

**Stars2/ Permitting
Call
6/21/2016
9:30AM-11:30AM**

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- Password for meeting: **stars24u**
- Call in # 1-877-668-4490 Access code: 639 921 250

#	Topic	Speaker
1	<p><u>Terri Dzienis, Canton City Health Department:</u> RACM requirements for Roadways: OAC 3745-17-08(B)(7) requires the covering of open bodied vehicles when transporting materials likely to become airborne and OAC 3745-17-08(B)(8) requires the removal of dirt deposited by trucks from paved streets (which are historically applied to paved public streets adjacent to property). These requirements are historically associated with the Roadway EU at a facility and are included in its permit (including the general permits).</p> <p>a. Permits only site the OAC 3745-17-07(B)(4) or (5), which is the roadway specific visible emission requirement [6 or 13 minutes in 60 min]. Does this VE requirement apply to the dust from the open bodied vehicles? Does this VE requirement apply to the dust from dirt on paved streets? Or does the general VE requirement in 3745-17-07(B)(1) apply (20% in 3 min) to these operations?</p> <p>b. The work practice plan (WPP) requirements and examples imply the VE inspections are only for the roadways since they don't specifically mention observing the open bodied trucks or the paved streets for dirt. Shouldn't these other operations be inspected and included in the WPP?</p>	Hopkins/ Hall
2	<p><u>Terri Dzienis, Canton City Health Department:</u> Coating operation particulate emissions question:</p> <p>We have an unpermitted facility called Tuscarawas Valley Builders that is a relatively large-scale manufacturer of wood storage buildings. They produce fully-assembled buildings which are sold through a network of dealers under the brand name Old Hickory Buildings. This facility uses an <u>airless spray</u> system to apply a stain/sealer product* to the exterior of the buildings, and they do this outside under a large metal roof that covers dozens of in-process storage buildings. They use up to 20 gal/day of the stain, which is 63% VOC (but zero HAPs) and 37% solids by weight. They are well above de minimis for VOC emissions and just slightly above de minimis for particulate emissions due to the high transfer efficiency of the airless spray process (75% or more). The facility <u>is</u> located in an Appendix A area.</p> <p>*Olympic Maximum Stain/Sealant In One D/F/S Toner</p> <p>For the particulate emissions only, what rules would apply and how to determine BAT for this operation? We would like input on the answers to these questions from other DO/LAAs regarding existing permits for similar sources since we have not been able to find anything comparable.</p>	Hopkins/ Hall

	<p>The requirements of 3745-17-11(C) would seem to apply, but the facility owner says that enclosing the spraying operation within a booth and controlling PE with filters is not feasible, or is at least very undesirable. We're wondering whether the process might qualify for one of the two exemptions below:</p> <ul style="list-style-type: none"> a. 3745-17-11(A)(1)(j): Surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ <u>airless spray</u> and bead-type (extrusion) application methods. <ul style="list-style-type: none"> i. Is this exemption limited to those materials in the e.g. list or does it apply to all surface coatings applied by airless spray? b. 3745-17-11(A)(1)(l): Surface coating processes for which the owner or operator demonstrates to the satisfaction of the director that, due to the large size of the item(s) being coated, it is technically infeasible and/or economically unreasonable (in terms of cost-effectiveness) to employ an enclosure (or hooding) and control device for the control of the particulate emissions (any such exemption approved by the director must be approved by the United States environmental protection agency as a revision of the state implementation plan). 	
3	<p><u>Matthew Stanfield, City of Toledo DES:</u></p> <p>Our office recently received applications for natural gas pipeline pigging activities at three small natural gas metering stations that were previously installed, but never permitted. One of these applications was for operations installed prior to applicability of BAT.</p> <p>Pipeline metering and regulating stations would have fugitive VOC emissions from equipment leaks, and, if present, VOC emissions from pigging operations and maintenance blowdowns. There are no applicable requirements contained in OAC rule 3745-21-09 regulating VOC emissions from natural gas transmission equipment leaks or equipment blowdowns.</p> <p>I searched for permitted natural gas metering stations in Ohio, and it appears from what I could see that non-Title V permitting for fugitive equipment leaks and pigging is done for new or modified units where BAT applies, but not at metering and regulating stations installed prior to 1974.</p> <p>Although before my time here, if our office had received the application for pipeline pigging installed prior to 1974, I think that the facility would have been informed that a permit was not required, since there were no applicable VOC requirements in OAC 3745-21-09.</p> <p>VOC emissions from a single pigging blowdown at the facility in question are 58 pounds, and there are reported to be up to a maximum of 5 pigging events per year for a total of 0.15 tons/yr VOC.</p> <p>Prior to issuing a hollow permit for the pigging operations installed prior to 1974, I just wanted to confirm if Central Office wants for us to do so. I don't know whether other non-Title V metering stations in Ohio with pigging are not permitted due to:</p> <ol style="list-style-type: none"> 1. Having de minimis emissions; 2. Not aware the facilities exist; or 3. There being no applicable requirements in OAC rule 3745-21-09. 	Hopkins/ Hall

3	<u>Electronic Document project update:</u> (i.e. LAAs access to OnBase and ingestion of documents)?	Erica Engel-Ishida
4	<u>For Local Air Agencies:</u> <ul style="list-style-type: none">• Sneak Peek at new Citrix	Erica Engel-Ishida