

Air Permitting
LIVE
04/21/2011
9:30 - 11:30AM

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Agenda

1	<p>2010 TV and SMTV Emissions Reporting FER/EIS</p> <ul style="list-style-type: none"> • Report Review Metrics • Please review these within 30 days. 	Erica Engel-Ishida
2	<p>CDO – Kelly Toth</p> <p>As we have been working on more Title V renewals, questions keep coming up related to the revocation of rule 3745-21-07(G) and how that affects BAT that don't seem to be addressed in EG #77. I'm guessing these may be universal questions so it may be a topic for the Stars 2 call.</p> <p>1.) How do we handle a permit where 21-07 was used as federally enforceable restriction on potential to emit. For example, we have a permit for an emissions unit that has a PTE of 100 tons/year but was permitted as a 21-07 source giving it a limitation of 7.3 tons per year. BAT for the source was listed as equivalent to 21-07. Would this permit need a federally enforceable limitation once 21-07 is revoked or will restricting the unit to 7.3 tons per year under BAT be enough protection for the company?</p> <p>2) Also, in the situation above, would an administrative modification to the PTI be necessary to remove 21-07 and require the 8 lb/hr and 40 lb/day limitation under BAT only or can the change be made in just the Title V renewal?</p> <p>3,) Finally, if BAT is listed in an issued PTI as equivalent to 21-07 but we will be removing the reference upon rule revocation and including the 8 lb/hr and 40 lb/day OC limitation under BAT, should we retain the applicability to only photochemically reactive materials? If so, that may be difficult without the rule to reference or if not, wouldn't the inclusion of all non-PRM's be considered more stringent than 21-07?</p>	Permitting
3	<p>SEDO – Kimbra Reinbold</p> <p>With the relatively recent promulgation of the engine and boiler MACTs that impact area source facilities, I have questions related to the exclusions to de minimis under OAC rule 3745-15-05(C)(1) and (2) and the permanent exemptions in OAC rule 3745-31-03(A)(1). Specifically:</p> <p>(1) Even very small engines are now subject to requirements in 40 CFR Part 63, Subpart ZZZZ. In some cases, these engines may otherwise be considered de minimis, but it appears they may not be eligible under the exclusion in OAC rule 3745-15-05(C)(1) because they are subject to this MACT. The MACT for smaller engines only requires work practices, so it is the size of the engines alone that result in emissions less than 10 pounds per day, not compliance with the MACT. Do these small engines still qualify for de minimis (because the federal rule does not limit the engines to <10 lbs/day), or does the applicability of the MACT automatically disqualify them regardless of the effect of the MACT on criteria pollutant emissions?</p> <p>(2) The newly promulgated major and area source boiler MACTs (40 CFR Part 63, Subparts DDDDD and JJJJJ) include as affected facilities smaller boilers, both existing and new, that formerly were permit exempt pursuant to OAC rules 3745-31-03(A)(1)(a) and (b). These MACTs require both notification and work practice requirements, and more for major sources, so it appears they are not excluded by the introductory paragraph to OAC rule 3745-31-03(A)(1). Are these boilers no longer permit exempt as a result? How does Ohio EPA intend to address existing boilers that were determined to be permit exempt prior to promulgation of these MACTs?</p>	Permitting

<p>Andrew Hall, Brittany Smith, Mike Kramer (HCDOES)</p> <p>Big picture goal for Boiler MACT T&Cs: The Boiler MACT (40 CFR 63 subpart DDDDD) was published in the Federal Register on March 21, 2011 and it is now effective on May 20, 2011. Terms and conditions need to be developed for this new standard. What is OEPA's strategy to accomplish this task and what T&Cs should be used in interim before Cheryl's T&C are finished? How will U.S. EPA's Reconsideration process for this rule affect the language in the T&C?</p> <p>HCDOES drafted a set of IBR Boiler MACT T&C's (to use before Cheryl finishes her's?). When drafting the T&C, they were considering the reality of the Reopening for Cause filed along with the Boiler MACT. There is in all likely-hood going to be significant changes to the Boiler MACT. (Attachment 1)</p> <p>There are a number of items U.S. EPA has decided will be up for Reconsideration for this rule - this list is attached and useful is so that people can be aware of what might change in the rule and the permitting implications down the road (e.g., Title V permit modifications). No specific rule citations were include in U.S. EPA's proposed Reconsideration Notice, so Brittany went through the Boiler MACT and made an educated guess as to which specific rule citations may be altered due to this notice. (Attachment 2)</p> <p>CDO/SEDO Boilers and OAC 3745-31-03(A)(1): The newly promulgated major and area source boiler rules (40 CFR Part 63, Subparts DDDDD and JJJJJJ) include as affected facilities smaller boilers, both existing and new, that formerly were permit exempt pursuant to OAC rules 3745-31-03(A)(1)(a) and (b). These rules require both notification and work practice requirements, and more for major sources, so it appears they are not excluded by the introductory paragraph to OAC rule 3745-31-03(A)(1). Are these boilers no longer permit-exempt as a result? How do we (OEPA) intend to address existing boilers that were determined to be permit exempt prior to promulgation of these MACTs?</p>	<p>Permitting</p>
<p>5 Toledo – Matt Stanfield</p> <p>In case it's useful to anyone, Toledo also has MACT DDDDD terms for gas-fired boilers using the Engineering Guide #76 format. Maybe the discussion could also include which format Central Office prefers – possibly a combination of both.</p>	<p>Permitting</p>
<p>6 NEDO – Misty Koletich</p> <p>For the facilities that have decided on a case by case basis to select the option of compliance with the vacated Boiler MACT, before this final MACT was issued final, do they have to comply with the new MACT, if more stringent, and how will that change be handled if the opted vacated MACT standards were already included in their renewal T5 permit?</p>	<p>Permitting</p>
<p>7 NEDO – Misty Koletich</p> <p>Will district and local offices be required to witness area source testing, and if the requirements are for area sources included in T5 permits, will we be required to enforce them?</p>	<p>Permitting</p>