

TITLE V

Information on Title V application completeness with respect to Draft Engineering Guide #65

February 23, 1996

The purpose of this short note is to clarify some information regarding **Draft Engineering Guide #65**. We want to make it clear to the permit applicants that Title V facilities are not obligated to follow the Draft Engineering Guide #65 monitoring, recordkeeping, and reporting suggested requirements. We have been advising the regulated community that we encourage the Title V applicant to place in their Title V application the recordkeeping, monitoring and reporting approaches that they believe are most effective for their company. In response to requests by the regulated community for assistance, Draft Engineering Guide #65 was prepared and represents Ohio EPA's effort to provide recommended approaches to monitoring, recordkeeping, and monitoring requirements designed to ensure compliance with our air pollution control rules. The guide does not represent mandatory, minimum requirements that must be submitted by the facility. This guide will also lead to more consistent permitting throughout Ohio.

If the Agency would disagree with a monitoring, recordkeeping and reporting approach that was provided by a company within their Title V application, this would not represent a condition that would deem the Title V application as incomplete. Rather, the Agency will work out the differences in opinion regarding appropriate recordkeeping, monitoring and reporting requirements through the permitting process [e.g., draft permit, preliminary proposed permit or an appeal of a final permit (if the Agency and the company are not able to resolve their differences)].

Ohio EPA has received mostly positive comments on Draft Engineering Guide #65. There are a number of Title V facilities that wanted Ohio EPA's recommendation for appropriate recordkeeping, monitoring, and reporting requirements. Also, all facilities in Ohio are interested in being treated equitably with their air permits throughout Ohio.

There have been concerns raised that Ohio EPA would deem a Title V application as incomplete if a Title V facility would file recordkeeping, monitoring and reporting requirements that are not consistent with Draft Engineering Guide #65. That information is not correct. If you have any questions, please call the STARShip/Title V support group or email at t5support@central.epa.ohio.gov.