

**Stars2/ Permitting
Call
12/15/2015
9:30AM-11:30AM**

<https://ohioepa.webex.com>

- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- Call in # 1-877-668-4490 Access code: 635 069 335

Agenda

| # | Topic | Speaker |
|---|---|--------------|
| 1 | <p>Question presented by Zorica Dejanovic, NEDO:</p> <p>Mostly due to the cost of fuel, Amish facilities have been purchasing/converting stationary engines from diesel to natural gas to power their facilities. Does the conversion from diesel to natural gas constitute a “new” manufacture date making older engines subject to JJJJ?</p> <p>According to Melanie King:</p> <p style="padding-left: 40px;">I don’t see anything regulatorily that we could point to that would say conversion from CI to SI (or vice versa) would give the engine a new date of manufacture. The only thing I could point to would be if the engine met the criteria for modification or reconstruction, which wouldn’t necessarily give it a new date of manufacture, but could make it subject to subpart JJJJ.</p> <p>Melanie King Energy Strategies Group Sector Policies and Programs Division Office of Air Quality Planning and Standards (919) 541-2469 king.melanie@epa.gov</p> <p>We have determined that the engines do not meet the requirements for reconstruction. However, they may meet the definition of a modification under subpart A, due to an emissions increase as a result of the changes made to the engine.</p> <p>Here are the issues: most of the engines were purchased from/converted by other Amish owners. The facilities cannot provide data on the original engine—so it may be impossible to determine if/how the conversions changed engine horsepower, rpm and/or emissions. Moreover, the engine placards may not reflect the actual engine data. Apparently, there are engine “manufacturers” that use, for example, a Ford engine block, add CAT parts and place a CAT engine placard on the product prior to selling it.</p> <p>A facility could be required to rent a load bank to determine horsepower—but how do we determine JJJJ applicability if we cannot determine if the conversions increased emissions? If we can determine previous diesel hp and post natural gas hp, we can use emission factors to determine if emissions increased. If no info exists on the original engine, can we simply assume an emissions increase and apply JJJJ?</p> | Mike Hopkins |
| 2 | <p>Question presented by <u>Jana Gannon, NEDO:</u></p> <p>Under the Design Efficiency of control devices section of the 2/7/14 BAT guidance, ongoing compliance is not expected and no monitoring, record keeping or reporting requirements should be included under BAT. However, the equipment is required to be maintained following manufacturer’s recommendations and records of maintenance on the unit should be kept along with the manufacturer’s recommendations.</p> <p>My question is, is there standard language that is being used that requires these recommendations and maintenance records? I couldn’t find any during my search of permits issued to woodworking</p> | Mike Hopkins |

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| | <p>facilities with baghouses. Can we still use the standard language regarding pressure drop range if the permittee puts a range in their application, or does it have to be included in the recommendations? Would the recommendations be considered an operating manual?</p> | |
| 2 | <p>Stars2 Deploy v 2.2.10 - December 4th Enforcement workflow and reports Review :</p> <ul style="list-style-type: none"> • How workflows are initiated – new workflow • Where did old workflows go? • How to find out status of a case • Enforcement Reports | <p>Jim Kavalec / Elisa Thomas</p> |
| 3 | <p>Stars2 - What's Coming Up in 2016?</p> <ul style="list-style-type: none"> • January Deploy v 2.2.13 – FCE form. • Upcoming Stars2 Enhancements Project 2.3.X <p>Solution for templates Making public information requests easier for staff Align Stars2 with Places/Core ; fixing township/city list</p> | <p>Elisa Thomas</p> |
| 4 | <p>LAA IT Issues</p> <ul style="list-style-type: none"> • Status of VPN Testing • LAA staff access inventory | <p>Erica Engel-Ishida</p> |

Enforcement Action Request 390988

Task Legend



Srt: Nov 25, 2015

Slr: Jan 14, 2016

Cur: Nov 25, 2015

Process Interval



Facility Id: 1318007376
 Facility Name: Malloy Memorial & Crematory

