

**Stars2/
Permitting Call
09/22/2015
9:30AM-11:30AM**

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- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- Call in # 1-877-668-4490 Access code: 631 316 711

Agenda

#	Topic	Speaker
1	<p>Miscellaneous Updates</p> <p>Revised EAC form 3862 <i>Stationary Internal Combustion Engine</i></p> <p>Customer Support Center</p> <ul style="list-style-type: none"> • New and Improved Permit Wizard – Give feedback using the tool • FAQ (Answer Place) – Answer Place IDs are the same • Training – All training under FAQ will move to this tab • Publications 	Erica Engel-Ishida
2	<p>Permit Processing Consistency</p> <ul style="list-style-type: none"> • Follow PTIO Implementation Guidance. • We split out permits for statistics and Q/A checks. 	Erica Engel-Ishida
3	<p>PTIs without a PTIO or Expired PTIO with not renewal.</p> <ul style="list-style-type: none"> • How are other other offices tracking this? • Do we need a new report? 	Elisa Thomas
4	<p>Public Notice Content</p> <ul style="list-style-type: none"> • Facility Profile info used • Example: Relocations use NAICS code descriptions 	Elisa Thomas
5	<p>Stars2 Outgoing Correspondence Types</p> <ul style="list-style-type: none"> • New outgoing correspondence type of ‘<i>Enforcement – other</i>’ 	Elisa Thomas
6	<p>eDocs Update</p> <ul style="list-style-type: none"> • Web-Based Unity client deploy 10/2 – If it works we will start eDoc SOP development. • Training in Fall (CO?) • Users need access unlimited – will need to review roles • Core IDs created at CO • Document Key 	Erica Engel-Ishida
7	<p>Permitting Question from City of Toledo (Brad Faggionato)</p> <p>Interpretation on the BAT guidance. Here is the question that has come up:</p> <p>I am writing a first time permit for an emissions unit (EU) for the SE district. This EU was installed on 3/9/2009 and has not been modified since. The facility assumed this EU was de minimis and did not submit a permit application. During a recent inspection, it was determined that this EU was not de minimis and the facility submitted an application. Consulting current BAT guidance and the installation date, this EU falls under the guidance in effect from 9/12/2006 to 8/3/2009 (March 2008 Guidance). But I interpreted the subsequent court decision Guidance (July 2, 2010 Guidance) to overrule the March 2008 Guidance and submitted BAT based on the July 2010 Guidance. During peer review, Sudhir Singal from Central Office was consulted on the timeline in the current guidance (February 7, 2014) that put the applicable BAT guidance for this time period with the September 2006 guidance, which meant no BAT would be set for this emissions unit. Sudhir consulted Mike Hopkins and concluded that was the case, that the September 2006 guidance should be used for this EU. I made the appropriate changes and removed BAT. When I submitted this SE district to review and they returned with feedback saying this was incorrect and brought up the questions posed in the July 2, 2010 guidance. The relevant questions from that guidance are as follows:</p>	Mike Hopkins

	<ul style="list-style-type: none"> • When should we use the new language described in this guidance? Answer: The new language should be used when you are processing any installation or operating permit where we originally used the <10 exemption. This includes permits for new or modified sources, chapter 31 or administrative modification or any renewal permit. • Should DO/Laa staff go back and reissue permits where the <10 exemption was used? Answer: DO/Laa staff should make these changes whenever the permit comes up for revision. At this point DAPC has not decided to search for all past permits issued with the <10 exemption in order to separately revise the permits. Other than renewal or modified permits, Ohio EPA does not currently believe that the Court's order requires the reissuance of permits where the <10 exemption was used. • Can we still use the approach to avoid BAT by putting in the restrictions that keep emissions to below 10 tons per year? Answer: No, the avoiding of BAT approach can no longer be used because under the current court decision, no new or modified sources can avoid the applicability of BAT. • Based on this guidance, it was intension, especially as stated in question #10, that permits would no longer be issued without BAT for emissions less that 10 tons per year. Should the September 2006 guidance be used with no BAT or should the subsequent July 2, 2010 guidance overrule the earlier guidance and BAT be set? 	
8	<p>LAA IT Issues</p> <ul style="list-style-type: none"> • F5 replacement research continues – could be higher expense • On-boarding/Off-boarding – Procedures coming 	Erica Engel-Ishida