

**Air Permitting/  
Stars2 Call  
01/16/2014  
9:30 - 11:30AM**

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## Agenda

#	Topic	Speaker
<b>Permitting</b>		
1	<p>Canton LAA has the following topic:</p> <p>In the lost-wax /investment metal casting industry, they commonly use mold pre-heat ovens. The mold pre-heat ovens are typically used as a dual purpose: first burning out the residual wax from the mold, then pre-heating the mold so it is hot for pouring molten metal into it. The majority of the wax is typically removed by a previous step by melting it out so the wax can be recovered. However, this is not a complete removal operation, so residual wax, of up to 0.5-1 pound of wax per mold, is required to be burned out in the oven for proper metal casting quality.</p> <p>1) Do other offices have experience with these operations?</p> <p>2) Do you consider the incinerator particulate emission limit in OAC 3745-17-09 to be applicable to the wax burning operation? [Definition from 3745-17-01(B)(9): <i>"Incinerator" means any equipment, machine, device, article, contrivance, structure, or part of a structure used to burn liquid, semi-solid or solid refuse or to process salvageable materials by burning other than by open burning as defined in rule 3745-19-01 of the Administrative Code.</i>]</p> <p style="padding-left: 20px;">a) If yes, in which way:</p> <p style="padding-left: 40px;">i) the wax is considered "refuse" being burned [Definition from 3745-17-01(B)(19): <i>"Refuse" means any discarded matter, or any matter which is to be reduced in volume, or otherwise changed in chemical or physical properties, in order to facilitate its discard, removal or disposal.</i>]</p> <p style="padding-left: 40px;">ii) the mold is considered the "salvageable material" that will be "reused". [Definition from 3745-17-01(B)(20): <i>"Salvageable material" means any material which is to be reduced in volume, or otherwise changed in chemical or physical properties, in order to facilitate its reuse.</i>]</p> <p style="padding-left: 20px;">iii) another reason?</p> <p style="padding-left: 20px;">b) If no, why not? How is burning wax different than burning paint off of paint hooks or plastic off of wire?</p> <p>Incinerator Rule questions:</p> <p>3) What is the intent of the OAC 3745-17-09 incinerator rule? [This rule was first effective on 02/15/1972. This was before the first USEPA incinerator NSPS Subpart E which was effective 07/25/1977 for new or modified sources after 08/17/1971, but is written very differently than the OAC].</p> <p>4) In the "Salvageable Material" definition, why the word "reuse" versus "use"?</p>	<p>Mike Hopkins/ Andrew Hall</p>

2	<p>From Bryan Sokolowski, CDAQ</p> <p>I recently ran into a situation where a Stage II GDF tore out their old Stage II dispensers and replaced them with new Stage I dispensers which is referred to as a “Raze and Rebuild” (OAC Rule 3745-21-09-DDD(4)(g). CDAQ performed an inspection on 12-13-2013 and witness the required static leak test. During the inspection the owner of the gas station filled out an updated PBR notification form. During this CDAQ realized that the current PBR Notification form, <a href="http://epa.ohio.gov/portals/27/pbr/GDFPBR.pdf">http://epa.ohio.gov/portals/27/pbr/GDFPBR.pdf</a>, has incorrect information on it. Both in the form and the instructions for filling out the form. There is no statement for the allowance of a Stage II station to become Stage I after they perform a “raze and rebuild”. Which is allowed in OAC Rule 3745-21-09-DDD(4)(g).</p> <p>My question is. Does Ohio EPA intend on updating the forms and instructions to allow for “raze and Rebuilds”? There are also several OCAPP guidance documents that make no mention of this. [NOTE: this question was posed prior to the recently finalized OAC revisions to Stage II Requirements]</p>	Mike Hopkins/ Andrew Hall
3	<p>Steve Alspach, SEDO</p> <p>PBR page vs. Permit page... know where to look to see if issued</p>	Erica Engel-Ishida
<b>Stars2</b>		
4	<p>PIDM/PIER Updates/Reminders</p> <ul style="list-style-type: none"> <li>• PER Updated as of 1/1/2013-12/31/2013 report</li> <li>• TVCC no longer needs to be sent to USEPA unless trade secrets are submitted.</li> <li>• FER reminder letters sent</li> <li>• NTV FERs mailed today – Send Linda updates for change in primary NTV contact for each office.</li> <li>• Don’t forget to log into the Answer Place!</li> <li>• Upcoming Training: <ul style="list-style-type: none"> <li>○ Emissions report reviews in Stars2</li> <li>○ FCE, Site Visit, Emissions Tests</li> </ul> </li> <li>• Blank ITR forms on the web</li> </ul>	Erica Engel-Ishida