

Division of Air Pollution Control
Portable Source Training

Michael Carper, SEDO
Erica Engel-Ishida, CO
Sarah Harter, SEDO



Common Terms

- Intent to Relocate (ITR)
- Facility
 - Production Unit
 - Supporting Emissions Unit
- Jurisdictional DO/LAA
- Permitting DO/LAA



Permitting
Michael Carper – SEDO



Permitting

- Is It Portable?
 - OAC rule 3745-31-01 definition
 - NSPS Subpart OOO definition
- Must make this determination in order to ensure that the permitting DO/LAA is properly established.
- When in doubt contact CO



What is the Production Unit?

- Company must make that decision.
 - Best way to provide for the differing degrees of flexibility that companies require.
 - Large units with multiple pieces of equipment
 - Single pieces of equipment



Creating New Facilities (Answer Place 2167)

- One Facility into Multiple Portable Facilities
- One EU into Multiple Portable Facilities
- Two+ Facilities into One Portable Facility



One Facility into Multiple Facilities

- Company Input
- Create New Facility IDs
- Existing Permits and Applications



One EU into Multiple Facilities

- Company Input
- Create New Facility IDs
- New Applications and Permits



Combining Two+ Facilities

- Company Input
- Select the Facility ID that will remain active
- Old or New Applications and Permits
- Shutdown the Old Facility Profile(s)



Example

- Company wants to permit their aggregate equipment as portable. They own the following equipment:
 - 1 crusher w/ attached generator
 - 1 screener w/ attached generator
 - 1 conveyor
 - 1 detached generator



Ohio | Environmental Protection Agency

Option 1

- Aggregate Plant A
 - P901 –Aggregate Plant (1 crusher, 1 screener, 1 conveyor, and 2 attached generators)
 - P001- detached generator
 - F001- roadways
 - F002- storage piles

Ohio | Environmental Protection Agency

Option 2

| | |
|--|---|
| <ul style="list-style-type: none"> ▪ Aggregate Plant A <ul style="list-style-type: none"> ▪ P901 –Aggregate Plant (1 crusher and 1 attached generator) ▪ F001- roadways ▪ F002- storage piles ▪ Aggregate Plant B <ul style="list-style-type: none"> ▪ P901- Aggregate Plant (1 screener with attached generator) ▪ F001 –roadways ▪ F002- storage piles | <ul style="list-style-type: none"> ▪ Aggregate Plant C <ul style="list-style-type: none"> ▪ F003- Aggregate Plant (1 conveyor) ▪ F001- roadways ▪ F002- storage piles ▪ Portable Generator A <ul style="list-style-type: none"> ▪ P001- detached generator |
|--|---|

Ohio | Environmental Protection Agency

Transfer of Ownership
(Answer Place 2168)

Whole Facility
vs.
Partial Facility

Within DO/LAAs
vs.
Between DO/LAAs



“Real Life” Scenario

- Sidwell (SEDO) is selling their crusher (F026) to Stone Cutters LLC (CDO)
- So what do we do?



Stars2 Demonstration



Portable Relocation Procedures
Erica Engel-Ishida – CO



Portable Relocation Procedures

- How can portable sources relocate without first getting a permit?
 - Exempted from new permit with each move
 - OAC 3745-31-05 (H) – Site Preapproval
 - OAC 3745-31-03 (A)(1)(p) – Site NOT Preapproved



Portable Relocation Procedures

| Relocation Site(s) Preapproval | Relocation to a Site NOT Preapproved |
|--|---|
| <ul style="list-style-type: none">▪ Potential locations known well in advance.▪ 2 Parts:<ol style="list-style-type: none">1. Facility requests site(s) to be preapproved and Ohio EPA grants it.2. Relocate 15-Days after notification to Ohio EPA  | <ul style="list-style-type: none">▪ Locations not known in advance▪ 1 Part:<ol style="list-style-type: none">1. Facility requests site and facility can relocate after the public notice citing Ohio EPA approval appears in newspaper.  |

I get an ITR, what do I do?



1. Enter it into Stars2 if received in hard copy and view To Do item.
2. Permitting DO/LAA notifies Jurisdictional DO/LAA within 5 days of ITR receipt.
3. Jurisdictional DO/LAA reviews the site within 2 weeks of notice.
4. Permitting DO/LAA processes approval or denial upon receipt of results.

Ohio Environmental Protection Agency

Who Does What?- RELOCATIONS

| | |
|---|---|
| <p>Permitting DO/LAA</p> <ul style="list-style-type: none"> ▪ Coordinator ▪ Enters ITRs into STARS2 ▪ Reviews facility compliance Status ▪ Emails jurisdictional DO/LAA <ul style="list-style-type: none"> ▪ ITR ▪ Relevant Permit #s ▪ Copies of non-STARS2 permits ▪ PTE of relocating source(s) ▪ Other relevant info ▪ Completes STARS2 workflow tasks | <p>Jurisdictional DO/LAA</p> <ul style="list-style-type: none"> ▪ Technical Support ▪ Reviews info provided by permitting DO/LAA ▪ Evaluates Site <ul style="list-style-type: none"> ▪ Nuisance or impact issues? ▪ PTE of co-locating facilities? ▪ Special conditions needed? ▪ Determines site acceptability ▪ Emails Permitting DO/LAA Approval Recommendation |
|---|---|

Ohio Environmental Protection Agency

**When is a site approvable?
 Jurisdictional DO/LAA**

- Consider PTE at proposed location, major source thresholds triggered?;
- Do not consider zoning rules.

| | |
|--|---|
| <p><u>Site Preapproval</u></p> <ul style="list-style-type: none"> ▪ Is there an acceptable environmental impact... residences, schools, site-specific concerns, etc.? | <p><u>Site Not Preapproved</u></p> <ul style="list-style-type: none"> ▪ Is the facility likely to cause a nuisance per OAC 3745-15-07? |
|--|---|

Ohio Environmental Protection Agency

**When is an ITR approvable?
Permitting DO/LAA**

- has a currently effective PTI, PTIO, State PTO or registration;
- complies with terms and conditions;
- owner has identified a proposed site;

| | |
|---|---|
| <u>Site Preapproval</u> | <u>Site Not Preapproved</u> |
| ▪ Owner has approval in writing from the owner of the site to relocate there. | ▪ was installed after January 1, 1974; |
| | ▪ owner provided proper notice within 30 days prior to relocation |



When is a conditional approval needed?

- Applicable rule requirements at the site must be met if more stringent.
 - Existing permits for new site;
 - Appendix A area
- Conditions can be included in both types of ITR approvals.





Approval & Denial Letter Issuance

- PIER issues ITR approval & denial letters
 - Portable Plant Relocation Confirmation
- PIER handles all public notice steps





Stars2 Demonstration

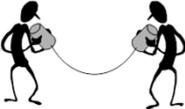


Inspection & Enforcement
Sarah Harter – SEDO



Inspection & Enforcement

- What are the 3 **C**'s of portable inspection and enforcement?
 - COORDINATION +**
 - COMMUNICATION =**
 - COMPLIANCE**



Who Does What?- RELOCATIONS

- What if a plant relocates without approval?
 - The jurisdictional and permitting DO/LAAs should **communicate** if either discover unapproved relocation.
 - The permitting DO/LAA will send NOV and cc: jurisdictional DO/LAA.
 - Repeat Offenders: Permitting DO/LAA prepares EAR, if needed.



Who Does What?- STACK TESTS

Permitting DO/LAA

- **Coordinator**
- Send ITT to jurisdictional DO/LAA if needed
- Reviews ITT
- **Communicates** with testing firm/facility and jurisdictional DO/LAA regarding pre-test issues

Jurisdictional DO/LAA

- Reviews ITT
- **Communicates** with testing firm/facility and permitting DO/LAA regarding pre-test issues
- Observes Test
 - Methods observation
 - VE readings
 - Collection of production data



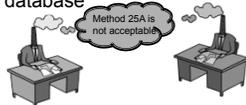
Who Does What?- STACK TESTS

Permitting DO/LAA

- Reviews test report
- Drafts/sends stack test letter to facility (seek input from and cc: jurisdictional DO/LAA)
- Enters final test data into statewide database

Jurisdictional DO/LAA

- Provides permitting DO/LAA with test data
- Provides support for test report review & letter preparation



Who Does What?- COMPLAINTS

Permitting DO/LAA

- Provides support to jurisdictional DO/LAA regarding facility requirements and history
- Maintains record of complaint and investigation in facility file



Jurisdictional DO/LAA

- Most often, Receives complaints from public
- **Communicates** with permitting DO/LAA
- Investigates complaint
- Drafts/Sends NOV's or other correspondence (seek input from and cc: permitting DO/LAA)
- Logs complaint in database



Who Does What?- INSPECTIONS

- Scheduling Required FEPTIO/TV Inspections for each FFY
 - Permitting DO/LAA reviews commitments for facilities located out of district.
 - Most often, jurisdictional DO/LAA performs inspection
 - Permitting DO/LAA may inspect in special circumstances
 - Proximity to permitting DO/LAA office
 - As needed, based on enforcement or other special concerns.
 - Permitting DO/LAA enters commitments into statewide database
 - All inspections should be scheduled for the 4th Qtr for maximum flexibility.



Who Does What?- INSPECTIONS

- How does a DO/LAA find out about extra portable inspection requirements?
 - Permitting DO/LAA management should **communicate** with jurisdictional DO/LAA management beginning each FFY list of required inspections and current location.
 - Jurisdictional DO/LAA management should **communicate** with Permitting DO/LAA management list of staff responsible for the scheduled inspections.



Who Does What?- INSPECTIONS

- What happens if a portable relocates before the inspection can occur?
 - As needed, Permitting DO/LAA management should send out updated list of facility locations, so the appropriate DO/LAA can complete the inspection.



Who Does What?- INSPECTIONS

Permitting DO/LAA

- Permitting DO/LAA reviews facility file (reports, correspondence, etc.) and **communicates** important issues with the inspector.
- Permitting DO/LAA enters site visit and FCE into statewide database upon receipt of inspection letter
- In cases where permitting DO/LAA conducts inspection, same communication should occur

Jurisdictional DO/LAA

- **Communicates** with permitting DO/LAA in advance of inspection.
- Conducts inspection.
- Drafts/Sends inspection letter (seek input from and cc: permitting DO/LAA)



Who Does What?- ENFORCEMENT

Permitting DO/LAA

- **Communicates** with jurisdictional DO/LAA regarding non-compliance
- Drafts/Sends NOV's (seek input from and cc: jurisdictional DO/LAA)
 - Permit non-compliance
 - Stack tests
 - Unapproved Relocations
 - Fees (mostly from CO)
- Prepares EARS
- Enters data into statewide database

Jurisdictional DO/LAA

- **Communicates** with permitting DO/LAA regarding non-compliance
- Drafts/Sends NOV's resulting from inspections (seek input from and cc: permitting DO/LAA)
- **Coordinates** with permitting DO/LAA regarding corrective actions and return to compliance
- Provides technical support for enforcement cases



Inspection & Enforcement

- Remember the 3 C's!



Ohio Environmental Protection Agency
