

Minutes from April 13, 2004 P&E Meeting

Attendees

Jim Braun, Cleve
Mike Ahern, DAPC
Adam Zolciak, Toledo
Mike Pluetz, HCDOES
Don Waltermeyer, NWDO
Sarah Hunter, SEDO
Kyle Nay, SEDO
Kay Gilmer, SEDO
Ed Fasko, NEDO
Jeff Canan, RAPCA
Jim Pellegrino, SWDO
Jenny Marsee, RAPCA
Frank Markunas, Akron
Mike Hopkins, DAPC
Jim Orlemann, DAPC
Pat Shriver, Canton
Cindy Charles, Portsmouth
Adam Ward, CDO
Mike Riggleman, CDO

Co-Chairpersons: Jim Braun and Jim Orlemann

Preliminary discussion regarding the purpose and direction of the group. Like to use the group to define the problem but continue to use subcommittees to work on specific solutions. We have to be willing to put some work in to resolve the issues rather than just discussing the problems. Strong desire from field offices to have more formal documentation of resolutions, policy or eng guides, web site postings of solutions. Would like a central location to go to for various issues and answers. How to? Try problem statement, background discussion, solution, then publication.

First, how do we utilize this meeting and/or group? Everyone needs to think about it and be ready for discussion next meeting

Agenda Items/Topics Follow

T 5 Permits etc.

Two Handouts from Jim O. Graphs prepared by Ahern showing remaining issuance steps for the last T5 permits. ***Triple Ps are critical and require our attention at this time. No new deadlines have been set for getting all Title V permits issued Final. The work on the first round of Title V permits is delaying work on modifications, renewals, and appeals due to a resource problem in Central Office with not enough people to handle the workload.***

Also, a list of FESOPs to be reviewed by central office. ***Please make sure technical support has been provided to Jim O. for these permitting actions.*** Technical support includes but is not limited to: Permit application, PTE analysis for all EUs, FESOP strategy analysis, Syn Minor Write-up.

Renewals are second priority. Central Office is not ready to issue permits without review. Field offices should still continue to process renewals (?). **Renewal training has been delayed until the summer.**

Regarding Engineering Guide 61, USEPA will not accept actual HAP emissions less than 20% of major source threshold for avoiding MACT. The 20% allowance is for Title V purposes only.

Hearing has been set for DP&L appeal on April 28. The resolutions of this appeal may significantly affect Title V permits.

Enforcement

No real update.

New Source Review

Mike H. Time is being spent on NSR reform. Revised draft rules on schedule, now with legal for their review, then they go out to interested parties. Exemption rules following close behind; **however, these will be handled as a separate rule package from the NSR reform package.** Some work going on with Permit by Rule. Threshold rule may be close but last minute issues are delaying the process.

RACM BACT Portable drills - Don W. - Generally permitting drilling activities under mineral extraction part of the permit. Also may have portable permits for drilling operations. NWDO issued NOV for VEs and related problems of discharge pile and subsequent blasting and/or weather conditions re-entraining the collected drilling material. What should be done at this point? Some discussion on establishing BAT for drilling operations. ***Don will continue to investigate and work on this problem.*** **Need to see what other states are doing to address this situation. Possibly have the company do a BAT/RACM study. For Appendix A areas, at a minimum they must comply with the 20% opacity limitation. Don will also check with the Ohio Aggregate Society.**

Don W. Handout on mercury emissions from cremations. What to do at this point regarding permitting activities? ***Mike H. will ask P. Koval to look at the article and decide if Ohio needs to pursue issue any further.*** **Currently, we do not need to include mercury limits in the crematory permits.**

MACT in PTIs - T&Cs should be included similar to T5 **(insert entire MACT in Part II facility terms)** except when time constrained. **If rush permit, just need to cite the MACT and include key elements.** Important, only way to enforce MACT is with STCs. All MACTs should go draft

except for Dry Cleaners, chromium electroplating, small printing operations, possibly more. Can we get a final list of those that do not need to go draft? **Mike H. to provide a list of MACT categories that can go direct final at the next meeting.**

Secondary Emission from Control Devices - Adam W. Must include additional emissions from control devices in Permits. (ex. incineration) Use de minimis or other exemptions as a guide for inclusion, or 1 tpy. **If emissions are less than de minimis or less than 1 tpy, do not need to include in the permit. For situations where multiple units are controlled by the same control device, need to include the control device emissions in the terms for each emissions unit and explain that they are dedicated to the control device.** This is a possible subject for “published guidance.”

April 1 deadline for using new PTI form. Your discretion for accepting old form. Send back or accept. Larger companies should use the new form - more flexibility with smaller companies. **If old application is used, still must provide all necessary information.**

BAT for transfer stations - NEDO is requiring a company to revisit BAT. Need more information from other states. Need to identify BAT for similar sources.

Multiple EUs w Common Controls

Jim Braun. Meeting set up for today with OEPA to discuss this concept and issue, possibly add it to “new source review reform.”

CETA

Curt Marshall issue regarding PCEs and stack testing and CETA. Other CETA issues. See attachment to e-mail from Curt Marshall regarding potential new AFS (CETA) Reporting Requirements. **Most of these issues identified are already handled by CETA. Other remaining issues have been discussed with USEPA in the past and there is disagreement. We will not make any changes to CETA unless USEPA is able to provide good reasons for making changes. Frank Markunas will be attending meeting with USEPA and will provide a summary of the meeting.**

How is noncompliance defined in CETA? Actions including warning letters on up are viewed as noncompliance. USEPA defined noncompliance in a document that Jim Orlemann will provide to the group.

PMU

Mike Ahern Modification and renewal guidance has been distributed somewhat. Additional guidance is work in progress and forthcoming.

MACT guidance provided at the MACT training seminar **for including MACT in Title V.** Consult attendees in your office for specifics.

Annual T5 Certs and dealing with new format. Questions and issues to Mike Ahern.

Notice of Deficiency will not be issued for several work related areas but T5 issuance remains a problem with DOJ.. Anything to improve T5 issuance rate will help with avoiding Notice of Deficiencies.

Landfill Operating Scenarios

Mikes Hopkins **inherited this project from Tammy**. No update.

VE Guide

May be close to complete. Problems due to Tammy leaving and responsibility for completing. *Jim O to take the lead.*

Appl Guidance on 17-11 etc. Finalize or drop from agenda? Jim O. Important enough to issue as a Eng Guide. It will be done no matter what. *Use as draft guidance and remove from Agenda.*

Stack Testing

Meeting over, 1p. Save remaining for next meeting. *June 8, 2004 next meeting, 9:30a.*