

# Ohio EPA Air Pollution Permit Requirements

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2022 Ohio Safety Congress and Expo Supplemental Environmental Sessions



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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; and
- Participants will gain knowledge about what permitting resources are available.



**It's Poll Time**



# Poll Question

**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**

# Air Pollution: Facility Classification

## Title V – PTI/PTO

- Potential emissions exceed 100 TPY for criteria pollutants; single HAP exceeds 10 TPY; combined HAPs exceed 25 TPY

## Synthetic Minor - FEPTIO

- Potential emissions are restricted below Title V thresholds

## True Minor - PTIO

- Potential emissions are under Title V thresholds

## Permit Exempt

- OAC 3745-15-05: De minimis emissions
- OAC 3745-31-03: Permit exemptions and permit-by-rule

# 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.
- During an inspection, an 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 (i.e. visible particulate emissions)
- 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 (PE, NO<sub>x</sub>, SO<sub>2</sub>, 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(B)(1)]
- 2) Permit-by-rule provisions [OAC 3745-31-03(C)]
- 3) “De minimis” source exemption [OAC 3745-15-05]



# Air Permit Exemption

## 1) Permanent exemptions [OAC 3745-31-03(B)(1)]

- 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



Non-vented machining operations



Small solvent parts washers  
w/non-chlorinated solvent



**It's Poll Time**





# Poll Question

**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 (PBR) [OAC 3745-31-03(C)]

- Emergency generators
- Plastic parts molding
- Small crushers
- Crematory units
- Auto body shops
- Gas stations
- Gas-fired boilers
- Printing facilities
- Small roadways

**Pre-defined operating conditions and recordkeeping. Simple single page notification required, effective upon submittal - no waiting and no fee!**



# Emergency Generator



# Air Permit Exemptions

## 3) “De minimis” source exemption [OAC 3745-15-05]

- Emits less than 10 lbs/day of PE, NO<sub>x</sub>, SO<sub>2</sub>, VOC, CO, and Pb
- Less than 2,000 lbs/yr of hazardous air pollutants
- Can’t be subject to federal rules

Requires emission calculations to be kept on-site

- potential to emit (PTE) calculations – source operating 24 hrs/day at maximum rated capacity.



# 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 emissions calculations.
- **Step 4:** Assume what is not exempt needs a permit.

# Types of Air Permits

Title V facilities require two permits:

**Permit-to-Install (PTI)**

**Permit-to-Operate (PTO)**

All other non-Title V facilities require one permit:

**Permit-to-Install and Operate (PTIO)**



# Air Permits

- For existing units - equipment installed after January 1, 1974 - require an air permit
- A permit is required before installing and operating equipment
  - Certain construction activities are permitted prior to obtaining air permits in accordance with OAC rule 3745-31-33
- Permit issuance: 1-6 months to get, depends on complexity
- Permit expires 18 months after issuance if haven't started construction or entered into contract

# 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 (PTO)** covering everything for continued operation





# Air Permits By Facility Type

## Non-Title V Facilities: Permit-to-Install and Operate (PTIO)



- **True Minor Facilities** (> 6,000 small emitters)
  - 10-year term for PTIO
- **Synthetic Minor Facilities** (~ 800 that voluntarily restrict emissions to avoid more complex regs)
  - 5-year term for PTIO
  - Permit requires quarterly reporting
  - Federally enforceable restriction
  - 30-day comment period

# Types of PTI/PTIOs

## Individual PTI/PTIO

- Permit is customized for facility operations & equipment
- Referred to as “case-by-case” permit

## General PTI/PTIO

- “Canned permit,” can view beforehand but can’t change
- Faster processing – 45 days or less
- *Simplified application form – no emissions data*
- Only requires: General Qualifying Criteria form and an EAC form

# General Permit Categories

- Dry cleaning
- Boilers
- Stone crushing
- Ready-mix concrete
- Metal parts painting
- Oil & gas well sites
- Human crematories
- 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 True Minor facilities only
- **Online using Air Services (eBusiness Center)**
  - Title V facilities - mandatory
  - Synthetic Minor facilities - mandatory
  - Non-Title V True Minor facilities - optional



**It's Poll Time**



# Poll Question

**Have you completed and submitted an air permit application for a facility in Ohio?**

- A. Yes, I have without any external assistance**
- B. Yes, with the assistance of an environmental consultant**
- C. No, I have not**
- D. No, but I will need to in the near future**
- E. I am not sure if I need an air permit**

# Air Permit Application Forms: PTI/PTIO

## Part I: Form 3150a

- 1) **Section I** - General company data and signature
- 2) **Section II** - Control equipment info, emissions calculations, and process flow diagram

## Part II: Emission Activity Category (EAC) Form

Equipment and process data, very specific – 43 types of EAC forms (based on type of process)



# Part I: Form 3150a, Section I

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



## Part I: Form 3150a, Section II

- Installation/operation proposed schedule
- Description of pollution control equipment
- Stack and emission point data for modeling (if required)
- Best available technology description
- Request for voluntary conditions and limits
- Air emissions data
- Include the following attachments:
  - **Process Flow Diagram**
  - **Calculations**

# Emissions Data - Form 3150a

- PE, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, OC, and Lead
- Hazardous Air Pollutants (HAPs)
- 303 Air Toxics (OAC 3745-114-01)
- Estimates of maximum emissions expected – potential-to-emit (PTE) required
- Actual emissions (normal ops.)
- Requested emissions (max ops.)

# Calculating Emissions

- **Emissions Factor:**
  - Fundamental permitting tool for quantifying emissions
  - A representative value that attempts to relate the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant.
  - Sources: Compilation of Air Pollutant Emission Factors, AP-42, Volume I; material balance; industry groups; stack testing; WebFire; vendor info; etc.
- **Potential-to-emit emissions (PTE)** is the amount of emissions of an air contaminant which would be emitted from a source during a 24-hour calendar day or calendar year basis ( $24\text{hrs} \times 365 \text{ days} = 8,760 \text{ hrs/yr}$ )

# Calculating Emissions: Potential-to-emit (PTE) Example

## Example #1

- Process: Stone - Primary Crushing
- SCC: 30502001
- Max Annual Rate: 900,000 tons of Limestone
- Emissions Factor: 0.00059 lb PE/ton of rock

$$\text{PTE} = (900,000 \text{ tons rock/Yr} * 0.00059 \text{ lb PE/ton of rock}) * 1 \text{ ton/2,000 lbs}$$

**PTE = 0.3 ton per year of PE**

## Example #2

- Process: Glass Melting Furnace
- SCC: 30501404
- Emissions Factor: 10.5 lbs SO<sub>2</sub>/hr

$$\text{PTE} = (10.5 \text{ lbs SO}_2/\text{hr} * 8,760 \text{ hrs}) * 1 \text{ ton/2,000 lbs}$$

**PTE = 46 ton per year of SO<sub>2</sub>**



## Part II: 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

# EAC Form Example

## Emissions Activity Category (EAC) form #3103 Surface Coating Operations

8. Check the method(s) of coating application and provide the accompanying information:			
<input type="checkbox"/> Spray:	<input type="checkbox"/> Air Gun <input type="checkbox"/> Airless <input type="checkbox"/> Electrostatic <input type="checkbox"/> High Volume Low Pressure (HVLP)		
<input type="checkbox"/> Other, describe:			
<input type="checkbox"/> Electrodeposition:	Tank capacity (gallons): _____	Tank Dimensions (feet): length ____ height ____ width ____	
<input type="checkbox"/> Dip Tank:	Capacity (gallons): _____	Dimensions (feet): length ____ height ____ width ____	
<input type="checkbox"/> Roll Coating	<input type="checkbox"/> Brush	<input type="checkbox"/> Bead-Type Extrusion	<input type="checkbox"/> Powder Coating
<input type="checkbox"/> Other, describe:			
9. How are parts transferred in and out of coating operation? <input type="checkbox"/> Manually <input type="checkbox"/> Conveyor			
<input type="checkbox"/> Other, describe:			

# Air Permit Application Forms: PTI/PTIO

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# How much does an air permit cost?

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

See fee schedule at:

<https://epa.ohio.gov/static/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



**Permit Process - Step 2:** DO/LAA reviews for **Preliminary Completeness** within 14 days, notifies company by letter. The 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) for final review. Usually takes 1-3 months. If there are questions or concerns, the permit writer will reach out to you at this time.

**Permit Process - Step 4:** Central Office performs final permit 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
  - Permit Issued Draft (some permits must have a 30-day public comment period)
    - PTI and PTIO synthetic minor permits
    - permits of high public interest
    - major NSR sources
  - Permit Issued Final
    - mailed/emailed a copy
    - also available through [eDocs](#) on our website



# What is in an air permit?

- **Cover Pages** – General info and important dates
- **Standard Terms** – Same in all permits of that type
- **Facility-Wide Terms** – Apply to whole facility
- **Emissions Unit Terms** – Emission unit specific
  - Equipment description
  - Rules and limits
  - “Action” items (monitoring, record keeping reporting & testing)

# Key Takeaways

- Four “Rules of Thumb”
- Stay on top of equipment changes and modifications at your facility
- Maintain permit monitoring and recordkeeping requirements
- Communicate with Ohio EPA regarding equipment changes and throughout permitting process
- Don’t be afraid to ask questions and reach out for assistance





- Northwest District Office
- Toledo Environmental Services
- Northeast District Office
- Dept. of Public Health Division of Air Quality
- Lake County General Health District
- Akron Air Pollution Control
- Canton City Health Department
- Central District Office
- Southwest Ohio Air Quality Agency
- Regional Air Pollution Control Agency (RAPCA)
- Portsmouth City Health Department
- Southeast District Office

**The Division of Air Pollution Control's jurisdictional boundaries for District Offices and local air agencies**

# Division of Air Pollution Control Resources

- Permit application forms: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/permit-application-forms>
- Permit-by-rule (PBR) info and forms: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/permit-by-rule-pbr>
- General permit: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/general-permit-program>
- Permanent permit exemptions:  
<https://epa.ohio.gov/static/Portals/41/sb/publications/AirPermitExemptions.pdf>



# Compliance Assistance Request:

## Office of Compliance Assistance and Pollution Prevention (OCAPP)

- Non-regulatory , free, and confidential
- **Excludes Title V permit assistance**
- Assistance with permit applications and compliance with permit requirements
- [Visit our website](#)



Hotline

Chat

Contact Directly

(800) 329-7518

Click Chat Live:


Chat Live:



Chat Live: An environmental specialist is available to help with permitting, environmental requirements, and grant applications.

Email/Phone

# Air Permitting Resources: Help Center




Filter by product

Select a product ▼

Filter by category

Select a category ▼




 **Published Answers**

Results 1 - 10 of 201

**Do I need an *air pollution permit* for installing and operating a paint spray booth?**  
Paint spray booths are installed at a wide variety of company sizes and configurations (e.g., one booth vs. multiple booths; low coating usage versus high coating usage; etc.) The following...

**EAC forms for *air permits***  
An Emissions Activity Form (EAC) is an *air pollution permit* application form that asks for information pertaining to a particular type of *air pollution* source. Click here for a...

**Contact Us**

-  [Ask Experts for Assistance](#)
-  [Ask Ohio EPA a Question](#)
-  [Give Feedback](#)

[ohioepa.custhelp.com](https://ohioepa.custhelp.com)



**Confidentially contact us with your questions about environmental requirements - by calling our hotline, clicking on the chat or contact links. Note all other options are not considered confidential.**

Agents available via phone or chat 8 a.m. – 5 p.m. Monday through Friday.

## Call



Call our toll-free hotline -  
**(800) 329-7518** for help with permitting and  
environmental requirements.

## Chat Live:



Chat Live: An environmental specialist is  
available to help with permitting,  
environmental requirements, and grant  
applications.

## Contact



Contact an environmental specialist in your  
area directly  
**by email or phone.**



# Questions

Want answers?

Ask the staff a question

Send

## Questions

- Please continue to submit your text questions and comments using the Questions Panel
- For more information please contact:  
**Samira Deeb**  
[Samira.Deeb@epa.ohio.gov](mailto:Samira.Deeb@epa.ohio.gov)  
(614) 705-1013
- Note: Today's presentation is being recorded and will be provided within 48 hours. The presentation slides can be found by clicking on the Handouts Section of your control panel



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Visit our Customer Support Center at [ohioepa.custhelp.com/app/apply](https://ohioepa.custhelp.com/app/apply) to apply.

## Encouraging Environmental Excellence (E3)

- Recognizes organizations for exceptional achievements in environmental stewardship
- For businesses, trade associations, professional organizations, non-profits, higher education institutions, etc.



## Encouraging Environmental Excellence for Communities (E3C)

- Recognizes communities for exceptional achievements in environmental stewardship
- Open to local governments



## Encouraging Environmental Excellence in Education (E4)

- Recognizes schools for their achievements in environmental stewardship and efforts to involve students in environmental topics
- Open to K-12 public or private schools



# Thank you for attending!

## Up Next

- March 8, 3 p.m. – 4:00 p.m. → BWC Safety Congress & Expo Live Sessions - [What to expect during an Ohio EPA Inspection](#)
- March 9, 10 a.m. – 11 a.m. → BWC Safety Congress & Expo Live Sessions - [Ohio EPA's Regulations – What You Need to Know to Stay Out of Trouble](#)
- Environmental Day April 5, 2 p.m. – 3:00 p.m. → [Water Resource Restoration Sponsorship Program](#)

## Register for Upcoming Sessions

- Visit our website at <https://epa.ohio.gov/about/media-center/events> to see the date and time for upcoming webinars and other Ohio EPA events
- Visit our website at [epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/training](https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/training) to view recordings of sessions you may have missed
- Create an **Ohio EPA Customer Support Center Account** at <https://ohioepa.custhelp.com/> to receive email notifications of future webinars

