



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Annual Permit Evaluation Report (PER) Form Frequently Asked Questions

Introductory Information

What is a PER?:

Under your Permit-to-Install and Operate (PTIO) you must submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency (DO/LAA).

The PER summarizes the activity over a 12-month period for each emissions unit (EU) that has been issued a PTIO, including deviations and exceedances. There are four possible reporting periods for a PER: January 1 through December 31, April 1 through March 31, July 1 through June 30, and October 1 through September 30. Your reporting period is identified in any PTIO issued for your facility.

The PER must be mailed to the DO/LAA and postmarked by the due date indicated on the PER form or completed electronically and submitted via "Air Services" by the due date indicated on the PER form. Synthetic Minor facilities must submit the PER via Air Services¹.

Note: If your PTIO is a federally enforceable PTIO (FEPTIO) you are also required to submit quarterly reports, consistent with the terms and conditions of your FEPTIO, for ONLY those terms and conditions associated with your federally enforceable limitation(s). Depending on the due date of your annual PER, one of your required quarterly reports will be due approximately two weeks earlier than the PER report. For example, if the annual PER due date is May 15th, there will always be a quarterly report due on April 30th. Because the annual PER report will cover very similar information as the quarterly reporting requirement, you may submit the annual PER by the quarterly report due date (two weeks earlier) to cover both reporting requirements. If any additional information is specifically required in the quarterly reporting requirement contained in the terms and conditions of your FEPTIO, this can be submitted as an attachment to the PER.

If additional assistance is needed after review of this document, please contact your appropriate DO/LAA representative.

Important: Please be aware that each EU with a PTIO may have additional record keeping and/or reporting obligations not covered by the PER. Please review the "reporting requirements" section of your PTIO to identify any additional reporting requirements.

Examples of additional reporting requirements, which would not be covered by the PER, are listed in Appendix A of this document.

Completing the Cover Page of the PER

How do I complete the top of the form?

The facility PER due date and reporting period were established when you were issued a PTIO. There should be a single due date and reporting period if multiple PTIOs have been issued for the facility. If there is more than one PER due date or reporting period, please contact the appropriate DO/LAA for instruction.

¹ For more information on the Agency eBusiness Center or Air Services, go to any Ohio EPA web page and click on the "Answer Place" icon in the upper left corner of the Web page. Search on "Air Services". www.epa.state.oh.us



The facility information was populated by Ohio EPA's most current database of information. If the information has changed or is incorrect, corrections should be made in the space provided.

How do I complete the Table of Emissions Units with issued PTIOs?

This table lists all of the EUs that have been issued a final PTIO for the facility. If an EU was issued a PTIO after the PER form was mailed out, then that specific EU may not be included. If the EU was installed before the end of the reporting period, then include the EU in the "Additional Information and Corrections" section. If an existing EU has been permitted in a PTIO and was not listed in the table, please include that EU in the "Additional Information and Corrections" section.

For each EU listed in the table, complete a separate "Detailed Emissions Unit (EU) Form". You should have received a "Detailed Emissions Unit (EU) Form" for each EU listed in the table and an additional blank form. If not please contact the appropriate DO/LAA. Blank "Detailed Emissions Unit (EU) Forms" can be downloaded from <http://www.epa.state.oh.us/dapc/permits/ptio.html>.

How do I complete the Additional Information and Corrections section?

This space is provided for communication of any information to the DO/LAA that may not be captured in the "Detailed Emissions Unit (EU) Form". Examples of relevant information you should identify under this section include the following:

- If an EU did not operate at any point during the reporting period but it is not permanently shutdown.

Operation would include periods of testing such as a routine maintenance checks and brief production runs. Specific operational schedules are not required to be kept unless specified by the issued PTIO. If an EU did not operate at any point during the reporting period, you should consider whether the EU will be operated at some point in the future or if it should be formally shutdown. Please note that if the EU did not operate during the reporting period, the facility is not required to permanently shut it down.

- If an EU was permanently shutdown.

If you decide that the EU will not operate at all in the future, you can permanently shutdown the EU. Permanently shutting down an EU relieves you of future permit obligations for the subject EU, including future reporting obligations. Please refer to the "Standard Terms and Conditions" of your PTIO for details.

If you wish to formally permanently shutdown an EU as part of this report, you must submit a request and signed certification from the authorized official, as defined in OAC rule 3745-31-04(B), that identifies the emission unit ID and the date on which the EU was permanently shut down. Please note that if the EU did not operate during the reporting period, you are not required to permanently shut it down. However, you will continue to be obligated to comply with the PTIO requirements associated with an EU that was not in operation but not formally permanently shutdown.

Authorization to operate the affected EU shall cease upon the date certified by the authorized official that the EU was permanently shutdown. No EU certified by the authorized official as being permanently shutdown may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



- Physical changes or changes in the method of operation of an EU that did not receive a PTIO.

This information will help you determine if a "modification" as defined by OAC rule 3745-31-01 has occurred during the reporting period. The rule partially defines "modify or modification" as:

Any physical change in, or change in the method of operation of:

(a) Any air contaminant source that:

- (i) Results in an increase in the allowable emissions; or*
- (ii) Results in an increase in emissions of greater than the de minimis levels in rule 3745-15-05 of the Administrative Code of any type of air contaminant not previously emitted; or*
- (iii) Results in the relocation of the air contaminant source to a new facility, including, but not limited to, the movement of any existing air contaminant source from another state, county, or other geographic location; or*
- (iv) Is otherwise defined as a major modification, or is defined as a modification under applicable regulations promulgated by the administrator of the United States environmental protection agency regarding new source performance standards or National Emissions Standards for Hazardous Air Pollutants, or Section 112 of the Clean Air Act.*

A complete definition can be found on our website at: <http://www.epa.state.oh.us/dapc/regs/3745-31/31-01.pdf>

If you believe a change to an EU meets the definition of modification you should identify the EU ID and the date when the modification was initiated. If you need assistance in determining if a change meets this definition you can contact the appropriate DO/LAA for assistance. Generally, if the change meets the definition of modification, then a new permit is required. Please contact the appropriate DO/LAA to determine if a new permit is needed or any further action is required.

- An EU that has been permitted, but will not be installed or modified.
- An EU issued a PTIO not listed in Table I above.
- Any additional relevant information.

Completing the Detailed Emissions Unit (EU) Form(s)

How do I complete the date questions?

Please provide date below if not present.

<i>Completion of initial installation date:</i>	
<i>Begin installation/modification date:</i>	
<i>Commence operation after installation or latest modification date:</i>	



The above section of the Detailed Emissions Unit (EU) Form is populated with information that has been provided to Ohio EPA. If the dates are incorrect or not completed, then update the appropriate section with the correct dates.

How do I complete sections A, B and C?

A. Were there any deviations or exceedances from PTIO required operational restrictions or emissions limitations?

Select "yes", if during the reporting period, one or more requirements listed as emission limitations or operational restrictions were exceeded or not maintained in a way that was specified in any term or condition or rule citation in the PTIO. Please note that selecting "yes" does not necessarily indicate that the EU is considered out of compliance.

Some examples of exceedances or deviations of operational restrictions or emission limitations include:

- A rolling, 12-month gallons usage restriction was exceeded for one or more months of the reporting period.
- A baghouse pressure drop reading was outside of the range specified as an operational restriction.
- An hourly/daily/yearly emission limitation specified by the PTIO was exceeded.
- The VOC content restriction of a coating was exceeded.
- The minimum thermal incinerator temperature as specified in the PTIO was not achieved while the EU is in operation.
- An alternative fuel that is not allowed by the PTIO was burned as fuel in the EU.

Select "no" only if, during the entire reporting period, the EU operated in accordance with all emission limitations and operational restrictions and experienced no exceedances or deviations.

B. Were there any deviations or exceedances from PTIO required monitoring, record keeping, or reporting requirements?

Your PTIO requires specific monitoring, record keeping, and reporting obligations for each EU. These requirements are found in the following sections of your PTIO:

- "Monitoring and/or Recordkeeping Requirements": Section A of the "Standard Terms and Conditions," and
- "Monitoring and/or Recordkeeping Requirements" and "Reporting Requirements": Section C of the "Emissions Unit Terms and Conditions".

Select "yes", if during the reporting period, one or more of these requirements were not completed, not completed on time, or not completed in a way that was specified in your PTIO. Please note that selecting "yes" does not necessarily indicate that the EU is considered out of compliance.



Some examples of deviations from the PTIO monitoring, record keeping, or reporting requirements include:

- A baghouse pressure drop reading is required to be performed at least once per day and one or more readings was not completed.
- A baghouse pressure drop reading is required to be recorded at least once per day and one or more readings was not recorded.
- Visible emissions monitoring was not done in accordance with the schedule specified in the PTIO.
- Coating material data was not recorded on a monthly basis as required in the PTIO.
- The reports, as listed in Appendix A, were not submitted correctly or not submitted at all.

Select "no" only if, during the entire reporting period, all requirements listed as PTIO monitoring, record keeping, and reporting requirements for this EU were completed as specified and on a timely basis.

C. How do I complete the submittal of information pertaining to deviation, exceedance or any visible emission incident?

For each instance of an exceedance or deviation that prompted a "yes" answer for section A or B above, additional information must be reported. In addition, If any visible emission incident occurred during the reporting period, additional information must be reported. This additional information is to be provided on a separate sheet of paper as discussed on the instructions at the top of the Detailed Emissions Unit (EU) Form.

On a separate sheet of paper, the following information must be identified for each reported deviation, exceedance or visible emission incident:

- a. Emissions Unit ID:
Identify the EU identification number that experienced the deviation, exceedance or visible emission incident.
- b. Dates/Duration:
The date(s) and duration of the deviation, exceedance or visible emission incident should be listed.

For any deviation, exceedance or visible emission incident that lasts longer than a single date, or occurs multiple times within a reporting period, a range of dates (for example, Sept 15 - Oct 7, 2005 or 1st quarter 2005) may be listed.

The duration of an deviation, exceedance or visible emission incident should match the format of the PTIO requirement. For example, if a daily record keeping requirement was not completed, identify the duration as the number of days. Or, for hourly requirements, list the duration as the number of hours. If the exact date or duration is not known, provide an estimate and identify it as an "estimated" number.



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- c. Description of deviation, exceedance or visible emission incident, and probable cause:
Provide a brief description and the probable cause of the deviation, exceedance or visible emission incident. Examples are provided above in section A and B of this document. If visible emissions were observed during a required observation, please note if the color of the visible emissions were normal of representative operations.

- d. Description of required corrective action(s), if taken?:
Provide a description of the corrective action(s) taken to resolve the deviation, exceedance or visible emission incident. Examples of corrective actions include changing a fabric filter, performing maintenance on equipment, and retraining of staff, etc. Please note that not all deviations, exceedances or visible emission incidents require a corrective action to be taken.

- e. If no corrective action(s) were taken, then why not?:
An example of an explanation may be that corrective action is not required by the PTIO. Other examples may be an explanation describing staff limitations or other extraordinary circumstances.



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Appendix A

Examples of additional reporting requirements not included in the PER:

- C Reporting requirements relating to limitation(s) found in a Federally Enforceable Permit-to-Install and Operate (FEPTIO).
- C As included in the below table, reports relating to malfunctions.
- C Specific rule based reporting requirements, such as those listed in the following table.

OAC Rule 3745-	Type of Report	Reporting Frequency
14-01(C)(2)(d)(iii)	Hours of unit operation or fuel usage; for units or sources exempt from the NOx budget trading	November 1 of the year
15-04(A)	Stack testing report, if necessary	30 days after completion of the test
15-05(I)	Exceedance report of the de-minimis rule	Immediately
15-06(A)(3)	Request to operate EU when control equipment is shutdown during scheduled maintenance	2 weeks prior to planned shutdown
15-06(B)(1)	Written report for malfunctions greater than 72 hours	Within 2 weeks of malfunction; detailed report within 2 months
17-08 Appendix B (A)(3)(c)	Unpaved roadway fugitive dust control practices	Within 5 days of any non compliance
17-08 Appendix B (B)	Reporting requirement for change to unpaved roads	Prior to change
17-10 (B)(3)(c)	Actual heat input report for de-rated boiler	no specific frequency
17-10 (C)(7)(vi)	Quality and quantity (on a dry basis) of each shipment of coal received	January and July
21-09(B)(3)(c)	Exceedance of 15 lb/day VOC limit for coating lines <i>Pertains to paragraphs (I) and (U) of the rule</i>	45 days after the exceedance occurs
21-09(B)(3)(e)	Exceedance of the maximum daily coating usage limit <i>Pertains to paragraphs (U)(1) of the rule</i>	45 days after the exceedance occurs
21-09(B)(3)(g)	Exceedances from coating and printing lines regarding the use of noncomplying coatings <i>Pertains to paragraphs (C) to (K), (S), (U), (Y), (FF), (II), (NN) to (PP), or (XX) of the rule</i>	30 days after the end of the calendar month in which the exceedance occurred
21-09(B)(3)(i)	Exceedances from coating and printing lines regarding daily volume-weighted average coatings. <i>Pertains to paragraphs (C) to (K), (S), (U), (Y), (FF), (II), (NN) to (PP), or (XX) of the rule</i>	45 days after the exceedance occurs



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OAC Rule 3745-	Type of Report	Reporting Frequency
21-09(B)(3)(k)	Exceedances from coating and printing lines regarding pounds of VOC per gallon of solids limitation. <i>Pertains to paragraphs (C) to (K), (S), (U),(Y),(FF), (II), (NN) to (PP), or (XX) of the rule.</i>	45 days after the exceedance occurs
21-09(B)(3)(m)	Coating and printing lines regulated under paragraphs (C) to (K), (S), (U),(Y),(FF), (II), (NN) to (PP), or (XX) are to report ongoing compliance with emissions limits or control requirement	quarterly
21-09(B)(4)(c)	Exceedances from operations other than coating and printing lines (O) to (W), (CC), (X),(EE), (KK) to (MM), (SS) to (VV), or (YY) to (BBB); ongoing compliance with emissions limits or control requirement	quarterly
21-09(L)(4)	Storing petroleum liquid with a vapor pressure greater than 1.52 psi	30 days after the exceedance occurs
21-09(P)(7)(a)	Bulk plant that exceeds 4000 gal/day	30 days of becoming aware of the exceedance
21-09(P)(7)(b)	Vapor leaks or liquid leaks not repaired within 15 days	30 days after repair is completed
21-09 (R)(5)	Gasoline throughput exceedance	45 days after the exceedance occurs
21-09(Z)(5)	Exceedance reporting of vapor pressure of 1.5 psi	within 30 days of becoming aware of the exceedance
21-09(BB)(5)(a)	Exceedance of the emissions limitation	within 30 days of becoming aware of the exceedance
21-09(BB)(5)(b)	Vapor leaks or liquid leaks not repaired within 15 days	30 days after repair is completed
21-09(BB)(5)(c)	Annual consumption of petroleum solvent greater than 4,700 gallons	30 days after the exceedance occurs
21-09(DD)(2)(m)	Number of pumps, valves, and compressors in service	semiannual
21-09(DD)(13)(b)	Alternative monitoring standard for valves	Notify prior to implementing an alternative standard
21-09(DD)(15)(b)	Testing requirements	30 days after the test date, and semiannually
21-09(DD)(15)(c)	Compliance testing requirements	Semi-annual reporting
21-09(NN)(5)	Minimum pressure differential for permanent total enclosure	quarterly
21-09(DDD)(2)(c)	Testing requirements reporting	30 days after the test date
35-03(H)(9)	Variance reporting	every 2 months
76	Various landfill reporting	
106-05(B) (draft)	Class I sludge concentrations of heavy metals, OC's, Operating parameters of control equipment	annually on February 19
106-05(C) (draft)	CEM's reporting	quarterly
107 (draft)	Similar reporting as 106	