Once In Always In (OIAI) R4 State Submitted Questions:

We have a facility subject to a MACT standard and the title V permit currently contains the applicable MACT requirements. After this particular MACT standard became applicable to the facility, the permittee accepted PTE limits (i.e. less than 10/25 tpy) to become a minor source of HAPs so that they would not be subject to any future MACT standards. Therefore, the current title V permit already contains enforceable PTE limits to classify the facility as an area source of HAPs.

1) Since the permit already has PTE limits in place that classify the source as an area source, at what point can the permittee stop complying with the MACT monitoring and reporting requirements of the permit? Does the permittee have to wait until the permitting authority revises the permit?

Response: I would comply with my permit, until my permit is changed.

2) What type of TV modification will this be?

Response: At this point, additional discussion is needed.