

**Stars2/ Permitting  
Call  
2/16/2016  
9:30AM-11:30AM**

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## Agenda

#	Topic	Speaker
1	<p><b><u>CDO – Ben Halton:</u></b> Can the provisions included in OAC rule 3745-21-09(B)(6), as the rule existed on January 1, 2006, be assigned as post-SB265 BAT for VOC emissions?</p> <p>Section 3 of the February 7, 2014, BAT guidance discusses the use of VOC RACT rules as BAT for post-SB265 sources including an identification of the OAC rule paragraphs that were effective on January 1, 2006. Because paragraph (B) is not listed in the guidance, it is unclear whether or not the alternative (in lieu of) compliance option is available as an option for establishing BAT for VOC emissions for relevant sources. It’s worth noting that paragraph (B)(6) is not specifically referenced in the relevant RACT rule paragraphs, rather, paragraph (B)(6) identifies which rule paragraphs the alternative compliance option is available.</p> <p>We would also like to suggest including the January 1, 2006, version of the relevant VOC RACT rules on the Ohio EPA rules page similar to how the historical version of OAC rule 3745-21-07 is included. It appears that only OAC rules 3745-21-09, 21-11, 21-12, 21-13, 21-14, 21-15, and 21-16 would be necessary. It’s also worth noting that the BAT guidance includes an identification of the relevant VOC RACT rule paragraphs with specific exclusions for paragraphs that were not in the January 1, 2006, version of the relevant VOC RACT rules (at the time the BAT guidance document was issued); however, as the relevant VOC RACT rules undergo subsequent rule revisions, the BAT guidance document will no longer include a complete list of rule paragraphs that were not included in the January 1, 2006, version of the VOC RACT rules therefore contributing to the need for an accessible version of the relevant, historical rule paragraphs.</p>	Mike Hopkins/ Andrew Hall
2	<p><b><u>SEDO - Compressor Engines Testing, Enforceability of BAT limits</u></b></p> <p>SEDO has been having issues with failed tests for engines at our oil and gas sites. We are having difficulty with some engines where BAT has been established at levels different than NSPS limits. BAT has been established as more stringent than the NSPS because the manufacturer’s guarantees are lower than NSPS. We would like input on our likelihood of pursuing enforcement in some of these scenarios. For example:</p> <ul style="list-style-type: none"> <li>• BAT is written as a Install to design efficiency per SB 265 guidance. The BAT install design efficiency is lower than NSPS. Initial test fails BAT limits but would pass for NSPS. Would we pursue enforcement? What about subsequent tests?</li> <li>• BAT is install catalyst with % reduction. Tested for short term emissions at end of pipe. Back calculation suggests failure of emissions factors in application. Do they retest? Did they fail? What do we tell them in stack test letter?</li> <li>• Other scenarios folks have encountered?</li> </ul>	Mike Hopkins/ Andrew Hall

<p>3</p>	<p><b>NWDO – Paul Chad:</b>  NSPS Subpart WWW for Landfills - Alternative (Compliance) Timeline Requests - or ATRs (almost always for) excess oxygen or lost vacuum /positive pressure, as read at the gas collection system wellhead(s)  Currently, NWDO DAPC is handling these according to EG 78 - primarily:  “If a wellhead measures [positive pressure, or excess oxygen or temperature], and the owner or operator cannot correct the exceedance ... within 15 calendar days, but does not believe that expansion of the well field is necessary, then requesting an alternative timeline to complete other corrective measures may be appropriate.”  NWDO DAPC reviews the request; coordinates /confers with NWDO DMWM as necessary; often follows up with the landfill for further information /data; and then, normally, issues an ATR approval on ‘letterhead’.  However, NWDO DAPC is interested to see how this compares with how other Districts or Locals are handling these. For example, we have found the 15 days to be almost never a feasible timeframe for getting a complete /sufficient ATR; most of the time, the landfill needs more than 15 days simply to DIAGNOSE the problem, let alone propose a solution. Another example: during a recent ‘webinar’ conference on the proposed US EPA revisions to Subpart WWW (and new Subpart XXX for future landfills), it was discussed how “...EPA is proposing to remove the operational standards for temperature and nitrogen /oxygen at wellheads in NSPS applicable GCCS systems...”, and in such outcome, ATRs would no longer be even applicable under the new rules.  In follow-up on some past ATR actions, specifically where US EPA had denied ATRs to some landfills in other states, it may be noted that apparently NO further non-compliance /enforcement action was taken, and the landfill took the needed time and actions to fix the problem (i.e. same as they would have done, with an ATR approval). Notwithstanding, I suppose Ohio EPA should give the matter of ATRs serious consideration - but there may be indications for more flexibility on how we handle these.</p>	<p>Mike Hopkins/  Andrew Hall</p>
<p>4</p>	<p><b><u>Akron LAA: Pressure Drop Range question:</u></b>  “This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.”   When does the new pressure drop range become effective? Does it become effective when we send a letter? Is the facility required to apply for the minor permit modification? Will the facility have to still report deviations of the old range until the permit is modified?</p>	<p>Mike Hopkins/  Andrew Hall</p>
<p>5</p>	<p><b><u>SEDO :</u></b>   <b>Equipment Leak permitting and monitoring requirements for small sites</b>   For the oil and gas industry, SEDO had been advising all facilities, based on discussions with CO, that fugitive equipment leaks cannot qualify for the de minimis exemption. The logic for this approach is that one unchecked leak would cause the potential to emit to exceed 10 lbs/day, and that facilities would need to routinely monitor and repair equipment in order to stay below the threshold.</p>	<p>Mike Hopkins/  Andrew Hall</p>

	<p>In late 2015 we refined this practice for certain sites, specifically small metering and/or regulator stations along the pipeline. These sites include maintenance activities and involve pigging, condensate loading, and liquids storage. Based on some pushback we received and further discussions with facilities, we began allowing these small operations with calculated emissions below 10 lbs/day to claim <i>de minimis</i>.</p> <p>Two issues need further clarification:</p> <ol style="list-style-type: none"> <li>1. Can we come up with more defined guidance for staff and regulated facilities that spells out what the cut off is for accepting a <i>de minimis</i> determination for equipment leaks?</li> <li>2. We have one metering station currently under review where calculated emissions are above <i>de minimis</i>, and we are trying to figure out what type of monitoring program to use. The facility does not want the LDAR language we have been using for oil and gas sites because they claim it is too onerous for this size of operation. Is there a more simplified leak check program we can prescribe for this site? If so, what criteria should we use to determine what facilities get reduced monitoring requirements?</li> </ol>	
6	<p><b>Stars2 – Updates for method 320 – pollutants added</b></p>	Elisa Thomas
7	<p><b>Stars2 Deploy v 2.2.13</b> – January 15<sup>th</sup></p> <ul style="list-style-type: none"> <li>• FCE Template Generation was incorporated</li> </ul>	Elisa Thomas
8	<p><b>Central Office Stars2 Admin Rights</b> – Discussion of who you can contact for changes to Enforcement/Emissions Test Changes</p>	Elisa Thomas
9	<p><b>LAA IT Issues</b></p> <ul style="list-style-type: none"> <li>• Status of VPN Testing</li> <li>• LAA staff access inventory</li> </ul>	Erica Engel-Ishida