

# Air Permitting Basics

## An Introduction to Air Permitting in Ohio

**September 25, 2012**

**Rick Carleski**

Office of Compliance Assistance  
and Pollution Prevention

(614) 728-1742

[rick.carleski@epa.ohio.gov](mailto:rick.carleski@epa.ohio.gov)



Environmental  
Protection Agency

# Overview of Session

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

# Basic permit facts

- 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 facts (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!
- Permit needed for "*air pollution source*," "*air contaminant source*" or "*emission unit*" = each separate activity or operation that emits air pollutants.
- Permit is only for 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 permits



Boiler



Paint booth



Printing press



Dry cleaner



Stone crushing

# Does Everything Need a Permit?

**NO – 3 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



Boilers, water heaters  
< 10 million Btu/hr



Storage tanks  
<19,800 gallons

# More examples....



Non-vented machining operations



Solvent reclaiming units  
< 20 gallon capacity

Small solvent  
parts washers  
w/nonchlorinated solvent



# 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
- **Prescribed operating conditions and recordkeeping**
  - **Simple 1-page notification required**
  - **No fee, no waiting!**

# Air permit exemptions (cont.)

## 3. “De minimis” source exemption (OAC 3745-15-05)

- Emits <10 lbs/day of air pollutants and <2000 lbs/yr of all hazardous air pollutants (HAPs).
- Can't be subject to federal rules.
- Requires emission calculations.
- No EPA notification required.

# 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.



# Types of Air Permits

## Permit to Install and Operate (PTIO)

- Permit 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.
- One-time installation fee.
- Allows 18 months to start construction.

# Types of Air Permits (cont.)

## Permit to Install and Operate (PTIO)

- Allows continued operation.
- 5-10 year term, all renewable on same date.
- For minor and Synthetic Minor facilities only.
- Not for “Title V facilities” → they need PTI.

# Types of Air Permits (cont.)

## General PTIO

- “Canned permit,” can view beforehand then decide
- 45 day or less processing time
- Simplified application form – no calculations!
- Certain operations and sizes only:
  - *Dry cleaning*
  - *Boilers*
  - *Ready-mix concrete*
  - *Metal parts painting*
  - *Fugitive dust (roads and storage piles) & others*

# Ways to apply for permit:

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

# Permit Application Form

Form 3150a



general company data

+

Emission Activity Category (EAC) form(s)



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

# Permit Application Form 3150a

- Company name, address, and contact.
- Estimate of types & quantities of air emissions.
- Diagram of process/equipment being installed/operated.
- Description of pollution control equipment.
- Description of emission points & stacks

# Emissions data-Form 3150a

- Estimates of maximum emissions expected
- PM, SO<sub>2</sub>, NO<sub>x</sub>, 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, actual testing, vendor info.
  - ➔ see EAC form Instructions.
- 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 application fees.
- One-time fee with issued PTIO/PTI.
- 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/dapc/permits/permits.aspx](http://www.epa.ohio.gov/dapc/permits/permits.aspx)



Environmental  
Protection Agency

# Permit Process - Step 1:

Company completes PTIO application & submits it to District Ohio EPA office.

- Plan ahead for timing, don't submit at last minute
- Make sure the application is complete
  - Signed by appropriate official
  - All required elements (EAC form, process diagram, etc.)
  - All necessary info and numbers, forms filled out as completely as possible

# Permit Process - Step 2

- District Office reviews for completeness within 14 days and sends letter stating:
  - Application is complete & further review, or
  - Application is incomplete and more info needed
  - Letter will include the name and contact info of district permit reviewer

# Permit Process - Step 3

- District does technical review, writes permit, sends to Central Office (Columbus).
  - Usually takes weeks to months, per complexity
  - Stay in contact with district permit reviewer
  - Respond appropriately and promptly to requests for information

# Permit Process - Step 4

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

# Permit Process - Step 5

- Central Office issues permit as
  - **Final** – 90%
    - published on Ohio EPA's website  
[www.epa.ohio.gov/dapc/permits/permits.aspx](http://www.epa.ohio.gov/dapc/permits/permits.aspx)
  - **Draft** - 10%
    - public notice published in local paper
    - public comment period of 30 days
    - adds 45+ days before final is issued.

*Ask district if it will be issued draft or final.*

# Tips for Faster Permits

- Pre-application meeting with district office to discuss installation and application preparation.
- Stay in contact with district permit engineer and promptly respond to requests for additional info.
- Ohio EPA “Rush List”
  - A written demonstration of economic or financial hardship if permit delayed, e.g., added construction costs, lost business, lost jobs, etc.

[www.epa.ohio.gov/dapc/permits/permits.aspx](http://www.epa.ohio.gov/dapc/permits/permits.aspx)

# Tracking Your Permit

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

[www.epa.ohio.gov/dapc/permits/permits.aspx](http://www.epa.ohio.gov/dapc/permits/permits.aspx)



Environmental  
Protection Agency

# Allowed construction activities before permit is issued

## Non-Title V (minor) facilities

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

## Title V and Synthetic Minor facilities

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.*



# Helpful air permitting resources

DAPC Permits web page (forms, fees, etc.)

[www.epa.ohio.gov/dapc/permits/permits.aspx](http://www.epa.ohio.gov/dapc/permits/permits.aspx)

Emission factors (AP-42)

<http://www.epa.gov/ttn/chief/index.html>

District Office permit engineers

[www.epa.ohio.gov/dapc/general/dolaa.aspx](http://www.epa.ohio.gov/dapc/general/dolaa.aspx)

Office of Compliance Assistance and Pollution Prevention

Toll-free hotline **800-329-7518** and helpful publications

[www.epa.ohio.gov/ocapp](http://www.epa.ohio.gov/ocapp)



Environmental  
Protection Agency

# Questions?

