

# **Does Your Business Need an Air Permit?**

Rick Carleski  
Office of Compliance Assistance and  
Pollution Prevention  
Ohio EPA

# Session Outline

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- ★ What operations need an air permit
- ★ Why permits and exemptions are important
- ★ Types of air permits
- ★ How to file and obtain a permit
- ★ Who can help you



# Basic permit facts

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- ★ It is the company's obligation to determine if an air permit is needed.
- ★ It is the company's obligation to apply for, obtain and comply with permit.
- ★ Permit needed before installing equipment, second permit to continue operating.



# Basic facts (continued)

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- ★ Air permits are for specific equipment at that facility location.
- ★ New permit is needed if equipment is moved to new facility location. Moving it within facility is generally OK.
- ★ Permits can be transferred to a new owner.

# Why Permits Are Important: = What EPA Inspectors look for

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- ★ Are there visible emissions & off-property odors?
- ★ Is company maintaining records required by air permits?
- ★ Does everything that needs an air permit have one?



# Common Air Quality Violations

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- ★ Installing and operating equipment without obtaining proper permits.
- ★ Not maintaining records required by permits.
- ★ Exceeding permit limits.
- ★ Not maintaining air pollution control equipment.



# What Needs an Air Permit?

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- ★ No definitive list exists!
- ★ Permit needed for “*air pollution source*,” “*air contaminant source*” or “*emission unit*” = each separate activity or operation that emits air pollutants.
- ★ Permit is only for that air pollution source. Company may need several air permits to cover all plant operations.

# What May Need an Air Permit?

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## 4 Rules of Thumb:

- ★ Something with a stack, vent or dust collector.
- ★ Something that uses solvents, paints, inks or adhesives.
- ★ Something that burns fuel.
- ★ Something that causes smoke, dust or odors.



# Common things needing permits



Boiler



Paint booth



Printing press



Dry cleaner



Stone crushing

# Does Everything Need an Air Permit?

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NO – 3 options for exemption:

1. Permanent exemptions (OAC 3745-31-03)

List of 45+ types of equipment and processes that do not need an air permit.

2. Permit-by-rule option (OAC 3745-31-03(A)(4))

Exempts 11 types of operations and facilities if they meet qualifying criteria and operating limits.

# Some things exempt from permits under permanent exemptions (#1)



Lab fume hoods

Boilers, water heaters  
< 10 million Btu



Storage tanks  
<19,800 gallons

# More examples



Non-vented machining operations



Small solvent parts washers

Solvent reclaiming units  
< 20 gallon capacity



# Permit-by-rule exemption categories (#2)

- Emergency generators
- Plastic parts molding
- Small crushers
- Ground water/soil cleanup
- Auto body shops
- Gas stations
- Gas-fired boilers
- Printing shops



# Does Everything Need an Air Permit? (cont.)

## 3. “De minimis” source exemption

(OAC 3745-15-05)

- ★ Emits less than 10 lbs/day of air pollutants and;
- ★ Less than 2000 lbs/yr of hazardous air pollutants.
- ★ Can't be subject to federal rules.
- ★ Requires emission calculations.



# Air Permit Self-Assessment

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1. Tour your plant to identify all air pollution sources using the 4 rules of thumb.
2. Determine what operations fit the permanent exemptions or permit-by-rule.
3. Determine if remaining operations can be de minimis by doing emission calculations.
4. Assume remaining sources need a permit.

# Types of Air Permits

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## Permit to Install (PTI)

- ★ One-time permit needed before installing equipment.
- ★ For equipment installed after January 1, 1974, can be done years after installation.
- ★ 1-6 month processing time.
- ★ One-time fee.
- ★ Allows 18 months to start construction.

# Types of Air Permits (cont.)

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## Permit to Operate (PTO)

- ★ Allows continued operation after PTI.
- ★ 5-year term, renewable.
- ★ No permit fee.
- ★ Title V permit = one PTO for whole facility.



# Permit Application Form Data

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- ★ Company name, address.
- ★ Detailed description & diagram of equipment being installed/operated.
- ★ Usage rates of raw materials, fuels.
- ★ Production rates of finished products.
- ★ Description of pollution controls.
- ★ Estimate of types & quantities of emissions.



# Permit Process

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- ★ Company completes PTI application.
- ★ Submits to District Ohio EPA office.
- ★ District Office reviews for completeness within 14 days, notifies company.
- ★ District does technical review, 1-3 months.
- ★ District writes permit, sends to Central Office (Columbus).



# Permit Process (cont.)

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- ★ Central Office performs review, < 1 month; returns to district if needed.
- ★ Central Office issues permit either:
  - Final – usually within 2-4 weeks
  - Draft – published in local paper, 30-day public comment, adds 45+ days min before final is issued.



# Permit Processing Pitfalls

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- ★ Incomplete application (unsigned, wrong form, missing data, no process diagram).
- ★ Submitting application at last minute before starting construction.
- ★ Not anticipating public concern, possible draft permit adding time.



# Tips for Faster Permits

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## General permit option (PTI or PTO)

- ★ “Canned permit,” can view beforehand
- ★ 45 day or less processing time
- ★ Simplified application form

## Ohio EPA “Rush List”

- ★ Letter demonstrating economic or financial hardship if not processed quickly.

# Tips for Faster Permits (cont.)

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- ★ Make sure application is complete.
- ★ Meet with district office to discuss installation before submitting application.
- ★ Stay in contact with district permit engineer.
- ★ Promptly respond to requests for additional information.

# Tracking Your PTI

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1. Contact your local district office
2. Through Ohio EPA Division of Air Pollution Control's Web site:

[www.epa.state.oh.us/dapc/pti/ptimain.html](http://www.epa.state.oh.us/dapc/pti/ptimain.html)



# Air Permit Format

## Permit to Install

## Permit to Operate

**OhioEPA** STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	Issue Date: 8/2/2005
Terms and Conditions	Effective Date: 8/2/2005

**FINAL PERMIT TO INSTALL 01-01294**

Application Number: 01-01294  
Facility ID: 0165010107  
Permit Fee: \$200  
Name of Facility: DuPont Teijin Films  
Person to Contact: James Riley  
Address: 1175 DuPont Road  
Circleville, OH 43113

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1175 DuPont Road  
Circleville, Ohio**

Description of proposed emissions unit(s):  
**film extrusion, forming, treating, and coating line with Dowtherm condenser, baghouses and cyclones (modification to PTI 01-08945, issued April 5, 2005).**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency  
  
Director

**OhioEPA** State of Ohio Environmental Protection Agency

**Final Permit To Operate An Emissions Unit**

Effective Date: 07/27/05  
Expiration Date: 07/27/10

This document constitutes issuance to:

Facility ID: 16-77-01-0903  
Holland Oil Company #37  
635 N. Main Street  
Akron, OH 44310

of a permit to operate for:

G001 (GDF)  
Gasoline dispensing with Stage I & II vapor control.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Akron Air Pollution Control  
146 South High Street, Room 904  
Akron, OH 44308  
(330) 375-2480

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency  
  
Joseph P. Koncelik  
Director

# Structure of Permits

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**Part I: General Terms and Conditions - same for all**

**Part II: Special Terms and Conditions - specific for each permit**

- ★ Part II specifies record keeping of materials usage, operating requirements, control equipment or testing requirements.
- ★ Part II specifies what reports are to be submitted.
- ★ Most violations found concern Part II requirements.

# What do permits require?

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- ★ Records of production, material and fuel usage (monthly/annual).
- ★ Quarterly/semi-annual/annual reporting of production, material usages, air emissions.
- ★ Regular maintenance of air pollution control equipment.
- ★ Malfunction/exceedance reporting upon occurrence.



# Where Can I Get Help?

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[www.epa.state.oh.us/ocapp](http://www.epa.state.oh.us/ocapp)

800-329-7518

[Rick.Carleski@epa.state.oh.us](mailto:Rick.Carleski@epa.state.oh.us)

# OCAPP's Services

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- ★ Toll-free hotline for EPA questions
- ★ Assistance with permit applications
- ★ On-site assistance
- ★ Partnership with trade organizations
- ★ Seminars & conferences
- ★ Assistance publications
- ★ Internet resources



# OCAPP's Services

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- ★ Quarterly newsletter
- ★ Advisory panel/regulated community input
- ★ Financial assistance referrals
- ★ Help resolve violations with District Office





# The Ohio Air Quality Development Authority



CLEAN AIR *&* CLEAN ENERGY  
ARE GOOD BUSINESS

# Contact for financing opportunities

Ohio Air Quality Development Authority  
Clean Air Resource Center

Toll-free: 1-800-225-5051  
*[www.ohioairquality.org](http://www.ohioairquality.org)*

Mark Shanahan, Executive Director  
*[Mark.Shanahan@aqda.state.oh.us](mailto:Mark.Shanahan@aqda.state.oh.us)*

Todd Nein, Project Manager  
*[Todd.Nein@aqda.state.oh.us](mailto:Todd.Nein@aqda.state.oh.us)*

