



## General Permits for Air Pollution Sources

*Ohio EPA issues general permits to certain qualifying air pollution sources as an alternative to the traditional air permit-to-install (PTI) and/or permit-to-install and operate (PTIO).*

Currently, there are more than 50 air pollution source types that are eligible for coverage under a general permit-to-install and/or a general permit-to-install and operate (PTIO). The general permits contain all the same requirements that would normally be included in traditional permits, but they can be obtained much more quickly.

For sources that qualify for a general permit, applicants must agree to meet pre-defined permit terms, including installation and/or operating requirements, related to items such as emissions limits, record-keeping, monitoring and reporting.

To retain coverage under the general permit, permit holders must continually meet all the qualifying criteria and requirements. If at any time the permit holder fails to meet the qualifying criteria and requirements, Ohio EPA can revoke the general permit and require the permit holder to apply for a traditional permit.

### How does the general permit differ from traditional permits?

The general permit program was developed to improve efficiency. Under the general permit program, all emissions limitations, monitoring, record-keeping, reporting and other requirements for qualifying air pollution sources are developed in advance in a model general permit.

If the applicant's air pollution source meets the qualifying criteria for a specific model general permit and they can comply with all the predefined terms and conditions, Ohio EPA will issue a general permit for the identified air pollution source.

For example, two model general permits are available for concrete batch plant operations. A facility would select the appropriate model general permit for its planned installation and operation and apply for coverage. If Ohio EPA finds that the facility's planned installation meets the model general permit criteria, the facility will be issued a general permit.

### How does Ohio EPA determine which activities are good candidates for development of a model general permit?

Ohio EPA uses the following criteria when considering whether to develop a model general permit:

- The number of similar air pollution sources in the state.
- The processes related to the air pollution source are used to produce the same or similar products throughout the state.
- The processes emit the same or similar air pollutants. There must be only one or a small number of alternative methods for capturing and controlling air pollutants from the source.
- The processes covered must be subject to the same emission limitations, monitoring requirements, federal standards or state rules regardless of location or permit holder.

### What types of sources qualify?

- Aggregate Processing
- Boilers
- Diesel Engines (Compression Ignition Internal Combustion Engine)
- Digester Operations
- Dry-cleaning Operation
- Mineral Extraction
- Miscellaneous Metal Parts Painting Lines
- Natural Gas Compressor Station
- Oil and Gas Well-Site Production Operations
- Paved Roadways and Parking Areas
- Paved and Unpaved Roadways and Parking Areas
- Ready Mix Concrete Batch Plants
- Storage Piles
- Tub Grinder.

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## What are the benefits?

The benefits of the general permit program include reduced permit review and issuance time frames. A traditional PTI can take up to 180 days to process and issue while a general PTIO can be issued in 45 days. The program also helps improve permitting consistency.

Applicants that wish to pursue coverage under the general permit program may quickly review the associated model general permit to determine if they qualify. Once they have obtained coverage, applicants can be assured that similar sources or facilities which may be needed in the future should also qualify for coverage under the same model general permit.

## How are standard emissions limits determined?

Under the traditional PTI and PTIO process, Ohio EPA reviews air pollutant source information, such as potential to emit, and calculates a specific emission limitation for each individual source.

Because model general permit emission limitation requirements are written in advance, potential applicants must be sure that their proposed air pollutant source can be installed and/or operated to meet Ohio EPA's designated criteria. In addition, model general permit requirements are very specific and designed to ensure that only similar, well-defined sources can be covered under the appropriate category.

For example, one specific model general permit for a natural gas and No. 2 oil-fired boiler is based on a source with a maximum design heat input greater than or equal to 25 mm BTU/hr, but less than or equal to 29.9 mm BTU/hr. The acceptable emissions for this model general permit are based on the potential to emit for sources which fall into the well-defined size limitation.

## How do I apply?

Applicants should review the qualifying criteria and the terms and conditions of the applicable model general permit to ensure they qualify and are able to comply with the specified terms. You must ensure that you are comfortable with your ability to comply with the terms and conditions of the model general permit, as the language contained in the model general permit cannot be altered. If the model general permit requirements are not acceptable, applicants should apply for a traditional permit.

If the predefined terms and conditions of the applicable model general permit are acceptable, the permit applicant applies for either a general permit-to-install or a general permit-to-operate just as they would for a traditional PTI or PTIO. However, under the general permit program, the applicant only needs to complete the portions of the traditional application that are identified in the application instructions for the specific model general permit of interest.

In addition to the standard application, the model general permit's qualifying criteria document is reviewed and signed by the applicant and any documents listed in the qualifying criteria are also submitted. The signed document checklist, completed documents and application materials should be submitted to Ohio EPA.

## Is there a fee?

Yes. The fees for coverage under the general permit program are the same as for the traditional PTI and PTIO program. Applicable fees are based on the size and type of air pollution source. Model general permit fees are based on the emissions generated by the covered source.

## Can existing permit holders switch to a general permit?

Yes. If a company already holds a PTI for a qualifying air pollution source, they may apply for issuance of a general permit-to-operate rather than a traditional PTIO. Companies that already hold a PTIO for a qualifying source may request coverage under the general permit program at the time of renewal. In these cases, a previously issued PTI may need to be modified to ensure consistency with the general permit-to-install.

## How often do general permits need to be renewed?

A general PTI is effective for the life of the air pollution source. A general PTIO must be renewed every five or 10 years.

## Can a source that qualifies for coverage choose to get a traditional PTI and PTIO?

Yes. An applicant may elect to obtain a traditional air PTI and PTIO.

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### Does the program have a negative effect on air quality?

No. As with the traditional PTI and PTIO program, the general permit program is just one tool used to help improve air quality. Because each model general permit is specifically designed to cover a distinct, qualifying air pollutant source, and contains the same record-keeping, monitoring and reporting requirements as traditional permits, there should be no increase in pollutants released to the environment from these qualifying sources.

### How does Ohio EPA ensure permit conditions remain current?

At a minimum, model general permits are reviewed every five years from the date they were originally developed. If needed, Ohio EPA or the public can request that new requirements be incorporated into a model general permit before the five-year review. In addition to the review of model general permits, all issued general permits-to-operate are subject to the same review and renewal every five or 10 years as the traditional PTIO program.

### How does the general permit affect Ohio EPA's enforcement authority?

Ohio EPA retains the authority to enforce all provisions of the general permit program through the Ohio Administrative Code (OAC). Therefore, Ohio EPA will enforce facilities covered under the general permit program in the same way as those covered under the traditional PTI or PTIO program. Sources operating under a general permit can be inspected by Ohio EPA and are subject to the same enforcement provisions as other permitted sources.

### How can I participate in development of model general permits?

Ohio EPA provides for public review and comment during the development of all model general permits. When a new model general permit is ready for public review, Ohio EPA places a request for public comments in newspapers, Ohio EPA's Weekly Review and on the Division of Air Pollution Control's website.

### More Information

To see applicable forms, links to the PTIO regulations and air permit services in the eBusiness Center, go to [epa.ohio.gov/dapc/genpermit/genpermits](http://epa.ohio.gov/dapc/genpermit/genpermits). For more information or questions about the program, contact your local field office or the Division of Air Pollution Control at (614) 644-2270.