



Maricopa County

Air Quality Department

1001 N. Central Ave, Ste 200
Phoenix, Arizona 85004-1942
Phone: (602) 506-6010
Fax: (602) 506-6985

March 24, 2005

Application Forms for Title V Permits/Revisions/Renewals

The purpose of this memo is to provide guidance over which forms and information must be filed when applying for a Title V air quality permit or Title V air quality permit revision.

The question of which application form should be used is addressed by Rule 210 §301.1 of the Maricopa County Air Pollution Control Rules and Regulations (Rules). It states that each application for a permit must include a completed Standard Permit Application Form. The Standard Permit Application Form is found in Appendix B of the Rules and a copy is attached. Please note that it is a two page form and requires the appropriate listing of emission sources. The Standard Permit Application Form is to be used for new source permits, revisions to existing source permits (including administrative, minor and significant revisions) and renewals for existing source permits. The only exception is for source changes allowed without a permit revision which must meet the requirements of Rule 210 §403.

The question of what additional information must be included with an application is also addressed by Rule 210. Various provisions of Rule 210 require that the following application information be submitted for the listed permitting actions:

- **NEW TITLE V PERMIT** – Rule 210 §301.4 requires that an application for a new Title V permit contain the following in addition to a completed Standard Permit Application Form (including the emission sources portion):
 - 1) All information required by the “Filing Instructions” as shown in Appendix B of the Rules;
 - 2) A certification by a responsible official of truth, accuracy and completeness as of the time of submittal¹;
 - 3) An assessment of the applicability of the requirements of Rule 240 and Rule 241;
 - 4) An assessment of the applicability of the requirements established under Arizona Revised Statutes (A.R.S.) §49-426.03 and A.R.S. §49-426.06; and
 - 5) For an application to construct or reconstruct any major source of hazardous air pollutants, a determination that maximum achievable control technology (MACT) for new sources under Section 112 of the Clean Air Act will be met.
- **TITLE V PERMIT RENEWAL** – Rule 210 §301.4 requires that an application for a Title V permit renewal contain the following in addition to a completed Standard Permit Application Form (including the emission sources portion):
 - 1) All information required by the “Filing Instructions” as shown in Appendix B of the Rules; and

¹ Rule 210 §301.7 requires the certification state that “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”

- 2) Certification by a responsible official of truth, accuracy and completeness as of the time of submittal¹.
- SIGNIFICANT PERMIT REVISION TO A TITLE V PERMIT – Rule 210 §301.4 requires that an application for a significant revision to a Title V permit contain the following in addition to a completed Standard Permit Application Form (including the emission sources portion):
 - 1) All information required by the “Filing Instructions” as shown in Appendix B of the Rules as it relates to the proposed change;
 - 2) Certification by a responsible official of truth, accuracy and completeness as of the time of submittal¹;
 - 3) Assessment of the applicability of the requirements of Rule 240 and Rule 241;
 - 4) Assessment of the applicability of the requirements established under Arizona Revised Statutes (A.R.S.) §49-426.03 and A.R.S. §49-426.06; and
 - 5) For an application to construct or reconstruct any major source of hazardous air pollutants, a determination that maximum achievable control technology (MACT) for new sources under Section 112 of the Act will be met.
 - MINOR PERMIT REVISION TO A TITLE V PERMIT – Rule 210 §405.3 requires that an application for a minor revision to a Title V permit contain the following in addition to a completed Standard Permit Application Form (including the emission sources portion):
 - 1) A description of the change;
 - 2) The emissions resulting from the change;
 - 3) Any new applicable requirements that will apply if the change occurs;
 - 4) The source’s suggested draft permit²;
 - 5) Certification by a responsible official of truth, accuracy and completeness as of the time of submittal¹;
 - 6) Certification that the proposed revision meets the criteria for use of minor permit revision procedures; and
 - 7) A request that minor permit revision procedures be used for processing the application.
 - ADMINISTRATIVE TITLE V PERMIT AMENDMENT – Although a Standard Permit Application Form is required, Rule 210 §404 does not require specific additional information for permit revisions that constitute an administrative permit amendment (except for permit transfers - see below). However, the requested change must be described in enough detail to allow for accurate processing.
 - PERMIT TRANSFER (A specific type of Administrative Permit Amendment) - Applications for permit transfer must meet the requirements of Rule 210 §404.1d and the notice requirements of Rule 200 §404. A form for a permit transfer incorporating these requirements (which must be submitted in addition to the Standard Permit Application Form) can currently be obtained from our website at:
<http://www.maricopa.gov/aq/Permits/docs/Transfer.pdf>

Please note that Rule 210 §301.4 allows the Control Officer to request additional information even if the application is completed based upon the criteria listed above. Finally, be sure to send a copy of the application package, including all follow-up correspondence and information, to EPA Region 9. This is also required for source changes allowed without a permit revision. Their mailing address is:

USEPA Region IX

² The source’s suggested draft permit must be submitted for changes being made immediately after filing of the application (i.e. before receiving final approval from the Department). Please note that Rule 210 §405.6 requires that the source comply with the applicable requirements and the proposed permit conditions from the time the change is made until the Control Officer takes final action on the application.

Maricopa Title V Permittees
March 24, 2005

Permits Office (AIR-3)
75 Hawthorne St.
San Francisco, CA 94105

If you have any questions regarding permit applications for Title V permits, please feel free to call Dale Lieb at 602-506-6738 or any of the other members of the Title V permitting team.

Sincerely,

Dale A. Lieb
Manager, Title V and General Permitting

Attachment