

Environmental Permitting in Ohio Workshop I

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Division of Air Pollution Control

July 18, 2024



**Environmental
Protection
Agency**

RENEWAL OF OPERATING PERMITS

- Your company has been running along for the past 3 ½ years or 9 years with a Title V permit or PTIO. You have received the notice from Ohio EPA that the permit is expiring. This is the first time you have seen this type of document. What should you do?



NEED FOR RENEWAL OF PERMIT

- Update applicable rules and requirements
- Revise terms with latest language
- Verify emissions units still exist
- Add any new emissions units
- Adjust monitoring, record keeping, reporting, and testing
- Check compliance



COMMON APPLICATION PROBLEMS

- Incorrect forms

- Find links to forms (Section I and II and EAC)

- No original signature

- Process flow diagram missing or does not match the application forms

- Insufficient information

- Blank spaces on forms

- No calculations

- Missing pages

epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/permit-application-forms



ADDITIONAL APPLICATION PROBLEMS

- Emission estimation deficiencies
 - Using outdated emission factors/guidance
 - Not calculating an emission unit(s) or facility's potential-to-emit (PTE)
 - Necessary to check Title V applicability
 - Necessary to determine applicability for some MACT regulations
- Failure to consider full operational capacity of equipment



OVERALL PERMIT REVIEW PROCESS AT OHIO EPA

- Completeness review
- Determine rule applicability
- Determine allowable emissions
- Do emissions calculations
- Draft terms
- Internal review
- Issue renewal



REVIEW PROCESS AT OHIO EPA

- Check for new applicable rules
- Check for changes to applicable rules
- Check to see if sources changed/materials changed
- Check for new exemptions
- Check for insignificant emissions units, compliance assurance monitoring (CAM)



REVIEW PROCESS AT OHIO EPA CONTINUED

- Check emissions calculation
- Check to see if permittee wants changes
- Check for new/updated terms and conditions (Terms and Conditions Library)
- Check for installed sources
- More/less testing required?



TYPICAL PROBLEMS AT TECHNICAL STAGE

- Sometimes see changed equipment/operation
- New equipment needing installation permit
- New stack test data/emission factors – in compliance?



TYPICAL PROBLEMS AT PERMIT WRITING STAGE

- Permittee does not review terms
- Permittee takes too long to review and respond
- Permittee does not check to see if they can live with monitoring/record keeping/reporting approach



TITLE V RENEWAL STEPS

- Title V permit program has additional opportunities for input by company
- Draft – anyone comments
- Preliminary proposed permit – Company comments
- Proposed permit – U.S. EPA comments
- Final permit (appealable to Environmental Review Appeals Commission)



FESOP/PTIO RENEWAL STEPS

- Federally Enforceable State Operating Permit (FESOP) - Draft – you have an opportunity to comment on conditions
- Controversial – Outside parties have expressed interest in the permit
- Most – small sources – just issued as final actions



CITIZEN/U.S. EPA COMMENTS

- Some permits must be issued as a draft and need a comment period
- Ohio EPA may receive comments from citizens, U.S. EPA, etc.
- Most comments are resolved easily – for others, we need your help
- Either way, you will review our responses



IMPORTANT RENEWAL TOPICS

- Make sure the Title V renewal is submitted on time - between 6 and 18 months before expiration.
This is a federal deadline.
- If deadline is missed, facility lacks legal authority to operate when permit expiration date is reached
- Ohio EPA will either issue an enforcement discretion letter for facility that misses application deadline by a few days or need to take a more formal enforcement action



IMPORTANT RENEWAL TOPICS

- Renewal of state PTOs should be completed on time – reminder sent out six months prior to expiration



IMPORTANT RENEWAL TOPICS

- Update facility profile
- Develop/contact district office/local air agency – know the permit review person for your facility
- Note: Some districts are helping each other with permits
- Some field offices have had personnel turnover – make sure you know your facility contact



PERMIT HAS BEEN ISSUED...NOW WHAT?

- Read and understand your permit
- Set up record keeping now
 - Make as simple as possible
 - Train employees
- For Title V facilities, submit quarterly reports and annual compliance certification
- For non-title V the permit evaluation report (PER)



PERMIT HAS BEEN ISSUED...NOW WHAT?

- Know what is happening at your facility (make sure that you are in the communication loop)
- Maybe you have responsibilities for more than one plant?
- Foster a good relationship with neighbors around facility



COMMON AIR POLLUTION VIOLATIONS

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



Photo of Republic Steel, Cleveland from Cleveland State University, Dept. of History, *Teaching and Learning Cleveland*.



KEY TAKEAWAYS

- Ohio EPA's goal is compliance, NOT enforcement
- We want a permit that meets regulatory standards and that you can live with
- Be in contact with your Ohio EPA representative to get a permit that works for you
- Don't be afraid to ask for assistance



U.S. EPA ENFORCEMENT

Initiates enforcement in two ways (typically)

1. U.S. EPA Inspection – sometimes because of many complaints
2. U.S. EPA 114 Letter



U.S. EPA ENFORCEMENT

- 114 Letters – Requests for Information - but are not requests
- You must supply information - typically a significant amount
- Cannot say no....can ask your attorney to request time extension
Must have reasons – not just too busy
- U.S. EPA will review information and issue notices of violations



U.S. EPA ENFORCEMENT

- U.S. EPA has significantly increased the number of inspections
- Almost all are unannounced
- Typically, U.S. EPA has FLIR camera for oil and and gas facilities
- Will also be looking at onsite records
- Have conducted many inspections in northern and eastern Ohio, but also in other parts of the state



U.S. EPA ENFORCEMENT

- What can you do?

Go over your compliance obligations

Make sure to report any compliance deviations to Ohio EPA

If you have a big problem, come to Ohio EPA directly – versus having U.S. EPA cite company



Thank You

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Workshop I Air Permit Renewals

July 18, 2024

DJ Wheeler – Managing Consultant



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Speaker Bio

DJ Wheeler – Trinity Consultants

- ▶ B.S. Chemical Engineering
- ▶ Columbus Office – started in 2008
- ▶ Co-Instructor for Ohio Permitting Course
- ▶ Areas of focus – Ohio and West Virginia Construction & Title V Air Permitting, Title V and MACT/NSPS Compliance, Modeling (AERMOD, Toxchem, ProMax)
- ▶ Contact Info:
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Air Permit Application Outline

- ▶ Process description
 - Process flow diagram
- ▶ Emissions documentation
- ▶ Regulatory applicability
 - Federal
 - State
- ▶ Best Available Technology (BAT)
- ▶ Air dispersion modeling
 - NSR Pollutants
 - Air Toxics
- ▶ Forms
 - PTI/PTIO application forms
 - EAC forms

Air Permit ~~Application~~ Renewal Outline

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+ Compliance Assurance Monitoring

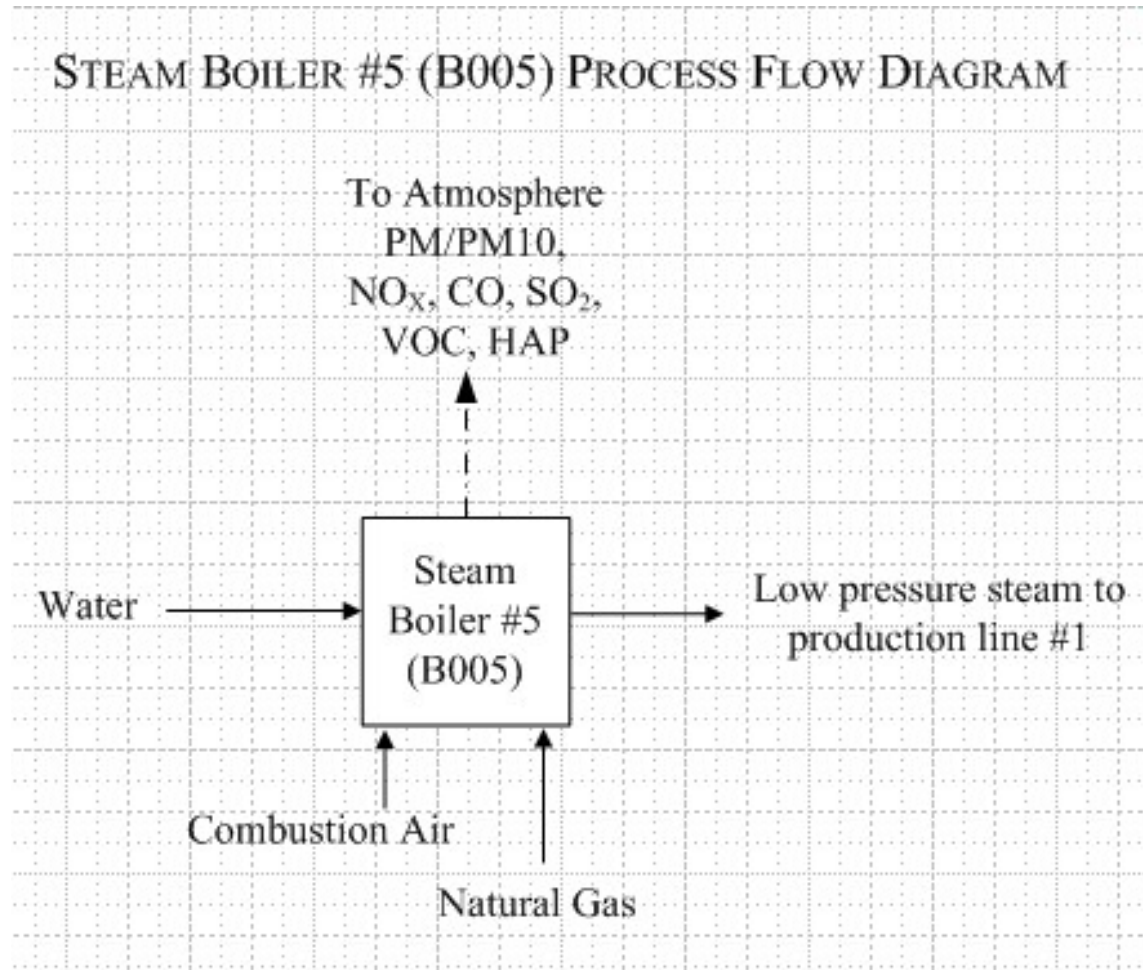
Application Package

- ▶ Submit to appropriate district office/local air agency (DO/LAA)
- ▶ Title V and Synthetic Minor Title V facilities must use **Air Services** for submittal
- ▶ Non-Title V facilities can submit hardcopy
 - Can no longer submit electronically via email
- ▶ Public and confidential versions must be submitted if information is being claimed as “trade secret”

Process Flow Diagram (PFD)

- ▶ PFD should contain:
 - Ohio EPA Emission Unit ID and Company ID
 - Process inputs and outputs
 - Material labels
 - ◆ Including pollutants, product, wastes
 - Process equipment
 - Control equipment
 - Egress points
 - ◆ Stack and fugitive

PFD: Example



Emission Calculations

- ▶ Goal:
 - Ultimate operational flexibility
- ▶ Potential-to-Emit (PTE)
 - For maximum flexibility, permit the source at its PTE
 - You can account for any applicable emission limits in this calculation
 - Using PTE will limit recordkeeping burdens and/or testing requirements in your PTI/PTIO

Standard Emission Calculation Methods (1/2)

- ▶ Mass balance
 - Typically used for coating and solvent use operations
 - Typically assume 100% of organics emitted or directed to control device
- ▶ Emission factors
 - Provide emissions in mass per unit production basis that can be scaled to different throughputs (e.g., lb/MMBtu, lb/ton)
 - AP-42 (<https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-Compilation-air-emissions-factors>) & WebFIRE (<http://cfpub.epa.gov/webfire/>) are most common EPA references containing emission factors
- ▶ Stack tests
 - Best if normalized to produce emission factor
- ▶ Grain loading
 - Provide PM emissions in terms of grains per unit of air flow (e.g., gr/dscf)
 - Typically based on vendor guarantee for control device

Standard Emission Calculation Methods (2/2)

- ▶ Tank Calculations (AP-42 chapter 7.1 – last updated in 2020)
 - TankESP
 - U.S. EPA TANKS 4.09d (outdated – latest version from 2006)
- ▶ Wastewater Treatment Processes
 - Toxchem
 - U.S. EPA Water9
- ▶ Batch Emission Calcs
 - Emission Master
- ▶ Other
 - ChemCAD
 - ProMax



TOXCHEM™



Emission Calculations

- ▶ **Potential-to-emit** – means the **maximum capacity** of an emissions unit or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the emissions unit or stationary source to emit an air pollutant, ... including **air pollution control equipment** and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as **part of its design if** the limitation or the effect it would have on emissions is ***federally enforceable or legally and practicably enforceable by the state***. Secondary emissions do not count in determining the potential to emit of a stationary source.

[3745-31-01(P)(23) & 3745-77-01(DD)]

Key PTE Terms

► Federally Enforceable (US EPA)

- Requirements under 40 CFR Parts 60, 61, and 63
- Requirements from a SIP-approved program
- Issued in a permit that is issued as a Draft action with a 30-day public comment period, then as a final action, allowing the public and US EPA an opportunity to comment
- Avoidance Limits (Synthetic Minor)
 - ◆ Require permit restrictions on production to support the emission limit, such as limits on hours of operation, production, amount of material processed, etc.
 - ◆ The limits must be **“enforceable as a practical matter”** per USEPA’s Guidance Memorandum of January 25, 1995, (Seitz Memorandum)

c.	<i>OAC rule 3745-31-05(D) June 30, 2008</i>	<i>0.0X lb. PM2.5/mmBtu 6.8 tons of PM2.5 per rolling 12-month period 4000 hours of operation per rolling 12-month period</i>
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Key PTE Terms

▶ **Legally and Practically Enforceable (State)**

- “Short term” emissions limitation (i.e., lb/hr, lb/day, tons/rolling 12-month period)
- The permit specifies a **method for determining compliance**, including appropriate monitoring, recordkeeping, reporting and testing.

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse **on a daily** basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer’s specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

What do I consider when calculating PTE?

- ▶ Maximum Capacity
 - Account for physical constraints
- ▶ Federal Limits (NSPS, MACT, NESHAP)
- ▶ Ohio SIP Limits (3745-17-11, VOC RACT, etc.)
- ▶ Synthetic Minor Permit Limits
- ▶ **BAT Permit Limits?**
 - BAT-based emissions limitations, operational restrictions, requirements to use control equipment, operational parameters, and voluntary restrictions identified in permits are NOT limitations on PTE unless they can be considered “**federally enforceable or legally and practically enforceable by the state.**”

Regulatory Applicability

- ▶ Benefits of rule applicability knowledge:
 - Accept avoidance limits for certain rules
 - Forms basis of PTE calculations
 - ◆ Use regulatory limit, instead of AP-42
 - Steer Ohio EPA in the right direction as to which applicable requirements should appear in the PTI
 - ◆ Can help expedite permit issuance
 - Draft your own terms and conditions!

EAC Forms

- ▶ General Process Operation
- ▶ Fuel Burning (revised 11/18)
- ▶ Surface Coating (revised 11/18)
- ▶ Material Handling
- ▶ Etc. (43 types total)

FOR OHIO EPA USE FACILITY ID: _____
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EMISSIONS ACTIVITY CATEGORY FORM GENERAL PROCESS OPERATION

This form is to be completed for each process operation when there is no specific emissions activity category (EAC) form applicable. If there is more than one end product for this process, copy and complete this form for each additional product (see instructions). Several State/Federal regulations which may apply to process operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.

- Reason this form is being submitted (Check one)
 New Permit Renewal or Modification of Air Permit Number(s) (e.g. P001)_____
- Maximum Operating Schedule: _____ hours per day; _____ days per year

If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. _____
- End product of this process: _____
- Hourly production rates (indicate appropriate units). Please see the instructions for clarification of "Maximum" and "Average" for new versus existing operations:

Not included within Air Services – complete & attach as separate document within Air Services

PTI/PTIO Application Submittal

- ▶ Most PTI/PTIO applications will be submitted in Air Services
- ▶ Attachments include:
 - PFD, EAC, emission calculations, regulatory write-up, modeling
- ▶ Must be certified by the Responsible Official (for Title V) and Authorized Representative (for non-Title V)

Certification Signatory (1/2)

- ▶ Who meets the definition of Responsible Official/Authorized Representative (AR)?
 - Inter-office communication issued on 02/11/2003 (amended on 04/28/2004)
- ▶ Options for corporations:
 - Direct authorization (at least VP level)
 - Delegated authorization without notification/approval
 - ◆ Person is responsible for overall operation of the facility AND
 - ◆ Facility > 250 employees OR gross annual sales or expenditures > \$25 million
 - ◆ Ohio EPA requests courtesy notification
 - Delegated authorization with notification/approval*

**Only Title V facilities eligible for this option.*

Certification Signatory (2/2)

- ▶ Which reports require the signature of the RO/AR?
 - Inter-office communication issued on 03/09/2004 (amended on 04/29/2004)
- ▶ Title V - RO must certify virtually everything
- ▶ Non-Title V
 - AR signatures/PIN required for:
 - ◆ Fee Emissions Report (FER)
 - ◆ PTIO applications
 - AR signatures NOT required for:
 - ◆ Intent to Test (ITT) notifications
 - ◆ Transfers of ownership, relocation
 - ◆ PERs, quarterly or semi-annual deviation reports
 - ◆ Stack test reports



**PIN still needed to submit*

Title V Permit Renewals

- ▶ Title V permits must be renewed every 5 years
- ▶ A “timely” renewal application is due no later than 6 months prior to permit expiration, but no earlier than 18 months prior to permit expiration
- ▶ Application shield
 - Timely and complete applications have application shield
 - Continue to operate under existing “expired” permit
- ▶ 60-day Ohio EPA completeness determination
- ▶ 1st time renewal complications
 - IEUs covered more comprehensively
 - Must address Compliance Assurance Monitoring (CAM) rule applicability (40 CFR 64)



Title V Permit Issuance Procedures

- ▶ Draft Title V permit
 - 30-day public comment period
- ▶ Preliminary Proposed Title V permit
 - Applicant has 14 days to comment
 - Resolve remaining issues
- ▶ Proposed Title V permit
 - U.S. EPA has 45-day review period (typically waived)
 - Last shot for source to resolve issues
- ▶ Final permit issued
 - Typically 21 days between issuance & effective dates

Title V Renewal Myths

- ▶ The Title V program does not establish any new requirements
- ▶ A Title V renewal is mostly a paperwork exercise
- ▶ I can simply make a copy of my initial Title V application
- ▶ I don't need to calculate uncontrolled emissions

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BUSTED BY CAM!

Compliance Assurance Monitoring (CAM)

- ▶ CAM Rule and Guidance Documents - <https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring>
- ▶ Definitions - 40 CFR Part 64.1
- ▶ Applicability - 40 CFR Part 64.2
- ▶ Monitoring design criteria - 40 CFR Part 64.3
- ▶ Submittal requirements - 40 CFR Part 64.4
- ▶ Deadlines for submittal - 40 CFR Part 64.5
- ▶ Approval of monitoring - 40 CFR Part 64.6
- ▶ Operation of approved monitoring - 40 CFR Part 64.7
- ▶ Quality improvement plan requirements - 40 CFR Part 64.8
- ▶ Reporting and recordkeeping requirements - 40 CFR Part 64.9
- ▶ Savings provisions - 40 CFR Part 64.10

CAM History

- ▶ Final CAM rule published 10/22/1997
- ▶ *“Part 64 is intended to provide a reasonable means of supplementing existing regulatory provisions that are not consistent with the statutory requirements of titles V and VII of the 1990 Amendments to the Act...EPA is committed to developing new emission standards subsequent to the 1990 Amendments with methods specified for directly determining continuous compliance whenever possible...”*
[62 FR 54904]

CAM Overview

- ▶ CAM establishes monitoring procedures to provide reasonable assurance of compliance
 - Identify performance indicators
 - Document continued operation of control device within specified indicator ranges
- ▶ Frequently involves older assets at your facility
- ▶ Serves as a back-stop to ensure proper performance of control devices

CAM - Applicability

(40 CFR Part 64.2(a))

- ▶ The unit is located at a major source for which a Title V permit is required; and
- ▶ The unit is subject to an emission limitation or standard; and
- ▶ The unit uses a control device to achieve compliance with a federally enforceable limit or standard; and
- ▶ The unit has potential pre-control or post-control emissions of at least 100% of the major source amount; and
- ▶ The unit is not otherwise exempt from CAM.

CAM - Exemptions (40 CFR Part 64.2(b))

- ▶ NSPS and NESHAP requirements established after 11/15/90
- ▶ Stratospheric Ozone Protection requirements (Title VI)
- ▶ Acid Rain Program requirements (Title IV)
- ▶ Standards that require continuous demonstration of compliance
- ▶ Emission limits or standards that apply solely under an emissions trading program or an emissions cap

CAM

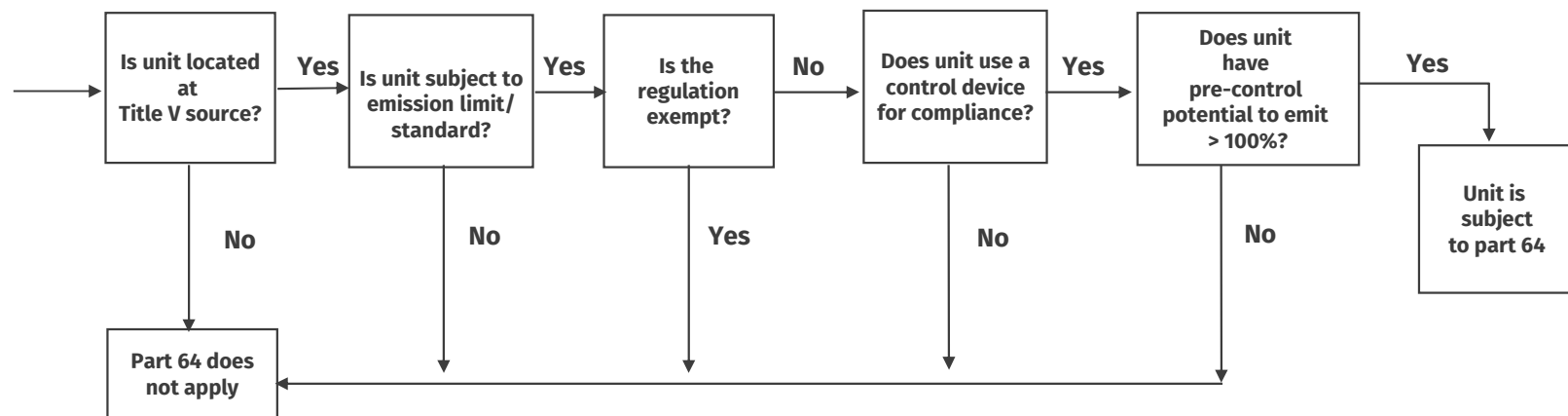
Emissions & Frequency

- ▶ Potential POST-controlled emissions less than major source threshold
 - Small Unit
 - Monitor once per day
- ▶ Potential POST-controlled emissions greater than major source threshold
 - Large Unit
 - Monitor four times per hour

Food for Thought...

- ▶ *Would data collected more frequently than a permit requires increase or decrease the likelihood for deviations?*

CAM Flow Chart (use for each regulation)



1. Unit = pollutant-specific emissions unit or unit/pollutant combination
2. Control Device → Excludes inherent process equipment and passive pollution prevention control measures
3. CAM applicability is determined for each Title V regulated pollutant individually.

Steps in the CAM Process

- ▶ Applicability determination
- ▶ Preparation and submittal of CAM Plan
 - May trigger performance testing
- ▶ Review and approval of CAM Plan (by agency)
- ▶ Implementation
- ▶ Quality improvement plan if monitoring indicates compliance issues

What does CAM require?

- ▶ Prepare and submit a CAM plan for affected units as part of Title V
 - List of indicators, ranges, and performance criteria
 - Justification for these indicators and ranges
 - Implementation plan
- ▶ Estimated 27,000 units at 9,000 sources will require CAM plans
- ▶ Selecting and justifying indicators often requires collaboration with manufacturers
- ▶ Ohio EPA may require a nominal CAM plan even for exempt standards

CAM Monitoring Examples

Control Technology	Emission Source Unit	Primary Pollutant	Example CAM Strategy	Frequency of Monitoring	Recording Method	Other Monitoring Options
Fabric filter Baghouse	Rotary drying system for granular polymer	PM-10	Pressure drop across the device	Each batch	Datalogger or logbook	Visual emissions, total material collected, broken bag detector
Carbon adsorption system	Industrial wastewater treatment system	VOCs	Time since last regeneration	Continuous	Strip chart at control panel	CEM for VOCs, presence of odors
Flare	Specific process reactor	Carbon monoxide	Visual presence of a flame	Twice per shift	Logbook	Temperature of the flame, outlet CEM for CO
Brine-cooled condenser	Synthetic fiber spinning operation	VOCs and HAPs	Monitoring the condenser exhaust gas temperature	Continuous	Datalogger	Volume of recovered solvents, inlet and outlet coolant temperature

When are CAM Plans Due?

- ▶ Potential POST-controlled emissions less than major source threshold (small units)
 - Submit CAM plan as part of the first Title V renewal application
 - Subsequent Title V renewals may also require CAM plans for any units added or modified since the previous renewal
- ▶ Potential POST-controlled emissions greater than major source threshold (large units)
 - Submit CAM plan as part of the initial Title V application
 - Submit CAM plan as part of any significant Title V modification
- ▶ Ohio EPA may consider the CAM plan to be a critical component of a complete application

Quality Improvement Plan (QIP)

- ▶ Two possible types of QIPs
 - Discretionary QIPs at the request of Ohio EPA
 - Automatic QIPs based on permitted thresholds
 - ◆ Frequency of excursions
 - ◆ Magnitude of excursions
- ▶ Elements of a QIP
 - Procedures for evaluating control performance problems, and
 - Based on the results of the evaluation, one or more of the following:
 - ◆ Improved maintenance practices
 - ◆ Process operation changes
 - ◆ Appropriate improvements to control methods
 - ◆ More frequent monitoring
 - ◆ Other appropriate steps

QIP Implementation Schedule

- ▶ Develop and implement QIP as expeditiously as practicable after receipt of request from Ohio EPA or after exceeding automatic trigger
- ▶ Maintain the QIP on site in a manner available for inspection
- ▶ Notify Ohio EPA if the time necessary to complete the improvements exceeds 180 days from receipt of the QIP request or the QIP trigger

CAM Reporting

- ▶ Required component of semiannual Title V reports
- ▶ Include the following information:
 - Number, duration, cause, and corrective actions for excursions or exceedances
 - Number, duration, cause, and corrective actions for monitor downtime
 - Descriptions of any actions taken to implement a QIP during the reporting period
 - ◆ If a QIP was completed during the reporting period, also include documentation of completion and the reduction in the likelihood of similar excursions or exceedances

Air Services



- ▶ Air Services/e-Business Center is accessed through Ohio EPA's OHID web portal at <https://ohid.ohio.gov/wps/portal/gov/ohid>
- ▶ Air Services is comprehensive
 - Title V permit applications*
 - Title V Annual Compliance Certifications (ACC)*
 - Fee Emission Reports (FERs), Emission Inventory System (EIS) Reports, Emissions Statements – TV*, SMTV*, & Non-TV facilities
 - PTI applications – TV facilities*
 - PTIO applications – SMTV facilities* & Non-TV facilities
 - Title V deviation reports*
 - Permit Evaluation Reports (PER) – Non-TV
 - Stack test reports, Intent to Test (ITT)
 - Scheduled Maintenance Bypass Request
 - Other Compliance Reports (CEMS) – TV*, SMTV*, & Non-TV facilities

**Must be submitted using Air Services, unless alternative arrangements are made/approved by Ohio EPA.*

Steps to Get Going on Air Services

- ▶ Step 1 – Create OH|ID account (New as of 11/6/2020!)
 - Everyone will have to do this
 - For existing e-Biz Accounts, your email address will be used to connect your existing eBiz account with the account you use in OH|ID
 - Do NOT use Internet Explorer



[SECURITY](#) [DEVELOPERS](#) [HELP](#) [MANAGE OH|ID ACCOUNT](#)



Secure access to State of Ohio services

OH|ID provides users with a more secure and private experience during online interactions with State of Ohio programs. Users with an OH|ID account can access multiple State applications by only entering their username and password once.

[Create OH|ID Account](#)

User ID

[FORGOT YOUR USER ID?](#)

Password

[FORGOT PASSWORD?](#)

[Log In](#)

[Get login help](#)

Steps to Get Going on Air Services

- ▶ Step 2 – Add Tile
 - Locate the Ohio EPA eBusiness Center tile under "Sites & Applications" and launch it.
 - Identify your eBiz account and verify it is yours with your eBiz account password
 - The eBiz landing page (ebiz.epa.ohio.gov) will no longer have an option to login, but will have OH ID help/instructions

My Apps

Click the star to pin your favorite apps to the top of the page.



Steps to Get Going on Air Services

▶ Troubleshooting Air Services

- Google Chrome and Microsoft Edge users can resolve e-Biz issues by changing browser settings to allow pop-ups, redirects, ads, and insecure content:

<http://wwwapp.epa.ohio.gov/dapc/oracleattachments/Chromebrowsersettings.pdf>

Steps to Get Going on Air Services

- ▶ Step 3 – Responsible Official (RO) or Authorized Representative (AR) obtains eBiz PIN
 - Request PIN in eBiz
 - ◆ <http://wwwapp.epa.state.oh.us/eBusinessCenter/eBizPINHelpSheet.pdf>
 - ◆ Complete PIN request form & submit online
 - ◆ **IMMEDIATE OPTION – use LexisNexis to verify identity**
 - ◆ Otherwise, mail hard-copy notarized form (1-2 weeks to get PIN!)
 - Activate PIN within eBiz Center (enter PIN & answer security question)
 - PIN not required for preparers/reviewers of applications/reports
 - ◆ But, must have someone in Certify, Submit, Manage Access (CSMA) role to delegate access to facility (more later)

Steps to Get Going on Air Services

- ▶ Step 4 – RO/AR gains CSMA role to facility(ies)
 - Submit online request form for each facility for which they want access
 - ◆ Search for your facility or create a greenfield facility
 - e-sign form using PIN granted by Ohio EPA
 - Refer to video (Answer ID 1583) at Ohio EPA's Customer Services Support Center
 - **First person to request CSMA role for a facility within Air Services must obtain eBiz PIN and be a(n) RO/AR—eligibility will be verified by Ohio EPA!**

Steps to Get Going on Air Services

- ▶ Step 4 – RO/AR delegates access to facility(ies) to others (e.g., back-up ROs, facility environmental staff, corporate environmental staff, consultants)
- ▶ Refer to video (Answer ID 1520) at Ohio EPA's Customer Services Support Center
 - Levels of facility access (roles)
 - ◆ CSMA – must have eBiz account & PIN
 - ◆ Prepare/Review – must have eBiz account
 - Ohio EPA frowns upon RO letting others submit using RO's PIN
 - *Person granted 1st CSMA role (RO or AR)* – can then delegate CSMA role to others with an eBiz PIN
 - *People that have been delegated CSMA role* – can further delegate CSMA role to others with an eBiz PIN
 - *All people serving in CSMA role* – can delegate Prepare/Review role to others with an eBiz account

All requests for delegation performed outside of Air Services and eBiz Center (e.g., email requesting facility access to person serving in CSMA role)

- [Owner/Contact](#)
- [Application\(s\)](#)
- [Permit\(s\)](#)
- [Emissions Report\(s\)](#)
- [Reporting Category](#)
- [Compliance Report\(s\)](#)
- [Correspondence](#)
- [Facility Profile History](#)
- [Event Logs](#)
- [References](#)

[Air Services Home](#) >

Air Services Home

Facility Information

Facility Name: _____ Facility ID: _____ Permitting Classification: NTV
 Address1: _____ Address2: _____
 City: _____ State: Ohio Zip: _____ County: _____

[View Facility Profile](#)

In Progress Tasks

Select	Task Type	Task Description	Dependent on Task	Created Date	User Name
<input type="radio"/>	Permit-by-rule Notification	Permit-by-rule Notification	Facility Profile Change	9/18/2019	
<input type="radio"/>	PTI/PTIO Permit Application	PTI/PTIO Application	Facility Profile Change	9/17/2019	
<input type="radio"/>	Facility Profile Change	Facility Profile Change	Facility Contact Change	11/6/2019	
<input type="radio"/>	Facility Contact Change	Facility Contact Change	N/A	11/6/2019	

[Delete](#) [Printable view](#) [Export to excel](#)

Click here to view submitted Facility Profile

3rd level menu

New Tasks

Select from the list below to create a new task [Hide How to Claim Trade Secrets](#)

NOTE: All information entered into Air Services or uploaded as an attachment is a public record once submitted (i.e., PIned) unless expressly identified as a trade secret using the mechanism(s) provided for specific fields. Ohio EPA has provided an option to request specific data fields or attachments to be held (screened from public view) as trade secret. Data fields in any Air Services form screens (i.e., facility profile, applications, reports, etc.) can only be protected as a trade secret in the software if the mechanism accompanies the specific field. If you believe a specific field should be withheld as a trade secret, but is not programmed with the trade secret mechanism, please contact Air Services customer support at (614) 644-3621 to discuss options BEFORE submitting to Ohio EPA.

- [Facility Profile Change](#)
- [Owner/Contact Change](#)
- [Permit-by-rule Notification](#)
- [PTI/PTIO Application \(Initial, Renewal, Modification, General Permit\)](#)
- [Title V PTO Application \(Initial, Renewal, Modification\)](#)
- [Title IV Acid Rain Application](#)
- [Request Administrative Permit Modification](#)
- [Fee Emissions Report \(can also include EIS and ES\)](#)
- [Permit Evaluation Report \(PER\)](#)
- [Emissions/Stack Testing](#)
- [CEMS/CERMS/COMS](#)
- [Scheduled Maintenance Bypass Request](#)
- [Other Compliance Report \(ex. Quarterly Deviation Reports\)](#)

Click links here to create a new task

3rd Level Menu on Air Services

- [Owner/Contact](#)
- [Application\(s\)](#)
- [Permit\(s\)](#)
- [Emissions Report\(s\)](#)
- [Reporting Category](#)
- [Compliance Report\(s\)](#)
- [Correspondence](#)
- [Facility Profile History](#)
- [Event Logs](#)
- [References](#)

▶ View & download facility data

- Submitted permit applications
- All existing permits
- Historical FERs
- Compliance reports (submitted in Air Services)
- Correspondence
 - ◆ Invoices, reminder letters, NOV, etc.
- Event logs
 - ◆ Status of PTI/PTIO applications
 - ◆ Ohio EPA changes to Facility Profile

Common Facility Tree Icons


 facility: Links to Facility Info


 emission units: Links to EU Info (equip ID, description, installation date)

 processes: Links to Process Info (process description, SCC)

 control equipment: Links to Control Equipment Info (type, CE%)

 egress points: Links to Stack Info (height, diameter, exhaust flow)

 Disassociated CEs

 Disassociated Eg. Points

} Indicates object is not associated with a process

 Invalid EUs: Indicates erroneous or duplicative EUs; also to be used for permitted EUs never constructed

 Not Installed EUs

 Permanently shutdown emission unit

Emission Unit Icons

▶ Title V emission unit classification

 Non-Insignificant

 Insignificant

 Insignificant (No Applicable Requirements)

 Trivial

- Emission units designed *IEU (No Applicable Requirements)* or *Trivial* will automatically be excluded from Title V permit applications.

Facility Tree Setup



The Facility Tree should mimic the airflow as it is conveyed from the emission unit/process to the control device(s) (if any) and out the egress point(s).

Collector No. 3 and No. 4 shown in series.

PTIO Renewal

Facility Information

Facility Name: _____ Facility ID: _____ Permitting Classification: TV
Address1: _____ Address2: _____
City: _____ State: Ohio Zip: _____ County: Jefferson

[View Facility Profile](#)

In Progress Tasks

Select	Task Type	Task Description	Dependent on Task	Created Date	User Name
<input type="radio"/>	Title V PTO Application	Title V PTO Application	Facility Profile Change	6/30/2020	
<input type="radio"/>	Facility Profile Change	Facility Profile Change	Facility Contact Change	7/9/2020	
<input type="radio"/>	Facility Contact Change	Facility Contact Change	N/A	7/9/2020	

[Delete](#) [Printable view](#) [Export to excel](#)

New Tasks

Select from the list below to create a new task [Hide How to Claim Trade Secrets](#)

NOTE: All information entered into Air Services or uploaded as an attachment is a public record once submitted (i.e., PINed) unless expressly identified as a trade secret using the mechanism(s) provided for specific fields. Ohio EPA has provided an option to request specific data fields or attachments to be held (screened from public view) as trade secret. Data fields in any Air Services form screens (i.e., facility profile, applications, reports, etc.) can only be protected as a trade secret in the software if the mechanism accompanies the specific field. If you believe a specific field should be withheld as a trade secret, but is not programmed with the trade secret mechanism, please contact Air Services customer support at (614) 644-3621 to discuss options BEFORE submitting to Ohio EPA.

Facility Profile Change	Fee Emissions Report (can also include EIS and ES)
Owner/Contact Change	Permit Evaluation Report (PER)
Permit-by-rule Notification	Title V Annual Compliance Certification Report (TVCC)
PTI/PTIO Application (Initial, Renewal, Modification, General Permit)	Emissions/Stack Testing
Title V PTO Application (Initial, Renewal, Modification)	CEMS/CERMS/COMS
Title IV Acid Rain Application	Scheduled Maintenance Bypass Request
Request Administrative Permit Modification	Other Compliance Report (ex. Quarterly Deviation Reports)

Select "PTI/PTIO Application" under New Tasks to initiate PTIO renewal

Application Options

Facility ID : ██████████
Request type : PTI/PTIO Application
Facility-requested correction to application :
Copy data from existing application :

Select "Create"

Complete PTI/PTIO General Form

- ▶ Summary of application purpose
- ▶ Specify PER due date
- ▶ Indicate federal rules applicability (NESHAP, MACT, NSPS, RMP, etc.)
- ▶ Permit application contact info
- ▶ Attachments

Federal Rule Applicability

3. Federal Rules Applicability

New Source Performance Standards (NSPS) : Subject to subpart ▼
New Source Performance Standards are listed under 40 CFR 60 - Standards of Performance for New Stationary Sources.

Select All | Select None

Select NSPS Subpart

IIII - Stationary Compression Ignition Internal Combustion Engines ▼

Add Subpart Delete Selected Subparts

National Emission Standards for Hazardous Air Pollutants (NESHAP) : Not affected ▼
National Emissions Standards for Hazardous Air Pollutants are listed under 40 CFR 61. (These include asbestos, benzene, beryllium, mercury, and vinyl chloride).

Maximum Achievable Control Technology (MACT) : Please select
Not affected
Unknown
Subject to subpart
Subject, but exempt
The Maximum Achievable Control Technology standards are listed under 40 CFR 63 and OAC rule 3745-31-28.

Select All | Select None

Select MACT Subpart

ZZZZ - Reciprocating Internal Combustion Engines ▼

Add Subpart Delete Selected Subparts

Prevention of Significant Deterioration (PSD) : Not affected ▼
These rules are found under OAC rule 3745-31-10 through OAC rule 3745-31-20.

Greenhouse Gas Pollutant Prevention of Significant Deterioration (PSD) : Not affected ▼
These rules are found under OAC rule 3745-31-34 and 40 CFR Parts 51, 52.

Non-Attainment New Source Review : Not affected ▼
These rules are found under 40 CFR 68.

112(r) - Risk Management Plan : Not affected ▼
These rules are found under OAC rule 3745-31-21 through OAC rule 3745-31-27.

Title IV (Acid Rain Requirements) : Not affected ▼
These rules are found under 40 CFR 72 and 40 CFR 73.

Dropdown list of NSPS subparts

Rule Applicability for Title V Renewal

State and Federally Enforceable Requirements [OAC rule 3745-77-01(H) and Statement of Methods Used to Determine Compliance OAC rule 3745-77-03(C)(10)(b)]

Allowable Limit	Pollutant	Rule Cite	Permit Cite	Monitoring			Record Keeping			Reporting			Testing			Status
				Requirement	Rule Cite	Permit Cite	Requirement	Rule Cite	Permit Cite	Requirement	Rule Cite	Permit Cite	Requirement	Rule Cite	Permit Cite	

State Only Enforceable Requirements :

Allowable Limit	Pollutant	Rule Cite	Permit Cite	Monitoring			Record Keeping			Reporting			Testing			Status
				Requirement	Rule Cite	Permit Cite	Requirement	Rule Cite	Permit Cite	Requirement	Rule Cite	Permit Cite	Requirement	Rule Cite	Permit Cite	

Trade Secret Attachments

The total public and trade secret attachments size cannot exceed 2147MB. Uploading large files may take several minutes to complete upload. Please be patient.

Attachment Type : ▼

Description :

Public File to Upload : No file chosen

Trade Secret File to Upload : No file chosen

Trade Secret Justification :

Trade Secret Justification

- ▶ Attach additional TS justification attachment
 - Explain in sufficient detail:
 - ◆ How the information derives independent economic value from not being generally known or ascertainable by other persons who can obtain economic value from its use/disclosure
 - ◆ Efforts used to maintain secrecy
 - ◆ Attestation that the info is not generally known outside the organization or otherwise discoverable
- ▶ <https://epa.ohio.gov/static/Portals/47/facts/TradeSecretProtectionRequests.pdf>

Select EUs

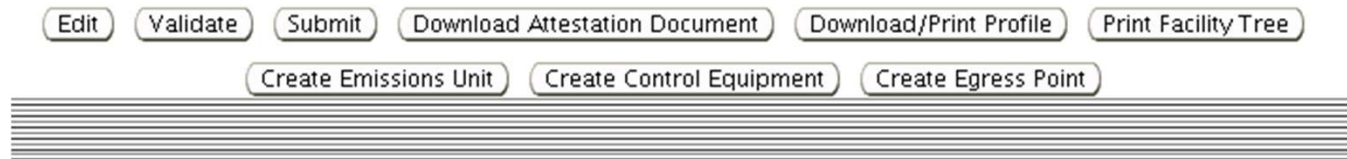
- ▶ After selecting “**Save**,” the following options should appear at the bottom of the screen if the form was completed properly.



- ▶ Select “Show Facility Profile” to add new emission units.
- Or-
- ▶ Click “Select EUs” to indicate which existing emission units are affected by this PTI/PTIO application.

Create a New Emissions Unit

- ▶ Select “Show Facility Profile”
- ▶ Scroll to the bottom of the page
- ▶ Select “Create Emissions Unit”



Create a New Emissions Unit

Emissions Unit Information

DAPC Emissions Unit ID:

DAPC Description:

Company Equipment ID:

Company Description:

* Operating Status:

Completion of Initial Installation Date: 

Begin Installation/Modification Date: 

Commence Operation After Installation
or Latest Modification Date: 

Permitting Classification and Status

Title V EU

Classification:

Exemption Status:

[Permit History](#)

▼ EIS Information

Boiler/Turbine/Generator Design Capacity:

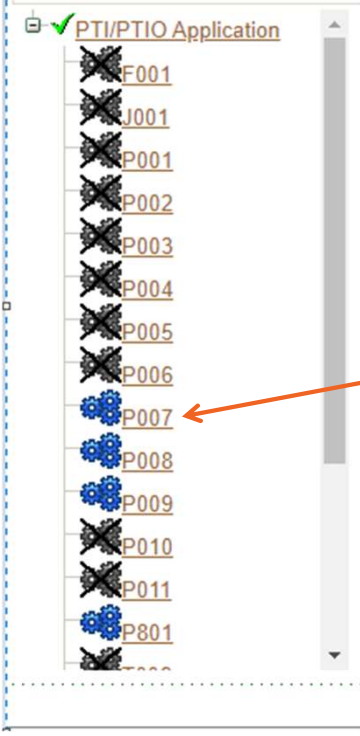
ORIS Boiler ID:

Create a New Emissions Unit

- ▶ Back in Application Detail, click “Select EUs”

The screenshot displays the 'PTI/PTIO Application' interface. At the top, it shows 'Facility ID: [redacted]', 'Facility Name: [redacted]', 'PTI/PTIO Application Number: [redacted]', and 'Request type: PTI/PTIO Application'. Below this, a tree view on the left shows 'PTI/PTIO Application' expanded, listing various units from F001 to P801. The main area is divided into 'Emissions Units' with two columns: 'Excluded EUs' and 'Included EUs'. The 'Excluded EUs' list includes F001, J001, P001, P002, P003, P004, P005, P006, P010, P011, T006, T008, TMP213717, and TMP213718. The 'Included EUs' list includes P007, P008, P009, P801, TMP213714, TMP213715, and TMP213716. Between the columns are buttons for 'Move', 'Move All', 'Remove', and 'Remove All'. Below these columns is a 'Copy data from EU:' dropdown menu. An orange arrow points from the text 'Temp ID for New Source' to the 'TMP213718' entry in the 'Excluded EUs' list. At the bottom, there are 'Save' and 'Return to Application' buttons.

Check/Update EU-Specific Data



*Select the unit
in the Facility
Tree*

Update EU-Specific Information

- ▶ First click “Edit” at the bottom of the screen.
- ▶ Include the following for the EU:
 - Reason for application
 - ◆ New Installation, modification, etc.
 - ◆ Installation or modification dates
 - Emissions information (requested allowable limits)
 - BAT description
 - Request enforceable restrictions
 - CEMS info
 - Attach EAC form & process flow diagram

Reason for Application

▼ 1. Air Contaminant Source Installation or Modification Schedule

Select reason(s) for this emissions unit being included in this application (must be completed regardless of date of installation or modification):

- New installation (for which construction has not yet begun, in accordance with OAC rule 3745-31-33)
- Initial application for an air contaminant source already installed or under construction
- Modification to an existing air contaminant source/facility (for which modification has not yet begun)
- Modification application for an air contaminant source which has been or is currently being modified
- Reconstruction of an existing air contaminant source/facility
- Renewal of an existing permit-to-operate (PTO) or PTIO
- Other

Emissions Info (1/2)

Criteria Pollutants :

Pollutant	Emissions before controls (max)* (lb/hr)	Actual Emissions* (lb/hr)	Actual Emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)	0	0	0	0	0
PM # 10 microns in diameter (PE/PM10)	0	0	0	0	0
PM # 2.5 microns in diameter (PE/PM2.5)	0	0	0	0	0
Sulfur dioxide (SO2)	0	0	0	0	0
Nitrogen oxides (NOx)	0	0	0	0	0
Carbon monoxide (CO)	0	0	0	0	0
Organic compounds (OC)	0	0	0	0	0
Volatile organic compounds (VOC)	0	0	0	0	0
Lead (Pb)	0	0	0	0	0
Total Hazardous Air Pollutants (HAPs)	0	0	0	0	0
Highest single HAP	0	0	0	0	0

* Provide your calculations as an attachment and explain how all process variables and emissions factors were selected. Note the emission factor(s) employed and document origin. Example: AP-42, Table 4.4-3 (8/97); stack test, Method 5, 4/96; mass balance based on MSDS; etc.

** Ohio EPA Calculated - See 'Help' for more information.

Emissions Info (2/2)

Hazardous Air Pollutants (HAPs) and Toxic Air Contaminants (see instructions):

Select	Pollutant Category	Emissions before controls (max)* (lb/hr)	Actual Emissions* (lb/hr)	Actual Emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)
<input type="button" value="Add"/>	<input type="button" value="Delete Selected HAPs"/>					

Greenhouse Gas Pollutants :

Select	Pollutant	Emissions before controls (max)* (lb/hr)	Actual Emissions* (lb/hr)	Actual Emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)	CO2e** (ton/year)
<input type="button" value="Add"/>	<input type="button" value="Delete Selected GHGs"/>						

* Provide your calculations as an attachment and explain how all process variables and emissions factors were selected. Note the emission factor(s) employed and document origin. Example: AP-42, Table 4.4-3 (8/97); stack test, Method 5, 4/96; mass balance based on MSDS; etc.

** Ohio EPA Calculated - See 'Help' for more information.

Emissions Info for Title V Renewal

Criteria Pollutants :

Pollutant	**PTE (ton/year)	*PTE Determination Basis	Reason Determination Basis is a Trade Secret
CO - Carbon Monoxide	0		Not a trade secret
NOx - Nitrogen Oxides	0		Not a trade secret
PM10 (Filt) - Primary PM10, Filterable Portion Only	0		Not a trade secret
PM10 - Primary PM10 (Includes Filterables + Condensibles) (PM<10 Microns)	0		Not a trade secret
PM2.5 (FILT) - Primary PM2.5, Filterable Portion Only	0		Not a trade secret
PM2.5 - Primary PM2.5 (Includes Filterables + Condensibles) (PM<2.5 Microns)	0		Not a trade secret
Pb - Lead	0		Not a trade secret
SO2 - Sulfur Dioxide	0		Not a trade secret
VOC - Volatile Organic Compounds	0		Not a trade secret

Hazardous Air Pollutants (HAPs) :

Pollutant	**PTE (ton/year)	*PTE Determination Basis	Reason Determination Basis is a Trade Secret
HAP - Single Hazardous Air Pollutants	0.0		
HAPS - Total Combined Hazardous Air Pollutants	0.0		

Attach EAC and PFD

▼ Attachments

Attachment ID	Attachment Type	Description	Trade Secret Document	Trade secret Justification
<input type="button" value="Add"/>				

Add an attachment

The total public and trade secret attachments size cannot exceed 2147MB. Uploading large files may take several minutes to complete upload. Please be patient.

Attachment Type :

Description :

Public File to Upload :

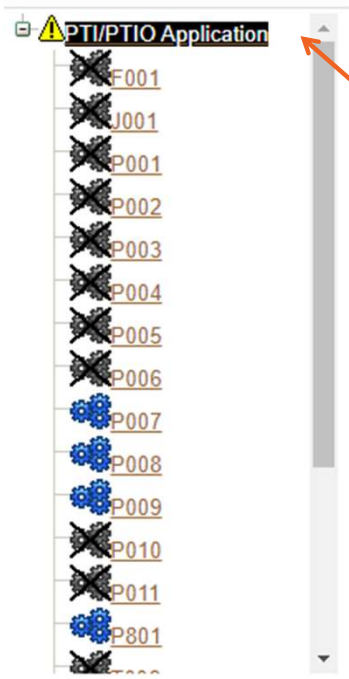
Trade Secret File to Upload :

Trade Secret Justification :

Select attachment type & upload file

Validate and Review

▶ Return to the Main Application Page



Select "PTI/PTIO Application" link to return

Validate and Review

- ▶ Select “**Validate**” at the bottom of the screen



Correct all Errors & Re-validate

Severity	EU ID	Message
ERROR	TMP216382	A process flow attachment is required
ERROR	TMP216382	An EAC attachment is required
ERROR	TMP216382	Emission unit: does not have any processes

Printable view Export to excel Close

Use the links to navigate to the errors!

Review/Submit the Application

[Edit](#) [Select EUs](#) [Validate](#) [Submit](#) [Download Attestation Document](#)

[Show Associated Facility Profile](#) [Download/Print](#) [Download/Print Trade Secret Version](#)

Application Documents

Document Description
Printable View of PTI/PTIO Application
Printable View of Facility Profile
Application [REDACTED].zip file

Attachments that are part of the Application:

Document Description
698354: PTIO Application - [REDACTED]
696159: [REDACTED] EAC
696158: [REDACTED] PFD
696160: [REDACTED] EAC
696161: [REDACTED] EAC
696162: [REDACTED] EAC
696163: [REDACTED] EAC Form
696164: [REDACTED] EAC Form
696165: [REDACTED] EAC Form
696166: [REDACTED] EAC Form

Select a link in the above table to download a document to print.

[Close](#)

Submit with an Attestation Document

- ▶ Hard copy signature attestations
 - See Customer Services Support Center ID 2113
 - ◆ RO/AR signs an Attestation Document (hardcopy)
 - ◆ Document is scanned to pdf, attached to Air Services submittal
 - ◆ Choose “No” when asked if you are authorized by law to submit the item(s)
 - ◆ Anyone (even those with no PIN) is eligible to Submit

Questions?

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