

## TITLE V DEVIATION REPORTING FORMAT INSTRUCTIONS

### INTRODUCTION

In order to receive consistent and complete deviation reports that identify ALL deviations from Title V permit requirements as specified in OAC rule 3745-77-07(A)(2)(c), the following minimum format for deviation report submissions has been established. When properly completed in this format, the deviation reports will provide the necessary information to evaluate your company's compliance with the terms and conditions of your Title V permit for the specified reporting period. At a minimum, each report shall consist of three (3) sections; (I, II, and III) and must be preceded by a cover letter and responsible official signature page as described below. These sections are described in the instructions following this introduction. Further instructions may also be provided below for each section of the final report. Instructions are presented in bold italics print.

The permittee must evaluate EACH term and condition of ALL parts of the Title V permit, including all emission limitations and operating restrictions, to determine if any deviations have occurred during the reporting period, and must include all the deviations in the appropriate section of the report to be submitted. The permittee shall submit to the appropriate Ohio EPA District Office or local air agency (LAA) a report that consists of:

- A. A cover letter
- B. A Deviation Reporting Form Signature Page (signed by the responsible official)
- C. A detailed and complete Section I format for the General T&C-s (Part I of the Title V permit)
- D. A detailed and complete Section II format for the Specific Facility T&C-s (Part II of the Title V permit)
- E. A detailed and complete Section III format for **EACH** emissions unit (Part III of the Title V permit).

The report must contain at least one page for each of Sections I, II and III. Permittees are encouraged to use additional Section II & III format pages and/or supplemental information to provide as much detail as possible to clearly identify ALL deviations, including those reported under OAC rule 3745-15-06(malfunction rule). The permittee may choose to submit an alternative format to the one presented in these instructions. Examples of other acceptable combined deviation / compliance certification reports provided by companies will be posted to [www.epa.state.oh.us/DAPC](http://www.epa.state.oh.us/DAPC) upon agreement with the companies. These formats are acceptable and can be used in lieu of the format presented herein. However, any alternative format **MUST** contain, at least, the information requested herein and have a certification statement consistent with the responsible official signature page as indicated below .

If a deviation report is submitted and deemed unacceptable by the Agency, a warning letter will be sent which will identify the deficiencies in the report. A modified report must be filed within 14 days to avoid possible enforcement action.

Following are instructions for the responsible official signature page and the three Sections of the report:

**Responsible Official Signature Page - SOURCE IDENTIFICATION**

The Responsible Official Signature Page needs to include the following information (if filled out electronically, the subsequent pages will also carry the entered information).

FACILITY NAME

FACILITY **ID (PREMISE NUMBER)**

FACILITY ADDRESS

**ISSUANCE or MOST RECENT MODIFICATION DATE OF THE TITLE V PERMIT**

DEVIATION REPORTING PERIOD (SEE NOTE BELOW)

DEVIATION REPORT SUBMITTAL DATE REQUIRED BY THE TITLE V PERMIT (RECEIVED BY DEADLINE DATE)

**NOTE:** *The deviation reporting period shall be stated in the following format: Axx/xx/xx through zz/zz/zz@ where xx/xx/xx and zz/zz/zz are the beginning and end dates for the deviation reporting period, respectively.* If the submitted report does not include a semi-annual reporting period, please indicate AN/A@ in the AFrom@ and ATo@ fields under ASemiannual reporting period.@

In accordance with OAC rule 3745 - 77 - 07(A)(2)(c)(iv) regarding deviation reports, A..... each report ..... shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.@ This page of the deviation report the shall contain the following statement:

ABased on information and belief formed after reasonable inquiry, the statements and information in this deviation report (including any written reports required by OAC rule 3745-15-06 that are referenced in the deviation report) are true, accurate, and complete.@

Immediately below this statement shall appear the name, title and signature of a responsible official of the corporation. See [http://www.epa.state.oh.us/dapc/title\\_v/respoff.pdf](http://www.epa.state.oh.us/dapc/title_v/respoff.pdf) and [http://www.epa.state.oh.us/dapc/title\\_v/IOCsignature.pdf](http://www.epa.state.oh.us/dapc/title_v/IOCsignature.pdf) for additional information regarding qualifications of an acceptable responsible official within a corporation for signing this report. A responsible official is also defined in OAC rule 3745-77-01(GG).

Please note that any false statement, representation, or certification constitutes a violation of ORC 3704.05(H) and subjects the responsible party signing this statement to civil and/or criminal penalties, as provided in ORC 3704.06(C) and ORC 3704.99(B).

*The signature page is followed by the deviation reporting details.*

## **SECTIONS I, II, and III - DEVIATION REPORTING**

### ***PLEASE NOTE SECTIONS I, II, AND III ARE DESIGNED TO BE PRINTED IN LANDSCAPE ORIENTATION ON LEGAL SIZE PAPER***

The permittee must provide the Facility Name and Facility ID (premise number) at the top of each Section, followed by the deviation information presented in the table format.

### **SECTION I NEGATIVE DECLARATIONS AND DEVIATION REPORTING**

Section I covers General Terms and Conditions. The following General Terms and Conditions must, at a minimum, be evaluated semi-annually and reported in the semi-annual deviation report immediately following when the deviation occurs: Part I.A.1.c establishing the requirement to submit reports, Part I.A.12.c. Part I.A.12.d, and the notice provisions of Part I.A.14, and Part I.A.16.b. Deviations of any other General Term or Condition must be evaluated quarterly and must be reported the quarter after the deviation of the permit term occurs. If no deviations of any of the General Terms and Conditions occurred (a term that is not applicable during the reporting period is considered the same as no deviations), simply mark the box in the table indicating no deviations occurred. If one or more deviations occurred, complete the second table by identifying the appropriate permit term for which the deviation occurred. Please note that it is acceptable to evaluate and report all General Terms and Conditions on a quarterly basis if you wish.

### **SECTION II NEGATIVE DECLARATIONS AND DEVIATION REPORTING FOR INSIGNIFICANT EMISSIONS UNITS (IEUs) AND FACILITY-WIDE PERMIT TERMS**

Section II covers IEU and Facility-wide permit term deviation reporting.

**The first table** in this section addresses negative declarations for IEUs. Please list each IEU that had no deviations of any permit terms or applicable requirements in the first table.

**The second table** in this section addresses a negative declaration for facility-wide permit terms. Simply mark an >X= in the second table if no deviations of any of the facility-wide permit terms.

**The third table** addresses deviations of IEU permit/applicable requirements and deviations of facility-wide permit terms. Please add rows as necessary.

*Please note,* The permittee MUST also report ALL deviations resulting from malfunctions as defined in OAC rule 3745-15-06.

### **SECTION III - ADDITIONAL DETAILED INSTRUCTIONS FOR COMPLETING A NEGATIVE DECLARATION or DEVIATION REPORTING TABLE FOR NON-INSIGNIFICANT EMISSIONS UNITS (EUs)**

**The first table** in this section addresses negative declarations for EUs. Please list each EU that had no deviations of any permit terms or applicable requirements. Note that the semi-annual column only applies when the report is including semi-annual deviation reporting.

**The second table** addresses deviations of EU permit terms. The table is designed to allow you to list each EU and associated permit term for which there was a deviation. Please add rows as necessary. Following is additional information with respect to filling out the second table:

**EU NUMBER/DESCRIPTION** - Please provide the emissions unit number as assigned by OEPA, i.e., B001, P023, etc.

**TITLE V PERMIT TERM NUMBER/DESCRIPTION** - Please list the Title V permit term no. as it appears in the permit for the specific T&C being evaluated. For example, the term number for the first operating restriction for an emissions unit in Part III of the Title V permit would be "Part III - A.II.1". For the first term or condition in the Specific Facility T&C Section of the permit, the number would be Part II - A.1. Also, please briefly identify the term in such a way that the Responsible Official has an understanding of what is being certified.

**REPORTING REQUIREMENT** - Please identify whether the reported deviation is subject to quarterly or semi-annual reporting.

**METHOD USED TO DETERMINE COMPLIANCE** - Please specify the ACTUAL method(s) used to determine compliance with the Title V permit T&C previously listed. If more than one method was used to demonstrate compliance with a specific term or condition in the permit for the emissions unit being evaluated during the reporting period, an additional entry should be made into Section II of the report for each method used during the reporting period.

**DEVIATION PERIOD** - Please provide the range of dates and times of ALL the deviations of this T&C that occurred. It is possible that several deviations occurred during various days and times. EACH deviation and/or deviation period must be listed as a separate table entry.

**DESCRIPTION AND MAGNITUDE OF THE DEVIATION** - Please provide a detailed and complete description of each deviation and the magnitude of the deviation. A simple example of a description of the magnitude of a deviation would be:

The mass emission value of PE detected during the stack test dated August 12, 2003 was 2.5 lb/hr. The permit mass emission limitation is 2.1 lb/hr. PM .@ The deviation and magnitude descriptions must be sufficiently detailed to clearly and completely describe the deviation. A description and magnitude for each table entry must be listed.

**PROBABLE CAUSE FOR THE DEVIATION** - A detailed and complete description of any probable cause(s) for each deviation shall be entered here.

**CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN** - A detailed and complete description of any and all corrective actions implemented to resolve the problem(s) that caused the deviation and any and all preventative measures implemented to prevent future deviations shall be entered here.

**WAS THIS DEVIATION ATTRIBUTABLE TO A MALFUNCTION ?**- If the answer to this question is YES, proceed to the next column. The permittee should have documentation of having submitted at least a verbal report for each malfunction. Malfunction requirements are specified in OAC rule 3745-15-06 (see [http://www.epa.state.oh.us/dapc/regs/3745-15/3745\\_15.html#1506](http://www.epa.state.oh.us/dapc/regs/3745-15/3745_15.html#1506)). Failure to provide a timely verbal notification of a malfunction and any of the follow-up written reports required by the rule constitutes noncompliance. The permittee is required to provide documentation of these notifications and reports upon request by the Agency.

FACILITY NAME			
FACILITY ID (PREMISE NUMBER)			
FACILITY ADDRESS			
Issuance or most recent modification date			
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate AN/A@ below in the AFrom@ and ATo@ fields if this report does include semiannual deviation reporting)	
From:	To:	From:	To:
Total pages in <u>report</u> , including this one (signature page and sections I, II, and III)			
Please list any supporting attachments			
Reporting deadline			

NOTE: The deviation reporting period shall be stated in the following format: Axx/xx/xx through zz/zz/zz@ where xx/xx/xx and zz/zz/zz are the beginning and end dates for the deviation reporting period respectively.

**SIGNATURE FOR STATEMENT**

This statement shall be signed by the responsible official as defined in OAC rule 3745-77-01(GG). Making of any false material statement, representation or certification constitutes a violation of ORC 3704.05(H), and subjects the responsible party signing this statement to civil and/or criminal penalties as provided in ORC 3704.06(C) and ORC 3704.

**CERTIFICATION**

Based on information and belief formed after reasonable inquiry, I hereby affirm, as stated in OAC rule 3745-77-03(D), that the statements and information as transmitted in this Title V report are true, accurate and complete to the best of my knowledge.

Authorized Signature \_\_\_\_\_ Date \_\_\_\_\_

Name (Please Print) \_\_\_\_\_ Title \_\_\_\_\_

FACILITY NAME			
FACILITY ID (PREMISE NUMBER)			
FACILITY ADDRESS			
Issuance or most recent modification date			
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate "N/A" below in the "From" and "To" fields if this report does include semiannual deviation reporting)	
From:	To:	From:	To:
Reporting deadline			

**SECTION I - PART I General Terms and Conditions (Permit Requirement Reporting) (Table1)**

Mark the following box with an X- if no General Terms and Conditions deviations occurred

	<b>THERE WERE NO DEVIATIONS OF ANY OF THE TERMS AND CONDITIONS OF PART I OF THE TITLE V PERMIT DURING THE REPORTING PERIOD</b>
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Add rows as necessary to the following table for reported deviations (one for each General Term as applicable; see detailed instructions for more information) **(Table2)**

TITLE V PERMIT TERM NO./Description	Reporting Requirement (choose one)		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION INFORMATION		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN
	Quarterly	Semi- Annual		DEVIATION DURATION			
				DATE / TIME START	DATE / TIME END		

FACILITY NAME			
FACILITY ID (PREMISE NUMBER)			
FACILITY ADDRESS			
Issuance or most recent modification date			
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate AN/A@ below in the AFrom@ and ATo@ fields if this report does include semiannual deviation reporting)	
From:	To:	From:	To:
Reporting deadline			

**Section II - Part II Facility-wide Permit Requirement Reporting**

**Insignificant Emissions Unit Negative Declarations (Table1)**

List each insignificant emissions unit where no deviations of any PTI terms or applicable requirements for the listed emissions unit occurred, or add rows as necessary to the deviation reporting table (see next page) for reported deviations (one for each term as applicable; see detailed instructions for more information)

<b>THERE WERE NO DEVIATIONS OF <u>ANY</u> PTI TERMS OR APPLICABLE REQUIREMENTS FOR THE FOLLOWING LISTED INSIGNIFICANT EMISSIONS UNITS IDENTIFIED IN PART II.A OF THE TITLE V PERMIT:</b>

FACILITY NAME			
FACILITY ID (PREMISE NUMBER)			
FACILITY ADDRESS			
Issuance or most recent modification date			
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate AN/A@ below in the AFrom@ and ATo@ fields if this report does include semiannual deviation reporting)	
From:	To:	From:	To:
Reporting deadline			

**Facility-wide Permit Requirements Terms and Conditions (Permit Requirement Reporting) - Negative Declarations** (mark with an >X= if applicable) **(Table 2)**

	THERE WERE NO DEVIATIONS OF ANY OF THE TERMS AND CONDITIONS OF PART II OF THE TITLE V PERMIT DURING THE REPORTING PERIOD SPECIFIED IN THIS REPORT
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**Section II - Part II Facility-wide and/or IEU permit requirement (Permit Requirement Reporting) - Deviation Reporting (Table 3)**

Add rows as necessary to the following table for reported deviations (one for each Term as applicable; see detailed instructions for more information)

TITLE V or IEU PERMIT TERM NO./Description or PTI terms for IEUs	Reporting Requirement (choose one) or both		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION INFORMATION		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS THIS DEVIATION ATTRIBUTABLE TO A MALFUNCTION ? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT(S) DATE(S) (If no reports were made, state ANO REPORTS@ in the space below)	MALFUNCTION WRITTEN REPORT(S) DATE(S) (If no reports were made, state ANO REPORTS@ in the space below)	
	Quarterly	Semi-Annual		DEVIATION DURATION							DESCRIPTION AND MAGNITUDE OF THE DEVIATION
				DATE / TIME START	DATE / TIME END						

FACILITY NAME			
FACILITY ID (PREMISE NUMBER)			
FACILITY ADDRESS			
Issuance or most recent modification date			
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate AN/A@ below in the AFrom@ and ATo@ fields if this report does include semiannual deviation reporting)	
From:	To:	From:	To:
Reporting deadline			

**Section III - Part III Emissions Unit Terms and Conditions (Permit Requirement Reporting) - Negative Declarations (Table 1)**

List each emissions unit where no deviations of any terms for the listed emissions unit occurred, or add rows as necessary to the second table (see next page) for reported deviations (one for each term as applicable; see detailed instructions for more information)

THERE WERE NO DEVIATIONS OF <u>ANY</u> OF THE TERMS AND CONDITIONS OF PART III OF THE TITLE V PERMIT FOR THE FOLLOWING LISTED EMISSIONS UNITS:		
Emissions Unit ID	Please place an >X= below if there were no Quarterly Deviations - If an >X= is not indicated, the deviation(s) must be identified in Table2 below	If applicable, please place an >X= below if there were no Semiannual Deviations - If an >X= is not indicated, the deviation(s) must be identified in Table2 below

FACILITY NAME			
FACILITY ID (PREMISE NUMBER)			
FACILITY ADDRESS			
Issuance or most recent modification date			
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate AN/A@ below in the AFrom@ and ATo@ fields if this report does include semiannual deviation reporting)	
From:	To:	From:	To:
Reporting deadline			

**Section III - Part III Emissions Unit Terms and Conditions (Permit Requirement Reporting) - Deviation Reporting (Table2)**

Add rows as necessary to the following table for reported deviations (one for each Term as applicable; see detailed instructions for more information) - Please group deviations for each emissions unit that has deviations of multiple terms.

EMISSIONS UNIT (EU) NO./Description (See below)	TITLE V PERMIT TERM NO & Description	Reporting Requirement (choose one) or both		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION INFORMATION		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS THIS DEVIATION ATTRIBUTABLE TO A MALFUNCTION ? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT(S) DATE(S) (If no reports were made, state /NO REPORTS@ in the space below)	MALFUNCTION WRITTEN REPORT(S) DATE(S) (If no reports were made, state /NO REPORTS@ in the space below)	
		Quarterly	Semi-Annual		DEVIATION DURATION							DESCRIPTION AND MAGNITUDE OF THE DEVIATION
					DATE / TIME START	DATE / TIME END						

See page 3 of the instructions **SECTION III ADDITIONAL DETAILED INSTRUCTIONS FOR COMPLETING A DEVIATION REPORTING TABLE@** for guidance on this table.