August 27, 2004

MEMORANDUM:

To: Regional Supervisors
   Section Chiefs

From: Keith Overcash

Subject: Title V Annual Compliance Certification Due Dates

Major facilities holding an effective Title V permit on December 31st are required to submit an Annual Compliance Certification by January 30th of the following year. Major facilities that have been issued a Title V permit may change permit classifications during a calendar year and become a Synthetic Minor or a Minor facility. These facilities are still required to submit a Title V Partial Year Certification.

The new non-major permit shall contain a reporting condition requiring the facility to submit the Partial Year Certification within 45 days of the non-major permit being issued. The facility will need to submit the Partial Year Certification to the NC DAQ & to EPA Region 4. If the non-major permit is issued on or after December 17th, the facility will be required to submit the Partial Year Certification by the January 30th deadline.

Permit engineers should make facilities aware of this requirement during the permitting process so that the facility can begin to generate the Partial Year Certification. Regional staff will be responsible for recording the certification in i-STEPs and its successor data system.

BKO:mp