

Air Permitting LIVE
03/18/2010
9:45 - 11:30AM

<https://ohioepa.webex.com>

- Meeting found under "Meeting Center"
- Password for meeting: **ilovecoffee**
- Had to use a bridge line this time... **(216) 787-0997**

Agenda

Enforcement Questions/Answers		Primary
1	<p>NEDO would like to discuss the issues surrounding the Excess Emissions review policy and when enforcement , and at what level should be pursued...Apparently, there is a quasi-agreement, understanding between CO and Region V that may be of value for Todd Brown to present to all the DO/LAA's.</p> <p>Todd Brown - OEPA has a directive from USEPA that we take some sort of action when downtime or excess emission time are greater than 5% of the operational time of the source on a quarterly basis. This is an old directive, but it has never been rescinded or revised. A couple of years ago (when USEPA started taking enforcement actions at levels of less than 5%) we asked USEPA for a revised directive, but instead were given an analysis of what facilities should be able to meet with regard to downtime and excess emission time...again, they did not rescind or modify the old directive (even though it was brought to their attention that this was the basis of OEPA's policy). Since USEPA is not willing to put anything in writing with regard to new action levels, and the old directive is still in effect, OEPA continues to follow the old directive. This by no means "allows" ANY downtime or excess emissions (with the exception of the allowances in 17-07 for excess opacity emissions, or excess emission exemptions actually spelled out in permits, which we do recognize), it just means that the level where we actually initiate an action has a minimum threshold. Should enforcement actually be warranted, ALL excess emissions and downtimes, regardless of the amount, should be addressed. To put it another way, NO downtime or excess emission (outside of those allowed in 17-07 or in permits) are allowed... This policy has been relayed to the district and local offices on a quarterly basis for years in Ohio EPA's EER summary report.</p>	Todd Brown
Permitting Questions/Answers		
2	NEDO - Waiting for additional info on the less than 10 TPY "stop issuance" due to the legal decision after the Sierra Club appeal	Hopkins
3	<p>Kim Reinbold</p> <p>As we discussed this morning, I am trying to determine whether the input of complete installation and begin operation dates into STARS2 for effected EUs can be considered compliance with the following NSPS notification requirements from 40 CFR Part 60 Subpart A (60.7) (from PTI #06-08384 for Arizona Chemical):</p> <p>"Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:</p> <p>a. construction date (no later than 30 days after such date); b. actual start-up date (within 15 days after such date); and c. date of performance testing (if required, at least 30 days prior to testing).</p> <p>Reports are to be sent to DAPC - CO and SEDO</p> <p>I believe we used to look for written notification of these milestones, but didn't know if this had changed w/ the implementation of STARS2.</p>	Hopkins
Stars2 Updates, Questions & Info Sharing		
4	CDO Could someone please review the 'flow factor' feature from the emissions process level of the facility profile?	Luksik

5	Tools > Bulk Operations Demonstration	Luksik
6	Lat/Long data & the new "Google Maps reference information" link in the Facility Profile. <ul style="list-style-type: none"> • Changing portable facility locations 	Engel-Ishida
7	Issues with recently deployed templates that create hollow permits. We reverted back.	Engel-Ishida
8	If a facility became a SMTV facility in 2009, are they expected to submit an FER via eBiz for 2009 emissions or should a hard copy be accepted for 2009 and we wouldn't require them to submit electronically until 2010? Does the same apply to compliance reports (quarterly reports)?	Engel-Ishida
9	When to contact CO regarding an EU exemption? If an EU becomes exempt/de-minimis and the permit is revoked, you still must notify CO if they need to be removed from annual emissions reporting.	Engel-Ishida
10	Annual FER/EIS/ES tools available to perform review. Any questions?	Thomas