

**Air Permitting LIVE**  
**04/15/2010**  
**9:45 - 11:30AM**

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- Meeting found under "Meeting Center"
- Password for meeting: **ilovecoffee**
- Bridge Line - (216) 787-0997

## Agenda

<b>Permitting Questions/Answers in Stars2</b>		Primary
1	<p>Greg Howard, HCDOES            When editing or entering an emissions unit in an application, the allowable emissions box has a pull down box to identify the pollutant.</p> <p>PE is identified as "primary PM (includes filterable + condensibles)"</p> <p>PE for sources subject to OAC 3745-17-10 and 11 has been identified as the filterable portion as measured by Method 5, which does not include condensibles. (defined in testing methods of OAC 3745-17-03)</p> <p>Also, the pull down box includes Stoddard solvent, which is not appropriate (not typically a regulated pollutant on its own).</p> <p>There is no option for entering other pollutants (such as HAPs ) which we often apply.</p>	Ahern
2	<p>Brad Miller, HCDOES            What happens if we can't get hold of the company to submit the PER form if they are shut down and there is nobody to contact?</p>	Hopkins
3	<p>Tracy Gu, NEDO            An existing facility who has 6 wood furniture coating booths (R001 - R006). R006 has been in place for years and due to recent products changing, they submitted a modification application for using new coatings (increase short term limit)</p> <p>R006 was initially planned to be permitted to less than 10 tpy to avoid BAT. Because of court decision and 2/19/2010 Memo, we will have to develop a BAT for the permit mod. Even though the company is not located in 21-15 counties, the BAT will be equivalent to 21-15. To avoid requirements from 21-15, the facility will have to restrict their facility-wide VOC emissions to less than 25.0 tpy. Either way, the BAT for R006 will effect to current operations of R001 - R005. How shall we handle a situation like this? What will be the BAT for R006? Do we need to re-permit R001 - R005? R001-5 have a total VOC limitation of 53 TPY in recently issued FEPTIO</p>	Hopkins

<p>4</p>	<p>Steve Alspaugh, SEDO</p> <ol style="list-style-type: none"> <li>When should the fee for 'Coal Mining Facilities' (\$250) be applied?</li> <li>Has the \$250 fee been mistakenly migrated from the Surface Water program to the Air Program?</li> <li>Is there other guidance or rules that may clarify air permit fees for Coal Mining facilities? (\$250 or SIC-PWR based )</li> <li>Should DAPC consider Coal Mining Facilities, Coal Prep Plants and Coal Crushers differently for fee purposes? If yes, please explain.</li> <li>How should the 'fees' for Coal related processed be determined?</li> </ol> <p>Discussion-----</p> <p>The Coal Mining fee (of \$250) is one of the choices in STARs2.</p> <p>And on page 3 of the <b>Ohio EPA 2008 Fee Schedule</b>, (<a href="http://www.epa.ohio.gov/portals/47/facts/feeschedule.pdf">http://www.epa.ohio.gov/portals/47/facts/feeschedule.pdf</a>), the Coal Mining Facilities fees are included/listed with Air Pollution activities and described as follows:</p> <p>Coal-Mining Facilities: For each mining source or location regulated under Ohio Revised Code, Chapter 1513, a PTI is \$250.</p> <p>Fees are automatically doubled if construction began after July 1, 1993, and before issuance of a PTI. <i>(ORC 1513 pertains to Department of Natural Resources)</i></p> <p>However, the language in ORC 3745.11 (<a href="http://codes.ohio.gov/orc/3745.11">http://codes.ohio.gov/orc/3745.11</a>) does not appear to support a \$250 <u>Air PTI</u> fee.</p> <p>ORC 3745.11 (B)(3)(b), (c) indicates Coal Mining fees should be based on the SIC-PWR fee schedule – not a \$250 fee.</p> <p>ORC 3745.11 (L)(1)(b) states: “Notwithstanding the fee schedule specified in division (L)(1)(a) of this section, the fee for a <b>water discharge permit</b> that is applicable to coal mining operations regulated under Chapter 1513. of the Revised Code shall be <b>two hundred fifty dollars</b> per mine.”</p> <p>This rule indicates the \$250 fee is for water discharge permits – not air permits.</p>	<p>Ahern</p>
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