

Environmental

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New Streamlined Annual Title V Compliance Certification Form

Ohio EPA has recently approved the use of a more streamlined Annual Title V Compliance Certification form that will significantly reduce the burden on companies that are subject to this reporting requirement.

All facilities that operate pursuant to a Title V Operating Permit are required to annually submit a Compliance Certification. Under the previous Compliance Certification "long form," companies were required to specifically identify every permit term, followed by the method used to determine compliance with the permit term, and whether compliance with that permit term was continuous or intermittent. For facilities with lengthy Title V permits, or with permits that incorporated by reference detailed MACT regulations, the Compliance Certification was often hundreds of pages in length.

Ohio EPA's new Compliance Certification "short form" greatly simplifies the certification report. Instead of identifying all permit terms, the "short form" only requires identifying the permit terms associated with intermittent compliance. Certification of the remaining permit terms is covered by a "catch-all" provision in the form that states compliance was continuous for all other permit terms.

The Compliance Certification is typically due on April 30th of each year, though some permits issued early in the Title V program identify different due dates. For Compliance Certifications due this year for the 2006 reporting period, Ohio EPA is allowing companies to use either the old "long form," or the new "short form." For Compliance Certifications due in 2008, for the 2007 reporting period, Ohio EPA is requiring the use of the new "short form."

The Compliance Certification "short form," along with instructions and a completed example form are available on Ohio EPA's website at (http://www.epa.state.oh.us/dapc/title_v/titlev.html).

If you have any questions on the new Compliance Certification "short form" and how it impacts your reporting obligations, please contact [Frost Brown Todd's Environmental Attorneys](#).

To contact us, write to:

Frost Brown Todd LLC
2200 PNC Center
201 East 5th St.
Cincinnati, OH 45202-4182

Frost Brown Todd LLC
400 West Market Street
Floor 32
Louisville, KY 40202-3363