

Parts of a Part 70 Operating Permit

Cover Page - OP #; expiration date; Installation ID; Project #
Owner/Operating Name and Address
Installation Description
Effective Date and Signature

Table of Contents

A Part 70 operating permit is made up of six sections and a Statement of Basis:

- I. Installation Equipment Listings
 - These lists provide a description of the equipment at the installation which emits air pollutants: both Emission Units with Limitations and Emission Units without Specific Limitations. The emission units should match those listed in the annual Emissions Inventory Questionnaire (EIQ).
- II. Plant Wide Emission Limitations
 - This includes all permit conditions that apply to all Emissions Units listed in Section I under Emissions Units with Limitations and Emission Units without Specific Limitations. Can come from CPs or OP.
 - Permit Condition contains an emission or operational limitation; monitoring; recordkeeping and reporting requirements.
- III. Emission Unit Specific Emission Limitations
 - This includes all permit conditions which apply on a specific basis. Each regulation is cited and the emission units which are subject to each regulation are identified. We usually organize this section by rule and list units that are applicable, rather than by emission unit.
 - Permit Condition contains an emission or operational limitation; monitoring; recordkeeping and reporting requirements.
 - Common rules in this section are 10 CSR 10-6.220; 10 CSR 10-6.260/2.61; 40 CFR Part 63 Subpart ZZZZ; Construction Permit requirements.
- IV. Core Permit Requirements
 - This section includes several State of Missouri and Federal Regulations that apply to the installation.
 - This section doesn't change much for different permits it is an overview of applicable rules common for all installations. It can be tailored to include some local rules (example open burning in St. Louis). 10 CSR 10-6.170 can include or not include monitoring/recordkeeping.
- V. General Permit Requirements
 - This section includes all requirements that apply to the installation contained in 10 CSR 10-6.065 *Operating Permits*.
 - 10 CSR 10-6.065(5)(C)1.E – Title IV Allowances (If Acid Rain not applicable we will not include.
 - 10 CSR 10-6.065(5)(C)1.I - Reasonably Anticipated Operating Scenarios
 - 10 CSR 10-6.065(5)(C)1.J – Emissions Trading – If not applicable we will not include.

- This is the section where we list the Responsible Official.

VI. Attachments

- This section includes all record keeping attachments needed to comply with the monitoring and record keeping requirements within the operating permit. The permittee may use these forms or equivalent forms approved by the APCP to demonstrate compliance. These forms must identify all applicable emission units and include emission factors and sources or other compliance determination method.
- Common attachments are for 6.220; 6.170; Plant wide emissions limitations; Attachments from CPs; CAM plans.

Statement of Basis

- The Statement of Basis (SOB) is a document that includes information supporting the operating permit. It is not an enforceable part of the operating permit. Typically the SOB will contain the following information:
 - a) An installation description including a plant wide potential to emit summary and historical actual emissions table;
 - b) A list of permit reference documents;
 - c) Construction permit history for the installation;
 - d) Applicability determinations of all 40 CFR Part 60, 61, and 63 regulations that were considered;
 - e) Other regulatory determinations including CAM applicability.