

Stars2/Permitting Call - Video Topic Summaries

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March 17, 2015

February 17, 2015

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>Pressurized Condensate Storage Tanks If a facility plans to utilize pressurized, horizontal condensate tanks at the site, would they meet the exemption of OAC rule 3745-31-03(A)(1)(I)(ii)? The exemption pertains to: “Storage tanks for pressurized storage for inorganic compounds or propane, butane, isobutene, and liquid petroleum gases.”</p>		
2	<p>Steve Alspaugh, SEDO Some O&G GP facilities are expressing a need to add additional tanks or additional engine capacity at existing GP sites. Cases by Case PTIOs are available but typically, are not conducive to the O&G timeliness needs , so - were hoping there are some General Permit(s) on the way (in development) for additional ‘tank-age’ and/or engine(s) to better serve or O&G customers.</p>		
3	<p>Steve Alspaugh, SEDO I also have a facility interested in the misc metal coating GP, any idea on when it will issued?</p>		
4	<p>Non-Title V 2012/2013 tasks on To Do lists</p>		
5	<p>New WRAPN software coming: Notices April 2015</p>		

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
6	eDoc <ul style="list-style-type: none"> • How to save an email into Stars2 • Testing on LAA Citrix connection to eDoc software done? • One more hurdle then the eDoc SOP for Open Burning will get finalized... LAAs into myOhio.gov to get passwords. 		
7	LAA IT Issues Nothing to report aside from eDoc progress above.		
8 ADDED	Laura Miracle, ARAQMD Under OAC rule 3745-31-03(A)(1): The following exemptions do not apply to emissions units subject to 40 CFR Part 61, the national emission standards for hazardous air pollutants (NESHAPs), with the exception of 40 CFR Part 61, Subpart M, asbestos removal activities; or <u>emissions units subject to 40 CFR Part 63, the NESHAPs for source categories, MACT standards</u> , unless such standard either only requires submission of a notification, and written notification satisfying the MACT notification requirements has been or will be submitted to the Ohio environmental protection agency prior to the notification deadline imposed by the MACT, or such standard does not impose any requirements (i.e., notifications, emissions limits, record keeping, etc.) to the particular emissions unit; or <u>emissions units subject to the new source performance standards (NSPS)</u> with the exception of 40 CFR Part 60, Subpart AAA, residential wood heaters, 40 CFR Part 60, Subpart OOO, nonmetallic mineral processing plants, and 40 CFR Part 60, Subpart I, hotmix asphalt facilities. The emergency generator is just below 50 HP (35 kW) and they applied for a PBR because of the statement above. They felt that they could not be exempt under (A)(1)(nn) because of 40 CFR Part 63, Subpart ZZZZ which requires them to comply with the NSPS. Can the emergency generator fall under OAC rule 3745-31-03(A)(1)(nn) exemption? If the emergency generator cannot fall under that exemption, can they fall under the PBR exemption even though they are slightly smaller than 50 HP?		
	<ul style="list-style-type: none"> • Can it be explained when to use the “No longer Applicable” button for a PBR opposed to letting the PBR be superseded? 		

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	<ul style="list-style-type: none"> Review meaning of check boxes in Permit Detail 		

January 20, 2015

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>Where should applicants send modelling files? Goals for CO modelling: Reduce processing time, ensure only CO staff is uploading modeling files into STARS2, and keep the field office in the loop.</p> <ul style="list-style-type: none"> Application instructions state to send application package to DO/LAA Consultants that contacted CO directly regarding modelling were instructed to send CD's to CO. <ul style="list-style-type: none"> Hearing from consultants that they were asked to stop sending the files to CO. Concern that will further delay CO receiving the files since some of these permits are a "rush." Would it be best if they send a letter and disk at the same time to both CO and DO/LAA? <ul style="list-style-type: none"> In what cases would DO/LAA use data sent? <ul style="list-style-type: none"> State-only modeling done with SCREEN3 can and should go directly to the DOs. CO uploads everything to STARS2 after finalize the modeling and would not want the DO to also do this b/c sometimes the modeling is revised, etc. and we only want the last version uploaded. Should applicants send a disc and letter to CO and perhaps a copy of the letter to the field office? In what cases? 		
2	<p>Ben Halton, CDO If an EU at a Title V facility is subject to PBR but would qualify as a significant EU, how are the EU specific terms and conditions handled?</p>		
3	<p>Sara Buzas – CDAQ, FYI – Not a question.</p> <p>I have been in contact with a facility working to step down from the Title V program by completing emission calculations via the EIIP document rather than using the AP-42 factors. During one of our recent conversations, I was</p>		

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	<p>informed that there is a consulting firm that is reaching out to Title V companies claiming they have a “new model” that can be completed to assist them in coming down from the Title V program. The person I spoke to indicated the consulting company (they would not give me a name) had contacted them directly and indicated that the model could be completed for around \$10,000.00. They were unsure if this was a legitimate claim so they contacted another local consulting firm and asked a few questions. From what we have learned since my initial conversations, several other companies have been contacted by this firm claiming to have the “new model”. CDAQ was unaware that someone has been reaching out to Title V companies and wanted to pass on the knowledge. Here at CDAQ we have a few facilities that have already contacted us with new calculations via EIIP and we feel this may be something that is going to become more common.</p>		
4	<p>Duane LaClaire, ARAQMD</p> <p>What can we do with confidential records of facilities that have been shut down for a long time?</p>		
5	<p><u>Important Permit Outline Word File!!!</u></p> <ul style="list-style-type: none"> • The DAPC permit writers’ Normal.dotm needs to be in the following directory: <ul style="list-style-type: none"> C:\Users\%username%\AppData\Roaming\Microsoft\Templates • Click here to get to the Answer Place topic with this file and further information. • Future DAPC PCs will get deployed with this file. <p>ITS will create an installation bundle for DAPC staff (unknown timeline)</p>		
6	<p>Stars2 version 2.2.X – What’s coming in the first half of 2015?</p> <ul style="list-style-type: none"> • Enforcement Changes • Applications, Emissions Reports, Compliance Reports, etc. to eDoc • Attachment search • Document generation overhaul <p>Title IV permit issuance fixed</p>		
7	<p>Stars2 attachment & correspondence types update</p> <ul style="list-style-type: none"> • Spreadsheet & FAQ posted on Answer Place • Discussion on proposed types • Change order of Correspondence pick list? 	<p>Types were moved from proposed list and were added to Answer Place EDOC Key – See Answer Place Topic # 2518.</p> <p>Work Practice Plans can be uploaded into Stars2</p>	<p>1:14 WPP</p> <p>1:50:00</p>

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	<p>In regards to new BAT, where should work site plans be uploaded in STARS? This question is in regards to the oil and gas GP for unpaved roadways, but the question could be asked for any facility work site plan. NEDO prefers the plan be submitted as part of the application so the 30 day submittal tracking is eliminated, but if it is not, should it be submitted as a compliance report? – Misty Koletich - NEDO</p>	<p>as an 'Other Compliance Report – Work Practice Plan' if the permit has been issued. A facility can submit via Air Services as an 'Other Compliance Report – Work Practice Plan' or can submit as an attachment to a PTIO application.</p> <p>There was request to add type of 'PER Late Letter'. Everyone decided that the document should be uploaded either as 'NOV-PER' or as 'Compliance Report – Other'</p> <p>A Handful of correspondence items was left on list to review at later time for next meeting due to call length.</p> <p>RTC document type is 'Inactive'. It has been replaced by document type of 'ROV' (Resolution of Violation)</p>	
8	<p>General Stars2</p> <ul style="list-style-type: none"> • New Staff Reminder - If DO/LAAs updated assigned staff in Stars2, please let Elisa know who needs to be assigned for default user roles for various counties. This will ensure correct people get assigned when a new facility is created in Stars2. • Status of adding new "De minimis w/ recordkeeping" exemption type to EU detail in STARS2 [to distinguish sources that are de minimis per 3745-15-05(B) or de minimis w/ daily records per 3745-15-05(D)]. This request was discussed during the 09/19/2013 APL most recently. – Terri Dzienis, CLAA • Review / overview of cloning procedure. What gets included, what needs added, who to contact, who can request it (companies ?,), facility to facility , or in same facility ?, where this is written. – Steve Alspach, SEDO • Errors Cloning an Emissions Test – Fix coming Friday! 01/23 <p>Test method added - ASTM method 6348-03 and M 320 put into the test</p>	<p>Cloning questions should be directed to Linda or Elisa on how the function works; can be discussed in later call.</p>	

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	choices. ASTM (infrared) 6348-03 for NOX, CO, VOC.		
9	eDoc Update <ul style="list-style-type: none"> Final LAA access hurdle is supposed to be have solution this week. Open Burning First Core ID creation Training 		1:59:20
10	LAA IT Issues <i>From this call forward there will be time at the end of this call for LAA's to bring LAA specific Ohio EPA IT issues to Erica's attention.</i> <ul style="list-style-type: none"> F5 server getting replaced 1/20 at noon Citrix down 9-10AM on 1/21 		02:02:00

September 16, 2014

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	Matt Stanfield – City of Toledo Is there is an update that can be provided in response to the attached September 2 letter regarding Region 5's concern that BAT limits established under Ohio EPA's new BAT policy do not appear to be federally enforceable for purposes of determining applicability of New Source Review. (*See e-mail attachment from Matt*)	Matt asked whether or not OEPA is considering changing BAT policy due to comments from Region 5. EPA's concern? BAT is a design factor and no ongoing compliance can be determined...therefore wouldn't meet Federal Enforceability. Hopkins states they are reviewing Region 5 concerns. In meantime, if there is an issue in a draft permit US EPA is likely to comment and OEPA will go to company. Company may be ok with traditional BAT approach. Therefore, no final decision has been made. If you have questions on a permit being drafted, talk to your designated CO permit writer.	6:50
2	Misty Koletich - NEDO NEDO recently issued a PTIO for a facility that has both paved (GP 6.1) and unpaved (GP 5.1) roadways. Of the four paved roadway GPs and two unpaved roadway GPs, only GP 5.1 for unpaved roadways with 120,000 vehicle miles traveled per year has changed to require a work practice plan which meets the new BAT policy. Getting	Plan it to update other GPs to incorporate Work Practice Plans. Companies that have requested the new GP need to submit a WPP and that they have a choice to submit with at application submission time. Chesapeake was aware of the	11:41

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	<p>back to the permit that NEDO recently issued, we now have a facility that has a ton per year limit for PM10 and PE for their paved roadways, yet has to develop a work practice plan for unpaved roadways. Will new GPs be developed for the other roadway GPs so they all meet the new BAT policy or will just GP 5.1 require this? Also, we have not received work practice plans from any facility yet within the 30 day timeframe, most notably from Chesapeake who has a handful of oil and gas well permits that contain the new GP 5.1 language.</p>	<p>incorporation of WPP in draft stages of GP comment stage. @ 18:00, Hopkins discusses that the WPP must include detail on frequency of checking roadways. SEDO has a template WPP they have developed and will make available to Mike Hopkins. This template will be made available on GP website (AP?)</p>	
3	<p>Wendy Licht – NWDO Do we have the regulatory authority to make a FEPTIO company list EU’s that are exempt via rule and/or de minimis in the facility profile in STARS2? If we will be requiring them to, please develop a “statement of requirement” that can be sent to a company to explain why they must do so. For example: An asphalt plant typically has tanks at the facility. Should the company be required to list these tanks in STARS 2 to show that they have been addressed during an inspection event or not?</p>	<p>OEPA cannot require NTV/FEPTIO sites to update their facility profile to include Exempt/De minimis sources. DAPC can update and correct already existing EUs in the profile to reflect correct status. We can put in earliest known date for installation. DAPC staff can put notes on profile or notes so that on inspection time, information is known about those sources. We can try explain to facilities that it is to their advantage to list those sources so that we don’t ask for that information each time site is inspected. However, it is voluntary for NTV sources.</p>	27:40
4	<p>Miki Mercer – SEDO So, when we are looking at determining whether or not a tank is a “Significant” or “Insignificant” EU at a TV facility, we just look at the controlled PTE from an internal floating roof to determine which way it would be classified?</p>	<p>DAPC considers controls as integral to design of internal floating roof tank. This is consistent with OEPA and USEPA. Therefore, is insignificant.</p>	36:28
5	<p>Erica Engel-Ishida – CO What updates were deployed in Stars2/Air Services version 2.1.6 and 2.1.7?</p> <ul style="list-style-type: none"> • Keeping Stars2 using current program language, infrastructure and technology • Attachment event dates • Attachment Trade Secret • Upload attachments at any time 	<p>Version 2.1.6 and 2.1.7 deployed. Demonstration of Stars2 enhancements made @ 53:32</p>	45:00
N/A	<p>Erica – Clarification of Correspondence (Outgoing) *<u>Not on Agenda</u>*</p>	<p>Correspondence (Outgoing) is only for documents/letters that OEPA and Locals send out to companies in US Mail. NOT email, NOT incoming correspondence. Letters from</p>	1:05:50

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		companies need to be uploaded where they best apply...ex: application, attachments to facility profile. Please make all in your office aware of this use at it can mean wrong info being uploaded to eDOC.	
6	<p>Erica Engel-Ishida – CO Status of eDoc project for facilities and non-facilities. How are we going to do this?!</p> <ul style="list-style-type: none"> • Assessment on incoming and outgoing regulatory documents • Seeking clarification on deadlines • Stars2 updates and changes in the queue • non-facility requirements <p>LAA access to OnBase Unity Client, Ability to use Places for creating facilities</p>	<p>Update: Phase 2 deadlines for day forward documents discussed September 30. However, DAPC has placed certain Stars2 and Local documents as exempt from timeline. October 31st mentioned as deadline for all paper-based incoming documents going into eDOC. Erica will send to managers assessment of incoming regulatory documents to Bob/Cindy can assess additional workload on staff/offices.</p> <p>@ 1:38:00, question asked on how deadlines will be communicated to offices. Local air agencies are on hold but need to stay organized and ready to go. @ 1:48:00 David Hearne asked for specifications for scanner/ingestor. What scanning technology is needed for this project so that they can have proper equipment.</p>	1:22:58
N/A	Acid Rain Permit Workflow Assignments? WHO?	Dana Thompson @ CO needs to be assigned Acid Rain Permit renewals.	1:51:00

June 19, 2014

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>Posted videos and searchable topics for past calls. AP Topic 2338 or search “Stars2 call” or “Permitting Call”</p> <p><input type="checkbox"/> Send suggestions to us</p> <p><input type="checkbox"/> How much detail for pre-2013 calls?</p>	Permitting call recordings with notes, key words and minute markers are available. Staff can do text search, see decisions summarized and pending action items.	0:00:45

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2	<p>SWOAQA – Should the facility report as a Deviation the failure to make a timely report of the prior year’s PER (the due date of which falls within the reporting year of the currently due PER)?</p> <p>On one hand, the PER form requires the permittee to answer “Yes/No” to any deviations or exceedances from the PTIO requirements for Monitoring, record keeping, or reporting requirements (B.) In this case, I would say they could not claim no deviations and would have to answer “Yes” for failing to meet the deadline for the prior year PER. Also, the PER form and Answer Place guidance includes the statement, "<i>This PER, including any accompanying information, is required under the authority of the director of the Ohio Environmental Protection Agency. [Ohio Revised Code 3704.03(I)] Failure to submit this PER, including any accompanying information, or falsifying this PER, including any accompanying information, may result in civil or criminal penalties in accordance with applicable state law. "</i></p> <p>On the other hand, OAC rule 3745-15-03(D), Permit evaluation report, does not appear to address the failure to make a timely report as a deviation/exceedance required to be reported in the PER with the caveat that the PER should contain the following information “at a minimum”:</p> <p>(D) Permit evaluation report. (1) Pursuant to paragraph (A) of this rule, each permit described under paragraph (B)(2) of this rule shall require the owner or operator to submit a permit evaluation report, in a form and manner prescribed by the director, which identifies, at a minimum: 3745-15-03 3 (a) A list of all air contaminant sources that have been issued a permit described under paragraph (B)(2) of this rule; (b) Additional information or corrections to air contaminant sources identified in the permit evaluation permit; (c) Any deviations from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in such permit; (d) The probable cause of such deviations; and (e) Any corrective actions or preventive measures which have been or will be taken to remedy the deviations; or (f) If no deviations occurred during the reporting period, the owner or operator shall identify in the permit evaluation report that no deviations occurred during</p>	<p>Question posed whether or not it is a reportable deviation (or violation) if a facility failed to file a timely PER?</p> <p>Initially, to Kurt it seemed it would be a deviation from permit terms and conditions. A couple other offices agreed. Hopkins relayed that historically, deviations have been restricted to violations of permitted emissions or T&C violations. Action: Hopkins and staff have been assigned to look into this issue and look at PTIO development document to develop a detailed response.</p> <p>? Anne from Portsmouth asked if a stack test was not reported in a timely manner, would that be a deviation? At 16:30 Terri (Canton) and Hopkins discussed that we would want to know in the PER when monitoring was not completed.</p>	0:07:05

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	<p>that reporting period.</p> <p>Finally, I'd say that since an NOV is generated for the failure to report or for submitting a late PER, which is a violation of the Terms and Conditions of the permit and the ORC, that they should mark "Yes" as a deviation for failure to submit/late PER.</p>		
3	<p>Current facility profile EU descriptions vs. Permit Detail EU level descriptions – Ok to do a wholesale replacement for blanks?</p>	<p>Decision made that data will be corrected in order to populate the DAPC EU description for in process permits so they can get T&Cs generated and not be looped back.</p>	0:19:26
4	<p>SEDO - GP 5.1 Work Practice Plans</p> <p>In particular, I was hoping to discuss how other districts were handling the plans (i.e. which method is acceptable for submission, where/are they being uploaded into Stars2, how are they being approved).</p>	<p>SEDO asked how work practice plans were being processed and approved. Hopkins relayed that it is acceptable to submit a Work Practice Plan at time of application. Meaning, it could show up as an application attachment type. The plan could also be submitted and/or entered as a specific 'Compliance Report' type in Stars2. We noted during the call there is a need for additional compliance report types and attachment types.</p> <p>Action: Erica will send email to Hopkins to get these named/identified and incorporated. (Need: Work Practice Plan and Preventative Maintenance Plan)</p>	0:30:25
5	<p>Canton - Shutdown of an abandoned PBR facility:</p> <p>We have an abandoned PBR facility (GDF) that we have inspected to confirm there are no tanks nor buildings left on the property (truly shutdown). EG#34 specifies procedures for shutting down a facility, but refers to facilities that were supposed to submit reports. PBRs do not need to submit reports, but EG #34 has no separate procedure for those facilities. The Abandoned facilities AP 2326 procedure requires processing a revocation of the permit, but STARS2 does not allow a revocation of a PBR.</p> <ul style="list-style-type: none"> • Do we need a "certification" from the facility contact (if we can find one) in order to shut down the PBR facility in STARS2? • Can we just shut down the facility based on our inspection confirming it is shutdown (without facility certification)? <ul style="list-style-type: none"> o We will make sure to include a note in the facility profile to 	<p>After brief discussion, DAPC & DO/LAAs decided legal needs to make a determination on how to handle abandoned PBR facilities as current EG 34 doesn't cover this situation. Decision was made at 0:43:20 that we see that the EU is permanently shut down that we can update or terminate permit/PBR for that EU. Terri will email Erica an example facility for legal review.</p>	0:38:28

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	document our inspection and the reason for shutdown.		
6	<p>SEDO</p> <p>Is someone tasked with repairing the formatting problems in Word Documents when writing a permit? I have been told you are aware that there is a problem. It affects permit writers daily and sometimes wastes hours trying to make documents look acceptable.</p>	Erica and Mike are continuing to work on this known problem with PIC.	0:45:00
7	<p>Canton - Site Visits:</p> <p>If a site visit is conducted at a shutdown facility (for asbestos purposes, complaint investigation purposes, etc), should the site visit be entered into STARS2?</p>	<p>If a site visit is not related to a facility's originally permitted activities, the site visit does not need to be entered into Stars2. DOLAA and CO has requested Ahern draft an answer place topic on this matter to cover what other reasons/scenarios would need to be entered into Stars2....Complaints/Open burning/Asbestos? NEDO had understanding that the partial local air agencies (Lake/ Geauga/ Mahoning/ Trumbull) don't enter into Stars2. Other offices mentioned this entry of complaint related inspections should continue to be entered into Stars2 as these were entered into CETA. Decision made to ask for input from John Paulian.</p>	0:49:22
8	<p>Canton - NTV FER questions:</p> <ul style="list-style-type: none"> Have the NTV FER tasks issues from Erica's 06/04/14 email to all the DO/LAAs been resolved? What were the issues? 	Yes	1:00:50
	<ul style="list-style-type: none"> Please confirm signatory requirements for the NTV FER submissions. <p><i>Are you a general partner, proprietor, or, in the case of a corporation, a president, secretary, treasurer or vice president in charge of a principle business function, or other person who performs similar policy or decisionmaking functions for the corporation?</i> Authorized Representative criteria in OAC rule 3745-31-04</p>	<p>non-Title V facilities, anyone submitting applications for a non-Title V facility via Air Services must meet the criteria for the signatory authority as defined in OAC rule 3745-31-04 (OAC rule 3745-31-04).</p> <p>Guidance: http://epa.ohio.gov/portals/27/title_v/respoff.pdf In addition, Ohio Revised Code (ORC) 3745.11.1 requires the "person responsible for the source" submit information to be used for emission fee purposes. In cases where a signature is not</p>	

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		required by a permit or rule, the following sections are not applicable.	
	<ul style="list-style-type: none"> • Is it still the procedure to upload the paper bluecard PDF prior to having the review task sent to the DO/LAA? There are some without it recently. These PDFs are extremely helpful when reviewing the reports. <ul style="list-style-type: none"> ○ Reference: 1576051671, 1576001589 	Yes	
	<ul style="list-style-type: none"> • For the "Current owner of record" section of the paper bluecard, what fields do those correlate to in STARS2 facility profile? <ul style="list-style-type: none"> ○ If there is a document or video describing this, please provide the reference. 	Demo	
	<ul style="list-style-type: none"> • If a company has only indicated a change of the owner information in the "my updated owner info" on the paper bluecard but did not fill out the section specifying if the facility was purchased or sold, should the "check here to specify facility ownership change" box be checked? It is Canton's understanding that box was only intended to be checked if purchased/sold info was filled out. <ul style="list-style-type: none"> ○ Canton has seen times the box was checked when the purchased/sold info was NOT filled out, and so an arbitrary "transfer date" is included on the STARS2 version NTV FER, that does not match any entry on the paper bluecard. How is that transfer date selected? ○ Reference: 1576015006, 1576135014, 1576045001, 1576131331, 1576135005 ○ Several of these appear to be entry errors, and would have been a "no review" NTV FER if entered correctly. 		
	<ul style="list-style-type: none"> • Why is the "contact person's" name being removed when a facility has (or not) indicated new information in the "my updated owner info" on the paper bluecard, but did not indicate a removal of a person's name? <ul style="list-style-type: none"> ○ Reference: 1576111630, 1576050274 		
	<ul style="list-style-type: none"> • I think it would be helpful to discuss what the definition of "owner" is in STARS2 contacts and how it should be used for NTV facility profiles. Is having an owner contact required for NTV facility profiles? 	Owner first and last name is not required. You can simply have an 'operating company name'	
	<ul style="list-style-type: none"> • Is it correct to say that once the NTV FER is approved by the DO/LAA approver, the facility profile is automatically updated? <ul style="list-style-type: none"> ○ Are there any changes made to the facility profile by the CO report uploader prior to the NTV FER report entry being possible? <ul style="list-style-type: none"> ○ Ref: 1576135014 appears to have the FP contact info updated prior to the bluecard entry. 	CHECK – Event Log – Carl updated the owner information on 6/16 same day report was submitted.	
	Are there any facility profile changes indicated in the NTV FER that may have to be manually completed by the DO/LAA?		

April 17, 2014

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1	General Permit 12.1, 12.2 (well-site) and 5.1(unpaved roadways) <ul style="list-style-type: none"> Made available 04/04/2014 Any old GP 12.1 or 5.1 apps still in the queue? Issue with GP 5.1 qualifying criteria to be fixed GP application instructions – include facility profile instructions coming	New General Permits 12.1, 12.2 & 5.1	00:00:36
2	eDoc update <ul style="list-style-type: none"> Overall Current State Non-Facility related documents <ul style="list-style-type: none"> Mapping document type to procedure Creating rough schedule Facility related documents <ul style="list-style-type: none"> Phase 2 <ul style="list-style-type: none"> Mapping existing documents for ITS “DIP ready” Plan for making all the other stuff “DIP ready” Plan for getting all the documents into Stars2 future and past Phase 3 – Implement plan from Phase 2 Confirm new attachment functions working accurately Work with ITS to enhance Stars2 <ul style="list-style-type: none"> Event date for attachments Attachment search Mapping Guidance Part 1 – confirm procedure, discuss Stars2 features and use of them Guidance Part 2 – document type = Stars2 location Existing attachment clean-up What to do in the meantime... <ul style="list-style-type: none"> Be clear in descriptions – ask where before you upload Hold off on back file Needed – DAPC policy on record retention	eDOC	00:07:00
		Question from Portsmouth: Responsibility to upload director signed documents?	00:09:59
		Backfile documents discussed & docs with bad metadata	00:13:50
		eDoc mapping; working on document upload schedule based on workload; latitude given to determine priority with existing resources	00:18:00
		Document import process reviewed	00:21:00
		Erica drafting guidance/procedure; making sure procedures work properly first	00:25:00
		Erica demo on how to upload documents; upcoming record retention policy	00:29:00
3	3 Where to upload... <ul style="list-style-type: none"> inspection reports stack test results from company ITT from company	Erica demo - Where to upload...	00:39:35
		Ahern – AP Topic 2363 for Uploading non-facility related documents	00:58:36

Agenda Topic#	Agenda Item	Summary - <i>As Discussed</i>	Time h:mm:ss
4	<p>Stars2 Issues</p> <ul style="list-style-type: none"> Negative days on FCE reminder task When will the FCE Inspection Report template be available in the Document Generation section? PER submitted as compliance report “other” - please ask company to resubmit using the PER forms. <p>PER submitted for incorrect reporting period – please ask the company to resubmit for the correct reporting period.</p>	Stars2 Bugs - FCE # of Days; FCE Inspection Report template is NOT ready	01:02:20
5	<p>Stars2/Air Services Future</p> <ul style="list-style-type: none"> Changes to maintenance process <p>Send issues and questions to DAPC, not ITS (Linda Luksik, Mike VanMatre, Arunee Niamlarb)</p>	Future of Air Services – Changes / ITS Resources	01:10:54

February 20, 2014

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>Gasoline Dispensing Facility: Stage I with Stage II Decommissioned</p> <ul style="list-style-type: none"> New PBR forms posted 02/19/2014 New PBR type added to Stars2 02/19/2014 <p>Do not delay processing them</p>	Discussion - Decommissioning of Stage II Vapor Control; Permit by Rule Forms & Stars2 updated; forms posted to OEPA web. Can still accept old forms; do not delay processing	00:00:51
		The 14 day ‘written’ notification can be done via email	00:08:42
4	Emailed or faxed copies of documents that are submitted outside of Air Services can be accepted without requiring a follow-up hard copy with a wet ink signature.	DAPC received Legal’s Valid to Accept a scanned/fax signature of application, forms, reports – no follow up needed of original copy of wet ink signature	00:04:40
8	<p>eDocs in Stars2 Update</p> <ul style="list-style-type: none"> Software updates to get Stars2 ready Finalizing the scope of documents for Phase 2 Establish attachment types and correspondence types where needed <p>Update AP 2518</p>	Ahern – eDOCS update and necessary enhancements to Stars2 discussed	00:11:20
2	Key points concerning the February 7, 2014 SB 265 BAT Guidance.	Hopkins – Feb. 7, 2-14 SB 265 BAT Guidance discussed	00:23:48
3	<p>Tracy Gu – NEDO</p> <p>The 2-7-2014 BAT guidance (page 1 paragraph 2) indicates the guidance applies to EUs</p>	Questions from Tracy Gu	00:33:20

Stars2/Permitting Call Video Summaries

Please note: This document is intended for internal DAPC use only and may not reflect current Agency policy or position.

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	<p>installed/modified on/after 2-7-2014. However, on the Appendix B of the same guidance indicates the guidance applies to EUs installed/modified on/after 9-1-2013. What would be the applicable date for 2-7-2014 BAT guidance?</p> <ol style="list-style-type: none"> 1. Exempt source (< 10 tpy) BAT determination <ol style="list-style-type: none"> a) Non-exempt sources (> 10 tpy) <ol style="list-style-type: none"> i. The 2-7-2014 BAT guidance (page 1 paragraph 3) indicates the procedures in the guidance shall be used to develop/determine BAT for non-exempt sources (> 10 tpy). ii. Our website http://www.epa.ohio.gov/dapc/sb265.aspx also marks the 2-7-2014 BAT guidance as “Current” for > 10 ton sources. b) Exempt sources (< 10 tpy) <ol style="list-style-type: none"> i. Our website http://www.epa.ohio.gov/dapc/sb265.aspx marks 7-2-2010 BAT guidance as “Current” for < 10 ton sources. ii. However, the answer for Question #34 in 2-7-2014 BAT guidance highlights the new BAT approach (2-7-2014 BAT guidance) shall be used for < 10 ton sources. <p>Please clarify for < 10 tpy sources how BAT shall be determined. If it intends to require exempt sources (< 10 tpy) applying BAT format based upon 7-2-2010 BAT guidance (dual language) and BAT requirements (2001) under the procedures of 2-7-2014 BAT guidance.</p> <p>Please verify for EUs, installed/modified prior 2-7-2014 BAT guidance applicable date and after 8-3-2009, shall follow the procedures in 12-10-2009 BAT guidance to determine/develop BAT?</p>		
5	<p>General Permit 12 – Oil & Gas - When is revision expected?</p> <ul style="list-style-type: none"> • Facility Profile Guidance Status <p>“Clone Facility” feature in Stars2</p>	<p>GP 12 – Status of Oil and Gas GP revisions</p> <hr/> <p>Question – Use of Stars2 dummy profile to use for cloning? Goal -> minimize messy profiles being submitted *<i>Action Item</i>* / how to let Air Services users know of its availability when new sites</p>	<p>00:37:09</p> <hr/> <p>00:46:05</p>

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
		created?	
6	Permit Keyword Search – Problems	Permit Keyword Search – problems functioning; working on cause & improvements	00:50:00
7	Permit Processing – Please continue to use PTIO guidance document from 2008 (pg 21) when determining which EUs to process together in the same permit.	Permit processing – Use PTIO guidance document 2008; know software constraints	00:52:58
9	<p>Non-Title V Emissions Report Review</p> <ul style="list-style-type: none"> • Blue forms scanned and uploaded to report • Which buttons to use? <p>If the information on the form is wrong what should be done?</p>	Non-Title V emissions report review and processing (AP Topic 2158 and 2118). CO is scanning original reports and uploading documents to Stars2; Cause of do/laa report approval Errors discussed @ 01:12:00	00:56:40
10	Title V/Synthetic Minor Title V Emissions Report Review Which buttons to use?	Title V / SMTV emissions report review ; questions posed on use of different buttons	01:14:00

January 16, 2014

Agenda Topic#	Agenda Topic	Summary – <i>As Discussed</i>	Time h:mm:ss
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, http://epa.ohio.gov/portals/27/pbr/GDFPBR.pdf, 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</p>	GDF Raze and Rebuild – PBR Form	0:00:50

Agenda Topic#	Agenda Topic	Summary – <i>As Discussed</i>	Time h:mm:ss
	this. [NOTE: this question was posed prior to the recently finalized OAC revisions to Stage II Requirements]		
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>a) If yes, in which way:</p> <p>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>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>iii) another reason?</p> <p>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</p>	<p>Lost wax; permit as 'Process' or 'Incinerator'? (See Detailed meeting Notes in table below)</p>	0:17:50

Agenda Topic#	Agenda Topic	Summary – <i>As Discussed</i>	Time h:mm:ss
	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]. 4) In the "Salvageable Material" definition, why the word "reuse" versus "use"?		
N/A	*not on agenda* - Canton Question	Permitting non-stationary operation that Sand blasts and paints weld points/ rigs	0:38:00
3	Steve Alspach, SEDO PBR page vs. Permit page... know where to look to see if issued	Demo: finding Copies of issued permits and active PBR sites on OEPA web Where can general permits be searched?	0:47:30 0:51:00
4	PIDM/PIER Updates/Reminders <ul style="list-style-type: none"> • PER Updated as of 1/1/2013-12/31/2013 report • TVCC no longer needs to be sent to USEPA unless trade secrets are submitted. • FER reminder letters sent • NTV FERs mailed today – Send Linda updates for change in primary NTV contact for each office. • Don't forget to log into the Answer Place! • Upcoming Training: <ul style="list-style-type: none"> ○ Emissions report reviews in Stars2 ○ FCE, Site Visit, Emissions Tests • Blank ITR forms on the web 	Air Services users notified of mailings and reporting; in order to see internal guidance you must log into the Ohio EPA Answer Place	0:56:20

Meeting starts with Topic number 2 on the agenda; GDFs being razed and rebuilt. The question posed by Cleveland local air agency posed the situation where the current PBR form for decommissioning stage II is not clear/ Jim Kavalec stated that we can request that companies complete section V that says 'not applicable' and submit an explanation. A revised/ interim PBR form will be posted to incorporate changes to 21-09 until 3745-31-03 rule changes are made effective. Per Hopkins, an updated PBR form will perhaps be done once rules are effective. {Video time 11:30} Action: We may want to have information provided to companies that explain the conflict/discrepancy between effective rules and 31-03 not being updated yet. Do not send back PBR forms. Video time 13:55 Rick Carleski explains there is a fact sheet available on Stage II decommissioning in early February. DO/LAAs asked if additional outreach is being provided on decommissioning. Status: unknown.

Lost wax process is explained by Terri in Canton and the current site that needs to obtain permits. She posed whether or not other DOLAAs have permitted similar processes. She found different permits in Stars2 for process versus incinerator.

DOLAA staff presented similar companies and most were permitted as ‘Process’ and not incinerators. The source in Canton jurisdiction has visible emissions excess/above 20%. Dana Thompson presented his views about the situation being needed to be viewed as a ‘process’ as the removal of wax is not to reclaim but to treat mold to make the transfer. Wax is part of the original process and not separate; it is done to make the mold available for use again and not solely to reclaim wax. **Decision:** made that it would be permitted as a process. Andrew and Dana will look at Canton’s list of sites permitted differently (as incinerator).

At approx. minute 38 in video, Terri asked about need to permit an operation that is not a stationary structure; the operation sand blasts. They bring in a rig and put up a pop tent and blast and paint. There are proposed exemptions to 3745-31-03 for stationary structures (billboards, lights, water towers) but this scenario does not fit. **Decision:** Appears this source needs to be permitted per Andrew Hall. Dana asked if process uses lead paint and also mentions exposure to crystalline silica and new OSHA standard. **Action point:** Air Toxics rule review mentioned. This material is used in fracking sites.

Erica demonstrated where permits and active PBRs are posted on the agency web site. PBRs will always be a separate listing; no issued document associated and will not be in eDOCs. General permits are not broken out separately in electronic copies of issued permit search. They are in with PTIOs. Currently, there is an enhancement request in MANTIS to show GPs search separately. Final topic of meeting is that Air Services users were notified of updates to hardcopy Permit Evaluation Report (PER) forms. Title V Compliance certification report reminders and other Fee report reminders mailed out. Non-Title V emissions reports mailed out to companies. Erica reminded staff that you must log in to Ohio EPA Answer Place in order to see internal topics and guidance. Stars2 training is forthcoming for emissions reports and CETA items.

October 17, 2013

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	Erica Engel-Ishida, CO If an updated renewal application is submitted for a permit that is currently backlogged, the updated application does NOT change the original application received date. The backlogged permit record in Stars2 should still be used. You must associate the application with the existing “In Process” permit. This procedure should be used whether the permit is backlogged or not.	Any new or revised applications need to be associated with the original backlogged permit. Approach has been confirmed with Mike Hopkins.	0:00:19
2	Kim Reinbold, SEDO Conflicting guidance has been given to a consultant on permit exempt natural gas fired boilers and process heaters that are large enough to not be <i>de minimis</i> but are eligible for the permit exemption in OAC rule 3745-31-03(A). We believe the Title V EU classification for those boilers should be Insignificant	Mike Ahern discussed that there are certain sources that are permit exempt that do have applicable requirements. Those would need to be included in a TV application. Mike pointed out existing answer place topics# 2634 and 2398. Action Item: We need to develop a	0:02:41

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	<p>(no applicable requirements) assuming they are operating at an area source of HAP emissions and not subject to boiler MACT requirements, and that those boilers would not need to be listed in the Title V permit in the facility-wide section for the insignificant EUs w/ applicable requirements. However, another office pointed out that those boilers are subject to OAC rules 3745-17-10 and 3745-17-07(A), and thus those EUs have applicable requirements and must be listed in the Title V (the consultant has been asked to provide EAC forms for them).</p> <p>I have reviewed the Chapter 17 rules, and could find no exemptions for permit-exempt boilers and process heaters. But in the most recent TV renewal guidance, it is stated that there will be a very limited number of IEUs that are not subject to PTIs but that have SIP-based applicable requirements that subject them to inclusion in the Title V permit IEU section. Because small boilers and process heaters are widely used at large manufacturing facilities, this question is not really limited to a small number of sources. So we are wondering what CO's expectation is on how the permit exempt boilers and process heaters that are not <i>de minimis</i> should be handled in Title V permits. Are we missing an exemption, or are those sources truly IEUs and not IES w/o applicable requirements?</p>	<p>listing of these types of sources in 31-03. Erica will email Sean Vadas to put topic on P&E agenda.</p>	
3	<p>Tim Fischer, NEDO Topic: Installation permit fees</p> <p>Over the last year NEDO has seen some discrepancies in how we charge fees for certain types of sources. After doing some searching in Stars2 I realize that the problems are not specific to NEDO. The fee schedule seems straight forward on the surface but while applying, it mistakes are easily made. Below are some examples of inconsistencies observed in Stars2:</p> <ul style="list-style-type: none"> • Storage Piles: generally they are assigned the \$200 minimum fee for PWR1. Occasionally they are based on the highest PWR for loading the pile which is typically a much larger fee (~\$1,200) • Fuel Burning Equipment: ORC 3745.11(F)(1) states that “units burning exclusively natural gas, number two fuel oil, or both shall be assessed a fee that is one-half the applicable amount...” – Sometimes this is applied, sometimes it is not. • Engines: It appears that the fee for turbines should be used for engines that produce electricity and PWR1 (PWR=0) should be used for engines which produce power for other purposes. Both of these are sometimes used incorrectly and many engines are also charged the fee for Fuel 	<p>Action Item: Fee Related Answer Place item to discuss historical decisions made related to certain types of sources (storage piles, combustion turbines). Erica mentioned current Mantis topic to clarify Process Weight Rate fee assignments for permit reviewers. Screen shot provided below for GP 12 fee assignments. Upcoming guidance for GP fees. Ahern mentioned the best time for fee review would be by DO/LAA management prior to sending permit to Central Office to review for consistency office-wide. CO does not review fees.</p>	0:11:50 and 0:26:59

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	<p>Burning equipment which in the ORC is said to only apply to Boilers, Furnaces, and Process Heaters.</p> <ul style="list-style-type: none"> Flares: sometimes \$200 minimum fee for PWR1 is used (PWR=0) and sometimes fuel burning equipment is assigned with variable fees <p>Some suggestions NEDO has had are more training or making fee selection a CO task to ensure consistency. Another idea to solve a portion of the problem would be to standardize the fee for all GPs. For example, if you get a storage pile GP you pay a specific fee that is published on line so that the permit writer does not have to calculate it. It would be preferable to have Stars2 do this automatically. In looking at Stars2 storage pile fees are inconsistent. Fees for the Oil & Gas GP have been a struggle as well.</p> <p>NEDO is trying to review fee selections more carefully and I suggest that all DO/LAAs and CO reviewers do the same. Are there other suggestions on a State-wide approach to prevent what appear to be widespread inconsistencies? How do other DO/LAAs feel about the GP suggestion?</p>		
4	<p>Canton Have a Die Washing emission unit at a forging facility that was installed in 1960. They hand apply, by rag, kerosene to wipe off grease and grit from metal pattern dies. Then they use steam to "rinse" off kerosene, grease, and grit. The estimated emissions are 22 pounds of VOC per day. Therefore, they do not meet <i>de minimis</i> permit exemption. We cannot find any applicable OAC rules or federal rules. (Ex. OAC 3745-21-09 applies to specific sources, and this source is not a coating line or degreaser per the definitions). How do we write a permit when there is no applicable rules? Has anyone issued a permit for a similar source?</p>	<p>Canton has die washing process where no applicable rules can be found. Is a permit required? Answer -> Yes it does need a permit but it would be 'empty' per Andrew Hall – no established requirements. Kim Reinbold provided Clow Water Systems in Coshocton County as example.</p>	0:32:04
5	<p>Canton We have a facility that installed a source without a permit. When discovered, we realized this source is a wax burnoff / mold preheat oven and classified as an incinerator per our rules. The facility says they cannot afford to install the controls needed on the source to comply with the SIP approved PE emission limit from OAC 3745-17-09. Is there any financial hardship that the facility can claim to be exempt from complying with a SIP approved emissions limit?</p>	<p>There is no financial hardship exemption available to avoid installing controls. Ahern discussed cost of non-compliance would be more expensive than adding equipment. Toledo mentioned a site that is putting paperwork together to apply for a variance; site is attempting to show that cost is not reasonable on a per ton basis. Variances are rarely granted.</p>	0:36:00
6	Canton	Answer: We issue the renewal based on type	0:41:13

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	What is the proper way of renewing General Permit T&Cs? Options: Keep them the same as issued originally (no change or updating T&Cs); Change the T&Cs to match the currently available model GP; Treat them as any other renewal permit T&Cs and update them accordingly.	of application received from company. If the applicant wants a GP then they would need to submit latest/most recent qualifying criteria document. If applicant didn't submit GP then they will receive a PTIO.	
7	Miranda Garlock, NWDO I have a facility that has submitted a New Site Owner Approval Form for a portable source in 2012. Since then, the portable has relocated twice to this same location each time submitting a new Intent to Relocate Form for this same location. My question is how long is the New Site Owner Approval Form good for? Does the facility need to complete one of these forms each time?	If new site owner approval form was submitted as part of 'Site Preapproval' application then it is good for three years. However, if they are submitting on a case by case then needs to be submitted each time.	0:44:41
8	Elisa Thomas, CO - FYI Verizon is submitting PBRs and some DOLAAs are not accepting the PBRs because a consultant is signing them and not the RO/Authorized Rep for the company. This has come up in Akron, SEDO and probably other offices.		0:47:56
9	<u>PIDM Updates</u> Title V Application - GHG PTE issue Standard Terms and Conditions update for permits issued beginning 10/24 .	GHGs and PTE values submitted as part of TV Application;	0:50:00
	Stars2 Recent Updates: <ul style="list-style-type: none"> • Reports > Complaint/GDF Monthly Totals > Monthly complaints – Columns added for Asbestos • Emissions Tests Detail – can now edit the memo after it has been exported to AFS. New button "Edit Memo" added. Emissions Reporting season is coming. Clean up existing emissions report tasks!	Emissions Testing data can be edited by SA (Elisa) if tests were entered incorrectly and data is 'locked'.	0:55:28
10	Larry Maline / David Hearne, CDAQ CDAQ has recently received two "corrected application" submittals via Air Services from two of our Title V facilities. Normally this would be a routine event, however, in both cases, the corrected applications address applications for permits that have already been issued final. We are reviewing the particulars of both requests, but on the surface it appears that what should really be submitted in each case is a request for some type of modification. When my senior staff and I discussed this we are questioning if	Larry Maline NASA; Graftech International. CDAQ is receiving 'Corrected Applications' for PTIs already issued; language on Air Services is discussed. The applicant is not selecting proper choice. Have them resubmit a new application but copy from previous application NOT submit as correction to an ISSUED permit. Action item: Erica will reach out to applicants	1:03:30

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	there could be any situation where a responsible official should be able to correct an application for a permit that has been issued.	and clarify Air Services text. Erica – Discussion with Tracy Gu, NEDO, that Air Services will allow applicant to choose any application type; they don't want to apply for TV permit. User education /outreach.	
11	Jennifer Jolliff, NWDO It was passed along to me from a previous STARS2 call that FCEs need to have an associated site visit. I've spent a fair amount of time going back and associating these and explaining it/demonstrating it. Is this truly necessary? If so, would you mind performing a demonstration so that people can see if you put in a FCE you can create an associated site visit from the same page, rather than doing them separately? That would be helpful.	Decision to hold off on FCE demo -> Waiting for Linda Luksik to be available at future call. Action item: Short FCE Creation Demo/video	1:13:00
N/A	?Not on agenda* Questions from Andrea Moore (NWDO) and Sarah Harter on SB 265 guidance	Action Item: Waiting for updated guidance document from Mike Hopkins	1:14:50

GP 12 - Fee With Roadways: \$ 2,400.00

Fee Summary

Facility ID: 0210002046
Facility Name: Chesapeake Exploration LLC - Woodland 26-12-4 Pad
Classification: NTV
Permit Type: PTIO
Permit Number: P0115462

Draft: Not Yet Issued
PPP: N/A
PP: N/A
Final: 10/7/2013

Hearing Notice:
Hearing:
Comments Period End:

Public Notice:

Final Effective: 10/7/2013

Expiration: 10/7/2023

Fee

Full Cost Recovery:

EU Fees

Caution: Permit fees should only be assigned or adjusted within the permit detail for each individual EU. In addition, the option to use full cost recovery for work on a permit or adjusting the total permit fee should only be used in extremely rare circumstances and only when approval has been given to do so by Central Office.

EU id	Category	Fee Name	Base amount	Adjustment	Adjusted amount
F001	Process Weight Rate 1	0 to 1,000 lbs/hr	\$200.00	None	\$200.00
F002	Process Weight Rate 1	0 to 1,000 lbs/hr	\$200.00	None	\$200.00
P001	Process Weight Rate 1	10,001 to 50,000 lbs/hr	\$1,000.00	None	\$1,000.00
P002	Process Weight Rate 1	0 to 1,000 lbs/hr	\$200.00	None	\$200.00
P003	Process Weight Rate 1	0 to 1,000 lbs/hr	\$200.00	None	\$200.00
P004	Process Weight Rate 1	0 to 1,000 lbs/hr	\$200.00	None	\$200.00
T001	Storage Tanks	100,001 to 500,000 gal.	\$400.00	None	\$400.00

[Printable view](#)

[Export to excel](#)

Other Adjustment : \$0.00

Total Amount : \$2,400.00

September 19, 2013

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	Matt Stanfield, TDES	Hopkins stated it would be correct to look at	00:01:48

Stars2/Permitting Call Video Summaries

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Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	<p>A facility is proposing to install a new flour mill and we wanted to ensure we're putting in the appropriate terms to ensure major source rules are not triggered for the facility. A determination for this facility was made that the baghouses used for flour milling are considered inherent to the process based on responses to the following questions:</p> <ol style="list-style-type: none"> 1. Is the primary purpose of the equipment to control air pollution? No 2. Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment? Savings of \$2.5 million/yr and control equipment cost of \$176,000. 3. Would the equipment be installed if no air quality regulations are in place? Yes, since it captures at least 3.5% of the material that would be lost to atmosphere. <p>The company is claiming 99.9% control efficiency for the 2 baghouses at the mill. At this level of control, emissions are estimated to be 2.8 tons/yr PE and 1.4 tons/yr PM10. Since the control is inherent to the process, the controlled emissions from the baghouse would be considered the uncontrolled emissions for purposes of determining potential to emit.</p> <p>Since the control equipment is considered inherent to the process, does Central Office consider an initial stack test at a point in the stack after the baghouse to determine the actual emissions rate that can be used for determining uncontrolled potential to emit without additional permit restrictions?</p>	<p>uncontrolled emissions after baghouse; other offices (NEDO) had similar permit where baghouses were inherent to the process; no requirement made to do initial stack test.</p>	
N/A	<p><u>Not on Agenda - NWDO</u></p> <p>If source is a 'less than 10 ton' source, which guidance do you use to set BAT? If source is a 'greater than 10 ton' source?</p>	<p>BAT – additional discussion Dual language is still used in permit You need to use the new BAT guidance when performing the BAT determination; if we have issued the DRAFT permit using old BAT and if final will be issued after October 1, then we need to get agreement or acknowledgement from company that they are aware new BAT determination is available.</p>	00:11:10
N/A	<p><u>Not on Agenda – Akron</u></p> <p>Should we give warning to facilities that are calculating PTE based on emissions after</p>	<p>PTE questions from Duane at Akron</p>	00:19:00

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	controls? We need to have some understanding from company if they choose to move forward without additional controls		
2	Full Compliance Evaluation (FCE) Assignments <ul style="list-style-type: none"> • Assignments from the Facility Profile • Inspection Classification • Future Deploy - To Do for FCEs 	FCEs can be scheduled outside of the bulk scheduler; via facility profile - demo	00:22:53
3	General Updates <ul style="list-style-type: none"> • Next deploys <ul style="list-style-type: none"> ○ Enforcement - CEPs? ○ Asbestos Inspection Columns ○ EIS export improvements 		00:43:20
	<ul style="list-style-type: none"> • eDocs & Stars2 <ul style="list-style-type: none"> ○ Phase 2 is coming end of June 2014 ○ Answer Place 2518 - DAPC Document Storage in Stars2 ○ Discuss/Suggest needs in Stars2 to work efficiently find documents <ul style="list-style-type: none"> ▪ Attachment Search ▪ New Attachment Types/Correspondence Types 		00:46:46
	<ul style="list-style-type: none"> • PTIO expiration dates 		00:56:24
	<ul style="list-style-type: none"> • Director's Confidentiality Determinations 		00:58:49

July 18, 2013

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
2	Canton		
	a. Status of the FCE inspection template being available in STARS2 document generation. This would help reduce time spent on creating these forms.	Paulian is working w/ US EPA to get FCE template / 'Exhibit N' document incorporated into Stars2. It is on the list of requested Stars2 enhancements.	0:00:40
	b. When can we start entering the EAAs (enforcement action alert referrals) in STARS2 (as an enforcement action)? This would help with tracking.	EAAs and EARs are being entered now into Stars2. Compliance Plans are only to be entered right now by Central Office	0:05:09
	c. When will the help info be available for the new CETA integration modules?	On Line help is still needed – but CO PIER doesn't have time; will be done at some point. CETA Training Module is available as Internal Answer Place topic # 2332. ACTION ITEM : CO will work to get table of contents updated	0:10:10

Stars2/Permitting Call Video Summaries

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Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
		with minute markers until ON LINE HELP is incorporated.	
2	<p>d. Proper way to do a rescind NOV in STARS2. (Note: Typically the NOV has a correspondence entry and an enforcement action entry). I have seen inconsistencies in how these have been entered across the DO/LAAs. [Instructions I have been provided from John Paulian and Mike VanMatre regarding the Enforcement Action: Enter the action type "withdrawal of enforcement action" and a second action type of "final compliance without enforcement"; Make sure to change back the compliance status to "yes".] Not sure what the instructions are regarding the correspondence entry in relation to the eDoc system. Are we to use the "rescission" correspondence type to enter the rescind NOV letter?</p>	Erica performed demo of how to upload "NOV- Rescission" letter to correspondence. This document can be uploaded and associated with an enforcement case, if needed. Correspondence can be deleted by SA if it is uploaded to an incorrect facility. Return to Compliance (RTC) Letters can be uploaded also and is separate correspondence type. 'NOV-Open Burning' also will be added.	0:11:50
3	<p><u>Stars2 Version 2.1 - Friday, July 19, 2013</u> 44+ bug fixes and enhancements - A list for internal changes and external changes that are noticeable to the user will be sent in 2 informative emails. This deploy focused primarily on error correction with a few easy bonus additions thrown in.</p> <p><i>Noteworthy Internal Stars2 Bug Fixes and Enhancements:</i></p> <ol style="list-style-type: none"> a. PTIO Renewal – Issue Upon Expiration b. Title V PTO – Issue Early Renewal c. Permit keyword search now uses permit issued date and sorts on that. d. Custom Reports <ul style="list-style-type: none"> • Explanations • Permit Status report – no more negative time frames • Use of Application Received Date vs. Submitted Date...good or bad? 	Demo	0:25:30
	<p><i>Noteworthy External Air Services Bug Fixes and Enhancements (in Stars2 as well where applicable):</i></p> <ol style="list-style-type: none"> a. Trade Secret notices to the user <ul style="list-style-type: none"> • Log In • Validation • Attestation/PIN b. PTE Calculation Correction (totals were wrong) & Facility PTE required Title V PTO application PDF now includes whole application 	Demo	0:38:00

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
N/A	<p>Mike and Erica:</p> <p>Our agency has a last minute permitting/rule delegation issue to possibly add to the call tomorrow. The RICE MACT subpart ZZZZ contains both major source and area source requirements. At present, Ohio has not accepted delegation of the area source NESHAP rules, so if an area source is subject to this Subpart ZZZZ we would use the area source delegation term that has been developed for the Facility-Wide Section B of the permit. However, certain engines located at area sources subject to Subpart ZZZZ are required to comply with the requirements of the NSPS Subpart JJJJ or Subpart IIII (see 63.6590(c)). Does Ohio have delegation of these NSPS rules? If so, are we to include the NSPS Subpart JJJJ and IIII requirements under the emissions unit-specific terms of the permit in Section C?</p> <p>Bonnie Pray</p>	<p>Source is RICE MACT subpart ZZZZ. We don't have delegation for RICE MACT; what do we put in permit in terms of delegation?</p> <p>Q: Is this a source that would normally get permit? A: YES.</p> <p>Only link to NSPS is area source MACT; we say in permit that OEPA hasn't accepted delegation.</p>	0:54:00
N/A	<p>Christina Weig – SEDO</p> <p>Old TV renewal submitted; Application is being reviewed and is missing. OEPA requested they give us GHG information. Company's rationale is saying they are not a major source of GHGs; we want info to make sure they are not PSD. Attorney wants regulatory authority.</p>	<p>Applicant giving OEPA pushback on GHG PTEs SEDO should talk to legal; get together letter that gives them deadlines and outlines GHG legal authority.</p>	0:57:50
N/A	<p>Christine McPhee – NEDO</p> <p>Use of emergency generators after May 2014 for peak shaving</p>	<p>Emergency generators – operating them for peak shaving. Summary is emergency generators are supposed to submit May their operating hours and comply with RICE rule. What will happen after May 2014?</p> <p>HOPKINS: Ability to use the engines for peak shaving will go away by the rule; unless FEDS change rule, they can't use engines. This is a one year allowance. F&Os state we can use it even though PBR doesn't allow for it. Company will need to submit application for regular PTIO if they want to continue using generator for that purpose.</p>	1:00:05
N/A	<p>Chris - RAPCA</p> <p>Source that paints large equipment</p>	<p>Send questions to Lynne Martz to get advice on permitting rules – 21-09 and 21-18</p>	1:02:44
N/A	<p>Erica – New Record retention schedule produced by Legal</p>	<p>DAPC is allowed to have own record retention schedule for STARS2. We can keep records longer than policy.</p>	1:04:30

June 20, 2013

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>Mike Hopkins <u>Asphalt Plants PM/PM10/PM25 and BAT</u></p> <p>The questions are:</p> <p>How should be establishing BAT for particulate for asphalt plants?</p> <p>Can we use PM for BAT under SB 265?</p> <p>What testing is required?</p> <p>Are there problems with using the PM10/PM2.5 test methods?</p> <p>If we can't use PM for BAT, then do we need both PM and PM10/PM2.5?</p> <p>Are the emission rates for PM10/PM2.5 less than the 10 ton BAT exemption?</p> <p>All of this is for discussion... no final decisions will likely be made.</p>	<p>Discussion of what other offices are thinking; developing Shelly permit terms to appealed permits. Can we use PM as BAT number; can we use PM10; PM 2.5? <u>Testing Methods</u>? Toledo states there are fugitive emission points and not just stack. Asphalt plants emissions limit may need to include both SEDO suggests we should maybe using PM10... PE and PM10 are (realistic ratio for plants). Consider using PM10 as pollutant for testing. Sites would still need voluntary restriction to avoid BAT since they have baghouse. CDO commented that it would be difficult to get reading (PM10 test method) on higher moisture stack. Getting it up to temperature in sample run; condensation...plugs filter. Stick to method 5 testing? No good asphalt plant test due to testing challenges. Method 5 but also include back half to deal w/ condensibles?</p>	0:01:30
2	<p>SEDO - Engines subject to permitting can either get individual permits or apply for one of the engine GPs. Looking at the various engine GPs, it appears that the full MACT Subpart ZZZZ requirements have been incorporated, even for area sources. However, if we were to permit the same engines with individual permits, we would just include the term in the facility-wide section putting the permittee on notice that U.S. EPA, and not Ohio EPA, is authorized to enforce the area source rule. Based on earlier direction that we need to include the applicable requirements of any area source MACTs or GACT in PTIs and Title V permits because of the need to identify all applicable requirements, and once a permit is issued with those requirements, Ohio EPA will have accepted authorization for those rules for those facilities. So it would seem that Ohio EPA is accepting authorization for the area source rules for any engine covered by one of the current GPs. Is this this correct, and if so, are we not then required to evaluate compliance and participate in any emissions testing activities for the engines covered by these GPs?</p>	<p>There are some GPs in which OEPA has put language for GACT. In those cases, we are accepting delegation and need to verify compliance with the terms. (4 GPs have area source MACT – all portable – diesel engines); SEDO states we would have issue tracking which sites have the area source MACT in it.</p>	0:20:00

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
3	<p>NWDO</p> <p>NSPS Subpart OOO Intents to Test and Method 9 VE Report submittals. NWDO has been requiring facilities to submit ITTs so that we are aware these Method 9 tests are going to be conducted. After the testing is completed, the company submits their report but don't review it and send out a stack test letter. Should we be uploading these ITTs and test reports to STARS2? What are other DO/Laas doing with these NSPS Subpart OOO submittals?</p> <p>Have you had any discussions with other DO/LAAs about this? Right now we are just sticking stuff in the files but we all know that practice can't go on forever...</p>	All offices enter the method 9 tests into Stars2 and put in comments that report is 'accepted'; not all offices however send out acceptance letters. If a limit is violated then a letter is logged to correspondence.	0:32:00
4	<p>Linda Luksik</p> <p>She's planning on giving training this summer on bulk annual FCE commitment scheduling. She still needs to know who should get this training from the offices below... please email her.</p> <p>Cleveland, CDO, Portsmouth, RAPCA and Akron</p>		0:38:55
5	<p>Stars2 and Other Updates:</p> <ul style="list-style-type: none"> • Version 2.1 planned on a 6/28 deploy date. Mostly bug fixes, a few enhancements. • PTIO Preliminary Completeness Letter revision deployed 6/12. 	Deploy version 2.1 will not happen until July 19 th .	0:39:45

April 18, 2013

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>NEDO - Many Chesapeake sites have now been issued their first GP. They are now requesting some changes to the permitted EUs. Some changes are of the nature where the EUs they are adding are insignificant, may not need to be added to profile, while other changes involve swapping out an engine or flare. While Z and I agree that Chesapeake can easily make changes to the facility profile via Air Services, some of the information that needs to be submitted doesn't necessarily trigger an Administrative Permit Amendment...the company doesn't want their permit modified. What Z and Ed Fasko have come up with for now, involves Chesapeake emailing these documents and then NEDO is attaching them to the original permit application. I don't think that is the best idea and am wondering if we can</p>	<p>As changes to GP12 permitted well site happens, how does a company let us know?</p> <p>Some changes built into GP (hp of engine remains same; ok to change)</p> <p>Other changes may need a change to permit; if more than what GP allows, may need a modification. It may not be a GP from that point forward dependent on the change if not covered under the GP. *SEE Answer Place Topic 2502, "Oil & Gas Well-Site General Permit - communicate equipment changes that do not require a permit</p>	0:01:30

Stars2/Permitting Call Video Summaries

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Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
	create an alternative Air Services mechanism to handle these notifications/changes, which will be coming in waves for NEDO and SEDO forevermore... Whatever that mechanism is, Z wants it to involve a info workflow task if possible.	modification” http://ohioepa.custhelp.com/app/answers/detail/a_id/2502/kw/2502	
2	<p><u>eDoc & Stars2</u></p> <ul style="list-style-type: none"> • Record Retention Schedules • Scope of eDoc Phase 2 • Estimated Phase 2 implementation date • Where should documents get uploaded in Stars2? <ul style="list-style-type: none"> ○ NWDO - We've had several discussions over the past couple of months about what all is supposed to go into the facility's correspondence file in STARS2 and what shouldn't. I've been asked where we should be placing responses from the facility- inspection responses, enforcement/noncompliance responses, etc. Are these types of replies to go into STARS2 at this time? ○ What about emails? <p>What about test result worksheets?</p>		0:26:50
3	NWDO – Permit Evaluation Report (PER) needs to make the need to include deviations more prominent. How can we do that?	<p>Following modifications have been made to the hardcopy PER form:</p> <p>A "Detailed Emissions Unit (EU) Form" (attached) must be submitted for each EU listed in Table I to satisfy PER reporting obligations. <i><u>In addition to the PER, please remember that your PTIOs may specify other state or federal reporting requirements or information beyond the questions A or B in the Detailed Emissions Unit Form(s).</u></i></p> <p>For each EU contained in the PER, item D was added : <i><u>In the applicable PTIO, are there additional reporting requirements for this EU that need to be met in this PER? If yes, please include the information in the "Additional Information and Corrections" section of this PER. Yes ___ No ___</u></i></p>	1:23:00

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
4	What fields in STARS2 are used to populate the permit issuance document (authorization section, etc)? Are they from the permit detail or the facility profile?	The permit detail page is generated from the facility profile at the time the application was submitted. Info in the issued permit cover letter comes from the current facility profile; the authorization page comes from permit detail page. The EU info from the issued permit document comes from EU info on the permit detail page. Permit writer has the ability to 'synch' the permit detail page with the current profile.	1:40:00
5	For permit applications submitted via Air Services: Is a "process" required for each emission unit that is part of the application, and is that included in the validation check? When are egress points required and included in the validation check?	Answer Place Topic# 2342 – validation requirements for applications Yes, process required for each EU is required.	1:43:04
6	<u>Stars2 Updates</u> <ul style="list-style-type: none"> • Stars2 version 2.0.2 may/may not be deployed Friday 4/19 <ul style="list-style-type: none"> ○ Permit Status Report (Error when try to run NEDO) ○ PER Overdue Report • Stars2 version 2.1 – shooting for May 2013 to fix 25+ bugs in Stars2 • Retro Stars2 reminders – Should we review? • Reminder to staff to validate and submit emissions tests, when they are finished with entry. There are 8 out there in draft state. I know some of them are valid and likely, some just forgot to “submit” the test. • Currently staff can’t link correspondence to a Closed enforcement case. We’ll fix that in 2.1, for now, send a request to Admin so one of us can link them. 	Question Asked: How do you get old PERs off the “PER Overdue List” Contact CO so we can troubleshoot. May be that EU permit status needs to be terminated.	1:45:00

February 21, 2013

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1	<p>Matt Stanfield - Toledo</p> <p>For consistency in setting emissions limitations, which of the following rolling annual emissions limitations (monthly basis) is Central Office's preferred format? The Permit Library of Terms and Conditions specifies the use of: tons per year, based upon a rolling, 12-month summation of the monthly emissions. The December 10, 2009 SB 265 BAT memo specifies: tons per rolling, 12-month period.</p>	<p>Central Office has no preference; either is acceptable. Most are permitting situations where monthly records are being kept.</p>	0:05:52
2	<p>Dana Thompson – CO Permitting</p> <p>I've had the question addressed to me of whether OAC 3745-105 (pathological waste incinerators) governs the incineration of</p> <ol style="list-style-type: none"> 1. household pets in a pet crematory; 2. research animals that have not been exposed to human pathogens. <p>I know what answer I want to give, viz.</p> <ol style="list-style-type: none"> 1) the rule doesn't specifically exempt pet crematoria, but it does exempt veterinary clinics and animal shelters, and it's hard to see why a defunct pet should be treated differently. Therefore I think 3745-105 does not apply. 2) if a research animal has been deliberately exposed to a human pathogen then 3745-105 clearly applies, whether it's a whole or dissected carcass. Furthermore, they must fulfill notification and recordkeeping requirements in order to exempt out from 3745-75, the infectious waste incinerator standard and also the federal hospital/medical waste incinerator rules. But, if no human pathogen is involved, then the question comes down to whether whole carcasses or dissected parts are involved. The defining criterion is whether blood is present, since blood is an excellent culture medium for both human and animal pathogens. The answer I'd give is whole critters no, pieces of critter yes, to the question of 3745-105 applicability. <p>Before I give my answer I'd like to be sure it doesn't conflict with established precedent. Hence the need to discuss it with the Districts/locals.</p>	<p>Tim Fischer (NEDO) describes permitting applicability question at minute 16:00.</p> <p>Decision made that Path Waste incinerator rules do NOT apply to pet crematories; may need to clarify guidance or put in exemption. If animals have been dissected (body parts) and exposure to pathogens is present then we need to clarify rules as Path Waste Incinerator rules would apply. Interim guidance? Plans to modify rules for pet parts...</p>	0:11:30

Stars2/Permitting Call Video Summaries

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Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
3	<p>Tim Fischer - NEDO</p> <p>At this point, although it is strongly encouraged for Title V and Synthetic Minor facilities to submit reports electronically, hard copy reports are still an option. One of the changes for the standard terms and conditions that has been under debate for years is requiring EVERYTHING of a Title V facility (unless extreme hardship) to be submitted electronically. We aren't there yet.</p> <ol style="list-style-type: none"> 1. For malfunction reports at a Title V facility that come in hard copy, should we be uploading them into Stars2? 2. We are now uploading all PER reports into Stars2. Should we also be doing this for each quarterly and semiannual report we receive hard copy from NTV facilities? I thought we were but apparently some are not. 	<p>Yes, we should upload hardcopy reports into Stars2 (include malfunction). Standard terms haven't been updated yet in requiring them to do it electronically. We need to upload any hard copy report if they haven't submitted electronically. (<i>'Form and manner prescribed by the director'</i> is in place for some reports but not all)...</p> <p>Right now, we don't know for eDOC purposes how far back this will be required. 15-06 Verbal notification? Do we upload these to Stars2? Stack test reports are large? How do we enter? Erica will ask that question.</p>	0:31:22
N/A	SEDO – Are all offices entering quarterly reports into Stars2 for NTV sites ?	Most offices are only entering hard copy PERs for non-Title V sites. For FEPTIO sites and TV enter them in if you get them in hardcopy. Amish sites are allowed to submit hard copy reports.	0:45:00
4	<p><u>Stars2 Updates</u></p> <ul style="list-style-type: none"> • Stars2 Demo for entering Emissions Tests. • Training videos available • Any other questions or demos needed on new Stars2 functionality? 	<p>CETA Stars2 support issues/questions should come to Elisa (Tier 1) and Erica/Linda Lazich as backup; not to Arunee or Mike VanMatre.</p> <p>Emissions test entry demo (52:00)</p> <p>There is a training video on emissions tests (Answer place topic 2332; complaint and gdf monthly totals)</p>	0:50:00
N/A	<p>Tony Becker – NEDO</p> <p>Questions related to non-Road engines and whether or not they need permits</p>	<p>See Answer Place topic# 2470 <i>Air Pollution Applicability Guidance for Non-road Engines</i> for flowchart; recommended by SEDO</p> <p>http://ohioepa.custhelp.com/app/answers/detail/_id/2470/kw/2470</p>	01:06:00

December 20, 2012

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1			
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October 18, 2012

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
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September 20, 2012

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
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May 17, 2012

Agenda Topic#	Agenda Item	Summary – <i>As Discussed</i>	Time h:mm:ss
1			
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April 19, 2012

Topic	Summary	Time h:mm:ss
1	Terms for Illegal Drug Destruction	0:00:00
2	Shelly Case	0:12:01
3	NTVs becoming Exempt	0:18:45
5	PIDM Updates	0:33:51
6	E-Docs and STARS2	0:47:46 & 1:03:35
7	NOV Designations	0:51:34
8	STARS2/CETA Update	1:34:49
	Hardcopy of Blue Cards	2:07:50
	Permit Keyword Search	2:12:11

This conference call begins recording mid topic 1 with the discussion of terms for illegal drug destruction by controlled burnings. It was determined that the DEA will make the final decision on the destruction of the illegal drugs. Syringes and plastics are not to be burned, but sent to a local Solid Waste District.

Regarding the Shelly 77 ERAC case, the guidance for asphalt companies was discussed with the revisions of separate emissions for each portion of the process are to be completed. Fugitive sources were also discussed as well as a new approach for entering them in STARS2.

The next topic addresses NTV permits becoming exempt and how to enter them in STARS2. OAC Rule 3745-21-09 (C), OAC Rule 3745-31-03 (A1) and (L4), and OAC Rule 3745-31-03 (L1) were also discussed in this topic.

PIDM staff and IT changes were also addressed followed by an e-document management update. Phase 0 has been completed and Phase 1 is beginning shortly.

Next, NOV designations in STARS2 were discussed in that more NOV topics are requested in the drop down bar. The uploading of documents into STARS2 was discussed in that all documents are to be uploaded here and the originals disposed of after uploading. There are legal ramifications for keeping both documents. Also, a generic user to upload the documents is not permitted by USEPA.

Next, a STARS2/CETA update was provided along with a tutorial of FCE search and the enforcement summary page. Extra topics not in the agenda include the permit keyword search bar, which is being fixed and the plausibility of uploading blue cards to STARS2 was also discussed. Topics 4 and the second topic 3 were not discussed in this call.

March 15, 2012

Topic	Summary	Time h:mm:ss
1	Meeting Notes & Updates	0:00:50
2	STARS2/CETA	0:03:49
3	Air Services Signature	0:17:44
4	ITR Form	0:26:10
5	Permit Strategy Write-Up	0:37:15
6	Shutdown/Idle Permits	0:37:15
7	Oil & Gas Well Sites	0:53:19
8	Non-Air Vapor Interphase Degreaser	1:02:18
	PER in STARS2	0:06:40
	Exemption request in Feasibility	0:58:01

This conference call discusses the meeting notes and updates initially, specifically Engineering Guide 34 for shutdown and idles as well as Engineering Guide 81 and the approval of EU IDs.

STARS2/CETA updates are included in the attachment regarding the interface and data migration which are to be tested. SWOAQA poses a question concerning the hard copies of PERs to STARS2 in that the PER is to be uploaded in the attachment section and the hard copy is no longer needed. The PER signature is then to be dealt with via the PTIO program.

Regarding Air Services signatures, it was requested that the facility name be displayed in Air Services as a signature. It was also stated that consultants may not submit information; a facility contact must. OAC Rule 3745-31-04 (B) was cited in this topic.

The ITR form in STARS2 has been enhanced for portable relocation groups being in progress. Also, the procedure has been updated to enter the ITR with a scanned copy of the ITR as an attachment.

A side topic of STARS2's purpose was also addressed as to whether or not the program was to be for e-content management.

Permit Strategy Write-up was also addressed in that the Draft is only reviewed, not the Final. The Draft should be uploaded as an attachment, not in the Permit Detail page was also discussed in this topic.

Shutdown and idle facilities and maintaining their permits were also addressed in regards to what period of time constitutes idle. It was decided to refer to Engineering Guide 34 for decision making as well and to verify if/how the equipment is maintained for reoperation. NSPS reconstruction was also discussed in this topic.

Oil and gas well sites were then discussed as nuisance complaints. The question was whether or not a person should contact OEPA or ODNR for complaints. Since the site is permitted for the site and not the drilling and fracking phase, OEPA is contacted in conjunction with ODNR for the production phase. ODNR is to be contacted for complaints in the well pad. Fugitive dust on roadways was also a concern and it was determined that it would be treated as a construction roadway.

Exemption requests and feasibility tests were also discussed in that approval is needed before the testing. OAC Rule 3745-31-03 as well as paragraph 3F was also cited for a specified date of expiration in the letter.

RAPCA also requested that anyone who has dealt with a Non-Vapor Interphase Degreaser should contact RAPCA with information.

January 19, 2012

Topic	Summary	Time h:mm:ss
1	PIDM/PIER Updates	0:01:02
2	Keyword Search Issues	0:35:15
3	PER changing Description	0:37:12
4	STARS2 Generating Documents	0:38:32
5	Synchronizing EUs	0:43:27
6	MACT PTE	0:57:29
7	PTE Controlled Sources for PSD	1:03:46
8	Boiler MACT Update	1:18:02
	SO2 Modeling	1:24:57
	PTI, TVs, MACTs & NSPS in Permitting	1:27:22

This conference call begins with PIDM/PIER updates including the launching of a new version of STARS2, how to submit a mod application for TV mods only as well as EU mods. Also, voluntary reporting of greenhouse gas emissions in emissions reports is now on STARS2/Air Services. The metrics reporting issue and the Rush/Express tally issues have been resolved. Three new workflow names are also available on STARS2 which include CEMS/RATA Results/Reports, CEMS/CERMS/COMS Initial Testing, and Emissions/Stack Testing. Reporting for Title V 2011 emissions will be enabled and available to Air Services users by January 30th. NTVs site reporting function is enabled now. Also, HCDOES is now known as Southwest Ohio Air Quality Agency (SWOAQA). A reminder to update staff users was also mentioned in this topic.

The keyword search issue in STARS2 was discovered to be a server error and is being resolved.

Next, the Permit Evaluation Report (PER) changes in the description for the facility description was determined to be an admin mod change only. The original topic 3 was a typo in the agenda, but was resolved in the call.

Also, in STARS2, when generating a document, discussion concerning logged versus not logged occurred. On the next topic, handling descriptions for applications coming in as hard copies that differ in permit was discussed. Chapter 31 mods, and the 'Sync EUs' button on the STARS2 page were discussed for the description profile. MACT PTE for *de minimis* via record keeping facilities for HAPS was discussed for the federal PTE of the unit. OAC Rule 3745-15-05 (D) was discussed as being a solution as a part of the SIP. The one ton threshold was determined to be an acceptable solution for this issue.

Then, permits with PTE from controlled sources for PSD were discussed. The December 10, 2009 BAT IOC was mentioned as well as the NSR applications. Permit draft versus direct finals were also brought up. Boiler MACT rules were discussed due to the federal move. The boiler MACT is now effective and up for comment. CAM plans then are no longer needed however; Engineering Guide 76 will be used for references.

An extra topic concerning SO₂ modeling was addressed for the one hour requirement. Engineering Guide 69 was discussed as a possible reference for this topic.

Finally, incorporated by reference for a landfill for PTI in TV, creating the permit incorporating MACT and NSPS rules was also discussed. Subpart A and Subpart WWW in the MACT were discussed as possible solutions for this topic.

November 17, 2011

Topic	Summary	Time h:mm:ss
1	PIDM/Air Services users	0:00:24
2	Compliance Report Review	0:32:10
3	Keeping Accurate Contact Information	0:48:29
4	Superseding Permit Issues	0:06:01
5	TN TV Permit Renewal NEDO	1:01:59
6	Document Scanning	0:58:40

This training conference call addresses the Air Services User Groups. Trivial sources in the STARS2 profile are addressed along with items submitted by Air Services to STARS2 by a CO, DO/LAA and or local health department. Superseding permit issuance in the chapter 31 mod is also addressed along with time extensions in the chapter 31 mod. The NOV lists generated are addressed in regards to some Air Services Users entering the wrong type of permit and how to correct the errors. A demonstration of how to keep and update contact information is also shown in the call. Finally, the MACT rule subpart ZZZZ is also discussed in this call with regards to the Tennessee Gas Pipeline #214.

September 15, 2011

Topic	Summary	Time h:mm:ss
1	Public Records	0:00:00
2	Capture Efficiency for Buildings	0:04:14
3	Mods on PBRs for TV Facilities	0:20:31
4	Preliminary Completeness by Mail	0:25:56
5	Oil & Gas Well General Permits/Fracking	0:32:30
6	Greenhouse Gas Permits	0:54:41
7	New STARS2 in Air Services	1:03:11

This training conference call begins recording towards the end of point two in the agenda in the midst of discussing the availability of public records. Capture efficiency for buildings is also discussed in point three, particularly six year 70% capture efficiency. Justification of the 70% capture is done on a case by case basis and is determined primarily by the RACM document and by particle size. Topic 4 addresses PBR's for TV facilities in regards to submitting mods for the TV permit after the PBR has been submitted. OAC chapter 3745-31-02 is cited for this issue. Topic 5 is addressed by RAPCA and the question of sending preliminary completeness letters by mail or by STARS2 or e-mail. Possible legal ramifications were a concern for this motion. Oil & gas wells with general permits, particularly the fracking industry, were also discussed in terms of emissions and permitting. Greenhouse gas permits under the federal Greenhouse gas Tailoring rule 3134 in terms of exemptions, PSD, and TV permits were also discussed in this call. A new version of STARS2 in Air Services was announced to be coming soon. Thus, urgent issues were encouraged to be brought up. Topic 6 was not discussed in this call.

August 18, 2011

Topic	Summary	Time h:mm:ss
1	STARS2 Reminders	0:37:04
2	Waving PPP of a TV Permit	0:38:28
3	Preliminary Completeness Letter	0:41:05
4	DAPC Description & Permit Detail	0:48:28
5	FEPTIO Renewals & Extensions	0:53:07
6	Expired PBRs	0:59:09
7	NTVs in Registration Status	0:00:25
8	FEPTIOs / Synthetic Minors	0:03:52
8	MACT Sources as <i>de minimis</i>	0:13:36

This training conference call begins by addressing the Registration status of NTV regular permits that will not be grandfathered into a new standard. The call also addresses a specific issue related to 40 CFR Part 63 Subpart T (Degreasers as a MACT source). The question addresses classifying the source as a

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FEPTIO/synthetic minor by rule or made a true minor. Also, the question of if a source is subject to MACT, can it be *de minimis* was also posed. Subpart WWWW/ table 1-25 is addressed as well as OAC Rule 3745-15-05 (C) and OAC Rule 3745-21-25 is used to address this issue. General reminders for the division were addressed next. The proper procedure and documentation to wave a PPP of TV permits are discussed as well. A demonstration was provided on location to save the preliminary completeness letter within STARS2 is shown. Next, when generating a permit initially, the question of if the DAPC description has to match the Permit Detail exactly was brought up. Minor changes were not a large concern; however, large changes must match in both. Then, FEPTIO renewal or extensions were brought up in regards to how early a facility can apply for one for the 2013 expiration date. It was decided that there is no hard date that is too early. Legal will have to be consulted to make a further decision. Finally, how to mark expired PBRs in STARS2 was discussed as being terminated or superseded at the end of the PBR.

June 16, 2011

Topic	Summary	Time h:mm:ss
1	Public Notices	0:00:39
2	Workflow & Shutdowns	0:04:34
3	Portable source WebEx	0:03:32
4	Surface Coating	0:24:51 & 1:11:30
5	Portable Sources by PBR	0:56:59
6	Boiler MACT Rule	1:07:50 & 1:18:57
	CO Shutdowns	0:04:52 & 1:38:03

This training conference call begins with stating that Public notices have been moved from Toi's responsibility to intern Joe Budgake for the summer. A reminder to cancel workflows when shutting down a facility then followed along with an announcement for a portable source WebEx training session. The next topic, which was not included in the agenda, addresses the permitting backlog when shutting down a facility by CO. A general consensus and input was sought by the districts on the idea of CO shutting down facilities when a notice is received. Locating this form in an accessible location was also addressed. Next, the issue of surface coatings for Title V sources was addressed. The main concern was with PTIs regarding if OAC Rule 3745-17-11 and OAC Rule 3745-17-07 was superseded by OAC Rule 3745-17-11 (C). BAT issues were also discussed regarding PTI mods and agency initiated mods and the use of sunset language/Streamlining language was also discussed in this topic. The next topic addressed portable sources by PBR if there are no comments on intent to relocate. The main question was if a source is relocating, does one get a new PBR or go through the relocation process. Determining what constituted a portable versus a permanent source was also discussed. Then, an issue from the previous call was brought up in regards to the boiler MACT in that many changes are still needed to the rule, including staying the rule. An IBR approach for TVs was also suggested. It was also determined that OAC Rule 3745-112 (J) won't apply for the boiler MACT rule.

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Other rules mentioned in this discussion include Subpart YYYY and Subpart DDDDD. Next, landfill operations wishing to increase operating values was addressed in that the districts should follow the proper processing tiers. Finally, an extra question regarding TV renewal of the PPP under Part A having revised terms and conditions without PAG was also discussed.

April 21, 2011

Topic	Summary	Time h:mm:ss
1	General Permits, SMTV & Review Metrics	0:01:40
2	OAC 3745-21-07 7 BAT	0:11:20
3	Engine & Boiler MACT	0:29:19
4	IBR and T&C Terms for Boiler MACT	0:25:37
5	New MACT Rules	1:09:47
6	Case by Case Facilities for MACT	1:01:45
7	Area Source Testing	1:10:56

This training conference call begins by addressing modeling mercury for toxics as the elemental PLV. General updates follow including SMTV reports, reviewing metrics and general permits for boiler compression engines. The next topic addresses OAC 3745-21-07 renewals in regards to BAT in TV renewals and limiting a source when OAC 3745-21-07 is no longer effective. The release of 8lb/hr and 40lb/day rule was addressed as well as the 7.3 TPY and the Chapter 31 mod for release. The SB 265 for less than 10 tons was also discussed in this topic. The MACT rules under 40 CFR Part 63 Subpart ZZZZ were discussed as well as the de minimis option for small engines. OAC 3745-15-05 (C)(1) was also discussed in this topic. Next, IBR and T&C terms for the boiler MACT were discussed. A set of terms were posed by HAMCO as well as from Cheryl, which prompted a discussion as to which terms to utilize. Using an output and performance based conditions for the boiler MACT were also discussed as well as limits on greenhouse gas limits. Also, in regards to facilities on a case by case basis for vacated boiler MACT compliance, references to the Clean Air Act 112 (G) were made. New rules for the boiler MACT, specifically Subpart DDDDD and the Engineering Guide 76, were being made for gas fired boilers as well and will be available soon. Finally, an area source for emissions testing was discussed regarding a requirement to witness the test in a TV permit and the issue if enforcement was brought up. Stack tests, the GACT, NTV permits and 40 CFR Part 63 Subpart JJJJJ were also discussed in this topic.

January 21, 2009

Topic	Summary	Time h:mm:ss
1	Permits in Ch 31 mod	0:00:30
2	PTIO issuance in STARS2	0:001:10
3	Separating EU's in the permit	0:06:13 and 0:14:44
4	Public notice dates	0:52:45

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This conference call addresses permitting in the chapter 31 mod, specifically PTIO applications with EU's that need to be entered initially as well as during the workflow process. PTIO issuance in STARS2 begins when the admin mods of PTIOs is selected for the 10 year renewal purpose. Separating EU's for different reasons in the application is also addressed in this call. This process is referred to as cloning the workflow and copying permits. The question of who completes the public notice dates is also addressed and it was determined that the CO issuance staff will complete the task.

The STARS2 portion of the call addressed resolved software bugs in the gateway and the potential of a permit keyword search. Hard copies of reports are encouraged to be submitted via Air Services. New queries include IOC long term tracking and processing as well as separate columns for notes with the EU number and description.