

Workshop F

**Minor Source Air Permits – Permitting Process
Including Best Available Technology (BAT)
Developments and Update on General Permits
& Permits by Rule**

**Thursday, August 26, 2021
8:45 a.m. to 10:15 a.m.**

Biographical Information

**Gregory A. Hemker, Founder & President
EHS Technology Group, LLC**

2912 Springboro Road West, Suite 101, Dayton, Ohio 45439

937.865.3818/ 800.356.9039 Fax: 937.865.3611 ghemker@ehstech.com

Mr. Hemker is one of the founders of EHS Technology Group, LLC located in Moriane, Ohio. He has over 45 years of experience in environmental engineering and management.

Mr. Hemker obtained a Master's Degree in Environmental Engineering from the University of Cincinnati and is a Certified Hazardous Materials Manager (CHMM). His principle fields of expertise are air pollution, hazardous waste, and hazardous chemical management. He has conducted numerous environmental management training seminars throughout the U.S. and China.

In recent years Mr. Hemker has focused on consulting with manufacturing industries to solve problems associated with air pollution, water pollution, hazardous waste, oil and chemical spill prevention, chemical safety, and industrial hygiene.

He has also lead the development and implementation of Energy management Systems at manufacturing facilities in Ohio and Kentucky.

Mr. Hemker is a RAB/Exemplar Global trained lead auditor and has been developing and implementing ISO 14001, 9001, 50001 and OHSAS 18001 management systems since the adoption of the Standards.

**Terri Sexton, Manager, Environmental & Energy Affairs, Navistar, Inc.
6125 Urbana Road, Springfield, OH 45502**

(937) 390-4011 Fax: (937) 390-4766 terri.sexton@navistar.com

Terri is a corporate Manager of Environmental and Energy Affairs for Navistar, Inc. She manages various environmental and energy projects and programs across the corporation, most recently focused on significant waste reductions, greenhouse gases, and energy conservation leading to cost reduction.

Terri is also currently responsible for EPA compliance in the air and solid waste media at the Springfield Truck assembly site. She has worked in the EHS field for 20 years including employment at corporate, manufacturing/industrial facilities, wastewater treatment operations, and EPA. Terri holds a master's degree in environmental management systems from Southern Methodist University and a bachelor's degree in biology and environmental sciences from Wright State University. She holds professional certifications as a QEP and CHMM, and an OEPA Class I Waste Water license.

Biographical Information

**Michael E. Hopkins, P.E., Assistant Chief, Permitting
Ohio EPA
P.O. Box 1049, Columbus, OH 43216-0149
(614) 644-2270 FAX: (614) 644-3681 mike.hopkins@epa.ohio.gov**

Michael Hopkins has been with the Ohio EPA since 1980. He is currently the Assistant Chief, Permitting within the Division of Air Pollution Control of the Ohio EPA. His duties include the review and final approval for all air pollution permit-to-install, permit-to-install and operate, and Title V permits in the State, the development of technical support for air pollution control regulations, litigation support, MACT program support, Tax Program support and general air pollution planning activities. He has been in this position since April 2003. Before this assignment, he was in charge of the Air Quality Modeling and Planning Section with similar duties as above from August 1993 through April 2003. Prior to that assignment, he was in charge of the engineering section of the Ohio EPA Central District Office air program. The engineering section is responsible for reviewing air pollution permit-to-install and permit-to-operate applications for compliance with air pollution regulations, facility inspections, complaint investigations, enforcement case development, policy and rule development, the Emissions Inventory Program, and other related duties in the central Ohio area.

Mr. Hopkins earned his bachelor's degree in environmental engineering from the Pennsylvania State University. He is a licensed Professional Engineer in the State of Ohio. He is a member of the Air and Waste Management Association, the National Society of Professional Engineers, and the Ohio Society of Professional Engineers.

Workshop F – Minor Source AIR Permits, BAT & UPDATES

31st Annual Conference on Environmental
Permitting in Ohio
Columbus, Ohio
August 25-26, 2021

Presented by:

Mike Hopkins, Ohio EPA

Terri Sexton, Navistar

Greg Hemker, EHS Technology Group

Presentation Overview

- Permitting Basics
- Permit Forms & Processing
- Best Available Technology Requirements

Key Definitions

- Emission unit:
 - Each separate operation or activity that results or may result in the emission of any air contaminant
 - Sometimes used interchangeably with “source”



Key Definitions (cont'd)

- Air Contaminant:

- Means particulate matter, dust, fumes, gas, mist, radionuclides, smoke, vapor or odorous substances, or any combination thereof.
- Does not include uncombined water vapor

- Potential to Emit (PTE):

- Used to determine applicability of many regulations
- Maximum capacity of an emissions unit or stationary source to emit an air pollutant under its physical and operational design
- Generally assumes operation at 8,760 hours/year
- Generally does not consider the use of air pollution control equipment
- Can include emission limiting factors if they are made part of an enforceable permit

Key Definitions (cont'd)

- Modification:

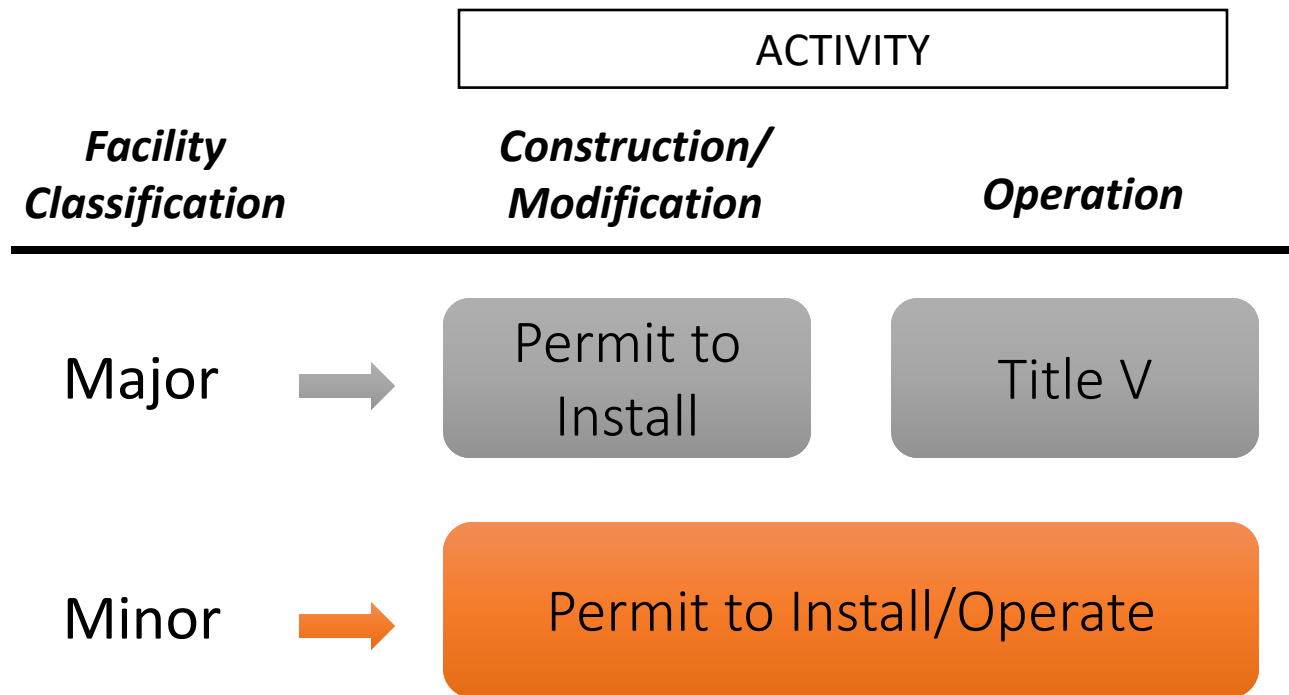
- Any physical change in, or change in the method of operation of an air contaminant source that results in an increase in *allowable* emissions
- Includes emission of a new pollutant
- Includes relocation of the source to a new site (but generally not within the existing facility)
- Does not include routine maintenance, routine repair, and routine replacement (be careful regarding interpretation of “routine”)
- Must get a permit

Permitting - Overview

- Permits are the primary tool for EPA to regulate industry
- Two basic categories of air permits:
 - Installation/Construction
 - Called a Permit to Install (PTI)
 - Operating (“major” sources only after June 2008)
 - After June 2008, non-major sources receive a combined Permit to Install/Operate (PTIO)
 - Major Sources receive a Title V Operating Permit



Ohio Permits



Major Source Thresholds

- Construction Permits

	Attainment Area	Non-Attainment Area
Categorical Industry	≥ 100 TPY	≥ 100 TPY
Non-Categorical Industry	≥ 250 TPY	≥ 100 TPY

- “Categorical Industries” includes any one of 28 listed in OAC 3745-31-01(LL)

- Operating Permits

	All Areas
Criteria Pollutants	≥ 100 TPY
Any Single HAP	≥ 10 TPY
Combined HAPs	≥ 25 TPY

Threshold Comments

- Any source that is not a “major source” is considered a minor source.
- Determination is typically made based on Potential to Emit (PTE)
- Sources can voluntarily limit emissions to less than major source levels
 - Voluntary limits on PTE must be contained in an enforceable permit condition
 - Source is known as a “Synthetic Minor”.



Synthetic Minor


• Synthetic Minor:

- A permit in which a company accepts voluntary emission limits in order to avoid major source status
- Limits can be on one emission unit or over entire facility
- Permit will impose record keeping/reporting requirements to “prove” that source is staying below major source thresholds

Minor Permits – “Permit to Install/Operate”

- OEPA regulations call it a “PTIO”
- Must obtain installation permit *prior* to beginning any construction of the new source
- Require that new or modified sources be reviewed to ensure that all applicable regulations will be met
- Need even if the source is already constructed





The Resource
Division of Environmental and Financial Assistance
Office of Outreach and Customer Support

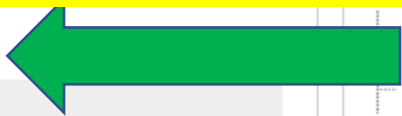
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Helping communities and businesses access compliance, technical and financial assistance for their environmental needs.

Search the Announcements

Announcements by Category

- Case Studies (4) 
- Deadlines (20) 
- Funding (26) 
- General (33) 
- Learn the Lingo (4) 
- Publication Updates (24) 
- Rules/Regulations (3) 
- Stakeholder Input (31) 
- Training Updates (37) 

Not All Air Emission Sources Require Air Permits 

On June 8, 2016 in [General](#)

Does your business use materials or conduct activities that can release air pollutants? These are called air emission sources and many businesses have them. Common examples include surface coating and painting, material handling activities and operating fuel-burning equipment such as boilers and heaters.

For more help identifying air emission sources, see Ohio EPA's [Does My Small Business Need an Air Permit](#) fact sheet. Once your business has identified your air emission sources, the next question is "Do I need an air permit for each air emission source at my facility?" Not necessarily. If an air emission source meets certain criteria it may be exempt from air permitting.

Currently, there are three different scenarios in which an air emission source could be exempt from air permitting:

1. The source is exempt under Ohio EPA's [air regulations](#) — Ohio EPA has determined that certain types of equipment and industrial activities which typically have lower air pollutant emissions do

June 2016

Su	Mo	Tu	We	Th	Fr	Sa
			1	2	3	4
5	6	7	8	9	10	11



Air Pollution Permitting in Ohio

Permits specify limits on the quantity of air contaminants emitted and requirements for construction and operation of regulated of air contaminant sources.

Permitting Overview

Permitting Programs

Regulatory Programs

Types of Permit Documents

Permit Mechanisms/Options

Various mechanisms have been developed over the years to speed up the permitting process. The basic process is described by the "[Steps to obtain Ohio EPA air pollution permits.](#)" However, additional permitting options may be available depending on the type of operation being installed. These options fall into two broad categories: exemptions and general permits. Ohio EPA has developed several types of permitting exemptions. These exemptions include:

- **De minimis:** Outright exemption established in the de minimis rule for very small potential air contaminant sources.
- **Permit exempt:** Exempt an operation from being required to first be issued a permit but remain subject to certain criteria in the exemption rule and/or air pollution control limitations or restrictions established in certain air pollution rules.
- **Permit-by-Rule (PBR):** Permit exemptions that establish emission limits and/or other conditions through the specific exemption rule.

QUICK LINKS

▶ [Rules and Laws](#)

▶ [eBusiness Center: Air Services](#)

▶ [Available Model General Permits](#)

▶ [Permitting Overview](#)

▶ [Asbestos Removal Information](#)

▶ [Current Air Quality Map](#)

▶ [Open Burning Information](#)

▶ [Air Toxics Webpage](#)

Do I need a OEPA Air Permit?



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- Does your “emissions unit” emit an “air contaminant?”
- Is it “Trivial” or “DeMinimis?”
- Is it specifically exempt from permitting?
 - Note: all rules still apply.
- Permit by Rule
- General Permit

Exemptions

- **De Minimis Exemption**

- Found in OAC 3745-15-05
 - Exempts very small potential air contaminant sources
 - Exempts sources with PTE < 10 lbs./day (PM, SO₂, NO_x, OCs, CO, Lead, etc.)
 - If PTE is > 10 lbs./day, but actual emissions are less than 10 lbs./day, can maintain daily records to prove exemption
 - Sum of similar sources can't be > 25 TPY
 - Emits < 1 tons/year any HAPs or combination of HAPs
 - *No notification required*
 - Keep documentation of applicable exemption.
-
- **Not considered an air contaminant source – Exempt from OAC Rules, “...Chapter 3704. of the Revised Code and rules adopted thereunder,”**



Permit Exemptions

- Permanent PTIO Exemptions
 - Found in OAC 3745-31-03 [...(A)(1) (a) – (ss)]
 - Based on process-type
 - Exemption criteria often small size units or limited use
 - Examples:
 - Boilers < 10 mm BTU/hr. natural gas; others <1 mmBTU
 - Maintenance Welding
 - Aqueous Parts Washers & solvent tanks complying with 3745-21-09(O), operating practices
 - Lab Equipment
 - Storage Tanks
 - *No notification required*



Streamlined Permits

- **Permit by Rule (PBR)**

- Found in OAC 3745-31-03
- PBRs are exemptions from the paper-permitting process
- Acts as PTIO and does not expire
- Standard permit terms written into regulations; continual compliance
- *Must notify OEPA with 1-page form*
- 45 different sources are listed; adding regularly

- **Typical activities covered are:**

- emergency electrical generators, pumps and compressors;
- resin injection/compression molding equipment;
- small crushing and screening plants;
- soil-vapor extraction and soil-liquid extraction remediation activities;
- auto body refinishing facilities;
- gasoline dispensing facilities;
- natural gas fired boilers and heaters; and
- printing facilities
- Paved and unpaved roadways



Streamlined Permits (continued)

- **General Permit**

- Found in OAC 3745-31-29
- Set of “pre-written” permit conditions for commonly found sources
- Must submit a (streamlined) application

- Available for the following:
 - Aggregate Processing
 - Boilers
 - Digester Operations
 - Dry cleaning Operations
 - Mineral Extraction
 - Miscellaneous Metal Parts Painting Lines
 - Oil and Gas Well-Site Production Operations
 - Paved Roadways and Parking Areas
 - Portable Diesel Engines (Compression Ignition Internal Combustion Engine)
 - Ready Mix Concrete Batch Plants
 - Storage Piles
 - Unpaved Roadways and Parking Areas



Contact Permit Writer

- Establish and maintain rapport with Agency and permit writer
- Communication –
 - At least a telephone call for small projects
 - Meeting for larger or complex projects
- Advice from RAPCA:
 - “you know your project better than the permit writer”
 - “Make sure the permit writer understands the project as well as you do”



Registration Permit

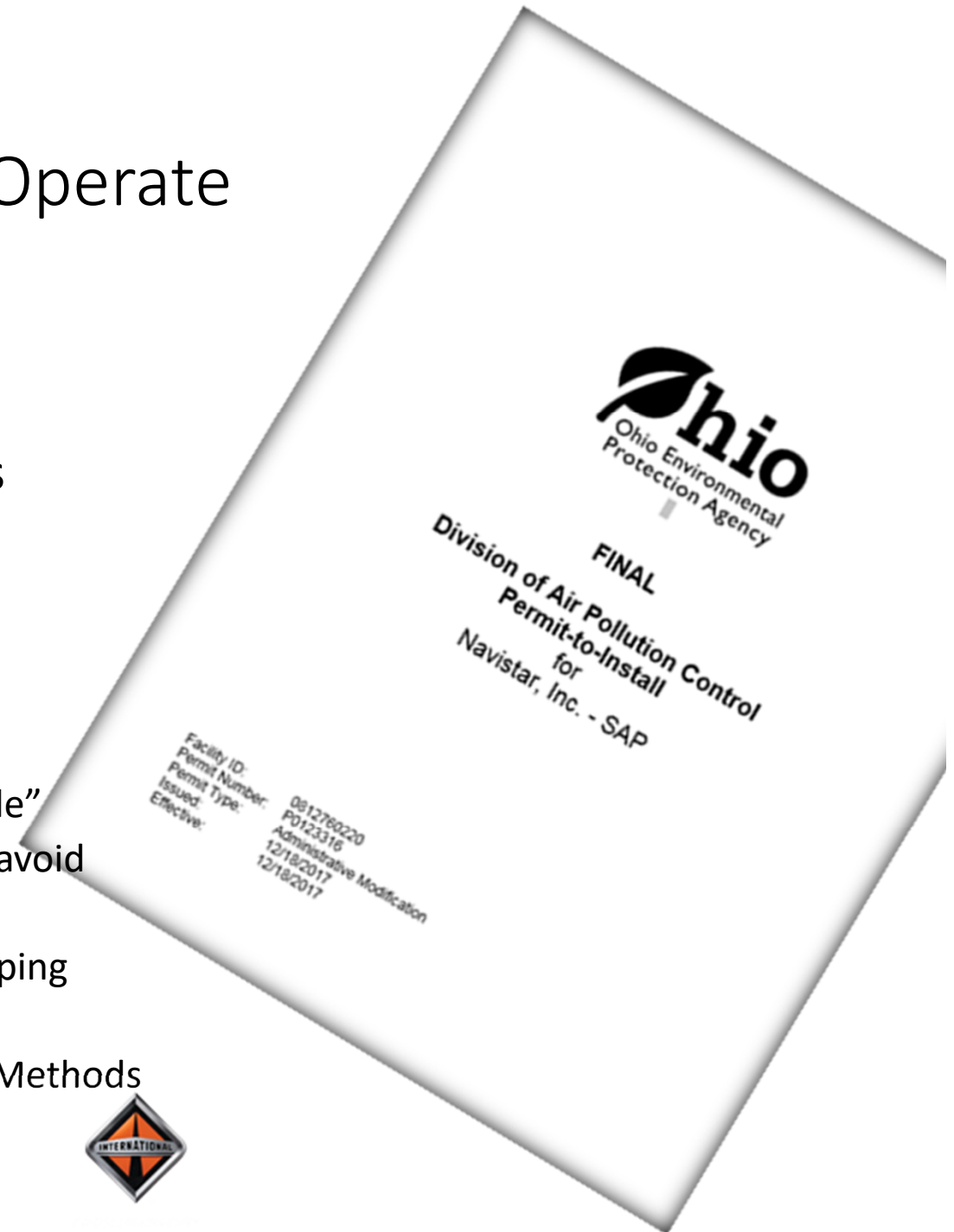
- Authorized in OAC 3745-31-08
- Current Registration PTO?
- Registration Status
 - The director may at any time require the owner or operator of...registration status...to submit an updated application for a PTIO...
 - Director may revoke a registration status if the permittee requests (DeMinimis)
 - Registration PTOs will be grandfathered into PTIO
 - Renewal PTIO will last 10 years



Permit to Install & Operate

- Content

- General Terms
- Terms and Conditions
 - Source Description
 - Applicable Rules
 - BAT Determination
 - Emission Limitations
 - Operating Restrictions
 - “Federally enforceable” restrictions needed to avoid Federal requirements
 - Monitoring & Recordkeeping
 - Reporting
 - Testing and Compliance Methods



Permit to Install and Operate (PTIO)

- **Permit Process**

- DO/LAA review, prepare and send to Central Office
- Draft permits/Public Comment Period
 - Newspaper notice and 30-day comment period
 - USEPA, citizens or company opportunity
- Life of PTI
 - Forever
 - 1 year PTO (if in compliance)
 - Extensions
- Life of PTIO
 - 10 years for true minor
 - 5 years for synthetic minor



Permit to Install and Operate (PTIO)

- Construction

- Effective Dec. 1, 2006 [OAC 3745-31-33] ...

- Any “MAJOR” new or modified source can do only the activities allowed in the past

- Any “MINOR”* new or modified source can do all allowed in past plus MORE.....*essentially you can do everything except hook up utilities and run new equipment*

**minor here means not a: major modification, major stationary source, synthetic minor, or netting project*



Permit to Install and Operate (PTIO)



- Construction (cont'd)

- Allowed for all sources (under previous and current rules)
 - Utility poles by a utility company.
 - Temporary erosion and sedimentation control (hay bales, silt fences, rip-raps, sandbags).
 - New landscaping (trees, bushes and seeding of disturbed earthwork).
 - Landscaping fencing.
 - Temporary fences and signs around the construction site.
 - Stockpiling of stone, soil and other materials for future construction.



Permit to Install and Operate (PTIO)

- Construction (cont'd)

- Now allowed for “MINOR” sources:
 - Equipment for source/control may be delivered prior to PTI issuance **if**:
 - In existing building - place in final location and secure
 - In new building - either secure on the foundation of its final site or place anywhere on the property

NOTE: No utilities, piping, or duct work may be connected and equipment cannot be operated.



Permit to Install and Operate (PTIO)

- **Issuance Timing**

- By statute, the Agency has 180 days to act upon a complete PTI application (excluding waiting on applicant)
- Preliminary Completeness review in 14 days
- How long to receive a PTI?
- When should you plan to submit a permit application to receive Permit to Install prior to planned construction or process change?



Permit to Install and Operate (PTIO)

- Why & What is the “Rush List”?

- EPA Receives Many Requests
- Need to Manage Requests
- Developed a "Rush List"
- Helps Prioritize Review/Processing in Central Office



Permit to Install and Operate (PTIO)

- Where to send Rush Requests:

- Mike Hopkins
Ohio EPA, DAPC
Lazarus Government Center
PO Box 1049
Columbus, OH 43216-1049
- Call (614) 644-3681
- Mike.Hopkins@epa.ohio.gov



Permit to Install and Operate (PTIO)

- Received PTIO - Now What?
 - **Read** and understand it! Ask your permit writer.
- Documentation and Reporting Requirements:
 - Annual Emissions Reporting
 - Deviations – something didn't happen the way it was supposed to
 - Excursions – limits or restrictions were exceeded
 - Control equipment malfunctions
 - Negative declarations – a fact of life
- Any late report is a deviation



Permit Applications

• **Common Pitfalls**

- Incorrect forms
- No original signature – PIN approval
- Not providing supporting calculations, (PTE, Actual, other)
- Insufficient information, (blank spaces on forms, missing pages, no calculations)
- Emission estimating deficiencies (pollutants, factors, hours)
- Failure to plan source operation to meet needs
- Failure to review draft permit for terms & conditions problems, “Pre-Draft Permit”
 - Informal comment period that allows the permittee and permit writer to resolve differences before Draft or Final issuance
 - “Please provide any comments or your approval by....”



Permit Applications

- **Monitoring and Record Keeping**

- Know what you can monitor and record
- Rule based monitoring requirements
- Continuous or intermittent
- Know what's the most cost effective for you
- Preference for input restrictions or limitations
- Build in Flexibility - Good terms and conditions can avoid future modifications
 - average versus peak volumes
 - hours of operation
 - hourly rates
 - Practical enforceability – Federal enforceable
- SDS ranges and air toxics



Permit Applications

- **Communication with Upper Management**

- How long it takes to get a permit – when to bring the environmental manager into the loop – cost of delays
- Critical thresholds – how calculated so management understands cost of controls versus costs of production limitations
- Miscalculation – understanding the costs and delays with getting a new permit if emissions are underestimated



BAT/GP/PBR Update

Workshop F

August 26, 2021



Michael Hopkins, P.E.
Assistant Chief, Permitting
Division of Air Pollution Control
614-644-3611
Mike.hopkins@epa.ohio.gov

Topics

- Permitting Efficiency Improvements
- Permitting Program Updates
- Permitting Paved and Unpaved Roadways
- BAT Determination Method



Permitting efficiency improvements

Ohio's General Permits

- Pre-written permit for specific size and type of equipment
- Qualifying criteria must be met
- Company must agree to the qualifying criteria and terms
- Company submits application



Ohio's General Permits

- Staff checks to see if they qualify
- No detailed review, no calculations, no writing terms
- If meets qualifying criteria – issue permit
- Average permit issuance time: 18 days



Major Efficiency Improvements

- Permit to install and operate program
- Stars2/Air Services
- New permit exemptions – 19 new
- Expanded PBR – 12 new PBRs promulgated
- Developed GP program – 70 available
- PAL permits – issued a few

PBRs, GPs and Exemptions Added

Year	Description
2003	4 PBRs: Injection Compression Molding, Crushing and Screening, Soil-vapor extraction and soil-liquid extraction
2004	14 GPs: Natural Gas Boilers
2005	6 PBRs: Autobody refinishing, 2 GDF, 100 mmBtu NG boilers/heaters, small printing, mid-sized printing
2006	Exemptions: Locomotive engines, dynamometers, mobile vacuum trucks. GP: 2 ready mix concrete
2007	GPs: 2 drycleaner
2011	GPs: 2 aggregate processing, 12 diesel engines, 1 mineral extractions, 2 well site.

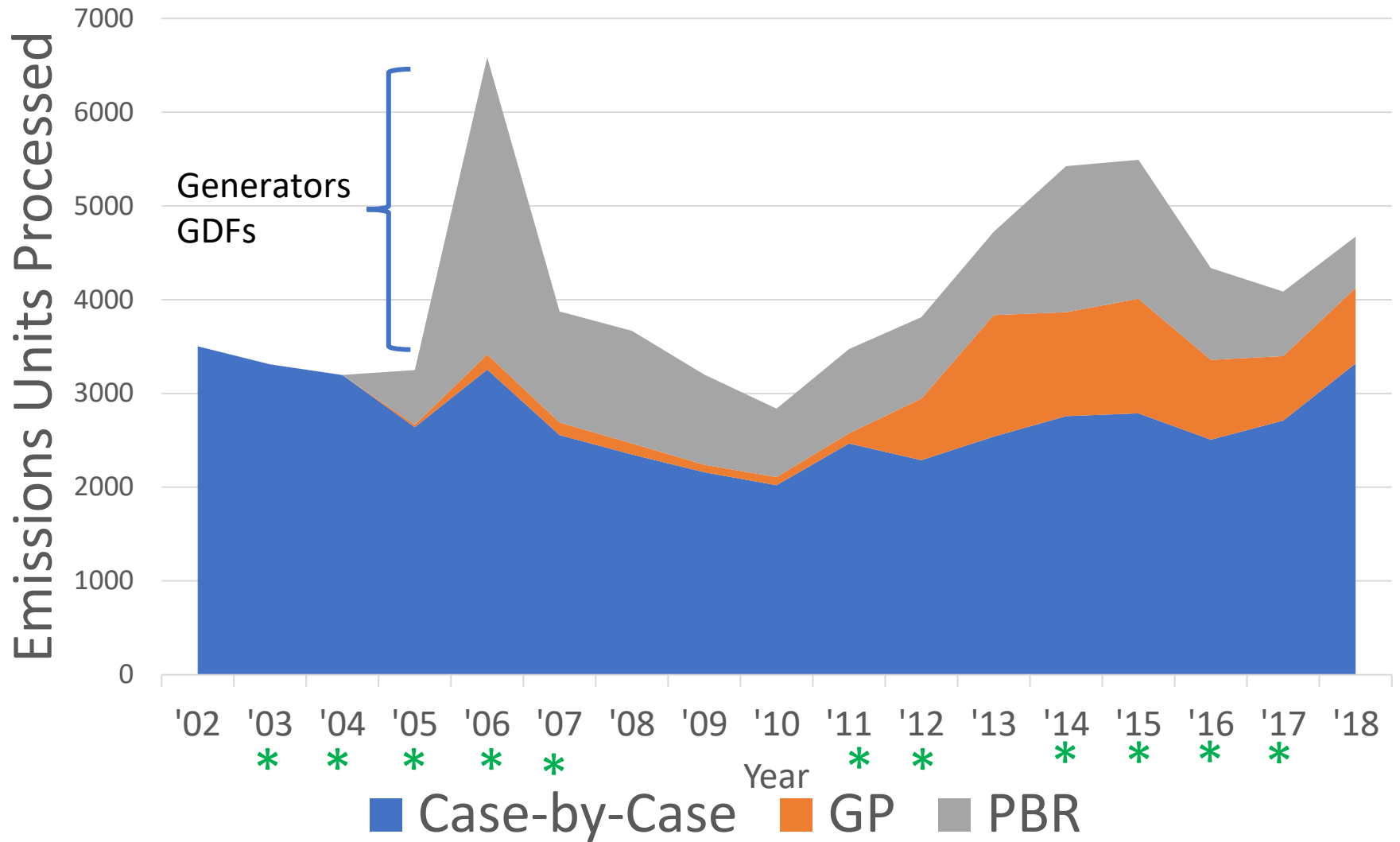
PBRs. GPs and Exemptions Added

Year	Description
2012	3 Digester operations
2014	2 GPs: 2 well site operations (updates)
2015	5 GPs: 2 roadways and parking area, 3 storage pile, 1 tub grinder
2016	16 Exemptions: POTW tanks, powder coating lines, outside stripping/coating, construction activities, building demolition, athletic/racetrack grading, traffic marking, masonry waterproofing/sealing, diesel storage/dispensing, shooting range, annealing, <500 Btu used oil heaters, compost piles, beauty salons, roadway/parking

PBRs. GPs and Exemptions Added

Year	Description
2017	GPs: 22 Mid-stream compressor equipment
2021	Updated GPs for 10 to 50 mmBtu boilers
2021	1 GP: Human Crematories

Installation Emissions Units Processed



* PBR, GP or exemption added.

Work Saved Since 2002

- 7,300 emissions units for GPs issued
- 15,750 emissions units for PBRs issued
- $7,300 + 15,700 = 23,000$ EU
- @3 EU per case-by-case permit = 7,600 permits
- Assume 7 hour/case-by-case permit
- ~53,000 man-hour; 25 FTE

Program changes

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What is Next?

- Recent improvements
 - Updated to NG Boiler GPs
 - New crematory GP
 - <10-ton BAT SIP approved!
- What is next?
 - Need to update other GPs w new BAT/rules
 - Revise well-site GPs w OOOOa?
 - Add new exemptions

<10 ton BAT Exemption

- 5/13/19 U.S. EPA approved exemption into SIP
- Means it is state and federally approved
- Will no longer see the “BAT applied until SIP approved” language in permits
- Will remove “BAT applies until” language at renewal

New Exemptions

- Did pre-interested party on 31-03 in 2017
- Interested party out July 29, 2021
- Comments due August 31, 2021
- Contains new exemptions, new/updated PBRs
- Move PBRs to 3745-31-30

New Exemptions

- Natural gas transmission valve sites, and metering and regulating sites.
- Portable flares for burning natural gas from maintenance activities at natural gas facilities
 - Temporary fuel burning equipment
- Small Breweries
- Portable sawmills

New Exemptions

- **Small sand and gravel storage and handling**
- Small cooling towers
- Small animal crematories
- Small electric arc welding operations
- **Small UV/Corona discharge ozone generators**

PBR Updates

- Update to emergency generator
- Railcar transloader
- Petroleum solvent drycleaners



Permitting Paved and Unpaved Roadways

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Paved and Unpaved Roadways

- Tiered approach
 - Exemption.... PBR.... GP.... Case-by-case permit
- Update permit options with new BAT
 - No BAT opacity (just rule opacity)
 - Can't cause nuisance; Work Practice Plan
- New/revised exemption, PBR, GPs

Tiered Roadway Approach

Category	Threshold	Limits	Restrictions	Comment
De Minimis	<10 lb/day	N/A	N/A	Permit Exempt
Exemption	<3800 VMT/yr ~7500 sq ft	5 Ton PE/yr 1.45 PM10	No Nuisance	Must control emissions
PBR	12k to 30k sq ft	Appx A VE	No Nuisance	Unpaved
PBR	40k to 90k sq ft	Appx A VE	No Nuisance	Paved
GP 5.1	<125k VMT ~60,000 sq ft	Appx A VE	Work practice plan required	TV/non-TV for paved and unpaved
GP 5.2	<320k VMT ~120,000 sq ft	Appx A VE	Work practice plan required	TV/non-TV for paved and unpaved
Case-by-case	>=320,000 VMT ~120,000 sq ft	>65 TPY 19.1 PM10	Varies	All types

Roadway Fugitive

- Updating based on new BAT approach
 - No BAT opacity (still need rule opacity)
 - Smaller sources BAT = can't cause a nuisance
 - Larger sources BAT = Develop and use Work Practice Plan



Work Practice Plan Requirements

- Includes paved and unpaved
- Identify each area
- Determine inspection frequency
- Set up recordkeeping for inspection/treating
- Submit to DO/LAA for approval
- Quarterly (TV) / annual (NTV) deviation reports

<http://epa.ohio.gov/dapc/genpermit/urpa.aspx>

Minimum Record keeping for inspection/treatment

- Identify area inspected
- Date inspected
- Name of employee doing inspection
- Result of inspection
- Why no treatment?
- Date treated
- Name of employee doing treating
- Method used to treat

Best Available Technology Changes

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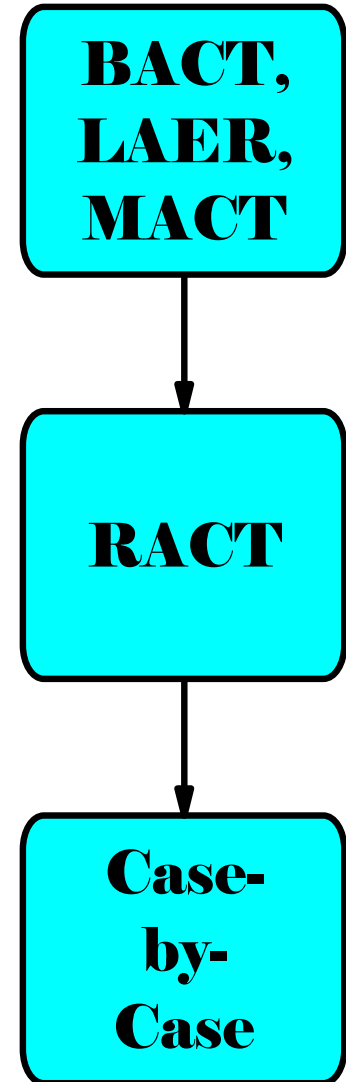
Background

- 2006 SB 265 Changed BAT
- Issued several rounds of guidance
- Got comments/suggestions
- Issued revised guidance February 7, 2014
- <http://epa.ohio.gov/dapc/sb265.aspx>
- Significant changes for new or modified after August 3, 2009

Determining BAT

- Follows 2006 SB 265 approach
- BAT = MACT, GACT, BACT or LAER
- If not, then BAT = RACT...
- If not, then case-by-case BAT

Note: Does not include NSPS requirements.



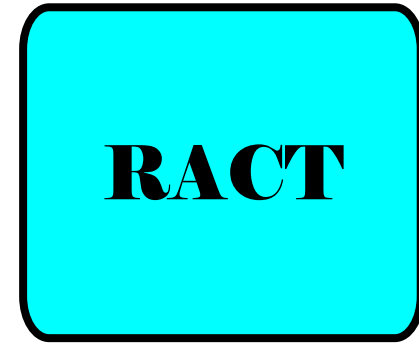
How do you determine BAT?

- Check each pollutant separately
- Check to see if MACT, GACT, BACT, LAER applies
- If so, then establish BAT
- If not, then review RACT rules



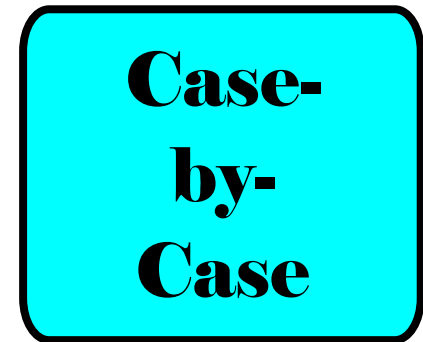
RACT Rule Review for VOC

- Review 01/01/06 version of Chapter 21 for VOC limits
- VOC limits apply anywhere in the state to the same size and type of source?
- If so, then find most stringent, establish limit as BAT floor for VOC
- Then move on to case-by-case approach for VOC



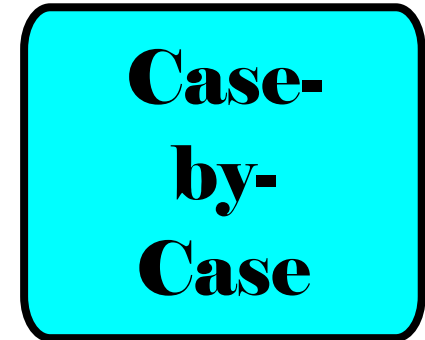
Case-by-Case BAT

- Step one – complete case-by-case analysis for BAT
 - Review similar sources
 - Complete cost-effectiveness
 - Each criteria pollutant and each operating scenario
- Determine control level/emission level for BAT
- More stringent than RACT floor?



Case-by-Case BAT

- Step two – determine how BAT should be *expressed*



SB 265 Expression Options

- Must express BAT using on of the four options:
 - Work Practice
 - Source Design Characteristic/Design Efficiency
 - Raw Material/Throughput
 - Monthly Allowable

Work Practices

- Most will be description of work practice or implementation of a work practice plan
- No opacity, no ton/yr
- Few will be traditional opacity – only if company wants

Source Design/Design Efficiency

- Applies when source/control was designed to limit a particular pollutant
- Short term appropriate but:
 - No emission limit in permit
 - Only “designed for” approach
- BAT = “Install a baghouse designed to meet 0.03”



Source Design/Design Efficiency

- Larger sources... can do initial test
- No ongoing emission limit obligation
- Will need to maintain per manufacture's recommendations
- Will need to maintain records on maintenance
- OAC/other rules provide short-term backup
- U.S. EPA has concerns...

Raw Material Specifications or Throughput Limitations

- Typical of part of synthetic minor limitations
- “45.6 tons of steel processed per rolling twelve-month period”
- No lb/hr, ppm, etc. for BAT... may need these for synthetic minor, however
- This format not used too often for BAT

Monthly Allowable

- Similar to synthetic minor limitations
- “3.2 tons VOC/**month** averaged over a 12-month rolling period”
- Old way: 38.4 tons VOC/rolling 12-month period
- Overall restriction ends up the same but just described differently

Monthly Allowable

- Will need monitoring, recordkeeping and reporting
- No lb/hr, ppm etc. short-term limits
- OAC/other rules provide short-term

Wrap-up

- BAT Guidance – <http://epa.ohio.gov/dapc/sb265.aspx>
- DAPC Web - <https://epa.ohio.gov/dapc/>
- Questions?