

Ohio EPA Air Pollution Permit Requirements

2021 Ohio Safety Congress and Expo

Jana Gannon

Northeast District Office

Division of Air Pollution Control

March 12, 2021



Welcome!

Submit Questions



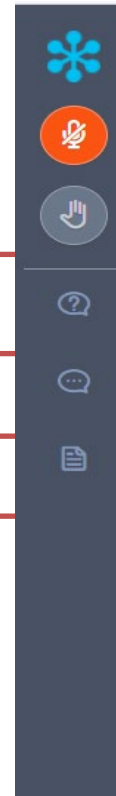
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- 1 BMP hour for C&DD Operator Certification *(Submit attendance certificate with Certified Operator application/renewal)*

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Learning Objectives

- Participants will understand why obtaining a permit before installation is important
- Participants will be able to identify what types of sources need air permits
- Participants will gain a basic knowledge of permit application forms, completion tips, and processing timeframes
- Participants will gain knowledge about what permitting resources are available

Poll

Do you currently work at a non-Title V facility or a Title V facility, or work with both kinds of facilities?

- A. Non-Title V facility
- B. Title V facility
- C. Both kinds of facilities
- D. Neither
- E. Don't know

Basic Permit Liability

- It is the company's obligation to determine if an air permit is needed and obtain it.
- Permit needed before installing & starting up equipment.
- New permit is needed before moving equipment to a new address.
- Permits can be transferred to new owners.

Why Permits Are Important: Focus of EPA Inspections

- **Permit** summarizes all applicable federal and state regulations.
- Inspector will check if company is maintaining records required by **air permits**.
- Inspector will check to see if everything that needs an **air permit** has one.

Common Air Pollution Violations

- Installing and operating equipment without obtaining proper permits.
- Not maintaining records required by permits.
- Exceeding permit limits.
- Not maintaining air pollution control equipment.



What needs an air permit?

- No definitive list exists!

- Need permit for an:
 - ✓ *air pollution source*
 - ✓ *air contaminant source*
 - ✓ *emissions unit*

= each separate activity or operation that emits air pollutants (PM, NO_x, SO₂, VOC, CO, Pb, HAPs).

- Permit only covers that air pollution source. Company may need several air permits to cover all plant operations.

What may need an air permit?

4 Rules of Thumb:

1. Something with a stack, vent, or dust collector.
2. Something that uses solvents, paints, inks, or adhesives.
3. Something that burns fuel.
4. Something that causes smoke, dust, or odors.

Common Things Needing Air Permits



Does everything need an air permit?

NO – three options for exemption:

1) Permanent exemptions (OAC 3745-31-03)

- Lists 60+ types of equipment and processes that do not need air permits.
- No Ohio EPA notification required.

Some Things Exempt Under Permanent Exemptions...



Lab fume hoods



Gas-fired boilers, heaters
< 10 million Btu/hr



Storage tanks < 19,815 gallons

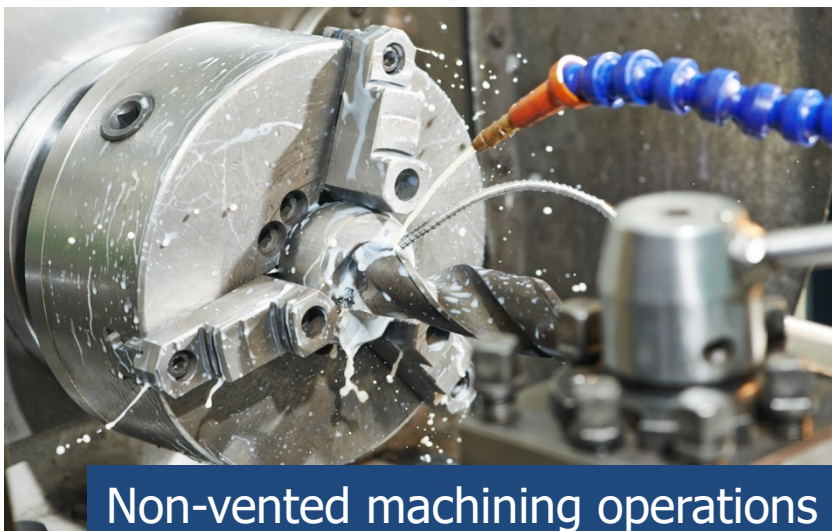
More Examples



Solvent stills <20 gal. capacity



Small solvent parts washers
w/non-chlorinated solvent



Non-vented machining operations

Poll

In Ohio, roadways and parking areas are eligible to use which of the following regulatory tools? (Pick all that apply)

- A. De minimis exemption
- B. Permanent exemption
- C. Permit-by-rule
- D. General permit
- E. Case-by-case (standard) permit

Air Permit Exemptions

2) Permit-by-rule provisions [OAC 3745-31-03(C)]

- Emergency generators
- Plastic parts molding
- Small crushers
- Ground water/soil cleanup
- Auto body shops
- Gas stations
- Gas-fired boilers
- Printing shops
- Small roadways

Pre-defined operating conditions and recordkeeping. Simple single page notification required, no waiting!

Air Permit Exemptions

3) “De minimis” source exemption (OAC 3745-15-05)

- Emits less than 10 lbs/day of PM, NO_x, SO₂, OC, CO, Pb, and;
- Less than 2,000 lbs/yr of hazardous air pollutants.
- Can't be subject to federal rules.
- Requires emission calculations.

Air Permit Self-Assessment

- **Step 1:** Tour your plant to identify all air pollution sources using the 4 Rules of Thumb.
- **Step 2:** Determine what operations fit the permanent exemptions or permit-by-rule.
- **Step 3:** Determine if remaining operations can be 'de minimis' by doing emission calculations.
- **Step 4:** Assume what is not exempt needs a permit.

Air Permits: Installation

Permit-to-Install (PTI) – *Title V facilities only*

Permit-to-Install and Operate (PTIO) – *everyone else*
(OAC 3745-31-02)

- Needed before installing and operating equipment.
- For equipment installed after January 1, 1974, can be done years after installation.
- 1-6 months to get, depends on complexity.
- Allows 18 months to start construction.

Air Permits By Facility Type

Title V Facilities

(~ 550 large emitters) need:

- Permit-to-Install (PTI) for each new installation or modification
- +
- One Title V Operating Permit covering everything for continued operation



Air Permits By Facility Type

Non-Title V Facilities (> 6,000* small emitters)

* This does not count Permit-by-Rule only facilities

and

Synthetic Minor Facilities (\cong 800 that voluntarily restrict emissions to avoid more complex regs)

- Need one or more **PTIOs** to cover installation and operation for all air pollution sources at the facility

Air Permits

Permit-to-Install and Operate (PTIO)

- Covers installation and continued operation.
- Five-year term if “synthetic minor” or “federally enforceable” PTIO w/ restrictions.
- 10-year term for other PTIOs.
- All facility’s PTIOs expire on same date.

Types of PTI/PTIOs

Individual PTI/PTIO

- Customized for facility operations & equipment

General PTI/PTIO

- “Canned permit”, can view beforehand but can’t change
- Faster processing – 45 days or less
- Simplified application form – no emission data
- Certain operations and sizes only
- More categories being added

General Permit Categories

- Dry cleaning
- Boilers
- Stone crushing
- Ready-mix concrete
- Metal parts painting
- Oil & gas well sites
- Stationary diesel engines
- Roadways & parking areas
- Storage piles
- Mineral extraction
- Anaerobic digesters
- Natural gas compressor stations

More categories being developed

Ways to Apply for Permit

- **Hard copy**
 - Non-Title V facilities only
- **Online using Air Services (eBusiness Center)**
 - Title V facilities - mandatory
 - Synthetic Minor facilities - mandatory
 - Non-Title V facilities - optional

PTI/PTIO Application

Form 3150a



general company data,
emissions, and controls

+

Emission Activity Category (EAC) form(s)



equipment and process data,
very specific – 43 types of EACs

Form 3150a, Section I

- Facility address and contact people
- Applicable federal rules
- Permit Evaluation Report (PER) date choice
- Trade Secret claim
- **Signature**

Form 3150a, Section II

- Installation schedule
- Estimate of types & **quantities of emissions**
- Best available technology description
- Description of pollution control equipment
- Process diagram of equipment
- Stack and emission point data for modeling
- Request for voluntary conditions and limits

Emissions Data - Form 3150a

- Estimates of maximum emissions expected
- PM, SO₂, NO_x, CO, VOC, OC, Lead
- Hazardous Air Pollutants (HAPs)
- 303 Air Toxics (OAC 3745-114-01)
- Actual emissions (normal ops.)
- Requested emissions (max ops.)

Calculating Emissions

- Use emission factors (AP-42), material balance, stack test results, vendor info.
 - ❖ See EAC form instructions.
 - ❖ See Engineering Guides 4, 45, 80, etc.
- Make sure info regarding equipment and production capacities match those on EAC form.
- Normal and maximum possible (worst case) emission rates.

EAC Form Data

- Detailed specs and capacities of equipment being installed/operated
- Usage rates of raw materials, fuels
- Production rates of finished products
- Types of pollution control measures

How much does an air permit cost?

- No permit application fees
- One-time fee with issued PTI/PTIO
- Fees vary depending on type and capacity of equipment (\$100 – \$1,250 typical)
- Fee automatically doubles if already installed

See fee schedule at

www.epa.ohio.gov/portals/47/facts/feeschedule.pdf

Permit Process - Step 1:

Company completes PTIO application & submits it to the appropriate Ohio EPA District Office (DO) or Local Air Agency (LAA).

- Plan ahead for timing:
 - ✓ Construction schedule
 - ✓ Draft permit issuance
- Make sure the application is complete:
 - ✓ Signed by appropriate official
 - ✓ All required elements
(Sections I and II, EAC form, process diagram, etc.)
 - ✓ Forms completed for maximum operational flexibility

Common Pitfalls

- Incorrect forms
 - Find links to forms (Section I and II and EACs) at:
www.epa.ohio.gov/dapc/permits/permits.aspx
www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx
- No original signature
- Process flow diagram – either missing or does not match the application forms
- Insufficient information
 - Blank spaces on forms
 - No calculations
 - Missing pages

Additional Application Pitfalls

- Emission estimation deficiencies
 - Using outdated emission factors/guidance
 - Not calculating an emission unit(s) or facility's Potential-to-Emit (PTE)
 - Necessary to determine Title V applicability
 - Necessary to determine applicability for some major source MACT regulations
 - Necessary to determine major source NSR applicability

Additional Application Pitfalls

- Failure to plan for actual source operation in order to meet your needs
- Not reviewing draft permit terms and conditions for problems

Permit Process - Step 2

- DO/LAA reviews for Preliminary Completeness within 14 days, notifies company
 - Will notify you by letter
 - Name, phone number, and email address of permit reviewer is included in the letter

Permit Process - Step 3

- DO/LAA does **technical review**, writes permit, sends to Central Office (Columbus)
 - Usually takes 1-3 months
 - Stay in contact with district permit reviewer
 - Respond appropriately and promptly to requests for information – “**clock stops**”

Permit Process - Step 4

- Central Office performs review
 - Usually takes < 1 month; returns to district if needed
 - May receive request for additional clarification from DO/LAA or Central Office reviewers

Permit Process - Step 5

- Central Office issues permit usually within 2-4 weeks
 - Draft
 - synthetic minor permits
 - permits of high public interest
 - major NSR sources
 - Final
 - permits published on Ohio EPA's website:
www.epa.ohio.gov/dapc/newpermits/issued.aspx#IssuedPermits
 - also available through eDocs on our website



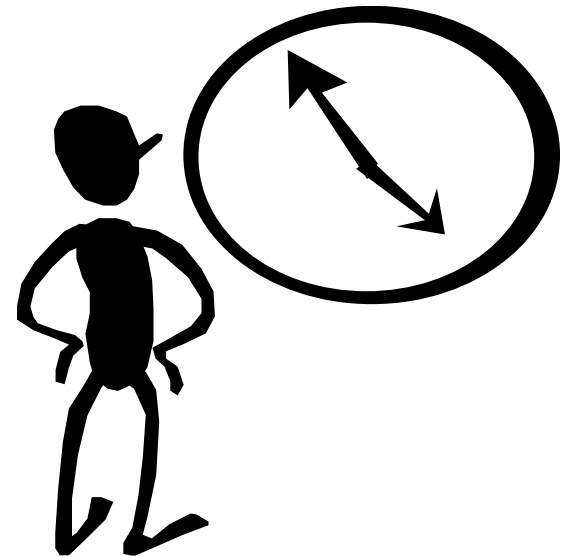
Poll

Ohio EPA has a statutory goal to issue installation permits within 180 days. What is the average number of days it takes Ohio EPA to process an installation permit?

- A. 200 days
- B. 180 days
- C. 121 days
- D. 56 days
- E. 47 days

Common Question

- How long will it take to get my permit?
 - Ohio EPA Days:
 - 56 average days (Goal 180)*
 - 29 median
 - Total Days:
 - 78 average days*
 - 42 median



**For installation and modification PTIs/PTIOs during calendar year 2020.
Includes public comment period, if applicable.*

Helpful Air Permitting Resources

DAPC Permits Web Page (forms, rush info, etc.)

www.epa.ohio.gov/dapc/permits/permits.aspx

Find Resources (FAQ, Publications and Training) “Answer Place”

<http://ohioepa.custhelp.com/app/home>

Air Services Info Website

www.epa.ohio.gov/dapc/airservices.aspx

OCAPP, one-on-one help with permit applications (small businesses only) 1-800-329-7518



Key Takeaways

- Four “Rules of Thumb”
- Stay on top of equipment changes at your facility
- Communicate with Ohio EPA regarding equipment changes and throughout permitting process
- Don’t be afraid of “Answer Place” or your Ohio EPA representative

Questions?



We Value Your Feedback

Please take the post session survey so we can continue to improve your Ohio EPA webinar experience!



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Thank You For Attending!

Up Next

- Mar. 12 – BWC Safety Congress Environmental Day →
 - What to expect during an Ohio EPA Virtual Inspection (3 - 4 pm)
- Mar. 25, 10:00 – 11:00 am → NPDES Construction Storm Water 101

View Session Recordings!

- Visit our website at epa.ohio.gov/default.aspx and click on the Training tab to view recordings of sessions you may have missed