

## P & E minutes December 9, 2003

Permitting & Enforcement Committee Meeting - December 9, 2003

### **PBR**

R. Carleski - talked about NSPS Kb revisions and how to proceed. Will drop the PBR and expand the exemptions in the rules.

Leaves 4 PBR:

1. Boilers - working on draft rule language. Goal by December 31, 2003. Distribute to the DO/LAAs for comment.
2. Printing - small and mid sized. Industry wanted more categories. Small <10 tons; mid-size <25 tons. J. B. - what about MACT? Shouldn't be an issue because less than 25 tons.
3. GDF - Had a lot of field office involvements. Industry has not responded to first drafts. Expects more than one draft.
4. Auto body shop - has not been submitted by Industry. One or two months max, reasonable PTE. Modeling to define no toxics problems less than 10 tons.

Format of the PBR will be different than in past. Will follow like a permit; easier to read.

Jenny M. - when will they be done? Original by January 31? Still in the works.

Adam W. - will there be any examples of how to calculate PTE? Rich said rule will contain how to calculate PTE

Mike H. - there will be a lot of other changes to the rules (NSR reform, etc.). Timing will be whether one package or several different packages. Threshold group is still working on the rules revision.

Jeff Canan - asked about whether nuisance will be taken into account.

DRAFT MEMO About Stack Testing Starting by Noon or EPA will not attend

Stack test needs to start by noon - memo draft. It seems that most people tend to work with the companies to make sure they get the testing done by a reasonable time. Memo needs formalized from Bob H. as a statement of authority

Ed Fasko will send to all in group to get comments from all.

### **Engineering Guide** rewrite - #33.

We had a conversation about the changes the director wants to sign all maintenance shutdown approvals. SEDO shared their information regarding past approvals through director's office and gave everyone copies of one of their past approvals responding to statements made by Tammy Van Walsen in the last meeting (none had gone through DAPC/CO signoff in 2 years of records).

Jeanne Mallett was at the meeting and stated that the approval letter for maintenance shutdown must be signed off by the Director to be legal. Jeanne also noted that you need to include a briefing memo with the shutdown request (example provided by SEDO).

Title V/Permit Application submittal times(guidance):

Jeanne Mallett was asked to give interpretation of the rules regarding what to do when the following situations apply and a facility submits their renewal applications.

1. If Title V permit is submitted prior to expiration and it is complete but performance testing is done after the submittal (like many of our permits require testing in the last 6 months of the permit) Do they still have shield? Yes, but they need to supplement with other information when they get it back from testing.
2. Late application that has been deemed complete? Do they have shield? They have no right to operate at all if they miss the deadline. Exercise enforcement discretion in these cases. Send an NOV.

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3. If facility submits renewal after expiration, then they really are in violation. The companies must realize that they are not allowed to operate without submitting the application. So they really should shutdown. The use of enforcement discretion in this case is harder. Put out NOV in this case.

Tammy Van Walsen will provide an edited version of Jeanne Mallett's responses.

SEDO brought up some questions about Title V application completeness. How far do we go to make sure that all information is filled in? This has to do with the Draft guidance Checklist. More on this later. CO will look into it.

Mike Ahern will coordinate minimum criteria comments. Please submit to him.

### **STACK TESTS** -Witnessing runs

NWDO: can we only witness one or two runs instead of all three if we feel comfortable with the testing company. Long discussion about the topic. Jim O. says they recognize that additional tests and less resources. The division is having a priorities meeting December 15<sup>th</sup> to discuss these type of things. Continue the same for now.

### DELTA T Discussion

Jenny Marsee - RAPCA has had problems with catalytic oxidizer unable to meet 80% temperature difference.

Jim O. - Dealt with this problem before w/MacTac and Pechiney. Changed the terms to deal with this issue, but still required other MRR. Dave Morehart can give terms to everyone. Email/writing to Kyle. It will be a minor mod because you are adding MRR.

Frank Markunas sent an email for the premise numbers MacTac or Morgan Adhesives 1677110026. This was related to STCs wording regarding the delta T problems for cat incinerators.

Dave sent out an Email on 12/09/03 regarding Pechiney. Here it is:

Proposed Catalytic Oxidizer Language for Pechiney Plastic Packaging

(Note: Proposed language herein is for control by a catalytic oxidizer. Appropriate language will also be needed for control by thermal oxidizers).

#### A.II Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic oxidizer, as determined by the catalyst activity testing, shall be at least 90% at a test temperature that is representative of the normal temperature at the catalyst bed inlet. Solvent loading during the catalyst analysis shall be consistent with the test laboratory's normal testing protocol.
3. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the catalytic oxidizer is not in operation.
4. All ventilation fans associated with this emissions unit and the catalytic oxidizer shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).
5. When employing the catalytic oxidizer, all bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations

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specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the catalytic oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

6. The average, total exhaust flow rate from this emissions unit to the catalytic oxidizer shall not be less than XXXX standard cubic feet per minute (scfm), as documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

### A.III Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the oxidizer's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day:
  - a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the oxidizer's temperature chart to determine the temperature differential across the catalyst bed.
  - c. A log of the operating time for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Each bypass of the collection system and/or control device shall be logged as to the date and time.
3. The permittee shall perform an inspection of the catalytic oxidizer, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on February 26, 2002, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in section A.V.3, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in section A.V.3.
4. The permittee shall maintain a record of the results of each annual inspection of the catalytic oxidizer, as well as the results of each catalyst activity test required in section A.V.3.
5. On an annual basis, the permittee shall inspect the electronics of the catalytic oxidizer interlock system used for this emissions unit to verify that the signals between the catalytic oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that an interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.
6. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the average, total exhaust flow rate from this emissions unit to the catalytic oxidizer, in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.
7. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.
8. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

### A.IV Reporting Requirements

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1. The permittee shall submit quarterly summaries of the following records:
  - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) did not comply with the temperature limitation specified above; and
  - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed (as determined by the continuous temperature monitor) was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

NOTE: Information submitted pursuant to section A.IV.1.c is not relevant for determining compliance with any operational restriction contained in section A.II.

2. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.3. These reports shall be submitted within 45 days after each catalyst activity test is performed.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):
  - a. each time the interlock system stops the operation of this emissions unit because the catalytic oxidizer is not in operation;
  - b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.6, based on the records maintained pursuant to section A.III.6 of these terms and conditions, and the magnitude of each deviation; and
  - c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.
4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the catalytic oxidizer interlock systems, based on the records maintained pursuant to section A.III.5 of these terms and conditions.

### A.V Testing Requirements

1. Compliance with the capture and control efficiencies in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Capture Efficiency:

a capture efficiency which is at least 65 percent, by weight

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
  - 1.b Control Efficiency:

a control efficiency which is at least 90 percent, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the 90 percent control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 65 percent capture efficiency limitation was performed in January/February, 1999.)
  - c. The test method(s) which must be employed to demonstrate compliance with capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or local air agency, and while the emissions unit is being vented to a control device.
  - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the

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USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- g. During each test run, the permittee shall measure the average, total exhaust flow rate from this emissions unit to the oxidizer system, in scfm.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, a diagram of the path of emissions from each piece of equipment to a control device, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in section A.III.3. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

US EPA is requesting OEPA to fill out a new form:

The form is titled "Performance Track Applicant Compliance Screening Questionnaire". Don W. wanted to know if anyone else has had to fill out. No one else has been asked. Jim O. said to Don W. not to fill out until Bob H. says that he needs to. Don was very happy with this answer.

PM-10 limits in permits PSD triggering sources. What test should we use 1-5 or 201-202? This issue is big. When we put in these limits, how do we determine compliance with this?

Those present also explained that some NSR reviewers are requiring PM-10 limits for state only permits as well. Mike Hopkins stated that he needed to talk to his NSR staff to make sure that PM 10 limits only are inserted into permits were they are required. Much discussion about proper testing methods and the problems with them. More on this issue in the next meeting.

Mike H. doesn't have a precise answer right now.

### **Title V - Permit and Issuance**

IEUS Moving IEUs to federal side. It seems that the How is the problem with USEPA right now. Method is too broad according to US EPA. OEPA will not be issuing any finals until the issue gets resolved.

DO/LAAs were handed out lists of remaining Title V they were asked to consult with DAPC/CO on time frames for getting remaining 81 permits issued. Several of the attendees from the DO/LAAs stated that they do not have any control over when the permits get issued. Title V permit reviewers will contact DO/LAAs soon to get their recommended schedules. The director was very concerned that the schedule is as hard as possible and that the dates will not be revised.

### **NSR**

- E.G. of EM factors - no progress.

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- "once in, always in" - Abdur submitted a revised guide. There have been some exceptions. He asked for more comments by January 5<sup>th</sup>. Several changes have been made.
- NSR reforms - collecting comment will be done with info gathering in January.
- Synthetic minor terms issues with defining all E.U.s in the permit. It looks like there are several different ways to do it. Way to do it is to list E.U.s This limit should be written explicitly and MRR must be developed to support. Mike H. - same method either TV or PSD synthetic minor.
- Portable drills - discharge of dust onto the ground. Causes a problem because the resultant piles have very fine particulate and alot of dust is generated off of piles. How are we going to handle these? NWDO will keep updated.
- Crematoriums - mercury BAT? What are emission factors for mercury? Do they have enough data to support an EF. Will be establishing BAT for mercury? Not enough information right now. Continue writing permits with current data.

### PMU

- Mike Ahern - questions on Title V renewal/put a statement in email subject "Title V Renewal"
- MACT - November 19<sup>th</sup> email - a lot of factors impact how we will put it in. Talked about 3 options. Look for more emails on this subject from Mike A.
- WP/STARs - stopped the conversion process. DO/LAAs can begin writing new/renewals the old way. A "patch is going to be created in STARs so that a draft can be made from a previously issued final permit.
- Patch - ITS is talking to Erica to get the patch.

Next meeting February 10, 2004