSPS recordkeeping and monitoring will only be necessary when the stationary source operates under the coal-burning scenario.

The scenario above applies to emission units that change operating scenarios *infrequently*, and is not intended for the more common “dual fuel” units such as natural gas / diesel-fired boilers that may be switched easily several times per year. Dual fuel units such as natural gas / diesel-fired boilers can be permitted to switch fuels as necessary without changing the operating scenario. The operating scenario for a stationary source with a dual fuel emission unit would simply state that either natural gas or fuel oil may be combusted in the boiler. The Alaska Title V permit template contains standard language for the permitting of such emission units.

Why base an operating permit on alternative operating scenarios?

The Alaska Title V Operating Permit program recognizes that industrial operations are dynamic. The permit is intended to allow the owner/operator to conduct the full range of stationary source operations provided the stationary source remains in compliance with all applicable requirements. The owner/operator must comply with all applicable requirements and must certify intermittent or continuous compliance with those requirements annually. The inherent variability of industrial processes--for example, the use of a different blend of fuels in a kiln at different points in time--can cause different applicable requirements and different compliance demonstration requirements to be triggered at different times. By anticipating this variability through the identification of alternative operating scenarios in the permit application, the owner/operator can obtain through the permit the needed flexibility to change the stationary source's operating parameters in response to market, raw material, and other pressures, and still remain in compliance with the applicable requirements identified in the permit. This built-in flexibility is intended to minimize the need for the owner/operator to seek a formal permit modification simply to accommodate typical industrial variability.

Accounting for existing and future changes in operations

The definition of alternative operating scenarios can address both existing and future configurations of equipment and processes. The permit has a term of five years. Between the time the permit is issued and the time of its renewal, changes in a stationary source's equipment and process configurations may occur. To avoid later permit modifications, the owner/operator may consider building anticipated future changes into the permit application. If New Source Review or Prevention of Significant Deterioration would be triggered, then the change may not be incorporated into the permit application.

To account for future stationary source changes in the permit application, the owner/operator may define **existing** versus **future** alternative operating scenarios. If the scenario is future, the owner/operator would discuss in the "Description of operating scenario" the nature of the anticipated future changes relative to current operations. In discussing anticipated future changes, the owner/operator should provide as much detail as possible. If adequate detail is provided in the application, any permit modification necessary in the future may be limited to a relatively straightforward permit revision.

Practical requirements associated with the operating scenario

The owner/operator is required to record contemporaneously the operating scenario under which the stationary source is operating at a given time. If the owner/operator switches the operation to a different scenario, that change must be recorded. This requirement serves practical inspection, compliance, and enforcement purposes. An inspector entering a stationary source must know under what operating scenario the stationary source is operating at that time in order to know what types of activities and emissions to expect relative to the stationary source's permit. Variations on an operating scenario do not, however, need to be recorded.

In the context of the permit application, the owner/operator must provide emissions data, address compliance requirements, and specify operating parameters for the base and all alternative operating scenarios. In essence, the definition of each alternative operating scenario in the permit application requires that each scenario in itself become a mini-permit.

The owner/operator should balance the need to define all operating scenarios that would assure operational flexibility with the requirements for a more complex permit application and contemporaneous recording of operating scenario changes during day-to-day operation. The owner/operator's objective in defining different operating scenarios in the permit application is to obtain adequate flexibility to conduct industrial activities, given their inherent variability, and still be able to demonstrate compliance with all applicable requirements. In this way, the Alaska Title V Operating permit is intended to allow the owner/operator to operate the stationary source without having to seek a permit modification each time stationary source operations vary. In most cases, the owner/operator should be able to build in adequate flexibility in the base operating scenario to minimize formal permit modifications.

When should the owner/operator refrain from defining an alternative operating scenario?

At times, for example, the owner/operator may use different fuels to operate a boiler, but the same pollutants are emitted and the same applicable requirements pertain. Switching fuels may constitute a *variation* on the source's operating scenario for the boiler; it would not constitute an *alternative* operating scenario. The different fuels would be variations on the operating scenario, provided all of the variations use the same methods to determine compliance (i.e., fuel usage monitoring) and emit the same regulated air pollutants (just in different amounts). If the owner/operator chooses to define each fuel as an alternative operating scenario, recording changes in scenarios could be frequent and burdensome.

Instructions for completing Form A3:

1. Enter the identification number for the operating scenario. The first or primary operating scenario should be defined as identification number "1." Alternate operating scenario identification numbers would be "2," "3," etc.
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 these instructions, the owner/operator may define an alternative operating

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scenario in a way that accounts for planned future changes in the operations or configuration of the stationary source. If this is an alternative operating scenario that has been defined to accommodate future changes, then the owner/operator should indicate that it is *not* an existing operating scenario but instead reflects operations as they will be configured at some point in the future.

3. List the emission units involved in this operating scenario. If this scenario is an alternative operating scenario, the owner/operator should identify the emissions units that this scenario shares in common with other defined operating scenarios. He/she should 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.
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, the owner/operator would indicate **25 percent** in each three-month period.
6. Attach a process flow diagram showing emission units, control devices, and emission points.

FORM A4 – RENEWAL APPLICATION

The owner or operator must submit an application for renewal of the Alaska Title V Air Operating Permit no sooner than 18 months and no later than 6 months prior to the expiration of the permit; unless otherwise directed by the Department. The owner or operator shall submit Form A4, as well as new or revised forms from the original application. Provided below is an overview of the renewal process and the instructions for completing Form A4.

Before completing the renewal application, the owner or operator will need to assemble the following materials:

- The current Title V permit, including any permit addendums issued since the permit was issued (these may include administrative amendments, minor permit modifications, or significant permit modifications);
- A complete compliance certification for the stationary source;
- Any Alaska Title I permits that have been issued to the stationary source since the most recent issuance of the Title V permit that have not been incorporated into the Title V permit.

After assembling the materials, provide the information requested and answer the questions on Form A4, fill out the application forms (Form Series A through E) and attach any additional information. As you will notice, Form A4 includes a certification that must be signed by the responsible official.

Once the renewal application is complete and certified, submit 2 certified paper copies and 1 electronic copy to the Department's Anchorage address. The current address for the Anchorage office is: ADEC, 619 East Ship Creek, Suite 249, Anchorage, AK 99501.

Comply with the following requirements for submitting application information to the EPA Region 10: Provide a copy of each application for modification or renewal of a Title V permit, including any compliance plan, or application addenda, at the time the application or addendum is submitted to the Department. Submit to EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101. To the extent practicable, provide applications in portable document format (PDF); MS Word format (.doc); or other computer-readable format compatible with EPA's national database management system.

Instructions for completing Form A4:

Note: Instead of listing all of the requested changes identified in items 10, and 16 through 21, the owner or operator may attach an edited copy of the permit showing any requested changes. Each change should be numbered within the edited permit so that the corresponding reason for the change can be provided in a list attached to this renewal application form. On Form A4, 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 stationary source contact person, mailing address, phone number and e-mail address, if available.
2. If there were changes to stationary source general information, complete and submit a Form A1.
3. If there were changes to the stationary source description, complete and submit a Form A2.
4. Were there any off-permit changes during the previous permit term? Reference any notifications provided to the Department, and attach copies of the notifications. Should the off-permit changes be integrated into the new permit? If not, explain why not.
5. Were there any Alaska Title I permits issued to the stationary source during the previous permit term that have not already been incorporated in a Title V amendment? Should the Title I terms be integrated into the new permit? If not, explain why not.
6. Will there be any new operating scenarios or changes to existing operating scenarios? If yes, describe and attach Form A3.
7. Will there be any new, modified, or reconstructed emission units or air pollution control equipment? If yes provide Form B and any applicable Form B#. 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? If PSD or NSR is triggered, the owner or operator will have to submit an application for construction approval. If PSD or NSR are not triggered, the owner or operator may still be required to submit an Alaska Title I permit application if the modification or new unit triggers permitting requirements under 18 AAC 50, Article 5 (minor permits).

8. Are the current emissions units correctly identified and defined in the permit? If not, provide any necessary revisions not covered in item 9.
9. Does 40 CFR Part 64, the compliance assurance monitoring (CAM) regulation apply to any emissions units? For each affected pollutant-specific emissions unit, the owner/operator must develop a CAM plan. The CAM plan is designed to identify indicators of control device performance, corrective action trigger levels, monitoring equipment, monitoring performance criteria, data collection criteria, and implementation schedules, if necessary. Depending on the emission unit, applicable requirement, and control equipment, there are several monitoring approaches that will satisfy CAM. These include actual emissions monitoring, predictive emissions monitoring systems, visible emissions monitoring, control device parameter monitoring, process monitoring, inspection and maintenance activities, or a combination thereof. The owner/operator will have to decide which is most appropriate for their situation. EPA has developed a CAM Technical Reference document that includes examples of CAM for different types of emissions units and control devices. Once the CAM plan is approved, elements of the plan will become permit conditions.
10. Does 40 CFR Part 68, the accidental release prevention regulations, apply to the stationary source? 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” means 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. The owner/operator should document the decision as to whether the individual vessels do or do not constitute a single process.

If a regulated substance or substances are present in a process in quantities greater than the threshold levels, the owner or operator will have to determine which risk management plan (RMP) program of the regulations is applicable. To ensure that individual processes are subject to requirements commensurate with their size and process type, EPA has 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 different Programs are defined as follows:

- b. Program 1: A covered process is eligible for Program 1 provided:
 - iii. 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;
 - iv. there are not public receptors within the distance to a toxic or flammable endpoint associated with a worst-case scenario; and
 - v. emergency response procedures have been coordinated with the local emergency planning committee and response organizations (see 40 CFR 68.10).
- d. 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.
- e. 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. See <http://www.epa.gov/emergencies/index.htm> on the internet for more complete

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guidance.

11. Are there any other new applicable requirements? If yes, list the applicable requirements and the emissions units (or entire stationary source) to which they apply. Also identify proposed monitoring for each emissions unit/applicable requirement.
12. Is the owner or operator requesting any changes to the assessable potential to emit? If yes, are the changes due to better information such as an emission factor from a recent source test or are the changes due to production increases or a physical change, e.g., the installation of new emission units? For corrections to the assessable potential to emit due to better information or changes in production, submit the applicable form from Series D along with supporting calculations and references for the new emission calculations. Any increases due to physical changes at the stationary source should be addressed in item 9 above.
13. Is the source in compliance with all of the applicable requirements at the time of submitting the renewal application? If yes, attach a compliance certification. If no, attach a compliance schedule and/or actions taken for any out of compliance emission units.
14. Is the owner or operator requesting any changes to the testing and/or monitoring conditions? If yes, identify the condition, the requested change, and the reason for requesting the change.
15. Is the owner or operator requesting any changes to monitoring conditions, except those that are being replaced by CAM? If yes, identify the condition, the requested change, and the reason for requesting the change.
16. Is the owner or operator requesting any changes to the recordkeeping conditions? If yes, identify the condition, the requested change, and the reason for requesting the change.
17. Is the owner or operator requesting any changes to the reporting conditions? If yes, identify the condition, the requested change, and the reason for requesting the change.
18. Is the owner or operator requesting any changes to the non-applicable requirements, (i.e., permit shield)? If yes, identify the emission unit, the requested change, and the reason for requesting the change. Include the appropriate Series B, D, and/or E form as necessary and attach additional information as necessary to fully document.
19. Are there any other changes requested? If yes, identify the permit condition, the requested change, and the reason for requesting the change.