Q/A regarding compliance with 40 CFR Part 63 Subpart MMMM

Q: What form do I need to fill out?
A: At this time you can submit either the Form PI-7-CERT or the Form APD-CERT. The PI-7-CERT should be submitted if you are registering and certifying emissions for a Permit by Rule (PBR). If your site has never been registered go to Air PBRs of Subchapter S to see if registration is required.

The Form APD-CERT should be submitted for the sole purpose of certifying emissions. The Form PI-7-CERT and the Form APD-CERT should show that you will have less than 10 tons per year (tpy) of any single hazardous air pollutant (HAP) and less than 25 tpy of total HAPs for the site. If there is anything needed after the form has been submitted you will be contacted for the additional information.

Q: What if I already have an NSR permit and I do not have time to get my permit altered or amended?
A: If your New Source Review (NSR) permit already has HAP emission limitations that are below the 10/25 limit, you do not need to submit a Form APD-CERT because those representations are federally enforceable.

If your NSR permit does not have HAP limitations below the 10/25 limit, please complete the Form APD-CERT as soon as possible and the NSR permit can be altered or amended to reflect the changes.

Q: I am currently registered with a Form PI-7 for a PBR, but did not list the individual HAPs and I did not certify the emissions?
A: If you have previously submitted a Form PI-7 to register a PBR and it represents that the HAP emissions are under the 10/25 limit, you still need to update that registration. Please keep in mind that there are no HAP limits under the PBR, so if your HAP emissions were represented before, but not certified, a Form APD-CERT should be submitted to make the representations federally enforceable.

Q: My corporate office is out of state and most of the people are out for holiday leave. Can I get an extension, because I will not be able to get the calculations to you by the deadline?
A: The deadline has passed so please submit the certification as soon as possible. Once we have received this information we will review it to see what else is needed and we will contact you for the additional information.

Q: I have a Stormwater permit, but I do not have an air permit. What do I need to do?

A: Your operation may require registration and a fee is associated with this registration. The type of registration can be either a PBR or an NSR permit. Go to Air PBRs of Subchapter S. If you meet one of these rules, submit a Form PI-7-CERT so that you will not be operating in violation of the PBR.

Q: Are emission calculations required to demonstrate that the certified emission rates are met?
A: Yes, include the calculations used, any assumptions, and operation information about the facility. The actual emission rates for each emission source at the site should be entered in Table 3 of the Form APD-CERT. The emissions should represent actual limits and not just less than 10 and less than 25 (<10 or <25).

Q: I have previously certified my HAP emissions for my surface coating operation, but the emission rates have changed. How do I update the certification for the site?
A: Submit a new Form APD-CERT with the emission calculations used. Also, be sure the surface coating operation still meets the requirements of its authorization.