

Final Model General Permits GPs 7.1, 7.2, and 7.3
Response to Comments and Questions Model General Permits (MGPs) for Material Storage Piles-MGPs 7.1, 7.2, and 7.3

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Background

- There are 6 possible terms and conditions to use:

MGP Number	Permit Classification	Maximum Production (tpy) and Maximum Surface Area of Storage Piles (acres)	Potential to Emit PE and PM 10 in tons per year (tpy)
7.1	Non-Title V terms	3,000,000 tpy and 15 acres	12.0 tpy PM (5.9 tpy PM10)-voluntary emission limits
7.1	Title V terms	3,000,000 tpy and 15 acres	12.0 tpy PM (5.9 tpy PM10)- voluntary emission limits
7.2	Non-Title V terms	3,000,000 tpy and 6 acres	6.4 tpy PM (3.1 tpy PM10) - voluntary emission limits
7.2	Title V terms	3,000,000 tpy and 6 acres	6.4 tpy PM (3.1 tpy PM10) - voluntary emission limits
7.3	Non-Title V terms	3,000,000 tpy and 15 acres	12.0 tpy PM (5.9 tpy PM10)
7.3	Title V terms	3,000,000 tpy and 15 acres	12.0 tpy PM (5.9 tpy PM10)

- GP's 7.1 and 7.2 will contain a voluntary emission limit for facilities wishing to have a ton per year emission limit for PM and PM10.
- Although the old MGPs 7.1 and 7.2 will no longer be available, Ohio EPA is **not** requiring facilities with the old GPs 7.1 and 7.2 to apply for new GP's . If a facility decides to make a change and meets the new Qualifying Criteria (QC), they can apply for one of the new GPS. The old GP would be replaced at the time of final issuance.

Comments Received during comment period 5/25/15 to 6/30/15

The following comments and questions were received during the comment period specified. In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Topic: Chapter 17 Fugitive Emissions Rule Citations

a. Comment: Please place back into section C.1.b)(1) b. the Appendix A area language per OAC 3745-17-07(B)(11)(e).

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a. Response: The language pursuant to OAC 3745-17-07(B)(11)(e) was added back into sections C.1.b)(1)b.

b. Comment: The term “The operator shall avoid dragging any front end loader bucket along the ground.....” has been deleted. Was there a decision to remove this term?

b. Response: Yes, a decision was made to remove this term.

Topic: Which material storage pile MGP should a facility apply for?

c. Comment: Why might a facility want to use GPs 7.1 or 7.2 (with the tpy limit)?

c. Response: The facility may want a federally enforceable emission limit in their permit.

Topic: Work Practice Plans

d. Comment: Missing Work Practice Plan details in the non-Title V version of GP 7.3.

d. Response: The missing details have been added.

Topic: General Items

e. Comment: How will a permittee calculate a potential to emit (PTE) for both PE and PM10 to see if they meet the qualifying criteria (QC)?

e. Response: AP-42, section 13.2.4.1 for Material Storage Piles is a good place to start. If the facility has emissions data on their storage piles, that would be used.