

P & E minutes
December 11, 2001
Lazarus Government Center
122 S. Front Street

Attendees: Jim Orlemann (CO), Kyle Nay & Dan Canter/SEDO, John Oleachea & Sarah Harter/RAPCA, Mike Hopkins (CO), Adam Ward (CDO), Harry Schwietering, Adam Zolciak (Toledo), Ed Fasko (NEDO), Frank Marcunas (Akron), Jim Braun (Cleveland), Rick Carleski (CO), Mike Ahern (CO), Cindy Charles (Portsmouth), Bud Keim(Canton) and Tammy VanWalsen (CO)

Item 1- charts of Title V's, FESOPs, etc- JO: 894 actions taken, 571 remaining. 71 actions last month (November 2001). Schedule for completing work, not yet made. USEPA will issue notice of deficiency in early April. Bob will be asking for the development of a schedule (next 3, 9 or 12 months). Historically we can do about 50 actions /month, therefore they will take about 9 months to complete these actions assuming that December goes well.

?'-s- USEPA has agreed to the 10-day review rather than 45-day review, will they continue? Probably will continue because of pressure to get the permits issued.

ALOAPCA- Jim Braun- selected to take Franks' place.

Mike Ahern- Item 2- averaging 60-65 state PTO's /month. Caught up now. PTI's- 40 permit actions per issuance (80/week). Record management officer Erin, will fill her spot when they can. TRI data, along with the other requirements of the records office. Please be patient with the new person during training. New year for blue cards for the upcoming billing cycle. Will be asking for double checks for fee categories in the beginning along with updating of the HPL's. Certificate of conformance forms- will check with Tom Rigo to see if there are any changes prior to mailing. Will notify the Title V facilities that have final permits that they will be asked to submit them.

Installation certificates for PTI's, can they get them? Not getting them routinely, only if asked for specifically. Need to know when the units go in, right now they are coming in to CO because of the way PTI 2000 is set up. Survey results mandated the two step process. New record officer/clerk position filled will take on some of this. Only way for the field office to know that they should be requiring the PTO applications. Mike Ahern will follow up.

Item #3- EG #71- PAG technical sub committee. With Tom Kalman, will then be moved on to Bob H. for final issuance. Next week.

Item #4- CO at asphalt plants- general discussion-burner adjustment schedules, how to determine on-going compliance, testing issues, no maintenance 30-days prior to the test, can they be made to put in a CEMs, CDO- shelley- burner maintenance should be at least annual or upon fuel change. When are CEMS appropriate? Mass mailing idea, unilateral orders for testing of existing units. Follow up with database and then with compliance assistance package/who needs

to test. Basic problem is that the emissions factors used to develop the allowable emissions rates were basically wrong.

Item #5 - Meeting scheduled for the 18th.

Item #6- Tom Kalman working on the document- not finished yet.

Item #7 New Source Review- distribution of DHWM MACT guidance

Cheryl Suttman added to PTI review list. New person starting next Monday, will then be fully staffed. No DAPC experience so it may take awhile. 180-day clock starting January 1- looking for clarification and adjustments to PTI 2000. Committed to the process improvement/industry group- all PTI's will be issued within 180 days ("our time") from the completeness date. Different priorities for permits. Anything received after 1/1/02 will be subject to the 180 day review. Get the old ones done now, because the new ones will have to take precedent. Mike gave some text for PTI 2000 so that comments/suggestions for that page can be incorporated. PTI 2000 will be used to track the 'clock'. Misty still working on the training program, anticipate it will be ready by spring. Manual being laid out the same way the training that will be held. November 30, 2001, latest Chapter 31 revisions effective- to address the issues that the feds had concerns with, will be submitted as a sip revision for PSD. Developing a "clean copy of the new rules" and uploading to the web. Whole agency going through 31- rule revision to deal with PTI's, other division splitting up into their own rules, will go out for internal review within the next couple of weeks.

New- PAG technical sub committee working on engineering guide on when emission factor changes. Package of what's been developed so far. Need feedback and EG guide #. If change triggers NSR or enforcement, not covered by this guide- may do others in the future. Wants input, comments so that they can be distributed at the next technical PAG group meeting on January 10, 2002. Need to get the comments to Mike H. by January 1, 2002.

?- diesel generators for a rock crushing plant- NOx emissions about 30 TPY, short stubby stack, do they need to model? Mike H- will have to get back with us. Worked on toxic part, but not on the non-toxic side. Looking at exempting roadways, parking areas. Working on specific permit- send it to Misty and Mike & Bill Spires will get back with Jim Braun.

Item 8- Inspection and enforcement AFS federal database. Lisa Holscher of Region 5 said that as of the end of the year, Ohio EPA/DAPC not doing it. Will have to implement it by April 1, 2002. Will ask for formal update. Identification of locations that are not permitted an ongoing problem. Hampers some of the computer work.

Item 9- Old Business -multiple emissions units controlled by common control device- 6 melting furnaces combined to one baghouse. One main concern is whether or not it is feasible without rule changes to combine. "Grouped" emissions unit approach. Questions developed, not been looked at recently. Jim Braun will redistribute them. Still feels that we are spending too much time developing these with no benefit to the environment. Braun reached the conclusion that

original rules not designed for unit-by-unit- but facility-wide, etc. figure two analyses- to create allowable rates for ‘groups’ - for electroplating units, guide allows for one limit for the group based on the outlet emission rate rather than the individual limits. Enforcement cases in past have created real problems when grouped because individual units can’t comply.

New business- cooling towers- AQM & P bringing up new issues regarding how these units were permitted in the past. Different cells that can operate independently, combined cycle turbine with a cooling tower as part of the system. Permitting of individual cells or as one emissions unit. 8 cells. 1-8 can operate at any time. If we are going to develop guidance on it, SEDO would like to make sure that the questions will be addressed in the guidance. Combined cycle turbine with cooling tower using well water, but various problems with dissolved solids where a certain amount of the water taken off and the leftover particulates can be considerable. (9TPY for the new SEDO site).Not de minimis, must be addressed in the permits.

Send mike H. comments/questions on how to permit these facilities. Some require water permits as well, trying to combine those. How to test them. What is the record keeping requirements. Gavin situation of fallout of particulate emissions from various emissions units, SEDO trying to address. Should they test for dissolved solids?

Old business- conversion from “as propane” or “as carbon” to VOC. Still a problem, Bob Generally working with individuals to correct.

21-07- revision of the rule. Director shot down appendices approach because it would add ‘hundreds of pages.’ Instead Bob asked us to revise it to clarify how we interpret the rule. Totally revised it. Instead of appendices, we will develop database to place on the web to show who is subject to this rule. Will be very controversial rule change. Attorney/industry intent on elimination of the rule. Comments to Todd Brown by the end of the month. One major change (see first change) (A)(2)(d)- not applicable to new sources after this rule revision. Use BAT instead. Added 21-07(G) wording to address the Ashland Chemical appeals. Encourages suggestions. Eliminating the hourly emission requirements, focusing on the daily. Mike hopkins- spent a lot of time on facilities who are required, but what if we find someone else. JO will be adding language to say that if we find someone not on the list, then we reserve the right to put them into the tables. Must file this with JCARR by March 2002.

Thought that Chapter 17 would go through, but now pulled from the agenda, so it may go before the particulate regs are finalized.