

## Engineering Guide #64

### Question:

Must a Title V permit applicant submit an Emergency Action Plan (EAP) to the Ohio EPA in accordance with OAC rule 3745-25-03?

### Answer:

Since the mid-1970's Ohio has not experienced air quality levels that would trigger the mandatory use of EAPs, and the Ohio EPA has not required industries to file or update these plans since the early 1980's.

Therefore, it is the Ohio EPA's position that we continue to exercise discretion by not expecting the development and submission of an EAP. If, in the future, an EAP would be necessary as a result of a new or revised air quality standard or a degradation in air quality, then the Ohio EPA will notify facilities that EAPs must be developed and submitted within a reasonable time frame, not to exceed sixty days.

For any emissions unit that emits 0.25 ton per day or more of any criteria pollutant, the applicable requirement of OAC rule 3745-25-03 should be referenced in the Title V permit application and permit. Attached is an example of how to complete the Title V application (STARShip) screen for the fields that would pertain to OAC rule 3745-25-03 . We recommend that this information be entered under a "facility-wide" applicable requirement.

This Guide has been discussed with U.S.EPA Region V staff, and they concurred that Ohio was taking a reasonable approach with this State Implementation Plan requirement. Further, Ohio EPA plans to revise OAC Chapter 3745-25 in the near future in a manner that should eliminate the need for this Engineering Guide.

Ohio EPA  
Division of Air Pollution Control  
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