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GUIDELINES

TO: Permitting Branch Staff

FROM: Marty Gray, Permitting Branch Manager *MG*

DATE: June 30, 2018

SUBJECT: Title V Testing Requirements During Prolonged Periods of Shutdown

Purpose

This guideline clarifies that sources are not required to run and test equipment during periods of prolonged shutdown.

Implementation and Analysis

If a Title V permit contains a periodic testing requirement that will be missed because the source is not operating due to a prolonged shutdown, the source is not required to start up the unit in order to perform a test on it.

The source would be required to submit a deviation report because they did not perform the monitoring specified in their Title V permit. The cause of the deviation shall be documented that they were not operating. The source shall perform the test that was missed due to shut down within six months of resuming operation of the affected unit.

This Guideline shall be audited every five years by the Title V Operating Permit Section Manager to determine the current status and relevance of the information.