

**Stars2/ Permitting  
Call  
5/17/2016  
9:30AM-11:30AM**

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- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- **Bridgeline# 1-614-387-7405**      Access code: 638 873 409

**\*\* We will not be using Webex Audio – Use Bridge Line\*\***

#	Topic	Speaker
1	<p><b>Question: Steve Alspach SEDO - DAPC:</b></p> <p>Chesapeake is planning to develop some new well pads which produce dry gas only.</p> <p>These Pads will have a total PTE less than 10 lb/d (actually 9.36 lb/d) This includes fugitives, loading, heaters, etc. There is no compression/engines needed at these sites.</p> <ol style="list-style-type: none"> <li>1. Are there any new leak monitoring requirements coming out of OOOO for well pad locations that would require these pads to have a permit even if the emissions are less than 10 lb/d?</li> <li>2. Should they document / submit this request to us for review? By a letter w/calcs or an application type submittal for determination?</li> <li>3. Future development at these sites may add an additional well(s) – which would then require a permit. They’ve asked if there would be any foreseeable ‘permitting issues’ at that juncture?</li> </ol> <p><i>I think they may be concerned OEPA may take the position that the project should have gotten a permit for the ‘ultimate’ project initially – even though they are not sure now, what the ultimate development of each site will be.</i></p>	Andrew Hall
2	<p><b>Question: Matthew Stanfield, City of Toledo DES</b></p> <p>Our office has been assigning BAT emissions limitations for natural gas combustion emissions from small burners associated with processes.</p> <p>A recent example is a railcar paint spray booth with a direct-fired 4 mmBtu/hr burner used for drying the paint after application at less than 200 degrees F in the booth where the combustion products will be emitted along with coating emissions through the same stack. The natural gas burner used as a dryer does not qualify for the permit exemption under OAC rule 3745-31-03(B)(1)(c) due to emissions from the coating being dried.</p> <p>Another example is a natural gas-fired bakery oven we are working on with approximately a 4 mmBtu/hr burner.</p> <p>The potential emissions from the products of combustion for both of the above examples result in emissions of less than <i>de minimis</i> levels.</p> <p>I would like to be consistent with permits issued by other offices, since many issued permits do not include BAT limits for combustion products from small natural gas burners. Some permits without the combustion products identified in permits may have a statement similar to the following.</p>	Andrew Hall

	<p><i>Emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, and PM<sub>10</sub> are generated as the products of combustion from the use of natural gas. The potential emissions for the above mentioned products of combustion are based on the maximum heat input of natural gas and result in negligible emission quantities and, therefore, have not been addressed through individual BAT limitations for natural gas combustion within this permit.</i></p> <p>For state-wide consistency, should our office stop adding BAT emissions limitations to processes similar to those described above for small natural gas fired burners where the potential to emit from the combustion products are less than 10 pounds per day?</p>	
3	<p><b>Portable Source Relocation Rule Changes:</b></p> <ul style="list-style-type: none"> <li>• One-time relocation approvals are effective for one relocation up to 365 days after approval.</li> <li>• Relocation site pre-approvals expire three years after the date of approval.</li> <li>• Reduction in the required lead time for one-time relocation requests from 30 days to 21 days.</li> <li>• Elimination of the requirement for advance notice when relocating to a pre-approved location.</li> <li>• Permit-by-rule sources that are portable are subject to portable relocation approval requirements.</li> <li>• Addition of the requirement to notify Ohio EPA within 21 days of any relocation.</li> <li>• Consolidation of rule language in one location (From OAC rule 3745-31-03(A)(1)(p) and 31-05(H) to 31-03(B)(1)(p)).</li> </ul> <p><b>Implementation:</b></p> <ul style="list-style-type: none"> <li>• Engineering Guide 44 Update</li> <li>• New Answer Place Topic &amp; Updates to existing coming soon.</li> <li>• Approval template updates</li> <li>• Insert for approvals</li> <li>• New Portable Source Relocation Form</li> <li>• Outreach to facilities</li> <li>• Stars2/Air Services Changes</li> </ul>	Erica Engel-Ishida