

YOUR FACILITY IS IN THE ROSS PROGRAM - NOW WHAT?

Your facility is currently in the Illinois EPA ROSS Program for smaller sources of air pollution, which was started in 2012. As a ROSS source, you enjoy many benefits, including:

- No longer required to have an Illinois EPA Air Operating Permit;
- No longer required to complete the Annual Emission Report;
- No requirement to obtain a Construction Permit, for most new equipment.

ON-GOING REQUIREMENTS FOR ROSS FACILITIES

Although being in the ROSS program has obvious benefits, the facility is not relieved from all Illinois EPA air recordkeeping requirements. **ROSS facilities are required to keep the following records on-site and available for an IEPA inspector:**

- Description of emission units and controls;
- Description of the emission rates or control efficiencies that were used to verify ROSS eligibility;
- Copy of the initial registration application;
- Copy of last five annual fee payments;
- Any other records required by applicable Illinois and Federal regulations.

If the facility's actual annual emissions exceed the ROSS eligibility criteria, a notification or construction and operating permit may be required. In addition, a timely notification to the Illinois EPA must be made for a change in ownership or contact information.

COMPLIANCE WITH OTHER EPA REQUIREMENTS

Registration in the ROSS program does not relieve the facility from compliance with other applicable Illinois EPA and U.S. EPA air pollution regulations. Depending on the type of operation, common compliance issues for "smaller source" ROSS facilities may include:

- Volatile Organic Material (VOM) limitations for coatings;
- VOM regulations for printing;
- Regulations covering solvent cleaning operations;
- The U.S. EPA NESHAP covering Chromium Electroplating and Anodizing processes;
- Various NESHAP rules covering Area Sources, including Plating and Polishing operations, Metal Fabrication and Finishing sources, Reciprocating Internal Combustion Engines (RICE), and Miscellaneous Surface Coating operations.

In some cases, a construction permit may be necessary for new equipment, and other regulatory notifications and requirements may still apply.

As always, Admiral can evaluate any planned changes to make sure all of your compliance requirements are met, and review your annual emissions to confirm your ROSS eligibility.