

2016 Compliance Assistance Conference

**Introduction to Air Permitting and
Reporting – Part 1**

Overview of Session

Part 1 – Permitting Basics

- Basic permit liability
- What needs an air permit, what is exempt
- Permit application forms and data req'd
- Permit application processing & tips
- Allowed construction before permit
- Questions
- Break

Overview of Session

Part 2 – Requirements of Permits

- Permit structure
- Recordkeeping and reporting
- Emission fee reports
- Federal rules and air toxics
- Reporting and using Air Services
- Questions

Part 1 -Air Permitting Basics

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Basic permit liability

- It is the company's obligation to determine if an air permit is needed.
- It is the company's obligation to apply for, obtain and comply with permit.
- Permit needed before installing & starting-up equipment.

Basic liability (continued)

- Air permits are for specific equipment at that facility location.
- New permit is needed if equipment is moved to new address. Moving it within the building is generally OK.
- Permits can be transferred to a new owner.

Why Permits Are Important: Focus of EPA Inspections

- Inspector will check if company is maintaining records required by **air permits**.
- Inspector will check to see if everything that needs an **air permit** has one.
- **Permit** summarizes all applicable federal and state regulations.

Common Air Pollution Violations

- Installing and operating equipment without obtaining proper permits.
- Not maintaining records required by permits.
- Exceeding permit limits.
- Not maintaining air pollution control equipment.



What Needs an Air Permit?

- No definitive list exists!
- Need permit for an:
 - ✓ *air pollution source*
 - ✓ *air contaminant source*
 - ✓ *emissions unit*

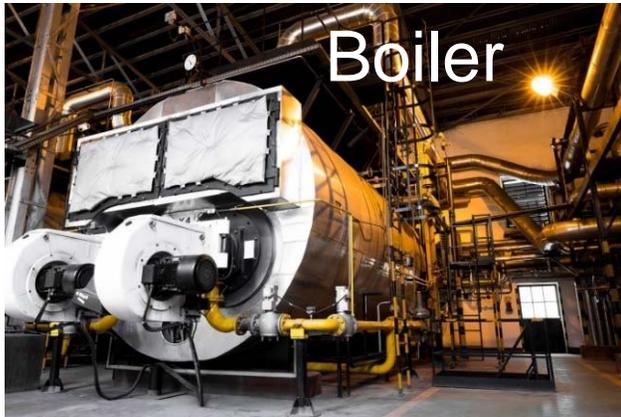
= each separate activity or operation that emits air pollutants (PM, NO_x, SO₂, VOC, CO, Pb, HAPs)
- Permit only covers that air pollution source. Company may need several air permits to cover all plant operations.

What May Need an Air Permit?

4 Rules of Thumb:

- Something with a stack, vent or dust collector.
- Something that uses solvents, paints, inks or adhesives.
- Something that burns fuel.
- Something that causes smoke, dust or odors.

Common Things Needing Air Permits



Does Everything Need an Air Permit?

NO – three options for exemption:

1) Permanent exemptions (OAC 3745-31-03)

- Lists 45+ types of equipment and processes that do not need air permits.
- No EPA notification required.

Some things exempt under permanent exemptions...



Lab fume hoods



Gas-fired boilers, heaters
< 10 million Btu/hr



Storage tanks < 19,815 gallons

More examples...



Solvent stills <20 gal. capacity



Small solvent parts washers
w/non-chlorinated solvent



Non-vented machining operations

Air permit exemptions (cont.)

2. Permit-by-rule provisions

OAC 3745-31-03(A)(4)

- Emergency generators
- Plastic parts molding
- Small crushers
- Ground water/soil cleanup
- Auto body shops
- Gas stations
- Gas-fired boilers
- Printing shops

Pre-defined operating conditions and recordkeeping; Simple 1-page notification required, no waiting!

Air permit exemptions (cont.)

3. “De minimis” source exemption

(OAC 3745-15-05)

- Emits less than 10 lbs/day of PM, NO_x, SO₂, OC, CO, Pb, and;
- Less than 2000 lbs/yr of hazardous air pollutants.
- Can't be subject to federal rules.
- Requires emission calculations.

Air Permit Self-Assessment

- **Step 1:** Tour your plant to identify all air pollution sources using the 4 rules of thumb.
- **Step 2:** Determine what operations fit the permanent exemptions or permit-by-rule.
- **Step 3:** Determine if remaining operations can be de minimis by doing emission calculations.
- **Step 4:** Assume what is not exempt needs a permit.

Air Permits: Installation

Permit to Install (PTI) – *Title V facilities only*

Permit to Install and Operate (PTIO) – *everyone else*
(OAC 3745-31-02)

- Needed before installing and operating equipment.
- For equipment installed after January 1, 1974, can be done years after installation.
- 1-6 months to get, depends on complexity.
- Allows 18 months to start construction.

Air Permits By Facility type

Title V Facilities

(\cong 600 large emitters) need:

- Permit to Install (PTI) for each new installation or modification
- +
- One Title V Operating Permit covering everything for continued operation.



Air Permits By Facility type

Non-Title V facilities (\cong 20,000 small emitters)

and

Synthetic Minor facilities (\cong 900 that voluntarily restrict emissions to avoid more complex regs)

- Need one or more **PTIOs** to cover installation and operation for all air pollution sources at the facility.

Air Permits (cont.)

Permit to Install and Operate (PTIO)

- Covers installation and continued operation.
- 5 year term if “synthetic minor” or “federally enforceable” PTIO w/ restrictions.
- 10-year term for other PTIOs.
- All facility’s PTIOs expire on same date.

Types of PTI/PTIOs (cont.)

Individual PTI/PTIO

- Customized for facility operations & equipment

General PTI/PTIO

- “Canned permit,” can view beforehand but can’t change
- Faster processing – 45 days or less
- Simplified application form – no emission data
- Certain operations and sizes only
- More categories being added

General Permit Categories

- Dry cleaning
- Boilers
- Stone crushing
- Ready-mix concrete
- Metal parts painting
- Oil & gas well sites
- Stationary diesel engines
- Roadways & parking areas (fugitive dust)
- Storage piles (fugitive dust)
- Mineral extraction (fugitive dust)
- Anaerobic digesters

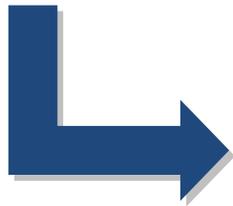
More categories being developed

Ways to apply for permit:

- **Hard copy**
 - Non-Title V facilities only
- **Online using Air Services (eBusiness Center)**
 - Title V facilities - mandatory
 - Synthetic Minor facilities – mandatory
 - Non-Title V facilities - optional

PTI/PTIO Application

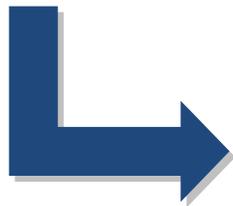
Form 3150a



general company data,
emissions & controls

+

Emission Activity Category (EAC) form(s)



equipment and process data,
very specific – 43 types of EACs

Form 3150a, Section I

- Facility address and contact people
- Applicable federal rules
- Permit Evaluation Report (PER) date choice
- Trade Secret claim
- **Signature**

Form 3150a, Section II

- Installation schedule
- Estimate of types & **quantities of emissions**
- Best available technology description
- Description of pollution control equipment
- Process diagram of equipment
- Stack and emission point data for modeling
- Request for voluntary conditions and limits
- EAC forms to attach

Emissions data-Form 3150a

- Estimates of maximum emissions expected
- PM, SO₂, NO_x, CO, VOC, OC, Lead
- Hazardous Air Pollutants (HAPs)
- 303 Air Toxics (OAC 3745-114-01)
- Actual emissions (normal ops.)
- Requested emissions (max ops.)

Calculating Emissions

- Use emission factors (AP-42), material balance, stack test results, vendor info.
 - ❖ see EAC form Instructions.
 - ❖ see Engineering Guides 4, 45, 80, etc.
- Must agree with equipment and production capacities on EAC form.
- Normal and maximum possible (worst case) emission rates.

EAC form data

- Detailed specs and capacities of equipment being installed/operated.
- Usage rates of raw materials, fuels.
- Production rates of finished products.
- Types of pollution control measures.

How much does an air permit cost?

- No permit application fees.
- One-time fee with issued PTI/PTIO.
- Fees vary depending on type and capacity of equipment. (\$100 – \$1,250 typical)
- Fee automatically doubles if already installed.

See fee schedule at

www.epa.ohio.gov/portals/47/facts/feeschedule.pdf

Permit Process - Step 1:

Company completes PTIO application & submits it to the appropriate Ohio EPA District Office (DO) or Local Air Agency (LAA).

- Plan ahead for timing:
 - ✓ Construction schedule
 - ✓ Draft permit issuance
- Make sure the application is complete:
 - ✓ Signed by appropriate official
 - ✓ All required elements
(Sections I and II, EAC form, process diagram, etc.)
 - ✓ Forms completed for maximum operational flexibility

Common Pitfalls

- Incorrect forms
 - Find links to forms (Section I and II and EACs) at:
www.epa.ohio.gov/dapc/permits/permits.aspx
www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx
- No original signature
- Process flow diagram – either missing or does not match the application forms
- Insufficient information
 - Blank spaces on forms
 - No calculations
 - Missing pages

Additional Application Pitfalls

- Emission estimation deficiencies
 - Using outdated emission factors/guidance
 - Not calculating an emission unit(s) or facility's Potential-to-Emit
- Failure to plan source operation to meet needs
- Not reviewing the issued draft permit terms and conditions for problems

What to consider for flexibility?

- ✓ Hours of operation
- ✓ Production volumes, short and long term
- ✓ Hourly rates
- ✓ Operational controls or limitations
- ✓ Minimum and maximum process ranges
- ✓ Air toxics? Possible modeling implications

Permit Process - Step 2

- DO/LAA reviews for **Preliminary Completeness** within 14 days, notifies company.
 - Will notify you by letter
 - Name, phone number, and email address of permit reviewer is included in the letter

Permit Process - Step 3

- DO/LAA does **technical review**, writes permit, sends to Central Office (Columbus).
 - Usually takes 1-3 months.
 - Stay in contact with district permit reviewer
 - Respond appropriately and promptly to requests for information – “**clock stops**”

Permit Process - Step 4

- Central Office performs review
 - Usually takes < 1 month; returns to district if needed.
 - May receive request for additional clarification from DO/LAA or Central Office reviewers

Permit Process - Step 5

- Central Office issues permit usually within 2-4 weeks
 - Draft
 - synthetic minor (FEPTIO permits)
 - permits of high public interest
 - opportunity to review terms and conditions
 - Final
 - permits published on Ohio EPA's website:
www.epa.ohio.gov/dapc/newpermits/issued.aspx#IssuedPermits
 - also available through eDocs on our website



Tips for Faster Permits

- Make sure application is complete.
- Discuss the application and/or installation with district office reviewer before submitting the application.
- Stay in contact with district permit reviewer.

Tips for Faster Permits

Ohio EPA “Rush List”

- A written notice of the date by which the permit is absolutely needed
- Written demonstration of economic or financial hardship if permit delayed

www.epa.ohio.gov/dapc/fops/rush.aspx

Tracking Your Permit

1. Contact your local district office
2. Contact Central Office (614) 644-2270
3. Electronic copies through DAPC's Web site:

www.epa.ohio.gov/dapc/permits/permits.aspx#tracking

Allowed construction activities before permit is issued

Minor New Source (includes minor modifications)*

Can do almost everything except hook-up utilities and begin operation.

* *Minor here means NOT a: major modification, major stationary source, NSR synthetic minor or netting project*

Major New Source (includes major modifications)

Can only do temporary activities like site clearing, excavation, temp utility connections, etc.

Nothing permanent.

All at own risk to owner/operator – no permit guaranteed

See [OAC 3745-31-33](#) for allowed activities list.

So what can minor sources do before a permit is issued?

- Site preparation activities
- Once a PTIO application has been filed:
 - Foundations, footers for building/equipment
 - Electrical service; piping and sewers; ductwork
 - not including connections to source or control device
 - **Source and control device** equipment and parts can be placed and secured to its foundation or final location; not operated

See [OAC rule 3745-31-33](#) for specifics of allowed activities

Helpful air permitting resources

DAPC Permits web page (forms, rush info, etc.)

www.epa.ohio.gov/dapc/permits/permits.aspx

Emission factors

www.epa.gov/chief

District Office permit engineers

www.epa.ohio.gov/dapc/general/dolaa.aspx

OCAPP, one-on-one help with permit applications (small businesses only) 1-800-329-7518



Questions?



Air Permitting and Reporting

Part 2: Now What?

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Who and What

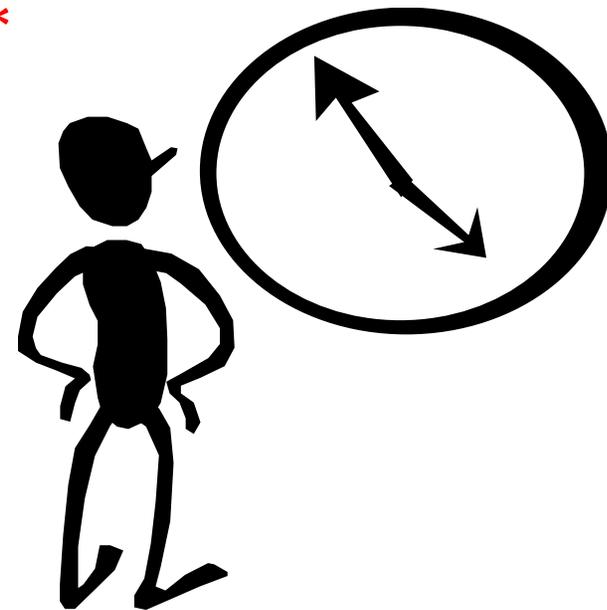
- Ohio EPA and Local Air Agencies
- Responsibilities and Day-to-day
 - Permits
 - Site Visits and/or Inspections
 - Stack Tests
 - Complaints
 - Air Monitoring
- Don't do: Zoning approvals, Refrigerants, Worker Safety, Indoor Air Quality

What will we cover?

- Permit Structure
- Monitoring and Recordkeeping
- Reports (Compliance and Fee Reports)
- Be Aware Issues/Helpful Hints
- e-Business: Air Services

Common Question

- How long to get my permit?
 - Ohio EPA days:
 - 127 average days (Goal 180)*
 - 62 median
 - Total Days:
 - 152 average
 - 76 median
 - Reality



*Includes public comment period.

Great Job!...Now what?

- Read and understand your permit
- Make compliance easy
- Submit reports
- Know what is happening at your facility

Permit Structure

- Cover Pages – General info
- Standard Terms – Same in all permits of that type
- Facility-Wide Terms – Apply to whole facility
- Emissions Unit Terms – Emission unit specific
 - equipment description
 - rules and limits
 - “action” items (monitoring, record keeping & reporting)

Emission Unit Terms

(As outlined in the air permit...)

- a. Enforceability term(s)
- b. Applicable Emissions Limitations
- c. Operational Restrictions
- d. Monitoring and/or Recordkeeping Requirements
- e. Reporting Requirements
- f. Testing Requirements
- g. Miscellaneous Requirements

Permit Number:
 Facility Name:
 Facility ID:
 Working Copy of a Permit in Progress

1. Emissions Unit Group - Lab Spray Booths: K006, K007,

| EU ID | Operations, Property and/or Equipment Description |
|-------|---|
| K006 | Spray Booth 9 - Color Lab |
| K007 | Spray Booth 10 - Technical Lab |

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| a. | | |
| b. | | |

- (2) Additional Terms and Conditions

a. None.

- c) Operational Restrictions

(1) None.

- d) Monitoring and/or Recordkeeping Requirements

(1) None.

- e) Reporting Requirements

(1) None.

- f) Testing Requirements

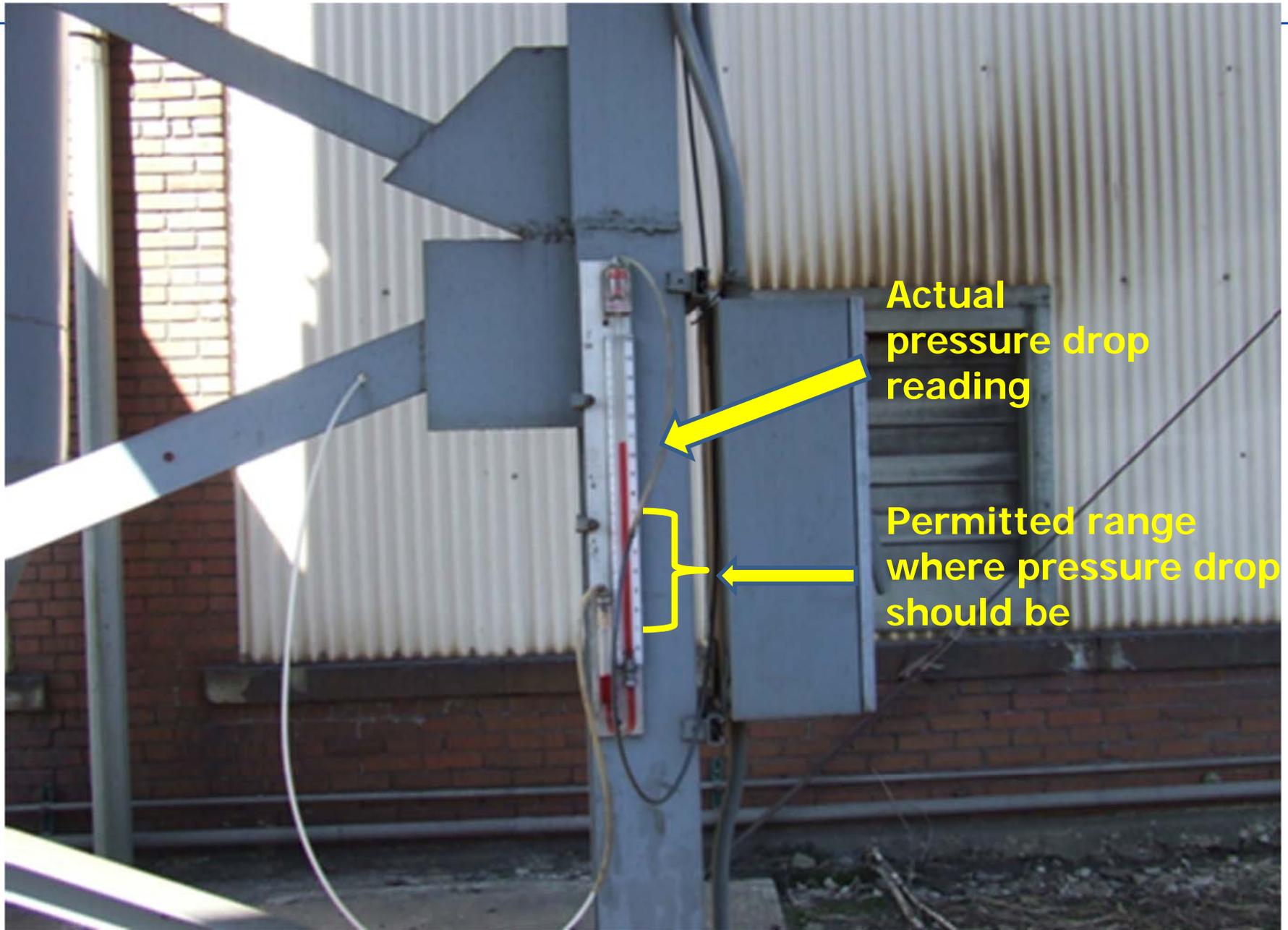
(1) None.

- g) Miscellaneous Requirements

(1) None.

Why Monitoring & Record Keeping?

- Designed to assure:
 - proper operation of emissions unit and control equipment
 - ongoing compliance with rules, limits and operational restrictions in the permit
- Per unit or facility-wide
- May be negotiable - at application stage



Actual
pressure drop
reading

Permitted range
where pressure drop
should be



Recordkeeping

- Read your permit
- Incorporate requirements
- Make it easy and fail safe (avoid excessive paperwork)
- Train staff



Reporting - Why?

- Compliance Reports
 - Method of notifying regulatory authorities of:
 - failure to follow permit requirements
 - equipment malfunctions
 - emission releases
 - (un)scheduled maintenance
- Fee Reports
 - Fees based on actual emissions/emission levels

Reporting – What and Where?

- May be annual, semi-annual, quarterly, after event (i.e. malfunctions), etc.
- Issued permits (PTIO, FEPTIO, Title V):
- Rules/Other
 - OAC rules 3745-21, 3745-15, etc.
 - Federal rules MACT, NSPS, etc.
 - Title V Annual Compliance Certification (due April 30)

Report Types

- Most Common
 - Permit Evaluation Report (PER)
 - Quarterly Deviation Reports
 - Malfunction Reports
 - Fee Reports

Report Types - PER

- Permit Evaluation Report (PER)
 - annual report for deviations
 - covers all units issued a PTIO
 - replaces most quarterly reports
- Does not replace **rule-based** reporting or **synthetic minor** reporting related to the avoidance of a federal requirement (i.e. TV, MACT, PSD)

Reports - PER

- OEPA will mail out:
 - reminder and (for NTV facilities) a PER form
 - only for units that have been issued a PTIO
- PER asks for specific information
- Due date is one of 4 days during year:
 - Feb 15, May 15, August 15, or November 15
(May be chosen by applicant)

Reports - PER (page 1)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Annual Permit Evaluation Report (PER)

Due Date: [PER Due Date]

Reporting Period: [Reporting Period Start Date] - [Reporting Period End Date]

Facility Name: [Facility Name]

Facility ID: [Facility ID]

Facility Address: [Facility Address Line 1]
[Facility Address Line 2]
[Facility City, State Zip]

Primary Contact: [Primary Contact First Name, Last Name]

Mailing Address: [Primary Contact Address Line 1]
[Primary Contact Address Line 2]
[Primary Contact City, State Zip]

Phone: [Primary Contact Phone]

E-mail Address: [Primary Contact E-mail]

The facility address information given above was populated by Ohio EPA's most current database of information. If the above information has changed or is incorrect, please indicate the correct information below. You may also complete this PER electronically using the eBusiness Center - Air Services at ebiz.epa.ohio.gov on the Internet.

Indicate changes below.

| | |
|-------------------------------------|--|
| Facility Name: | |
| Facility Address: | |
| Reason for Facility Address Change: | |
| Primary Contact: | |
| Mailing Address: | |
| Phone Number: | |
| E-mail Address: | |



Basic facility information pre-populated



Identify if changes needed in box below



Reports - PER (page 2)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Annual Permit Evaluation Report (PER)

Table I: Emissions Units with Issued PTIOs

| EU ID* | EU Description | Company Equipment ID | Permit Number | PTIO Effective Date |
|---------|----------------|----------------------|-----------------|---------------------|
| [EU ID] | [Description] | [Company ID] | [Permit Number] | [Effective Date] |
| | | | | |
| | | | | |

* List any additional emissions units (EUs) that have been issued a PTIO that are not included in the list above.

A "Detailed Emissions Unit (EU) Form" (attached) must be submitted for each EU listed in Table I to satisfy PER reporting obligations. In addition to the PER, please remember that your PTIOs may specify other state or federal reporting requirements.

Additional Information and Corrections:

Please list below any additional information you need to communicate with Ohio EPA. At a minimum, identify if you have any EU(s) that were permanently shutdown, EU(s) that will not be installed or modified, or EU(s) not in operation during the reporting period. See the "Annual Permit Evaluation (PER) Form FAQs" document for an explanation and additional examples or relevant information.

| |
|--|
| |
| |
| |
| |
| |
| |
| |
| |

Report Responsibility:

This PER, including any accompanying information, is required under the authority of the director of the Ohio Environmental Protection Agency. [Ohio Revised Code 3704.03(I)] Failure to submit this PER, including any accompanying information, or falsifying this PER, including any accompanying information, may result in civil or criminal penalties in accordance with applicable state law.

Assistance With This Form:

If you have any questions please see the attached "Annual PER Form FAQs" document or contact [DO/LAA Long Name] at [DO/LAA Phone].

★ Emissions Unit(s) table pre-populated



★ Box to identify any additional info/corrections



★ Responsibility language



Reports - PER (page 3)

Detailed Emissions Unit Form(s)

PER Reporting Period: [Reporting Period Start Date] - [Reporting Period End Date]

Detailed Emissions Unit Form Instructions*:

1. Please complete questions A and B for each emissions unit (EU) that has been issued a PTIO. In addition, either confirm the accuracy of the information provided or change the information accordingly.
2. If you indicated "yes" for question A or B, for each deviation or exceedance that occurred during the reporting period, please provide an attachment with the following information:
 - a. EU ID;
 - b. dates and/or duration;
 - c. description of deviation or exceedance including probable cause;
 - d. description of corrective action(s) if taken; and
 - e. if no corrective action(s) were taken, then why not?
3. If applicable, for each visible emission (VE) incident that occurred during the reporting period, please provide an attachment with the following information:
 - a. EU ID;
 - b. dates and/or duration; and
 - c. additional information as required per the applicable PTIO.

* For further explanation, or if you have any questions, please see the attached "Annual PER Form FAQs" document or contact the **Office of Compliance Assistance and Pollution Prevention at (800) 329-7518** or **Ohio EPA DAPC, Central District Office at (614)728-3778**.

PER Detailed EU Form

EU ID: [EUID]

Facility ID: [Facility ID Number]

EU Description: [Permit Number]

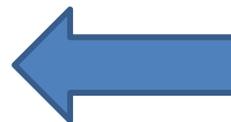
Please provide date below if not present.

| | |
|--|-------------------------------|
| Completion of initial installation date: | [FP EU Complete Installation] |
| Begin installation/modification date: | [FP EU Begin Installation] |
| Commence operation after installation or latest modification date: | [FP EU Commence Operation] |

Were there any deviations or exceedances from the following PTIO requirements?

- A. Operational restrictions or emission limitations? Yes___ No___
- B. Monitoring, record keeping, or reporting requirements? Yes___ No___
- C. If Yes for A or B above, then submit the appropriate information as specified in the Detailed Emissions Unit Form Instructions #1 and #2 above. If any visible emission incident occurred during the reporting period, then submit the appropriate information as specified in #3.
- D. In the applicable PTIO, are there additional reporting requirements for this EU that need to be met in this PER? If yes, please include the information in the "Additional Information and Corrections" section of this PER. Yes___ No___

- Complete this form for each unit issued a PTIO
- Fields in [brackets] are pre-populated
- Questions are at bottom



Reports - PER

Found in your Air Permit

Were there any deviations or exceedances from the following PTIO requirements?

- A. Operational restrictions or emission limitations? Yes___ No___
- B. Monitoring, record keeping, or reporting requirements? Yes___ No___
- C. If Yes for A or B above, then submit the appropriate information as specified in the Detailed Emissions Unit Form Instructions #1 and #2 above. If any visible emission incident occurred during the reporting period, then submit the appropriate information as specified in #3.
- D. In the applicable PTIO, are there additional reporting requirements for this EU that need to be met in this PER? If yes, please include the information in the "Additional Information and Corrections" section of this PER. Yes___ No___

- Answer "Yes" or "No"
- If "Yes", to question A or B, attach info:
 - i.e.. dates, duration, probable cause, corrective action information
- If "Yes", to question D, include additional info:
- No signature required!

Reports - Quarterly

- Old permits and ALL Synthetic Minors and TVs
- Quarterly Deviations for:
 - Visible emissions observations
 - Emission limits
 - Production limits
 - Control device parameters
- Need cause(s) and corrective actions or preventative measures

Reports - Quarterly

- Negative declaration reports are needed.
- In other words, facilities must submit a report every quarter, regardless of whether or not deviations occurred.
 - “If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter...”

Reports - Malfunctions

- Breakdown of a source or control equipment (e.g., fabric filter, incinerator, carbon adsorber, etc.) that results in a violation
- Scheduled/unscheduled maintenance to avoid a malfunction
- Action required: Report malfunction



Reports - Malfunctions

OAC 3745-15-06(B):

- Notify Ohio EPA or Local Air Authority
 - **Immediately** (e.g., by email or phone)
 - **Written report** required within 2 weeks if event lasts longer than 72 hours

Reports - Malfunctions

- Identification of and location of source
- Duration of breakdown
- Quantity of release
- Statement including:
 - why shutdown of EU was not possible
 - justifying the breakdown time as reasonable
 - interim control measures used
 - PM & MA plan implemented, if applicable

Reports – Other types

- Federal Rules
 - MACT, GACT, etc.
 - Only if rule applies to your source
- State Rule based (e.g., OAC rule 3745-21-09)
 - Reporting frequency will be specified
such as within 30 days, 45 days
 - Others

Compliance Reports in General

- Make sure to review all records and information available to ensure an accurate reporting of compliance status
- Must satisfy permit requirements
 - Review reporting requirements upon new permit issuance and renewal
 - Modify your reporting forms/letters appropriately

Fee Emission Reports

- Based upon Classification as:
 - Non-Title V - every 2 years, “Blue Card”
 - Synthetic Minor - annual
 - Title V - annual
- Actual emissions determine fee
- Mailed out in February, due **April 15**
- Invoice sent later by Ohio EPA

Non-Title V (Blue Card) Fee Report

- Emissions are totaled for entire facility
- Annual fees are:
 - 0-9 tons = \$100.00
 - 10-49 tons = \$200.00
 - 50-99 tons = \$300.00
 - 100 or more = \$700.00
- Answer Place ID 2118
- Additional Guidance - www.epa.ohio.gov/dapc/nontvfee.aspx

Title V and Synthetic Minor Fees

- Report emissions for each emissions unit
- Reports submitted via eBiz/Air Services
- Title V facilities pay by the ton
- Synthetic Minor fees range from \$170.00 to \$3,350.00 depending on emissions level

www.epa.ohio.gov/portals/47/facts/feeschedule.pdf

Common Question:

- What reporting do I need to worry about?
 - PTIO - PER, biennial Fee, malfunction
 - FEPTIO - PER, quarterly, annual Fee, malfunction
 - PTI, TV PTO - quarterly, annual Fee, malfunction, Annual Compliance Certification

Ohio EPA Inspections

- Don't be surprised...they happen.
- Be open and honest
- Show inspector:
 - Emissions units
 - Control equipment
 - Recordkeeping



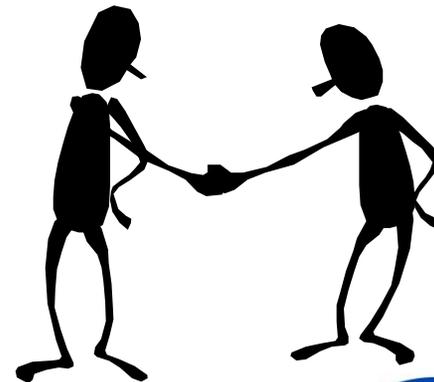
USEPA Inspections

- Don't be surprised...they happen too.
- Traditionally by Source Category
- Usually concentrate on compliance with applicable federal requirements
- Ohio EPA not involved and usually not informed



Helpful Hints

- Ohio EPA's goal is compliance, **NOT** enforcement
- Make recordkeeping as simple as possible
- Develop a pattern for recordkeeping and reports
- Foster a good relationship
with neighbors



Be Aware...

- GACT rules
 - Engineering Guide #88
- Emergency Engine PBR
- Air Services
- Air Toxics Modeling

NESHAP Area Sources

- National Emissions Standards for Hazardous Air Pollutants (NESHAP)
- Clean Air Act, Section 112(k)(1) and July 19, 1999, Urban Air Toxics Strategy require EPA to:
 - ID 30 Hazardous Air Pollutants (**HAPs**) that pose greatest threat
 - ID source categories with 90% of top 30
 - Write Area Source standards

NESHAP Area Sources

- Generally Available Control Technology (GACT)
 - Cover small facilities
 - Many affect businesses not previously regulated
 - Many facilities have low emissions already
- GACT standards may include:
 - Applicability and compliance dates
 - Testing, monitoring, notifications, reports and records

NESHAP Area Sources

- Delegation of authority to Ohio via Memorandum of Understanding (MOA)
 - Delegates major source MACTs to Ohio
 - Does NOT delegate most area source GACTs to Ohio
- May be confusing

NESHAP Area Sources

- What does this mean for permits?
 - Non-Title V permits will include info in the Facility-Wide Terms stating that the facility may be subject to the GACT
 - Title V permits will incorporate the rules throughout the permit by reference (Engineering Guide #76)

[Engineering Guide #88](#)

<http://epa.ohio.gov/Portals/27/engineer/eguides/guide88.pdf>

Emergency Engines

- Update to the Emergency Engine PBR
 - Requires compliance with engines NESHAP and NSPS
 - PBR language updated prior to the Vacatur
- NESHAP and NSPS Vacatur
 - What does this mean?

Emergency Engines PBR

- Retains <500 hrs per rolling, 12-month period threshold
- No change in fuels allowed
 - Gasoline
 - Natural gas
 - Distillate oil (no sulfur content limit)
 - LPG (propane)
- Major change involves language that requires compliance with applicable provisions of IIII and JJJJ NSPS and ZZZZ NESHAP

Emergency Engines PBR

- IIII (compression-ignition) and JJJJ (spark-ignition) NSPS are complex
 - Provisions for manufacturers, owners, and operators
 - Applicable restrictions are affected by manufacture date, size, and qualified uses
 - Emergency engine definition involved in vacatur

Emergency Engines PBR

- ZZZZ (RICE) NESHAP similarly complex
 - Affects both major and area sources of HAPs
 - Applies to SI and CI engines
 - Applicable restrictions are affected by construction/installation date, size, and qualified uses
 - Emergency engine definition involved in vacatur

Vacatur in Summary

- 2 provisions included in the emergency engines definitions of the federal rules have been vacated. An emergency engine:
 - **Can't** operate at the request of the NERC
 - **Can't** operate due to deviation in voltage or frequency
 - Can operate for maintenance and readiness
 - Can operate up to 50 hours non-emergency

What's the Takeaway?

- Emergency Engine PBR requires compliance with IIII, JJJJ, and ZZZZ
- For emergency engines, compliance with these federal rules has been affected by the Vacatur
- PBR/rule language update will take time
- Be aware of external influences

[U.S. EPA Guidance on Vacatur](https://www3.epa.gov/ttn/atw/icengines/docs/RICEVacaturGuidance041516.pdf)

<https://www3.epa.gov/ttn/atw/icengines/docs/RICEVacaturGuidance041516.pdf>

Air Toxics Modeling

- New or modified sources
- Emit more than 1.0 ton per year of any toxic
- 303 Air Toxics listed in OAC 3745-114-01
- New Sources, highest allowable short-term is modeled
 - Or, if modification, increase is modeled
- Modeled concentration must not be above the Maximum Acceptable Ground Level Concentration (MAGLC) for that toxic

Toxics Modeling

- AERSCREEN is the model used for state-only permit modeling...which includes toxics
- Exempt (generally) from toxics modeling:
 - Sources subject to MACT
 - Sources in which BACT/LAER has been required
 - Certain source categories (i.e. parking lots, storage piles, storage tanks, grain silos, emergency generators, gasoline dispensing facilities)

[Engineering Guide #69](#)

<http://www.epa.ohio.gov/Portals/27/engineer/eguides/2014-07-17%20FINAL%20Revised%20EG69.pdf>

Other Minor Source Modeling

- Required for **Minor Source Projects** with proposed allowable emissions greater than the following levels (see Table 3 in Engineering Guide 69):
 - PM_{2.5} - 10 tons
 - PM₁₀ - 15 tons
 - SO₂ - 40 tons
 - NO_x - 40 tons
 - CO - 100 tons
 - Lead - 0.6 ton

Table 3

(<http://www.epa.ohio.gov/Portals/27/engineer/eguides/Table%203-stand%20alone.pdf>)

eBusiness Center: Air Services

The eBusiness Center is a web-based system for applications, reporting and more!

- **Secure** portal
- **Update** facility and contact information directly
- **Instant** electronic submittal

No paper printing, no paper signature, no mailing!

Air Services: Who?

- Air Services users:
 - Title V facilities - **mandatory**
 - Synthetic Minor facilities – **mandatory**
 - Non-Title V facilities – optional, but encouraged
- Only Non-Title V facilities retain the option to submit hard copy documents, but also have the opportunity to use Air Services

Air Services: What?

- Electronically generate and submit:
 - applications: PTIO, permit-by-rule, general permits, admin modifications, corrections to applications
 - reports: fee emissions, PER and all others
 - changes to owners/contacts

Air Services: What?

- View:
 - all your emissions units, control equipment, egress points, etc.
 - issued permits
 - historical facility make-up, fee reports, applications, etc.
 - progress of your application at Ohio EPA

Air Services: How?

- First step is to go to <http://ebiz.epa.ohio.gov> and click “*Create New Account*”
- Request “*Personal Identification Number*” (PIN)
 - Acts as electronic signature for all eBusiness Center services that require one
 - Plan ahead! The process may take several days and at least one document requires a **notarized** signature.
 - Answer Place ID 1136

Air Services -Home Page

[Help](#)

[Air Services Home](#)

[Application Detail](#)

- [Owner/Contact](#)
- [Application\(s\)](#)
- [Permit\(s\)](#)
- [Emissions Report\(s\)](#)
- [Reporting Category](#)
- [Compliance Reports](#)
- [Facility Profile History](#)
- [Event Logs](#)
- [References](#)

[Air Services Home](#) >

Air Services Home

Facility Information

Facility Name: Knox Community Hospital
Address1: 1330 Coshocton Rd
City: Mount Vernon **State:** Ohio
Facility ID: 0142010014
Address2:
Zip: 43050 **County:** Knox

[View Frozen Facility](#)

▼ In Progress Tasks

| Select Task Type | Task Description | Dependent on Task | Created Date | User Name |
|---|---|---|--------------|-----------|
| <input type="radio"/> Facility Change | Facility Profile Change | N/A | Apr 18, 2008 | dapc14 |
| <input type="radio"/> PTI/PTIO Permit Application | PTI/PTIO Application | Facility Profile Change | Apr 18, 2008 | dapc14 |

[Delete](#) [Printable view](#) [Export to excel](#)

New Tasks

Select from the list below to create a new task

[Facility Profile Change](#)

[Owner/Contact Change](#)

[Permit-by-rule \(PBR\) Notification](#)

[PTI/PTIO Permit Application](#)

[TV Permit Application](#)

[Request Administrative Permit Modification](#)

[Emissions Report](#)

[Permit Evaluation Report \(PER\)](#)

[Title V Annual Compliance Certification Report \(TVCC\)](#)

[Other Compliance Report](#)

[Air Services Home](#) | [Application Detail](#) | [Help](#)

Air Services - Facility Profile Page

Facility Profile

Facility ID: 1431070849 Current Permitting Classification: TV Facility Profile Start Date: 3/11/2008
Facility Name: University of Cincinnati Operating Status: Operating Facility Profile End Date: Current

Facility Information

Facility ID: 1431070849
Facility Name: University of Cincinnati
Facility Description: University power plants, Clifton Campus
Address1:
Address2:
City: Cincinnati State: Ohio Zip: 45221
County: Hamilton
Portable:
Operating Status: Operating
Permitting Classification: TV PER Due Date: Not Applicable
Transitional Status:
Title V Permit Status: Extended Title V Certification Report Due Date: April 30
Emissions Reporting Category for 2007: TV Status: Reminder Sent
Anticipated Emissions Reporting Category for 2008: TV

Facility Details

Core Place ID: 21097

Latitude and Longitude

Latitude Degree: 39 Minute: 8 Second: 2.0
Longitude Degree: 84 Minute: 30 Second: 33.0
[Lat/Long reference information](#)

SIC

SIC
8221 Colleges And Universities
[Printable view](#) [Export to excel](#)
[SIC reference information](#)

NAICS

NAICS
611310 Colleges, Universities, and Professional Schools
[Printable view](#) [Export to excel](#)
[NAICS reference information](#)

[Edit](#) [Validate](#) [Submit](#) [Show Profile Report](#)
[Create Emission Unit](#) [Create Control Equipment](#) [Create Egress Point](#)

Navigation Menu:

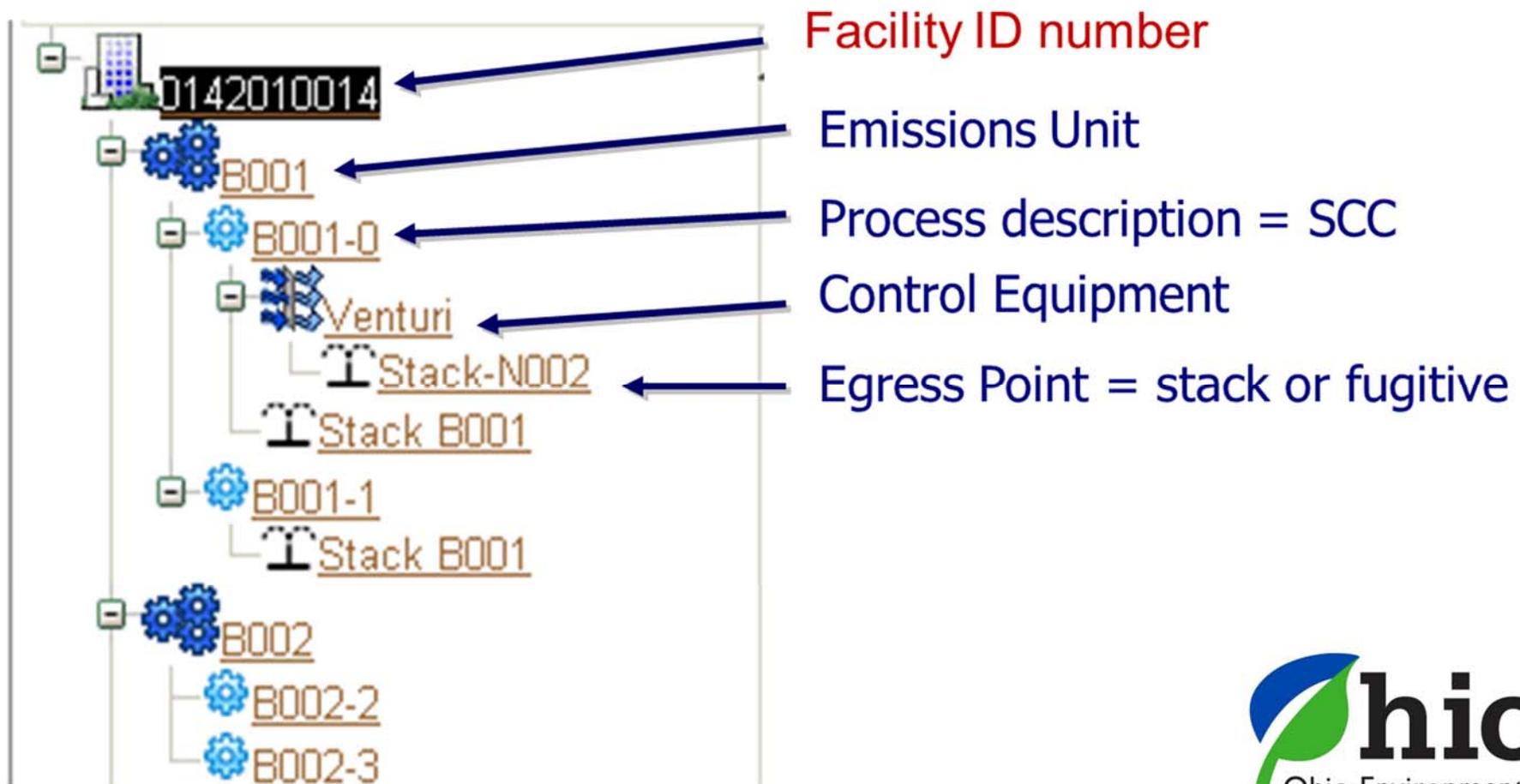
- Emission Units
- Control Equipment
- Egress Points
- Federal Rules

Facility Tree:

- 1431070849
 - 8005
 - 8005-0
 - 8005-1
 - 8005-2-TEMP
 - UC02
 - 8006
 - 8007
 - 8008
 - 8009
 - 8009
 - 8010
 - 8011
 - 8012
 - 8013
 - 8014
 - 8015
 - 8016
 - 8017
 - 8018
 - 8019
 - 8019-3
 - 8019-4
 - 8019-6-TEMP
 - UC01
 - 8020
 - 8000-6

Facility Tree Concept

- Represents the “emissions units” at your facility
 - Started for you (pre July 2008 data migrated in)
 - Shows “parts” of each emissions unit (process type, controls, stacks, etc.)



Save, Validate and Submit Documents

- Save for as long as you want before submitting
- All “In progress tasks” (saved documents) are NOT viewable by Ohio EPA until you submit
- Click “Validate” – ensures minimum fields complete
- Submit and enter PIN
- INSTANT SUBMITTAL!!!

No paper copies to print, sign or mail.

Additional Tips and Resources

“FAQs (Answer Place)”

<http://ohioepa.custhelp.com/app/home>

- Gain access to FAQs, answers, and how-to videos
- Search Agency’s database using keywords or Answer Place IDs
- Sign up for an account and customize your support interests

Where is FAQs (Answer Place)?

- www.epa.ohio.gov



Ohio.gov State Agencies | Online Services

Search... 



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| Rules | Online Services | Forms and Publications | Professional Certification |
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| Get Help | eBusiness Center | Environmental Programs | Water and Wastewater Operator Certification |
| Permit and Compliance Assistance | Pay Fees Online | Air Pollution Control | Certified Drinking Water Labs |
| Small Business Assistance | eDocument Search | Brownfield Redevelopment | Voluntary Action Program Certified Professionals |
| Pollution Prevention and Compliance Assistance | Electronic Data Reporting | Discharge Monitoring Report-Quality Assurance | Voluntary Action Program Certified Labs |
| Recycling | Customer Support Center | Emergency Response | View Maps |
| Financial Assistance | FAQs (Answer Place) | Enforcement | |
| Sign up for updates and news | Permit Wizard | Ground Water | |
| Request a public record | Publication Catalog | Hazardous Waste Investigation and Cleanup | |
| Regulatory Ombudsman | Ask a Question | Public Drinking Water | |
| Request an Adjudication Hearing | Sign up for updates and news | Wastewater and Storm Water | |
| | Training Catalog | Waste Management/Landfills | |
| | Environmental Permitting | | |
| | Permit Fees | | |



FAQs (Answer Place)

- Example: [Answer Place ID 1148](#) – Activating eBusiness Center Service



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1148

Search

Search Our Database of Frequently Asked Questions

Search Type ▾

Results 1 - 2 of 2 for [1148](#)

[Detailed information on activating an eBusiness Center Service](#)

To request a service After you select the facilities After the service request is submitted You can cancel or remove a service request B efore a transaction (e.g. electronic submittals and fee...

Date Updated: 07/31/2013

[Non-Title V Permit Application and Reporting Requirements - How to submit electronically in Air Services](#)

As an owner/operator of a non-Title V facility you can choose to submit your permit applications or reports through the eBusiness Center instead of turning in a hard copy. This topic...

Date Updated: 01/14/2014

Air Services: Online Help

Tips, tools, and resources are available online via the Agency “[FAQs \(Answer Place\)](#)”

- Answer Place [ID 1148](#) – *Activating eBusiness Center Service*
- Answer Place [ID 1166](#) – *Information and who to contact when working with Air Services*
- Answer Place [ID 2118](#) – *How to submit electronically in Air Services*
- Answer Place [ID 1642](#) – *Air Services Training Videos*

Additional Tips and Resources

DAPC permit info website:

www.epa.ohio.gov/dapc/permits/permits.aspx

Air Services info website:

www.epa.ohio.gov/dapc/airservices.aspx

Area Source Standards:

www.epa.gov/ttn/atw/area/arearules.html

Questions?

