

**Stars2/  
Permitting Call  
03/17/2015  
9:30-11:30AM**

<https://ohioepa.webex.com>

- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- Call in # 1-877-668-4490      Access code: 688 265 621

## Agenda

#	Topic	Speaker
1	<p>Title V Compliance Certification issue  <a href="http://www.epa.gov/region7/air/title5/t5memos/20140430.pdf">http://www.epa.gov/region7/air/title5/t5memos/20140430.pdf</a></p> <ul style="list-style-type: none"> <li>• Message to Air Services users</li> </ul>	Mike Hopkins/ Andrew Hall
2	<p>Topic: Produced Water Injection Wells - Jessica Kuenzli – SEDO</p> <p>We have received a handful of calls in regards to injection wells for produced water. In particular, are we requiring anything from the facility for drilling and operation? It has been brought to our attention that some of these sites contain open lagoons, which may need to be addressed. Also, if we aren't requiring anything for the actual operations, what about pre-treatment activities (i.e. loading/unloading, tanks, etc.) that are conducted at the site?</p>	Mike Hopkins /Andrew Hall
3	<p>Canton - What are the allowable Operational Restrictions (OR) for the new case-by-case BAT options from the February 2014 policy? Below are some scenarios to discuss:</p> <p>Source Design Characteristic example: For a source with BAT expressed as "Install a baghouse that is designed to meet 0.03 gr PM/dscf", is it allowed to place an OR stating the baghouse must be in operation at all times the source is operated?</p> <p>Source Design Characteristic example: For a source with BAT expressed as "Install a burner that is designed to meet 0.1 lb NOx/mmbtu heat input", which is based on a manufacturer specification for using natural gas only, is it allowed to place an OR stating the source can only burn natural gas as a fuel?</p> <p>Design Efficiency example: For a source with BAT expressed as "Install an electrostatic precipitator with a design control efficiency of at least 98.7% control of PM", is it allowed to place an OR stating the electrostatic precipitator must be in operation at all times the source is operated?</p> <p>Monthly Allowable example: For a source with BAT expressed as "3.21 tons NOx per month averaged over a 12-mth rolling period", which is based on AP-42 EFs (or stack test data) and using natural gas only, is it allowed to place an OR stating the source can only burn natural gas as a fuel?</p> <p>Monthly Allowable example: For a source with BAT expressed as "4.50 tons PM per month averaged over a 12-mth rolling period", which is based stack test data for the baghouse (not manufacturer specifications), is it allowed to place an OR stating the baghouse must be in operation at all times the source is operated?</p> <p>Monthly Allowable example: For a source with BAT expressed as "1.50 tons VOC per month averaged over a 12-mth rolling period", which is based on AP-42 emission factors for a fixed roof storage tank equipped with submerged fill, is it allowed to place an OR stating submerged fill must be used at all times the tank is being filled?</p> <p>Work Practice BAT: Is it most appropriate to list the work practices in the Additional Terms section or the Operational Restrictions section? Is there a limit as to the # of work practices that can be established as BAT for the same pollutant?</p>	Mike Hopkins/ Andrew Hall
4	<p>NEDO</p> <p>Is there any guidance that discusses when we can use the de minimis exemption for controlled sources? I hear some folks around the state say they never accept de minimis determinations for controlled sources and others accept them with minimal or no</p>	Mike Hopkins/ Andrew Hall

	<p>monitoring/record keeping. The rule lists several options for items we might request and indicates the company must demonstrate that emissions didn't exceed the thresholds, but it doesn't talk about what is acceptable to us. I have seen records of parametric monitoring on the controls required, but I have also seen a simple one-time calculation using the manufacturer's control efficiency be acceptable. I want to open it up to the group to see if there is guidance out there that I have not seen and to hear if other offices have a standard practice for approving these determinations.</p>	
5	<p><b>eDoc</b></p> <ul style="list-style-type: none"> <li>• Updates on status and schedule</li> <li>• Updates on Attachment &amp; Correspondence Types</li> </ul>	Elisa Thomas
6	<p><b>Upgrade to Public Notice/Weekly Review Software</b></p> <ul style="list-style-type: none"> <li>• March 27 – “Notices” on, WRAPN off</li> <li>• March 25 – 10:30AM-Noon – DAPC Notices Training Webinar</li> <li>• All notices from Stars2 changing to Notices that day – 60+ interfaces</li> <li>• Confirmation of public notice publications will be accessed in Notices software OR public web page</li> <li>• Publication and dates will still be in Stars2</li> <li>• Newspaper contact work shifting to Legal</li> <li>• DAPC still confirm draft notification done before progressing permit workflow</li> <li>• Changes to Stars2: <ul style="list-style-type: none"> <li>○ Entry of hearing dates</li> <li>○ Entry of short vs. long notices</li> </ul> </li> <li>• DAPC Public Notice Guidance - Coming</li> </ul>	Erica Engel-Ishida
7	<p><b>LAA IT Issues</b></p> <ul style="list-style-type: none"> <li>• New Notices (a.k.a. WRAPN) user accounts for F5 and WebApps</li> <li>• F5 Interface – What issues do you have we can address? <ul style="list-style-type: none"> <li>○ Banner</li> <li>○ Links &amp; Names</li> </ul> </li> <li>• F5 ITS Contact – Mark Garner until June, then Dung Nguyen.</li> </ul>	Erica Engel-Ishida

Next call 4/21 9:30-11:30