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## INSTRUCTIONS FOR PERMIT TO INSTALL (PTI) AND PERMIT TO INSTALL/OPERATE (PTIO) APPLICATIONS

### 1. General Information

The term "facility" specifically refers to the real estate that is the site of the actual, or potential, regulated activity. A facility contains one or more related manufacturing plants, disposal sites, transfer points, clean-up sites, well fields, treatment plants, etc.

**Legal Facility Name:** Please state the complete official name of the facility. Do not use abbreviations. The legal names of organizations, not facilities, are on file at the Ohio Secretary of State.

**Alternate Name:** Please state an alternate or secondary name for the facility, if one is commonly used. This may be a "d.b.a." (doing business as) name to emphasize the ownership or location of the facility. The alternate name will be used to distinguish this facility from similar facilities and help Ohio EPA locate it. This name will be used on all correspondence and authorizing actions regarding the facility.

For example, in the case of a dry-cleaning facility, the legal name could be "Rondinelli". But the common name would be "Dutchess Dry Cleaners". Any permits and/or correspondence would be issued to either "Dutchess Dry Cleaners" or "Rondinelli d.b.a. Dutchess Dry Cleaners".

**Facility Physical Address:** Please state the street address of the facility including the city, county or counties, and zip code. If the facility does not have a street address, please describe the physical location of the facility, including the city or township where it is located, as precisely as possible. P.O. Boxes are not physical addresses and not acceptable.

**Facility ID:** Please state the 10-digit ID number that applies to the facility. If you do not know the appropriate number or the ID number has not yet been assigned, please leave blank.

**Facility Description:** Please briefly describe the purpose of the facility, including primary products and/or services.

**Primary NAICS Code:** The North American Industrial Classification System (NAICS) Code is a standard identifier used to indicate the type of activity conducted at a facility. Please state the primary code that is most appropriate to the activity being conducted or proposed to be conducted at the facility.

<https://www.naics.com/search/>

**Standard Industrial Classification (SIC) Code:** A system for classifying industries by a four-digit. Replaced by the six-digit NAICS code,

<https://www.osha.gov/pls/imis/sicsearch.html>

**Facility Latitude and Longitude:** Please state the longitude and latitude of the facility or a point on the facility.

**Core Place ID:** The Core Place ID number is assigned by Ohio EPA and acts as the unique agency-wide identifier for each physical facility or regulated activity. Please state the facility's Core Place ID, if it is known. If not known, please leave blank.

**SCSC ID:** This is a U.S. EPA identifier for facilities categorized as "super facilities" and is used for National Emission Inventory (NEI) purposes only. If applicable, please state the facility's SCSC ID, if it is known. If not known, please leave blank.

**Portable:** According to OAC rule 3745-31-01, a portable source means an air contaminant source that, in the Director's judgment, is specifically designed to be transferred to a new site as needs warrant. Please indicate whether or not the air contaminant source is designed to be moved from one location to another. If so, please select the type(s) of portable operation(s) and the county in which it will be first located.

### 2. Contact Information

This section identifies the persons responsible for the various roles at this facility. Please identify a person for each listed role. If a person fills more than one role, multiple check boxes may be marked, and the contact information entered just once. If you have previously completed this table for another application (hard copy or online after July 1, 2008) and there have been no changes since that time, please check the box at the top of the table indicating that no changes are needed.

**Billing:** Please state the name of the organization or individual responsible for general billing activities at the facility. All invoices and other financial documents associated with the permitting of the facility will be sent to this contact.

**Owner:** Please state the name of the organization or individual that owns the regulated activity at or associated with the facility. The owner of a facility is any person or organization who completely or partially owns a facility. You may enter more than one owner, if appropriate.

**Primary:** Please state the name of the individual who should be the primary contact for air pollution control related activities at the facility. All correspondence and authorizing actions regarding the facility will be sent to this person.

**Operator:** Please state the name of the organization or individual that is operating or will be operating the facility. The operator of a facility is any person or organization who is charged with the operation of a facility. You may enter more than one operator, if appropriate.

**On-Site:** Please state the name of the individual located at the facility physical address that will be available for contact by Ohio EPA.

**Responsible Official:** Please provide the name of the individual who meets the requirements for a responsible official, as defined in OAC rule 3745-77-01, for a facility subject to OAC Chapter 3745-77, OR, the individual who meets the signatory requirements, as identified in OAC rule 3745-31-04, for a facility not subject to OAC Chapter 3745-77. For example, in the case of a corporation, the official should be at least the level of vice president. In the case of a partnership, the official should be a general partner. In case of a sole proprietorship, the official should be a proprietor. (Refer to above rules for the complete list and for requirements for delegating responsibility if you are a corporation.)

### **General Instructions:**

This application form is needed to obtain a permit-to-install (PTI) or a permit-to-install and operate (PTIO) for an air contaminant source (emissions unit). A PTI is required for all emissions units installed or modified after January 1, 1974, that are subject to Ohio Administrative Code (OAC) Chapter 3745-77. A subsequent Title V operating permit per OAC Chapter 3745-77 will be needed for these types of facilities. Title V facilities are not eligible for PTIO. A PTIO is required for all emissions units that are not subject to OAC Chapter 3745-77. A PTIO is the only air pollution control permit needed for these facilities. Please note that all facilities must submit PTI applications via eBiz.

Please note that submittal of an incomplete application will result in a delay in processing of the application and/or could result in return of the application as incomplete. At a minimum, all bolded items in this application must be completed, except when applying for a general permit PTIO (GPTIO). If you are applying for a general permit, follow the specific general permit application instructions available separate from this document for each general permit type. General permit information and application instructions can be obtained by visiting the Ohio EPA Division of Air Pollution Control's (DAPC) general permit website at <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/general-permit-program>.

"Air contaminant source" means each separate operation, or activity that results or may result in the emission of (1) an air contaminant or precursor of an air contaminant for which a national ambient air quality standard has been adopted under the Clean Air Act; (2) an air contaminant for which the source is regulated under the Clean Air Act; or (3) a toxic air contaminant as listed in OAC rule 3745-114-01. This definition applies to operations or activities that emit air contaminants whether they are regulated new source review (NSR) pollutants or regulated under Ohio law ("regulated NSR pollutant" is defined in OAC rule 3745-31-01). An "emissions unit", per OAC rule 3745-31-01, means any part of a stationary source that emits or would have the potential to emit any regulated NSR pollutant and includes an electric steam generating unit. This term regulated NSR pollutant does not include air contaminant sources that emit a pollutant regulated under State law.

This application should be used for the following reasons:

- New installation of an air contaminant source (for which construction has not yet begun)
- Initial application for an air contaminant source already installed or under construction
- Modification to an existing air contaminant source/facility
- Reconstruction of an existing air contaminant source/facility
- Renewal of an existing permit-to-operate (PTO) or PTIO
- Transition from OAC Chapter 3745-77 (Title V) to OAC Chapter 3745-31 (State PTIO)

## Where to Get Help

There are several options to obtain assistance for either filling out these forms or for general Ohio EPA related matters.

**District Office/Local Air Agency (DO/LAA)** - The first of these is to simply contact your DO/LAA to ask questions. It is highly recommended that you discuss your plans with the appropriate DO/LAA representative very early in the process. They will be glad to help direct you to make sure the permitting proceeds as smoothly as possible. Remember that you may have several people to contact within Ohio EPA. For example, if your project involves air contaminant sources and wastewater discharges, then you will need to contact the air and wastewater sections in the appropriate local office (see the table at the end of these instructions).

**Office of Compliance Assistance and Pollution Prevention (OCAPP)** – This non-regulatory office of Ohio EPA provides answers and information about environmental regulations, compliance concerns, and pollution prevention. Offered services include toll-free hotline, on-site compliance and pollution prevention assessments, assistance with permit application forms, quarterly newsletter, and compliance assistance publications. All services are free. Contact OCAPP at 1-800-329-7518 or (614) 644-3469. Also see Web site information below.

### Assistance on the Web

Ohio EPA: <https://epa.ohio.gov/home>

Division of Air Pollution Control (DAPC): <https://epa.ohio.gov/divisions-and-offices/air-pollution-control>  
Contents: DAPC program guidance documents; forms; modeling information, links to regulations (OAC), and other information.

Office of Compliance Assistance and Pollution Prevention (OCAPP):  
<https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/about-defa/office-of-compliance-assistance-and-pollution-prevention>  
Contents: Compliance publications, guidance documents, pollution prevention studies, information on alternative materials and processes and more.

Code of Federal Regulations (CFR): <https://www.ecfr.gov/>

U.S. EPA Factor Information RETrieval (FIRE): <https://cfpub.epa.gov/webfire/>  
Contents: The Factor Information RETrieval (FIRE) Data System is a database containing EPA's emission estimation factors for criteria and hazardous air pollutants in an easy-to-use Windows program. Users can browse through records in the database or select specific emission factors by source category, source classification code (SCC), pollutant name, CAS number, or control device.

**Consultants** - You can also contract with consultants for assistance. These are typically listed in the yellow pages under Consultants: Environmental. Ohio EPA cannot recommend any one consultant. It is highly recommended that you get references prior to hiring a consultant. Consultants have a wide range of experience and expertise, so it is important for you to find out if the consultant you plan to hire will be capable of doing the job you need done correctly.

## Section I – General Application Information

The questions presented in the application are in bold and the question's specific instructions are given below or next to it.

### **1. Purpose of Application – Transition from OAC Chapter 3745-77 (Title V) to OAC Chapter 3745-31 (PTIO)**

Checking "Yes" indicates that the facility is currently subject to the Title V permitting program but will not be in the future and will be transitioning from the Title V permitting program to the PTIO permitting program based on this application and issuance of a final PTIO.

### **2. Establish PER Due Date**

If a PTIO is issued as a result of this application, an annual Permit Evaluation Report (PER) will be due after the final permit is issued for the air contaminant source(s) regulated in the PTIO. Only one PER due date will be established for the entire facility. This date may be selected by the applicant only in the first application that results in the issuance of a PTIO. The PER will be due on the due date selected and will evaluate the permit requirements for the prior 12

calendar months as indicated under the “For Time Period” heading. If the facility is subject to Title V or a PER due date was previously established for this facility, the “PER not applicable” box should be selected. An established PER due date may be changed by submitting a letter explaining why the change is needed, and the new date desired. The letter should be sent to the DO/LAA indicated in the permit.

### 3. Federal Rules Applicability – Please check all of the appropriate boxes

One box must be selected for each of the federal rules identified in the application. The descriptions for the selections are given below:

- **not affected** – the given regulation does not apply
- **subject to Subpart** – the given regulation does apply. Refer to the regulations referenced in the application, which may be found in the Code of Federal Regulations (CFR) Part 40 (Protection of the Environment) and identify which specific subpart the air contaminant source(s) are subject to. For example, a miscellaneous metal parts coating operation, may be subject to 40 CFR Part 63, Subpart MMMM. In the space provided, simply list “MMMM”.
- **unknown** – it is unknown if the given regulation applies. Checking “unknown” is acceptable but does not relieve you of the responsibility of complying with any applicable requirements.
- **subject, but exempt** – the air contaminant source(s) you are applying for are subject to the regulation but are exempted from the emission limitations and/or control requirements specified in the regulation. Explain your rationale in the space provided at the end of this question or attach the rationale separately.

### 4. Express PTI/PTIO

Express status provides that:

Within 60 days of the receipt of a complete request, the director shall notify the applicant whether the air contaminant source will be accepted for express permit status. Installation or construction of the air contaminant source may commence upon the issuance of the express permit, or after 60 days if the applicant has not been notified or the express permit issued at an earlier date. The issuance of an express permit does not relieve the applicant from compliance with any applicable air pollution control requirement and is at the discretion of the director.

This status may be of benefit to your facility if you meet **all** of the requirements listed below.

In order to be considered for express PTI/PTIO status per OAC rule 3745-31-05, the air contaminant source owner or operator must:

- Submit a complete permit application;
- Demonstrate compliance with all applicable law;
- Have “maximum uncontrolled emissions,” as defined in OAC rule 3745-31-01 of less than five tons per pollutant per each year for particulate matter, sulfur dioxide, nitrogen oxides, and organic compounds;
- Not be subject to the U.S. EPA new source performance standards; and
- Not be subject to the national emission standards for hazardous air pollutants or a U.S. EPA promulgated standard for hazardous air pollutants.

If you are unsure of your eligibility, contact your DO/LAA representative or just check “No.”

Note: An Express PTI/PTIO is not the same as a Rush PTI/PTIO. Information on how to put your permit on the “rush” list is available on the Ohio EPA DAPC website: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/getting-your-permit-on-the-rush-list>.

### 5. Air Contaminant Sources in this Application

**Emissions Unit ID** – This ID would have been created by the DO/LAA when a previous air permit was issued. If no previous permits have been issued for this air contaminant source, leave this field blank. If this air contaminant source was previously identified in STARShip applications as a “Z” source (e.g. Z001) please indicate that identification and a new ID will be assigned when the PTI/PTIO is issued.

**Company Equipment ID** – Provide your identification for each air contaminant source for which the application is submitted. We want to know what you call the air contaminant source at your facility (examples: spray booth #1, widget line #2, welding operation, sand handling system A).

**Equipment Description** – Identify the process equipment associated with the air contaminant source (examples:

for a chemical reactor system – 2 weigh tanks, reactor vessel and product drop tank; for roadways and parking areas – 2 miles of unpaved roadways and 10,000 square feet of unpaved parking areas).

## 6. Trade Secret Information

If you indicate “yes” claiming trade secret applicability, attach a separate piece of paper to this form and include the following information to justify the claim:

- Identification of the specific information (item # and description) submitted within this application that is being claimed as a trade secret;
- An explanation of why the information specified is indeed a trade secret under Ohio law;
- Confirmation the alleged trade secret is not revealed by inspection or analysis of any marketed product (example: "reverse chemistry"); and,
- Identification of security measures that have been adopted to ensure secrecy and that reasonable or enforceable agreements or other confidential relationships prohibiting use or disclosure of the secret existed with those to whom the secret was revealed (examples: employee secrecy agreements and/or contractor agreements).

Finally, if a confidentiality claim is being submitted, two copies of the application must be submitted, one completed version with all the information requested and one "non-confidential" version containing all information requested except that information upon which a trade secret claim is being made. Note: A “non-confidential” version of this application must be submitted in order for this application to be deemed complete.

## 7. Permit Application Contact

The person designated as a contact should be someone knowledgeable about this permit application. This person may be a responsible official for the facility or may be a consultant or contractor.

## 8. Authorized Signature

No further instruction needed.

## Section II - Specific Air contaminant source Information

### 1. Air Contaminant Source Installation or Modification Schedule

At least one box must be selected. The descriptions for the selections are given below:

- **New installation:** Identify the month and year that construction is scheduled to begin or check the box if you plan to begin construction as soon as the permit is issued. If construction of the air contaminant source already began prior to this application, do not select this box (you will select the next box).
- **Initial application for an air contaminant source already installed or under construction:** Identify the month and year that construction began. If operating, also identify the month and year that operation began.
- **Modification to an existing air contaminant source/facility:** Identify the number(s) of all previous permit(s) for the air contaminant source being modified. Identify the month and year that modification is scheduled to begin or check the box if you plan to begin modification as soon as the permit is issued. If modification of the air contaminant source already began prior to this application, do not select this box (you will select the next box). See OAC rule 3745-31-01 for the complete definition of a “modification”. The following are examples of descriptions of modifications:
  - A facility identifies a way to increase the production rate of an air contaminant source with a corresponding increase in the allowable emissions.
  - A facility identifies a way to increase process efficiency at an air contaminant source to decrease process cycle time by 20%. This will result in the exceedance of existing hourly emission limitation.
- **Modification application for an air contaminant source which has been or is currently being modified:** Identify the number(s) of all previous permit(s) for the air contaminant source being modified. Identify the month and year that construction began. If operating, also identify the month and year that operation began.
- **Reconstruction of an existing air contaminant source/facility:** Reconstruction is a modification of an existing air contaminant source as defined in 40 CFR 60.15.
- **Renewal of an existing permit-to-operate (PTO) or PTIO:** Identify the month and year that operation began

after installation of the air contaminant source or after the latest modification (as defined in OAC rule 3745-31-01), whichever is later.

- **General Permit:** If you are requesting a general permit, check this box in addition to another box if appropriate. Identify the category and type of general permit you are applying for. Be sure to include the unique general permit identification number included in the full title of the type of general permit. Attach the appropriate completed and signed Qualifying Criteria Document. Be sure to follow the specific general permit application instructions available separate from this document for each general permit type. Further instructions, forms and other information are available at <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/general-permit-program> or by contacting your DO/LAA representative.
- **Other:** If there is a special situation not covered above, check this box and explain.

## 2. SCC Codes

Source Classification Codes (SCC) classify the processes performed by an air contaminant source. For example, if you have a boiler that burns both coal and natural gas for electric generation, you would list two SCC's: (1) 1-01-002-04 for coal burning and; (2) 1-01-006-02 for natural gas burning. If you are not certain what SCC would best represent the operations of this air contaminant source, you can use U.S. EPA's FIRE database, available from the link in the "Where to Get Help" section above.

## 3. Emissions Information

The emissions information requested in this table must be determined before this application can be processed. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) form required with this application. If you need further assistance, contact your DO/LAA Representative to discuss your specific air contaminant source.

Please show all calculations used in determining the information in this table. Describe how emission rates were estimated and what worst case conditions were assumed for potential to emit calculations (see question #8 instructions for definition). Calculations provide us with a more complete understanding of your air contaminant source and also allow us to deal with special situations such as batch processes where emission rates are not uniform, or complex air contaminant sources such as production lines containing several emission points.

For emission rates expressed in units other than those specified, identify units used and be sure to relate those units to time and/or production. Examples:

- A mass balance for a batch process determines lbs. emissions/batch. We may need to know batch length, batch cycle time, potential number of batches/yr, etc. in order to set short-term and annual emission limits.
- Baghouse outlet loadings are typically expressed in gr/dscf. Flow rate should be used to relate gr/dscf to lb/hr and ton/yr.

**Pollutant:** If you are unable to distinguish PM<sub>2.5</sub> and PM<sub>10</sub>, report it all as PE/PM. If data is available for PE/PM<sub>10</sub> or PE/PM<sub>2.5</sub>, please provide that information.

OC and VOC are defined in OAC rule 3745-21-01. Normally, OC emission rates are needed since the definition of VOC exempts certain compounds and only applies to specific types of air contaminant sources.

"Hazardous air pollutant" (HAP) means any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act. The list is available from USEPA at <https://www.epa.gov/haps/what-are-hazardous-air-pollutants>. For Title V applicability, we need to know the total of all HAP emissions (**Total HAPs**) as well as the highest emission rate for any individual HAP (**Highest single HAP**), which should be identified in the table.

Toxic Air Contaminants are any air pollutant listed in OAC rule 3745-114-01. Emissions of toxic air contaminants are evaluated in accordance with ORC 3704.03(F) and the Ohio EPA document entitled "Option A – Review of New Sources of Air Toxic Emissions" (issued May 1986). Any allowable emissions that include a toxic air contaminant at a rate greater than 1 ton/yr are modeled to determine the potential impact on adjacent property. If more than one toxic air contaminant is emitted at a rate greater than 1 ton/yr, only the one with the greatest potential impact is needed, i.e. the highest emission rate and lowest TLV combination, and should be identified in the table. Several toxics may need to be modeled in order to determine this. Any allowable emissions that include an air toxic at a rate greater than 1 ton/yr are modeled to determine the potential impact on adjacent property. Modeling may be performed by either

you or the DO/LAA, at their discretion.

**Emissions before controls** – For the listed pollutant(s), enter the worst-case emissions (usually at maximum operation) or potential to emit for this air contaminant source prior to any add-on control equipment.

**Actual emissions** – For the listed pollutant(s), enter the actual worst-case emissions or potential to emit for this air contaminant source, as determined in the previous column, taking into account any add-on control equipment. If emissions control equipment is not present, then “Actual Emission” is equivalent to “Emissions before controls”.

**Requested Allowable** – For the listed pollutant(s), enter the allowable emission limit that you are requesting to be listed in your permit for this air contaminant source. This could be the same as the actual emissions, as determined in the previous column (using the worst-case uncontrolled emission rate and the lowest expected control efficiency) or could be determined by your potential to emit (see question #8 instructions for definition). The allowable emission rate you request should not be greater than any applicable emission limit from state or federal rules. Remember that you must be able to comply with this limit under all production levels and process conditions.

Please note:

1. “Actual emissions” and “Requested Allowable” should be based on operating 8,760 hours per year unless the facility is requesting federally enforceable operating restrictions to limit emissions and the facility’s potential to emit (PTE). If requesting federally enforceable limits, please calculate emissions based on the requested and identified operational restriction(s).
2. “Requested Allowable” (ton(s)/yr is often equivalent to PTE as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.
3. Although not required by EAC form 3103 (Surface Coating Operations), the applicant may want to consider including any data sheets, coating product bulletins, coating supplier technical data sheets, MSDS, or other coating supplier-based information that was used to provide the basis for the emissions information required in section II.3. of the permit application form (i.e., OC, VOC, HAP, and Toxic Air Contaminant emissions). Submittal of this additional information may prevent future requests for such items.

#### 4. Best Available Technology (BAT)

Best Available Technology is a combination of control techniques designed to reduce emissions. See [https://epa.ohio.gov/static/Portals/27/regs/3745-31/3745-31-01\\_Final.pdf](https://epa.ohio.gov/static/Portals/27/regs/3745-31/3745-31-01_Final.pdf) for the full definition. BAT must be employed if (a) the air contaminant source was installed or modified on or after January 1, 1974, but before August 3, 2006, and (b) the air contaminant source was installed or modified on or after August 3, 2006, and the potential to emit of the air contaminant source is greater than or equal to 10 tons per year per pollutant. This applies to each pollutant for which emissions information is required to be entered into the table on the application (see No.3 above and additional instructions on the applicable form.) If applicable, identify each subject pollutant and describe the strategy for minimizing emissions of that pollutant.

#### 5. Control Equipment

For each emissions control device to be used on the air contaminant source, if any, check the appropriate box and enter the information requested for that specific type of control device.

- If multiple pollutants are controlled, specify control efficiencies for each (e.g., OC: 99%, CO: 95%) and the basis for each efficiency (e.g., stack test, design, engineering estimate).
- For Thermal Incinerator/Thermal Oxidizer, Minimum operating temperature (°F): Some rules specify a location where temperature must be determined. If your air contaminant source is subject to one of these rules, then the temperature must be determined at the location specified by the rule.

#### 6. Process Flow Diagram

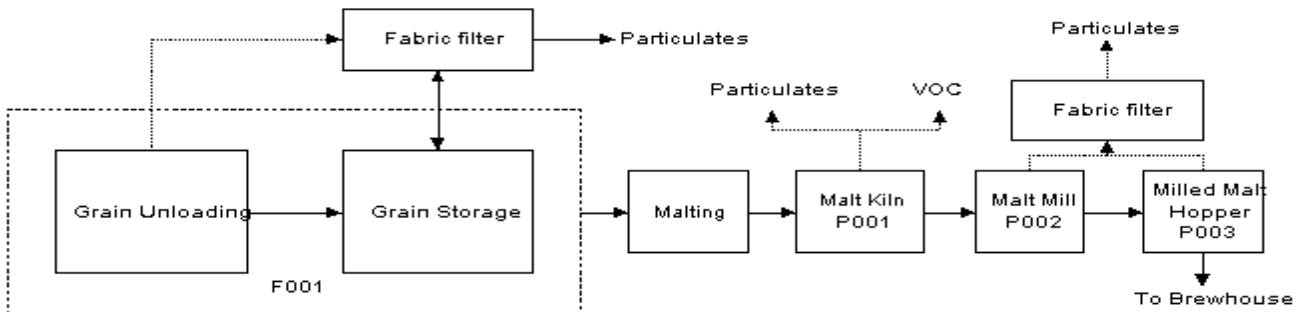
A process flow diagram is needed so that we can understand the air contaminant source’s operation and emissions. The diagram should include the following:

- The emissions unit ID (if known) and company identification for the air contaminant source, see Section I (e.g., Emissions Unit ID = P004, Company ID = Line #4);
- The entry and exit points of process inputs and outputs;
- Labeling of all materials (product, waste, and airborne pollutants); and
- Labeling of all process equipment, control equipment, and egress points (stack and fugitive).

If there is more than one piece of control equipment (parallel configuration), please show the following:

- Flow rate to each (percent or cfm); and
- Emissions vented to and controlled by each (percent or mass rate).

EXAMPLE PROCESS FLOW DIAGRAM:



## 7. Modeling Information - (see Engineering Guide #69)

An egress point is a point at which emissions from an air contaminant source are released into the ambient (outside) air. There are two main classifications of egress points: stack or fugitive. A stack is any chimney, flue, conduit, or duct arranged to conduct emissions to the ambient air. Stack emissions are emissions that are released into the ambient air through a stack. Fugitive emissions are emissions that are released into the ambient air by means other than a stack. Fugitive emissions include emissions from air contaminant sources like roadways and storage piles (no stack involved, emissions are emitted directly into the ambient air) and emissions from air contaminant sources that are inside a building and the emissions escape into the ambient air through doors and windows (not a chimney, flue, conduit, or duct arranged to conduct emissions to the ambient air) in the building. Many air contaminant sources have multiple egress points, and some air contaminant sources have both stack and fugitive egress points.

**Table 7-A:** Air quality models incorporate the downwash effect that buildings and structures can have on the dispersion of the plume from a Stack Egress Point. Therefore, information on the largest nearby building or structure is necessary to fully estimate the ambient impact of emissions from a Stack Egress Point.

A building or structure may not be a simple cube. For example, a building could be mostly one story but have a segment that is five stories. Such a building would be viewed as two buildings. One would be a one-story structure that extends over the entire footprint of the building and the second would be a five-story building that only extends over that part of the footprint that is five stories. Non-square buildings (e.g., those with “L” or “U” shaped footprints) should be given a length and width that would contain the entire footprint. The height of a building with a pitched roof should be given a height equal to the height of the midpoint of the pitched roof. If you have a complex building shape with varying roof heights and you need assistance, contact your DO/LAA representative.

A building is “nearby” to a Stack Egress Point if the stack is within five times the Building Height. For example, if a Stack Egress Point is 200 feet from a building segment that is 20’ high, that building, or structure would not be a nearby structure. That building segment is too far away from the Stack Egress Point to cause building downwash.

**Table 7-B:** There are two types of fugitive releases which can be modeled. Area sources are unenclosed and can generally be understood as horizontal and 2-dimensional. Examples are roadways and parking areas, landfills, and open crushing and screening operations. Volume sources are often enclosed, 3-dimensional sources. Although they may have well-defined points where emissions are released, those egress points are not primarily designed to vent emissions and are not powered. Examples are buildings containing sources which emit dust inside the building; the dust escapes through doors, windows and/or natural draft roof vents.

**Table 7-C:** Enter the latitude and longitude for each egress point previously identified in Tables 7-A and 7-B. These would be the location of the particular egress point or the center point for a fugitive source.

## 8. Request for Enforceable Restrictions

It may be to your advantage to obtain additional restrictions, whether state and federally enforceable or state-only enforceable, on your operations in order to avoid the applicability of some rules. For instance, you may want to avoid the applicability of Title V permitting or the requirement to obtain a Major New Source Review permit. Please be informed that additional operational and/or production restrictions, record keeping, and reporting requirements may be included in your permit. If you think this might apply to you, you should discuss this issue with your DO/LAA Representative. If you decide to restrict your potential to emit (defined below), attach a separate piece of paper providing the following information:

- Identification of the proposed operational/production limitation(s) for the air contaminant source(s), (e.g., hours/12-month period, days/year, gallons/12-month period, tons of production/12-month period, etc.);
- Proposed method(s), that will be utilized to demonstrate compliance with the state and/or federally enforceable limits, (e.g., reference test methods, record keeping, continuous emissions monitoring (CEM), etc.);
- For avoidance of Title V, MACT, or NSR major source designation, a summary of the total facility potential to emit (tons/year) for each pollutant (PE/PM, PE/PM<sub>10</sub>, PE/PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, Lead, HAPs) before and after implementation of the proposed federally enforceable limits (include supporting calculations); and

OAC rule 3745-31-01 states that "Potential to emit" means the maximum capacity of an air contaminant source or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the air contaminant source or stationary source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable or legally and practicably enforceable by the state. Secondary emissions do not count in determining the potential to emit of a stationary source.

## 9. Continuous Emissions Monitoring

This applies only to those devices that actually measure emissions from a stack. This is defined by U.S. EPA as, "A continuous emission monitoring system (CEMS) is the total equipment necessary for the determination of a gas or particulate matter concentration or emission rate using pollutant analyzer measurements and a conversion equation, graph, or computer program to produce results in units of the applicable emission limitation or standard." Continuous parametric monitoring systems (e.g., a temperature monitor) should not be included in this table. Parametric monitoring systems are described in Engineering Guide #66 whereas criteria for requiring the use of CEMs are described in Engineering Guide #52, available from Ohio EPA at: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/guides-and-manuals/engineering-guides-notebook>.

## 10. EAC Forms

An Emissions Activity Category (EAC) form is required for each air contaminant source included in this permit application. A list of available EAC forms is on the following page. Please choose the EAC form(s) that is (are) most applicable to the type(s) of air contaminant sources that are part of this application. If none of the forms are applicable, then choose the Process Operation form 3100.

### **Form # Emissions Activity Category Form Description**

3100	Process operations
3101	Fuel burning operations
3102	Incineration operations (except add-on emissions control devices)
3103	Coating operations
3104	Storage tanks
3105	Gasoline, diesel and/or kerosene dispensing facility
3107	Loading rack for liquid materials
3108	Printing operations
3109	Solvent metal cleaning
3111	Roadways and parking areas: fugitive dust emissions
3112	Storage piles: fugitive dust emissions
3113	Material handling: fugitive dust emissions
3114	Earth Moving/Mineral extraction
3115	Coke manufacturing

3116	Iron production
3117	Steel manufacturing
3118	Lime Plant: fugitive dust emissions
3119	Fly/bottom ash disposal: fugitive dust emissions
3120	Grain terminals and elevators: fugitive dust emissions
3121	Asphalt Plants
3123	Gray iron or steel foundries: fugitive dust emissions
3124	Glass manufacturing processes
3126	Secondary aluminum processing
3127	Fertilizer mixing/blending operations
3128	Cement manufacturing and blending plants
3129	Ferroalloy production operations
3130	Metal salvage operations
3131	Pulp and paper mills
3132	Woodworking operations
3133	Aggregate processing plants: fugitive dust emissions
3134	Coal processing plants
3135	Brick and related clay product manufacturing
3137	Concrete batching plants
3138	Abrasive blasting operations
3140	Agricultural chemical manufacturing operations: fugitive dust emissions
3142	Carbon black manufacturing operations
3143	Municipal incineration operations: fugitive dust emissions
3144	Salt processing operations
3145	Galvanizing operations
3149	Landfill operations
3846	Dry cleaning facility
3862	Internal Combustion Engines
3863	Bakery operations

<b>Ohio EPA District &amp; Local Air Pollution Agencies</b>		
<b>Agency Number</b>	<b>District Office</b>	<b>Telephone</b>
01	Ohio EPA/DAPC Central District Office (CDO) PO Box 1049 Columbus, OH 43216-1049	(614) 728-3778
02	Ohio EPA/DAPC Northeast District Office (NEDO) 2110 E. Aurora Road Twinsburg, OH 44087	(330) 963-1200
03	Ohio EPA/DAPC Northwest District Office (NWDO) 347 N. Dunbridge Road Bowling Green, OH 43402	(419) 352-8461
06	Ohio EPA/DAPC Southeast District Office (SEDO) 2195 Front St. Logan, OH 43138	(740) 385-8501
<b>Agency Number</b>	<b>Local Air Pollution Agencies</b>	<b>Telephone</b>
04	City of Toledo (Toledo) Division of Environmental Services 348 S. Erie St. Toledo, OH 43604	(419) 936-3015
07	Portsmouth City Health Department (Portsmouth) Air Division 605 Washington St., 3 <sup>rd</sup> Floor Portsmouth, OH 45662	(740) 353-5156
08	Regional Air Pollution Control Agency (RAPCA) Montgomery County Health Dept. 117 S. Main St. Dayton, OH 45422	(937) 225-4435
13	Department of Public Health (Cleveland) Division of Air Quality 75 Erieview Plaza, 2 <sup>nd</sup> Floor Cleveland, OH 44114	(216) 664-2297
14	Southwest Ohio Air Quality Agency (Cincinnati/SOAQA) Air Quality Programs 250 William Howard Taft Road Cincinnati, OH 45219	(513) 946-7777
15	Canton City Public Health (Canton) Air Pollution Control Division 420 Market Ave., North Canton, OH 44702-1544	(330) 489-3385
16	Akron Regional Air Quality Management (Akron) 1867 W. Market St. Akron, OH 44313	(330) 375-2480
20	Lake County General Health District Air Pollution Control 5966 Heisley Road Mentor, OH 44060-1886	(440) 350-2543

**County vs. Agency Table**

<b>County</b>	<b>Agency #</b>	<b>County</b>	<b>Agency #</b>
Adams (01)	7	Licking (45)	1
Allen (02)	3	Logan (46)	1
Ashland (03)	3	Lorain (47)	2
Ashtabula (04)	2	Lucas (48)	4
Athens (05)	6	Madison (49)	1
Auglaize (06)	3	Mahoning (50)	2
Belmont (07)	6	Marion (51)	3
Brown (08)	7	Medina (52)	16
Butler (09)	14	Meigs (53)	6
Carroll (10)	2	Mercer (54)	3
Champaign (11)	1	Miami (55)	8
Clark (12)	8	Monroe (56)	6
Clermont (13)	14	Montgomery (57)	8
Clinton (14)	14	Morgan (58)	6
Columbiana (15)	2	Morrow (59)	1
Coshocton (16)	6	Muskingum (60)	6
Crawford (17)	3	Noble (61)	6
Cuyahoga (18)	13	Ottawa (62)	3
Darke (19)	8	Paulding (63)	3
Defiance (20)	3	Perry (64)	6
Delaware (21)	1	Pickaway (65)	1
Erie (22)	3	Pike (66)	6
Fairfield (23)	1	Portage (67)	16
Fayette (24)	1	Preble (68)	8
Franklin (25)	1	Putnam (69)	3
Fulton (26)	3	Richland (70)	3
Gallia (27)	6	Ross (71)	6
Geauga (28)	2	Sandusky (72)	3
Greene (29)	8	Scioto (73)	7
Guernsey (30)	6	Seneca (74)	3
Hamilton (31)	14	Shelby (75)	3
Hancock (32)	3	Stark (76)	15
Hardin (33)	3	Summit (77)	16
Harrison (34)	6	Trumbull (78)	2
Henry (35)	3	Tuscarawas (79)	6
Highland (36)	7	Union (80)	1
Hocking (37)	6	Van Wert (81)	3
Holmes (38)	2	Vinton (82)	6
Huron (39)	3	Warren (83)	14
Jackson (40)	6	Washington (84)	6
Jefferson (41)	6	Wayne (85)	2
Knox (42)	1	Williams (86)	3
Lake (43)	2	Wood (87)	3
Lawrence (44)	7	Wyandot (88)	3