

Air Permitting LIVE
08/19/2010
9:30 - 11:30AM

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- Meeting found under "Meeting Center"
- Password for meeting: **ilovecoffee**
- **614-644-1097**

Agenda

Permitting Questions/Answers in Stars2		Primary
1	Reminder: Please try to wrap up any FER reviews on your to do list so we can invoice where applicable. DAPC's chance of collecting fee dollars from companies is much higher the quicker we can invoice a facility.	Engel-Ishida
2	CETA integration into Stars2 is coming in the next 6-8 months. You will start hearing more about this in the coming months.	Engel-Ishida
3	What is the button to do a DAPC Amended Application for?	Engel-Ishida
4	When working on a renewal permit, why does STARS2 generate a multi-media letter when the "Multi-Media Form" workflow task is skipped in the permit workflow? As result, the document that is created, is, not applicable because it is not needed when processing a renewal. Also the form is directed to the LAA supervisors when it should be directed to the DO. We are unable to delete the original document. Can this be corrected?	Engel-Ishida
5	"MACT" applicability check box on PTI/PTIO to be changed to "MACT/GACT"	Engel-Ishida
6	If a facility applies for a modification to a registration status EU and we issue a permit but the facility never performs the modification, should the EU status be changed back to registration status? Likewise, for a permitted EU that receives a CH31 mod that is never performed, should the superseded permit be changed back to active/effective?	Hopkins/ Engel-Ishida
7	This agency is processing a PTI and a question has come up concerning the July 2, 2010 memo for less than 10 TPY BAT exemption. For example we have a boiler which wants to take a sulfur limit of 0.05 lb/MMBtu. First we used this limit to establish the short term and annual limit (TPY) for the federally approved BAT [OAC rule 3745-31-05(A)(3)]. By using this limit the emissions unit will avoid BAT in the future once the SIP is approved if we incorporate it as outlined in the memo. The problem comes in with the answer to question #29 in the March 2008 document. It requires you quote the SIP allowable which would become effective when BAT goes away. Using the SIP allowable the emissions could trigger major new source review or a case-by-case BAT determination (greater than 10 tpy). The answer to question #29 does not address it but are we now required to develop terms and conditions including monitoring, record-keeping, testing, and reporting which would state what case-by-case BAT would be once BAT goes away? Can we establish a limit of 0.05 lb/MMBtu under existing BAT and establish a voluntary limit as outlined in question #15 of the March 2008 guidance to avoid having to establish dual requirements in the permit?	Hopkins
8	Are we still following the July 16, 2008 e-mail concerning the use of OAC rule 3745-31-05(D), 3745-31-05(E), and 3745-31-05(F)?	Hopkins
9	Since the July 2, 2010 "Less than 10 TPY" memo references question #15 in the March 2008 guidance, could you please provide the updated rule references for the answers in question #15?	Hopkins
10	If we receive a Permit-by-rule notification for an emissions unit which is not yet installed, how do we find out if it is installed since they do not have to submit a PER?	Hopkins

<p>11</p>	<p>A Title V facility is replacing burners on a furnace for the purpose of complying with the NOx RACT. The facility's contact person proposes two scenarios.</p> <p>Scenario 1: There's a decrease in NOx, no increase in any other criteria pollutants. And there's no new pollutants.</p> <p>Scenario 2: There's a decrease in NOx, but slight increase in CO. And there's no new pollutants.</p> <p>In OAC rule 3745-31-01 QQQ(1)(a)(vi), there a environmentally beneficial exemption:</p> <p>'Modify' or 'modification' shall not include pollution control or pollution prevention projects that the director has determined, in writing, are environmentally beneficial. environmentally beneficial projects do not include those that cause or contribute to a violation of a national ambient air quality standard, cause or contribute to a violation of an increment per paragraph (B) of rule 3745-31-11 of the Administrative Code, adversely impact a visibility limitation, or are expressly prohibited under any Ohio environmental protection agency or Clean Air Act permit condition or applicable requirement.</p> <p>My question: should she apply for an environmentally beneficial exemption in either case: "no increase in allowable emissions" or "NOx went down CO went up modestly"? And update her facility profile in Air services?</p> <p>Or in the case of "no increase in allowable emissions" just update her facility profile?</p> <p>Or something else?</p>	<p>Hopkins/ Engel-Ishida</p>
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