

Under 40 CFR Part 70 and Utah rule R307-415, applications for renewal of an operating permit must contain the same information and level of review as the initial application. However, DAQ staff recognizes the burden associated with this activity, and has reviewed ways to ease the renewal process. Cross-referencing is the easiest way to achieve this. The information below describes how a renewal application may refer to other documents. Any source wishing to use this referencing should make sure that the referenced documents actually exist at both DAQ and the source location. Also, this approach has not yet been endorsed by EPA; the source may be required to provide a full, non-referencing application if EPA requests it.

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When compiling a renewal application, remember the following:

- 1) The application form must be completed and certified by a responsible official.
- 2) The application form requires the source to submit certain information in an appendix to the application. ***If none of the information has changed since the initial application (i.e., no new Approval Orders or applicable state or federal regulations)***, the source may include a page referencing the initial application (or the current Operating Permit) for all appendices except for Appendix K, Compliance Information, which must be completed for every application. For the other appendices, if the referenced application is not current or complete, the updated or complete information must be included in the renewal in the appropriate appendix.

| Appendix | Information covered                        | May reference                |                        |
|----------|--|------------------------------|------------------------|
|          |  | Initial app                  | Current Title V permit |
| A        | Site location                              | Yes                          | Yes                    |
| B        | Building & stack information               | Yes                          | No                     |
| C        | Process description                        | Yes                          | No                     |
| D        | Potential Emissions                        | Yes, with summary in renewal | Yes                    |
| E        | Insignificant activities                   | Yes                          | Yes                    |
| F        | Control equipment description              | Yes                          | Yes                    |
| G        | Monitoring methods, devices, etc           | Yes                          | Yes                    |
| H        | Applicable requirement list                | Yes                          | Yes                    |
| I        | Proposed exemptions                        | Yes                          | Yes (shield)           |
| J        | Emissions trading                          | Yes                          | No                     |
| K        | Compliance plan/schedule/certification     | No                           | No                     |
| L        | Compliance certification now in Appendix K | No                           | No                     |

- 3) If there are any requested changes to the current Title V permit, a redline/strikeout of those changes is very helpful and should be included.
- 4) Renewals for Acid Rain (Title IV) sources must include an Acid Rain application in accordance with 40 CFR Part 72. Cross-referencing is currently not allowed for this portion.
- 5) Be sure to evaluate the applicability of 40 CFR Part 64 (CAM) and any other applicable requirements that have been promulgated since the initial application! This is part of the review required for every app by Part 70.
- 6) As a reminder, certification by a responsible official is required in TWO places in every application: on the application form itself, and in Appendix K for compliance certification. Failure to include these two certifications will result in the application being deemed incomplete.