

**Air Permitting
LIVE
09/15/2011
9:30 - 11:30AM**

<https://ohioepa.webex.com>

- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- Bridge Line 1-866-699-3239 Meeting #/Access Code: 682 310 319

Agenda

1	<p>PIDM/PIER Happenings:</p> <ul style="list-style-type: none"> • Public notice changes coming • Participate in Safaa El Oraby's Facility Profile support calls if possible. • Review SCC's during PTI app review for accuracy • PIER Increasing NOV (late notice) generation <ul style="list-style-type: none"> ○ Title V FER/EIS/ES ○ SMTV FER/EIS/ES ○ NTV FER/ES ○ Title V applications (late & not submitted) ○ Title V Compliance Certifications ○ FEPTIO (Synthetic Minor) PER <ul style="list-style-type: none"> ▪ Letter will mention other possible quarterly and semi-annual reports 	Engel-Ishida
2	<p>RAPCA</p> <p>Can a facility request that their federally enforceable production limits be held as Confidential Business Information or Trade Secret?</p>	Engel-Ishida
3	<p>NEDO</p> <p>Historically permit writers throughout the state used 70% building capture efficiency for particulate emissions sources at facilities such as foundries when the emissions were considered to not be heated. This was based on some very old (1980's) memos and a very old letter sent to a specific company by Central Office.</p> <p>More than five years ago we at NEDO were told by Central Office that we should not allow any building capture efficiency unless the facility can demonstrate through some type of published emission factor or research that a building capture efficiency is applicable.</p> <p>Since that time many of our larger PE sources have been required to use 0% building capture in any new permits and pay fees using 0% in the calculations for any source that didn't establish building capture efficiency in a PTI. We have struggled many times to get our companies on board with this because various building capture efficiencies are still being used around the state and around the country, with nothing substantial to back them up. Consultants are using 70% in some areas of the state and 0% in others and have voiced this concern repeatedly.</p> <p>NEDO would like to know if other offices have received a similar directive regarding the use of building capture efficiencies and if Central Office can provide some clarity as to how all offices should be handling this issue. NEDO feels there should be more consistency on this issue.</p>	Hopkins/Hall

4	<p>Cindy Charles (from consultant)</p> <p>I have a question about PBR generators. If a generator is installed at a TV site under PBR, does the site have to do a TV modification after the PBR is posted online to add the applicable requirements to the TV permit?</p> <p>OEPA's PBR Guidance notes:</p> <p style="padding-left: 40px;">Permits to Install and operate OAC Chapter 3745-31-02 are not required for PBR operations. However, PBR requirements will be incorporated into the appropriate operating permit if the operation is located at a Title V facility. PBR sources will need to be listed in Title V permit applications as insignificant emissions units.</p> <p>This leads me to believe a TV modification application IS NOT required, that OEPA incorporates the requirements in the TV at its next issuance automatically.</p> <p>However, in most instance these generators are covered by an NSPS and/or MACT standard, and it seems odd to not have to do anything more with them once the PBR application is submitted.</p>	Hopkins/Hall
5	<p>RAPCA</p> <p>Is it necessary, by law, that we send preliminary completeness letters via mail?</p> <p>Would it be acceptable for preliminary completeness letters for PTIOs, PTIs, TVs to be signed by DO/LAA staff, scanned, uploaded in STARS2 and then email the signed document to the company and leave out the mailing step. This is just for preliminary completeness letters. Are there any other letters we could do avoid mailing?</p>	Ahern/Hopkins
6	eDocument Management/eContent Management updates	Ahern