

TITLE V

Calculating Potential to Emit


Under Ohio Environmental Protection Agency (Ohio EPA) **Title V Permit Rules**, "potential to emit" means the **maximum** capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restriction on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as a part of its design if the limitation is enforceable by the Administrator of the U.S. EPA. The term does not alter or affect the use of this term for any other purposes under the Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

For potential to emit purposes, to take credit for air pollution control equipment or operational restrictions there must be federally enforceable limitations. What this means is that USEPA must be able to enforce the restrictions that are established with a State Implementation Plan (SIP)^{***} limitation (e.g., an emission limitation rule which USEPA has approved as part of Ohio's SIP), or federally enforceable limitations established in a permit to install (issued first as a draft, then issued final), or FESOP that both the public and USEPA had an opportunity for comment prior to final issuance. If there is no SIP emission limit or federally enforceable PTI or PTO restriction, then you must calculate the potential to emit for the emission based on the uncontrolled emission rate at maximum capacity.

"Any physical or operational limitation on the capacity of a source to emit an air pollutant"-Limitations on the capacity of a source to emit an air contaminant, or more importantly, what you are allowed to emit, are found in Ohio's SIP, 40 CFR, and Permits to Install. Typical emission limitations are in terms of lbs/hr, pounds of Volatile Organic Compounds per gallon (lbs VOC/gal), gallons per year (gal/yr), tpy, and physical limitations frequently specify required control equipment, such as incinerator, baghouse, or scrubber.

"Maximum capacity of a source to emit"- Unless there are enforceable restrictions, this is determined by combining a maximum hourly process rate or limitation (lbs/hr) with continuous operation (8760 hrs/yr). These assumptions to obtain a theoretical maximum are in most cases unrealistic, but they must be employed if nothing else limits the production rate.

To summarize determining potential to emit for an emission source, look first for established allowable limitations in OAC rules, PTIs, or 40 CFR, and expand them by 8760 hours of operation or an applicable use limitation. If there is no SIP emission limit or federally enforceable PTI restriction then you must calculate the potential to emit for the emission based on the uncontrolled emission rate at maximum capacity.

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