

ROSS PROGRAM REQUIREMENTS

COMPLIANCE WITH OTHER EPA REGULATIONS

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),
 - Miscellaneous Surface Coating operations

It is important to evaluate new processes for applicability under these and other regulations. In some cases, a construction permit may be necessary for new equipment, and other regulatory notifications and requirements may still apply.

Admiral can evaluate any new equipment or operating changes that are planned to make sure your compliance requirements are met.

SPECIAL ROSS REQUIREMENTS

The ROSS regulation also includes many additional conditions and requirements for covered facilities, including:

- Rules for obtaining a construction or operating permit if the facility's actual emissions exceed the ROSS eligibility criteria;
- Notification if actual emissions exceed the ROSS eligibility, or if there is a new or changed regulation that causes your facility to not be ROSS eligible.
- Timely notification for a change in facility ownership or contact information;
- Specific records that must be maintained on-site and available for an IEPA inspector;
 - Documentation of emission calculations,
 - Description of emission units and controls,
 - Description of control efficiency or emission rates used to be eligible for ROSS,
 - Copy of the initial registration application,
 - Copy of last five annual fee payments,
 - Any other records required by Illinois and Federal regulation.

Additional details on NESHAP and other regulations are available on our website.