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MEMORANDUM

TO: Regional Directors

FROM: John M. Daniel, Jr., P.E., DEE
Director, Division of Air Program Coordination

SUBJECT: Memo Number 03-1006: Procedures for Shutting Down Sources

DATE: October 1, 2003 (as amended January 28, 2010)

COPIES: Bob Burnley, Air Permit Managers

REFERENCES: Code of Virginia, Applicable State and Federal Statutes and Regulations

The attached guidance document on the procedures of shutting down registered and permitted air emission sources has been updated to reflect changes in the VAC regulations and the development of the CEDS database system. This document supercedes all earlier versions of the guidance document.

Questions or comments on this guidance should be directed to the Office of Air Permit Programs.

APPROVED:

_____
John M. Daniel, Jr., Director
Air Division

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

Division of Air Programs Coordination
Office of Air Permit Programs

Procedures for Shutting Down Sources

Issued

October 1, 2003
(amended January 28, 2010)

Table of Contents

1.0 Introduction……1
2.0 Prerequisites……..……..2
3.0 Procedures for Shutting Down……3
3.1 After Discovery by VADEQ of Cessation of Operations……..…..….3
3.2 Tentative Decision……...3
3.3 Mutual Decision……4
3.4 Final Determination……..4
4.0 Procedural Rights of the Source……5
5.0 Dealing with Sources that are Hard to Find……5
6.0 Reflecting the Shutdown on the CEDS database……...6
6.1 Shutdown Definitions within CEDS……6
7.0 Summary……7

Attachments

Table – Template Letter Variables

Letter – Tentative Shutdown Decision
Letter – Mutual Shutdown Decision
Letter – Final Shutdown Decision

1.0 Introduction

1.0.1 As required by 9 VAC 5-20-220, a facility or an emission unit must be formally declared as “shutdown” prior to the revocation of a construction or operating permit. These procedures can also be used to declare existing or non-permitted sources (but included in the CEDS database) as shutdown as well. The purpose of this document is to describe the procedures that have been developed for establishing a regulatory basis for formally shutting down facilities or individual emission units whose cessation of operation has already taken places in fact. It will be presumed that these facilities did not provide prior notice to the VADEQ of this fact nor have they asked that their permit be modified or terminated to reflect this change in operations.

1.0.2 The significance of declaring a facility or emission unit “shutdown” from a permitting standpoint is twofold. First, by shutting down a source and then updating the CEDS database accordingly, the VADEQ provides the federal agencies with an accurate list of the type and number of emission sources active in the state. Second, by officially naming an emission unit as shutdown, we prevent facilities from taking unfair advantage of “grandfathering.” If a facility wishes to restart an older air emission unit that has been listed as shutdown, they will have no choice but to apply for new air quality permits and meet the latest NSR or PSD standards.

1.0.3 These procedures are not to be used to require a facility to shut down, either for enforcement or for emergency reasons. This document also does not apply to facilities that have been granted a permit, but have never started construction. These circumstances are addressed elsewhere in the Virginia Administrative Code.

1.0.4 The regulatory authority for formally declaring that individual air emission units or an emission source “shut down” is provided in the General Provision, Part II section of the Air Quality Program (9 VAC 5-20-220). All of the different permit program regulations (9 VAC 5 Chapter 80) concerned with closed facilities refer back to this initial citation. A list of these permitting program references is provided in the following table. A review of these citations will show that they are almost identical in wording and format.

Permit Program	Regulatory citation
Federal Operation Permits (Title V)	9 VAC 5-80-180
Federal Operating Permits (Title IV Acid Rain)	9 VAC 5-80-540
State Operating Permits	9 VAC 5-80-950
New and Modified Stationary Source, Article 6	9 VAC 5-80-1210
Permits for Major Stationary Sources in PSD Areas	9 VAC 5-80-1930
Permits for Major Stationary Sources in Non-Attainment Areas	9 VAC 5-80-2160

1.0.5 The VAC regulations describe the process of how a source is to be declared shutdown in general terms but does not provide details. The system of notification letters and hearings described in this guidance document has been developed to be consistent with the regulations and represent the official policy of the VADEQ.

1.0.6 In addition to the actual notification process, this document will provide suggestions for handling situations in which the owner of the facility can not be easily found. A brief overview of the additions required for CEDS will also be provided.

2.0 Prerequisites

2.0.1 When the compliance staffs of the VADEQ Regional Offices discover that air emission equipment has been revoked or has ceased operation, the inspectors will inform the permitting staff. Based on the permit staff review, the regional office will make the determination of whether the situation requires "shutdown" prior to the revoking or modification of the site's permit(s). The prerequisites for initiating shutdown procedures are:

a. Discover that a permitted facility, or that a permitted or registered air emission unit(s) located at a facility, has been demolished, disassembled, or permanently removed from the site where it was operating and/or permitted. These last two possibilities would not necessarily apply to emission units that have been permitted as a "portable emission unit."

b. Discover or identify a situation in which a permitted facility or where one or more permitted or registered air emission units located on the facility have not operated for at least one full year. The air emission unit(s) will still be located at the site and could potentially be placed back into operation with relatively little effort.

2.0.2 For the second prerequisite listed above, the next step will be to determine whether the source is planning to leave the facility or emission unit shut down permanently. The preferred method will be to contact the owner or operator of the source directly by telephone or mail. If this contact can be made and the source states their intention never to restart the equipment, it may be possible to skip directly to the "mutual decision" letter described in Section 3.3 of this guidance.

2.0.3 Normally for both prerequisites listed, the first step will be to send a "tentative decision" letter to the owner that will inform them of the VADEQ's intention to declare their facility/emission unit shutdown. The owner will have a set time period from the date of the letter to object to this proposed action. In their written response, the owner must provide technical information to demonstrate that the unit(s) should not be considered permanently shutdown. This information either can be the date they plan to restart the equipment or proof that the equipment is considered currently operational.

2.0.4 After reviewing the owner's response, the regulations provide the VADEQ two reasons to override the owner's objections. Either reason is sufficient by itself. They are as follows:

a. The source's proposed re-starting date allows for an "unreasonably long period" of non-operation; or

b. The source's basis for asserting that the emission unit or facility is not to be considered shut down is "unsound."

2.0.5 The regulations themselves do not define what is meant by "unreasonably long period" or "unsound" basis. The final decision will be left up to the Regional Office staffs on what is unreasonable and unsound. The following interpretation of an unreasonably long period was developed for the original version of this guidance document.

- Where the source, having received a tentative decision letter from the VADEQ, objects to the shutting down of the emission unit or facility and proposes that it be kept on the books because it will be re-started at some time in the future, the final shutdown decision should be deferred if the proposed starting date is less than 18 months in the future. If the proposed starting date is later than that, the VADEQ should undertake a more rigorous, case-by-case evaluation of the source's plans to re-start the facility or emission unit.

3.0 Procedures for Shutting Down

3.1 After Discovery by VADEQ of Cessation of Operations

3.1.1 After it has been determined that a facility or an emission unit(s) has ceased to operate for at least one full year, the formal procedures to declare the equipment or facility shut down can begin. The owner/operator should be contacted to notify them of the VADEQ intention to list the facility or equipment as shut down as a first step in revoking or altering their permit(s).

3.1.2 The definition of the person(s) who can be considered a representative of the source with the authority to make decisions regarding shutdown and permit revocation will follow the criteria found in 9 VAC 5-20-230. The Regional Office permitting staff will decide if the chosen company representatives meet these criteria on a case-by-case basis.

3.1.3 Prior to completing the "tentative decision" letter, the permitting staff will determine what types of permits are currently held by the source. In addition, the type and number of emission trading accounts and/or registration(s) of the source with federal programs will be summarized. This information will determine which regulatory citations are appropriate as you complete the model letters.

3.1.4 Templates for the three shutdown letters are provided as attachments to this guidance document. Word for Windows versions of these letters can be downloaded at your convenience from:

http://deqnet/documents/index.asp?path=%2Fdocs%2Fair%2Fair%5Fpermitting%2FPolicy%5FGuidance%2FNSR%5FBoilerplates/NSR+Letters

3.2 Tentative Decision

3.2.1 The initial or "tentative decision" letter is an optional document. The use of this letter is generally limited to cases where communication with the source has been difficult or non-existent. If you discover an inoperative unit or facility and cannot readily contact the source, the "tentative decision" letter sets the formal shutdown process in motion; apprising the source of its rights and announcing the VADEQ's intention to remove the facility or emission unit from the emissions inventory database (CEDS).

3.2.2 Completion of the tentative letter phase of shutdown is as follows:

a. Fill in the blanks (variable) in the letter with the appropriate information. A list of these variables has been provided in the attached table.

b. The Regional Director of their designee will sign the letter. Have the letter sent to the last known address of the owner using Certified or Registered Mail. The returned mail receipt will be placed in the permanent file as proof of notification. If the letter itself is returned undelivered, it and the attached mail receipts will be placed in the permanent file.

c. If the tentative letter is returned, the Regional Office permitting staff will make a good faith effort to find the current address of the owner and forward a copy of the tentative letter to their attention. See Section 5.0 for suggestions on locating difficult to contact owners.

d. Identify a calendar date within the body of the letter for approximately 90 days after the mailing of the letter. The source has three months after receipt of the letter to challenge the tentative determination that the facility or unit is shut down. Whenever possible, the owner should be contacted by telephone or email prior to the deadline to determine if they plan to respond to the tentative shutdown determination.

e. If no response (written or verbal) is made by the owner by the end of the 90 day deadline, the regional staff can proceed with the "final determination" as described in Section 3.4.

3.3 Mutual Decision

3.3.1 When a permit writer or an inspector has communicated with a source and has confirmed that the source does intend to leave a facility or emission unit inactive, the "mutual decision" letter can be used. To prevent any future disagreements between the owners and the VADEQ over which units the shutdown applied to, the letter will be signed by both parties and "notarized."

3.3.2 Completion of the mutual decision letter will be as follows:

a. Fill in the variables in the mutual decision letter with the appropriate information.

b. Send two copies of the (unsigned) mutual decision letter to the representative of the source. Have them sign both copies of the letter in the presence of a notary and <u>return both copies</u> to the VADEQ Regional Office.

c. The Regional Director or their designee will then sign both copies of the mutual decision letter. Return one copy with both "original signatures" to the source. The other "original" copy is to be placed in the permanent file.

3.4 Final Determination

3.4.1 Use of the final determination letter will be limited to the following circumstances:

a. The source did receive the tentative determination letter but failed to respond to the document within the three month deadline period.

b. The source did respond to the tentative determination letter, objecting to the shutdown, but the VADEQ determined that:

- There was insufficient basis for the source's assertion that the shutdown is not to be considered permanent, or

- The source's projected re-starting date allows for an unreasonably long period of non-operation.

3.4.2 The format of the final determination letter potentially has a broader range than the tentative and mutual agreement letters due to the wider range of subjects that can be included in the document. Items that may be included in the final determination letter are as follows:

a. A statement on whether the source did or did not reply to the initial tentative decision letter within 90 days.

b. If the source did respond with an objection to the proposed shutdown, include a summary of their objection(s) in the letter. This may include the source's proposed date for startup of the equipment and/or a technical argument on the current operating status of the equipment.

c. Summarize the VADEQ/s reasoning for overriding the sources technical objections and issuing the final determination to declare the facility or equipment shutdown.

d. The Regional Director of their designee will then sign the final determination letter. Send the letter by Certified or Registered mail. Place the returned mail receipt in the permanent files.

3.4.3 If the tentative determination letter was returned undelivered and a good faith effort was unable to locate the owner of the source, the facility still can be declared shutdown and any permits revoked. A final determination letter does not have to be created in this case. It is advisable that an interoffice memo be added to the permanent files with the Regional Director's signature stating the date of the declaration of shutdown for legal protection.

4.0 Procedural Rights of the Source

4.0.1 The source may challenge the VADEQ's tentative determination of shutdown by writing to the VADEQ following receipt of the tentative decision letter (or equivalent communications). In this reply, the source must explain why the emission unit or facility should not be considered permanently shut down and/or indicate a date when it is to be re-started.

4.0.2 The source may request a formal hearing, informal hearing, and/or judicial review of a final decision declaring a source, facility, or unit permanently shut down in accordance with the provisions of the Virginia Code and the Virginia Administrative Code.

5.0 Dealing with Sources that are Hard to Find

5.0.1 When a source ceases to operate and leaves the area, it may be difficult to track down for the purpose of sending the tentative decision letter. If you have tried the last known address and phone number, there are other possible ways to communicate with the owner of the inoperative facility. These would include:

- Registered agent – Many companies have a registered agent for service of process when the company is sued for any reason. In Virginia, when a company has no registered agent and cannot otherwise be served, the Clerk of the State Corporation Commission acts as the registered agent.

- Real estate assessor's office

- State tax records

- Other local files (zoning, planning, police, economic development, etc.)

5.0.2 It is expected that the permit writer will make a good faith effort to locate the owner of the source and inform them of the VADEQ's intentions. At this time, a formal procedure for locating absence owners has not been developed. At a minimum the following items should be placed in the permanent file as a record of this "effort":

- Copies of the returned notification letters and mail receipts

- Lists of persons, agencies, or companies contacted during the search, to include their names, addresses, telephone numbers, email addresses, etc.

- The dates and times these persons, agencies, and companies were either contacted, or an attempt was made to contact them

- Brief summaries of the conversations or the copies of the written responses from these sources

5.0.3 If after a reasonable effort the owner can not be located, the Regional Office has the authority to declare the facility as shutdown and to revoke any existing permits without reaching agreement, or the owner receiving notification. As mentioned in Section 3.4.4, it is advisable that an interoffice memo be added to the permanent files stating the date of the declaration of shutdown.

6.0 Reflecting the Shutdown on the CEDS Database

6.0.1 The state and federal databases for registered and permitted sources must reflect the shutting down of units or facilities and the revocation of permits that follow the procedures in this guidance. Care must be taken not to eliminate an air emission source from the database that is still operational.

6.0.2 Entrees must be made in both the compliance and permit modules of CEDS in response to shutting down a source. Please refer to the CEDS manual for further information in this area.

6.1 Shutdown Definitions within CEDS

6.1.1 In reviewing the CEDS database, it was discovered that there are differences in the application of "shutdown" between the permit and compliance modules of the database. To prevent confusion in the future, we will briefly go over this issue now.

6.1.2 As described in the referenced VAC citations, all “shutdowns” will be considered permanent for permitting purposes. Permanent shutdowns can be declared for facilities or for individual emission equipment that are still in position at their original sites. Once the permit is revoked, the equipment can not be restarted without the owner applying for a new permit.

6.1.3 The compliance module of CEDS uses the terms “temporary” and “permanent” shutdowns. A temporary shutdown is for a facility that has stopped operations but has left the equipment in place. This equipment is capable of being restarted fairly quickly. There is no time limit on how long a facility can be defined as temporarily shutdown. As long as the equipment remains in place, the term “temporary” will be applied.

6.1.4 Permanent shutdown as used in the compliance module of CEDS is applied to facilities that have either removed the permitted emission equipment from the site and/or “crippled” the equipment so that it can not be quickly or economically rebuilt.

7.0 Summary

7.0.1 The procedures provided for in this guidance are limited to facilities and equipment that have ceased operations without prior notice to the VADEQ. These procedures should not be applied to other situations involving enforcement actions or permit withdrawals and rescissions.

7.0.2 As described in 9 VAC 5-20-220, the decision to declare a source shut down will become final six months after the initial notification if the owner does not respond with an objection. If the owner did reject the tentative decision and requested a hearing or judicial review, but this appeal was eventually turned down, the shutdown will become final one year after the date of the initial notification.

7.0.3 It is recommended that the regional office personnel routinely review CEDS data entrees to confirm that all of the facilities and individual emission units in Virginia that have stopped operations have been properly listed in the database. This will ensure that the federal databases that use CEDS as their source continue to accurately describe the type of and number of emission units in Virginia. It will also prevent sources in the future from taking advantage of “grandfathering” and avoiding the NSR and PSD emission unit standards.

7.0.4 Be alert to changes in other federal programs that may require a formal shutdown. If for example a facility applies for a NO_X Budget Retired Unit exemption, it will need to be declared as shutdown as well.

Attachments

Attached are three “template” letters for use in formally shutting down inactive sources or emission units. These letters are meant to be used by the air permitting staff of the appropriate regional offices of the VADEQ of Environmental Quality. The letters contain bracketed text portions indicating prose that varies from one circumstance to the next.

A separate table of “Variables” required by these letters has been included. These variables include the name, address, location, and registration number of the source or unit but also previous permit number or date and the regulatory provision governing the shutdown procedure.

A list of the editorial “variables” required for the three letter templates.

Variable	Mutual letter	Tentative letter	Final letter
Owner’s Name	x	x	x
Owner’s Title	x	x	x
Source name	x	x	x
Source address	x	x	x
City/town	x	x	x
Location	x	x	x
Registration no.	x	x	x
County	x	x	x
Plant no.	x	x	x
VAC Citation(s)	x	x	x
date of tentative letter		x	x
"did/did not receive response"			x
"requested hearing"			x
Hearing date			x
Old air permits/dates			x
Source name		x	
Facility/emission unit	x	x	x
Regional office phone	x	x	x
Regional Director's name	x	x	x

SHUTDOWN LETTER MODELS
for Tentative Shutdown Decisions

[Regional Letterhead]

(date)

Mr./Ms. (Contact's name)
(Contact's Title)
(Source name)
(Source address)
(City or town), Virginia (zip)

Location: (describe)
Registration No. (_____)
County: (_____)
Plant No. (_____)

Dear [Contact's Name]:

The Commonwealth of Virginia's Regulations for the Control and Abatement of Air Pollution, at [9 VAC 5-20-220 and 9 VAC 5-80-****], provide a procedure for the VADEQ of Environmental Quality to follow in making a final determination that a source is permanently shut down. The Regulations require the VADEQ to give the owner notice of a tentative determination and to provide an opportunity for the owner to respond in writing and, if desired, request a formal hearing before the State Air Pollution Control Board. If the determination becomes final, the Regulations require the VADEQ to revoke the applicable permits.

The VADEQ has made a tentative determination that the [facility], located at [address, town or city], Virginia (Registration No. [*****]), is permanently shut down.

This decision will become final if the owner of the [facility] fails to provide, within 3 months of receipt of this letter, a written response informing the VADEQ that the shutdown of the [facility] is not to be considered permanent. This response shall include (1) the basis for the assertion that the shutdown is not to be considered permanent, and (2) the projected date for re-starting the facility. The response shall also include a request for a formal hearing if the owner wishes to exercise that right. The response should be addressed to:

Director, [name] Regional Office
Virginia VADEQ of Environmental Quality
[address]
[city or town], Virginia [zip code]

If no response is received by this regional office within three months, or if the VADEQ finds that the basis for the assertion is not sound or the projected date for re-starting allows for an unreasonably long period of in-operation, then the decision to consider the shutdown permanent will become final. All applicable permits will be revoked within six months of this letter on _____, 20XX (date of letter plus 180 days).

Draft Models

If you have any questions concerning this tentative determination or if you have questions concerning the response necessary to challenge this determination, please call this regional office at [telephone number].

Sincerely,

[Regional Director's name]
Regional Director
for

[Director's name]
Director

cc: Director, Office of Air Permit Programs
Manager, Data Analysis Section, Office of Air Quality Programs
Air Inspections Coordinator

Template

SHUTDOWN LETTER MODELS
for Mutual Shutdown Decisions

[Regional Letterhead]

(date)

Mr./Ms. (Contact's name)
(Contact's Title)
(Source name)
(Source address)
(City or town), Virginia (zip)

Location: (describe)
Registration No. (_____)
County: (_____)
Plant No. (_____)

Dear [Contact's Name]:

In response to your letter dated [_____], the VADEQ of Environmental Quality is joining you in a mutual determination, pursuant to [9 VAC 5-80-**** and 9 VAC 5-20-220] of Virginia's Regulations for the Control and Abatement of Air Pollution, regarding the shutting down of a source. The Regulations provide that the VADEQ and the owner of a source may make a "mutual determination that a stationary source or emissions unit is shut down permanently." The Regulations also require that, upon making a final decision that the source is permanently shut down, the VADEQ revoke the permit (9 VAC 5-80-*****).

In execution of this mutual determination of permanent shutdown, [source name] agrees that:

1. A mutual and final determination has been made that the [facility or emissions unit] at [location] in [city or town], Virginia is permanently shut down;

2. [Source name] is the sole owner, as defined in the Regulations, of the [facility or emissions unit];

3. [All air permits] [The air permit] issued for the [facility or emissions unit], dated [___ and ___], [is/are] revoked;

4. The VADEQ of Environmental Quality will remove the [facility or emissions unit] from the air emission inventory and will consider its air pollutant emissions to be zero in any future air quality analysis to be conducted; and

5. Upon signature of this document by the VADEQ and by [source name], the [facility or emissions unit] shall cease operations. No future operations shall occur until the owner has obtained a permit pursuant to 9 VAC 5 Chapter 80. Any use of the [facility or emissions unit] after execution of this document shall be considered equivalent to construction and operation of a new emissions unit and will subject [source name] to the requirement to obtain a permit pursuant to applicable provisions of 9 VAC 5 Chapter 80 in the Regulations.

6. The permanent shutdown of [facility or emission unit] will become effective upon signature of this document by both parties.

Template

7. The permanent shutdown of [facility or emission unit] is binding upon [Source name], its successors in interest, designees, and assigns, jointly and severally.

By authorized signature below, and in accordance with the Virginia Regulations for the Control and Abatement of Air Pollution, [Source name] and the VADEQ of Environmental Quality, acting on behalf of the State Air Pollution Control Board, mutually determine that the [facility or emissions unit] is shut down permanently.

Date:_____ _____
Director
VADEQ of Environmental Quality

The terms and conditions of this determination are accepted by [Source name].

Date:_____ _____

[Title]

State of Virginia
City/County of _____

The foregoing instrument was acknowledged before me this (date) _____ by

_____, _____ of
(Name) (Title)

[Source name], a _____ corporation, on
(Place of Incorporation)
behalf of the corporation.

_____ _____
(Date) (Notary Public)

My commission expires: _____ (Date)

Template

SHUTDOWN LETTER MODELS
for Final Shutdown of Source or Unit

[Regional Letterhead]

(date)

Mr./Ms. (Contact's name)
(Contact's Title)
(Source name)
(Source address)
(City or town), Virginia (zip)

Location: (describe)
Registration No. (_____)
County: (_____)
Plant No. (_____)

Dear [Contact's Name]:

The Commonwealth of Virginia's Regulations for the Control and Abatement of Air Pollution, at [9 VAC 5-20-220 and 9 VAC 5-80-****], provide a procedure for the VADEQ of Environmental Quality to follow in making a final determination that a source is permanently shut down. In accordance with the Regulations, this office notified you, in a letter dated [date], of the VADEQ's tentative determination that the [facility], located at [location, town/city, etc.], is permanently shut down.

[We did not receive a response to that letter within the three-month period allowed in the Regulations for challenging this determination (see 9 VAC 5-80-*****).] [We received a response, dated [date], challenging the tentative determination.] [The response also requested a formal hearing before the State Air Pollution Control Board pursuant to 9 VAC 5-80-*****.]

[A hearing was held on [date].] [After consideration of the owner's response,] the VADEQ has made a final determination that the [facility] is permanently shut down as of _____, 20XX. Upon making a final decision that a source is permanently shut down, the VADEQ is required by the Regulations to revoke all applicable permits (9 VAC 5-80-*****). [Provide a date when the permits will be revoked if possible].

Accordingly, you are hereby notified that:

1. [All air permits] [The air permit] issued for the [facility], registration number [******] and dated [date(s)], [is/are] will be revoked effective _____, 20XX ; and

2. The VADEQ of Environmental Quality will remove the [facility] from the air emission inventory and will consider its air pollutant emissions to be zero in any future air quality analysis; and

3. The [facility], or any portion thereof, shall not re-commence operation unless it is authorized by a new permit issued under the applicable provisions of Chapter 80 of the Regulations.

Draft Guidance

If you have any questions concerning this final determination or the revocation of the cited permit(s), please call this regional office at [telephone number].

Sincerely,

[Regional Director's name]
Regional Director

for

[Director's name]
Director

cc: Director, Office of Air Permit Programs
Manager, Data Analysis Section, Office of Air Quality Programs
Air Inspections Coordinator

Template