

**Air Permitting/
Stars2 Call
06/19/2014
9:30 - 11:30AM**

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- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- Call in 1-877-668-4490 Access code: 688 065 955

Agenda

#	Topic	Speaker
1	<p>Posted videos and searchable topics for past calls. AP Topic 2338 or search "Stars2 call" or "Permitting Call"</p> <ul style="list-style-type: none"> • Send suggestions to us • How much detail for pre-2013 	<p>Erica Engel-Ishida Elisa Thomas</p>
2	<p>SWOAQA – Should the facility report as a Deviation the failure to make a timely report of the prior year's PER (the due date of which falls within the reporting year of the currently due PER)?</p> <p>On one hand, the PER form requires the permittee to answer "Yes/No" to any deviations or exceedances from the PTIO requirements for Monitoring, record keeping, or reporting requirements (B.) In this case, I would say they could not claim no deviations and would have to answer "Yes" for failing to meet the deadline for the prior year PER. Also, the PER form and Answer Place guidance includes the statement, "This PER, including any accompanying information, is required under the authority of the director of the Ohio Environmental Protection Agency. [Ohio Revised Code 3704.03(I)] Failure to submit this PER, including any accompanying information, or falsifying this PER, including any accompanying information, may result in civil or criminal penalties in accordance with applicable state law. "</p> <p>On the other hand, OAC rule 3745-15-03(D), Permit evaluation report, does not appear to address the failure to make a timely report as a deviation/exceedance required to be reported in the PER with the caveat that the PER should contain the following information "at a minimum":</p> <p style="padding-left: 40px;">(D) Permit evaluation report. (1) Pursuant to paragraph (A) of this rule, each permit described under paragraph (B)(2) of this rule shall require the owner or operator to submit a permit evaluation report, in a form and manner prescribed by the director, which identifies, at a minimum: 3745-15-03 3</p> <p style="padding-left: 40px;">(a) A list of all air contaminant sources that have been issued a permit described under paragraph (B)(2) of this rule; (b) Additional information or corrections to air contaminant sources identified in the permit evaluation permit; (c) Any deviations from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in such permit; (d) The probable cause of such deviations; and (e) Any corrective actions or preventive measures which have been or will be taken to remedy the deviations; or (f) If no deviations occurred during the reporting period, the owner or operator shall identify in the permit evaluation report that no deviations occurred during that reporting period.</p> <p>Finally, I'd say that since an NOV is generated for the failure to report or for submitting a late PER, which is a violation of the Terms and Conditions of the permit and the ORC, that they should mark "Yes" as a deviation for failure to submit/late PER.</p>	<p>Mike Hopkins</p>

3	Current facility profile EU descriptions vs. Permit Detail EU level descriptions – Ok to do a wholesale replacement for blanks?	Erica Engel-Ishida
4	SEDO - GP 5.1 Work Practice Plans In particular, I was hoping to discuss how other districts were handling the plans (i.e. which method is acceptable for submission, where/are they being uploaded into Stars2, how are they being approved).	Erica Engel-Ishida
5	Canton - Shutdown of an abandoned PBR facility: We have an abandoned PBR facility (GDF) that we have inspected to confirm there are no tanks nor buildings left on the property (truly shutdown). EG#34 specifies procedures for shutting down a facility, but refers to facilities that were supposed to submit reports. PBRs do not need to submit reports, but EG #34 has no separate procedure for those facilities. The Abandoned facilities AP 2326 procedure requires processing a revocation of the permit, but STARS2 does not allow a revocation of a PBR. <ul style="list-style-type: none"> • Do we need a "certification" from the facility contact (if we can find one) in order to shutdown the PBR facility in STARS2? • Can we just shutdown the facility based on our inspection confirming it is shutdown (without facility certification)? <ul style="list-style-type: none"> o We will make sure to include a note in the facility profile to document our inspection and the reason for shutdown. 	Mike Hopkins
6	SEDO Is someone tasked with repairing the formatting problems in Word Documents when writing a permit? I have been told you are aware that there is a problem. It affects permit writers daily and sometimes wastes hours trying to make documents look acceptable.	Erica Engel-Ishida
7	Canton - Site Visits: If a site visit is conducted at a shutdown facility (for asbestos purposes, complaint investigation purposes, etc), should the site visit be entered into STARS2?	Erica Engel-Ishida
8	Canton - NTV FER questions: <ul style="list-style-type: none"> • Have the NTV FER tasks issues from Erica's 06/04/14 email to all the DO/LAAs been resolved? What were the issues? • Please confirm signatory requirements for the NTV FER submissions. • Is it still the procedure to upload the paper bluecard PDF prior to having the review task sent to the DO/LAA? There are some without it recently. These PDFs are extremely helpful when reviewing the reports. <ul style="list-style-type: none"> o Reference: 1576051671, 1576001589 • For the "Current owner of record" section of the paper bluecard, what fields do those correlate to in STARS2 facility profile? <ul style="list-style-type: none"> o If there is a document or video describing this, please provide the reference. • If a company has only indicated a change of the owner information in the "my updated owner info" on the paper bluecard but did not fill out the section specifying if the facility was purchased or sold, should the "check here to specify facility ownership change" box be checked? It was Canton's understanding that box was only intended to be checked if purchased/sold info was filled out. <ul style="list-style-type: none"> o Canton has seen times the box was checked when the purchased/sold info was NOT filled out, and so an arbitrary "transfer date" is included on the STARS2 version NTV FER, that does not match any entry on the paper bluecard. How is that transfer date selected? o Reference: 1576015006, 1576135014, 1576045001, 1576131331, 1576135005 o Several of these appear to be entry errors, and would have been a "no review" NTV FER if entered correctly. • Why is the "contact person's" name being removed when a facility has (or not) indicated new information in the "my updated owner info" on the paper bluecard, but did not indicate a removal of a person's name? <ul style="list-style-type: none"> o Reference: 1576111630, 1576050274 • I think it would be helpful to discuss what the definition of "owner" is in STARS2 contacts and how it should be used for NTV facility profiles. Is having an owner 	Erica Engel-Ishida Linda Lazich Elisa Thomas

	<p>contact required for NTV facility profiles?</p> <ul style="list-style-type: none">• Is it correct to say that once the NTV FER is approved by the DO/LAA approver, the facility profile is automatically updated?<ul style="list-style-type: none">○ Are there any changes made to the facility profile by the CO report uploader prior to the NTV FER report entry being possible?<ul style="list-style-type: none">○ Ref: 1576135014 appears to have the FP contact info updated prior to the bluecard entry.○ Are there any facility profile changes indicated in the NTV FER that may have to be manually completed by the DO/LAA?	
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