

Things to Know When Preparing Title V Renewal Applications

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- IDEM has changed the way it assigns permit reviewers. In the past, permit reviewers were dedicated to certain industries but IDEM has changed its approach and so it is possible to have a permit reviewer who has never dealt with a foundry permit reviewing your application.
- IDEM now requires source-wide Greenhouse Gas calculations to be included with all permits so if these calculations have not been completed with recent permit modifications, IDEM will require the calculations to be included in the next Title V renewal permit.

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- Permit reviewers have asked for updated calculations for all processes, even if the previous Title V renewal permit and subsequent modifications have included these calculations. We have been able to persuade some reviewers that this information is not necessary but other reviewers insist upon having it.
- In some instances, permit reviewers have decided to combine various D sections of the permit, without asking the Source for any input. The reviewers claim that their revisions make it easier to read and/or comply with the permit but this is not always the case and then they are reluctant to change it back to the original format.

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40 CFR Part 64 CAM Applicability and General Language.

- IDEM will review past CAM applicability determinations and do additional CAM applicability determinations for new emission units. General language in Section C for compliance responses to excursions and exceedances is different for units subject to CAM.