



Air Permit Renewals Workshop K

July 21, 2022

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Permit Renewal Application – Questions to Ask!

- ▶ When is it due?
- ▶ How do I submit the application?
- ▶ What must be included in the application?
- ▶ What has changed?
- ▶ How can I make my permit better?
- ▶ Permit Type Matters
 - Title V or
 - Non-Title V (FEPTIO or PTIO)?

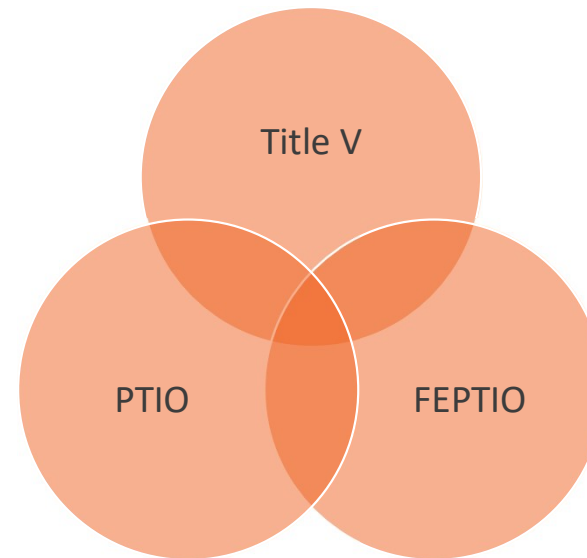
General Permit Renewal Requirements

- ▶ Facility Information
- ▶ Emission Unit Specific Information
 - Emission Activity Category (EAC) Form
 - Process Flow Diagram (PFD)
- ▶ Emission Calculations
- ▶ Applicable Requirements
- ▶ Any requests for permit revisions?
 - Confusing permit language
 - Changes in monitoring equipment
 - Incorrect applicable requirements
 - Chance to compile multiple non-Title V permits into one permit!

Renewal Application Requirements - Similarities

All Permit Types:

- ▶ Reason for application: “Renewal”
- ▶ Attach for each emissions unit included:
 - Emission Activity Category (EAC) form(s)
 - Process flow diagram
 - Allowable/potential emissions
- ▶ “Signed” by Responsible Official (RO) or Authorized Representative (AR)



Renewal Application Requirements – Differences

Requirement	Title V	FEPTIO	PTIO
Due Date	No later than 6 months prior to expiration	Permit expiration date	
Submittal Process	Air Services	Air Services	Air Services or Hard Copy
Permit Exempt Sources	List in profile all Insignificant Emission Units (IEUs) <ul style="list-style-type: none"> • Include EAC form & emissions for IEUs with App. Reqs. • IEU could have PTI 	Not included in application	
Emission Calculations	Facility-wide potential to emit (PTE) Includes all permit exempt EUs!	<ul style="list-style-type: none"> • Synthetic minor strategy • Permitted EU PTE 	Permitted EU PTE
EU-Specific Information	<ul style="list-style-type: none"> • Applicable Requirements • Compliance Assurance Monitoring (CAM) Plans 	<ul style="list-style-type: none"> • Best Available Technology (BAT) • Request federally enforceable restrictions? 	

Permit Renewal Applications – Common Pitfalls

- ▶ **Things change!**
 - Preparer of prior application may no longer be with company
 - Prior application may no longer be accurate
 - New permit writer
- ▶ **Air Services**
 - Is your facility's profile up-to-date, complete, and accurate?
 - Is your Responsible Official (RO) set up and ready to certify?
- ▶ **Emission Unit Inventory**
 - Complete and characterized correctly?
- ▶ **Potential to Emit (PTE) Calculations**
 - Do you have complete set of facility-wide PTE calculations?
 - Synthetic minor strategy is required for FEPTIO
- ▶ **Applicable Requirements**
 - Changes to regulations and updating/creating Compliance Assurance Monitoring (CAM) Plans



**GOAL – Submit a
timely and complete
application!**



Updating the Responsible Official/Authorized Rep.

▶ Two (2) Steps to get a PIN:

1. Request a PIN in eBusiness Center (My Account/Request New PIN)
 - <http://wwwapp.epa.state.oh.us/eBusinessCenter/eBizPINHelpSheet.pdf>
 - Login, complete PIN request form & submit online
 - **IMMEDIATE OPTION** – use LexisNexis to verify identity
 - Otherwise, mail hard-copy, notarized form
 2. Activate PIN in eBusiness Center (Enter PIN & answer security questions)
 - PIN not required for preparers/reviewers of applications/reports
 - PIN needed to delegate access to a site's Air Services profile
- ▶ **ALTERNATE OPTION** – Attestation Document
- PIN still needed for submittal, but does not have to be the RO/AR's PIN

Copying an Application

- ▶ Copying prior renewal applications saves time!
 - Which prior application is best to copy?
 - Remember:
 - ◆ EAC Form updates
 - ◆ Modified equipment updates
 - ◆ Incorporate newly installed EUs
 - ◆ Old STARShip applicable requirements?

Facility ID : -----
Request type : Title V PTO Application
Copy data from existing application :
Affected Application Number : Please select

Created

- Please select
- A0014116
- A0014117
- A0014118
- A0014119
- A0014120
- A0014121
- A0014122
- A0014123
- A0014124**
- A0036908
- A0039470
- A0040684
- A0042102
- A0043371
- A0059590
- A0061776
- A0065753

Oldest

Newest

Facility ID : -----
Request type : Title V PTO Application
Copy data from existing application :
Affected Application Number : Please select

Create Cancel

▼ Facility-Wide Requirements

State and Federally Enforceable Requirements [OAC rule]

Select All | Select None

Select	Allowable Limit	Pollutant	Rule Cite	Permit Cite
<input type="checkbox"/>	See attached TV Application			

Add Edit Se

Other Changes – EAC Form Updates

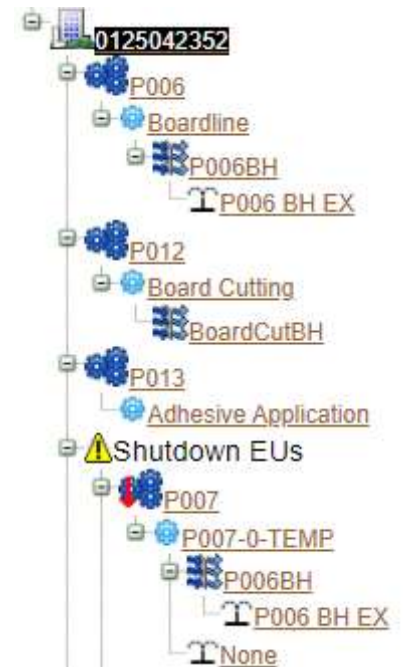
- ▶ Emission Activity Category (EAC) Forms
 - Must be attached to each emission unit included in the application
- ▶ Some common EAC forms have been revised recently:
 - Fuel Burning Operations (11/2018)
 - Surface Coating Operations (11/2018)
 - Stationary Internal Combustion Engines (9/2015)
- ▶ For hard copy PTIO submittals, PTIO Section 1 and 2 Forms have also been updated

Form	Form Name (Revision Date)
3100	Process Operation
3101	Fuel Burning Operation (November 2018)
3102	Incinerator Operations
3103	Surface Coating Operations (November 2018)
3104	Storage Tank
3105/3106	Gasoline, Diesel, and/or Kerosene
3107	Loading Rack for Liquid Materials
3108	Printing Operations
3109	Solvent Metal Cleaning
3111	Roadways and Parking Areas
3112	Storage Piles
3113	Material Handling
3114	Mineral Extraction
3115	Coke Manufacturing
3116	Iron Production

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

Facility Profile Review & Updates

- ▶ Facility Profile identifies all emission units, stacks, control equipment, and operating status of each
 - Not Installed vs. Operating
- ▶ Avoid last-minute errors - run a validation check right away!
- ▶ TV Application pulls in all EUs from the profile except those marked as IEUs (no applicable requirements) and trivial
 - Confirm Title V EU classifications
 - Include equipment that has not been installed yet?
- ▶ New Equipment
 - Mark as 'operating,' if applicable
 - Dates (mo/yr) for begin & complete installation and commence operation
 - ◆ Cannot change/update the *Permitting Classification and Status* for an existing EU (already in profile) if these dates are missing!
- ▶ Permanent Shutdown
 - Date of shutdown (mo/yr)



Emission Unit Inventory

Non-Trivial Emission Units

- ▶ Ensure EU inventory is complete and well documented
 - Be prepared to justify any permit exemptions!
- ▶ During a site walk-through, look for:
 - Previously listed equipment that has been removed, shutdown, or replaced
 - Equipment with a stack, vent, or control device (e.g., dust collector)
 - Equipment that burns fuel(s)
 - Equipment that uses inks, paints, coatings, adhesives, solvents, glues
 - Equipment that releases smoke, dust, and/or odors
 - Common missed EUs – emergency generators, roadways, solvent degreasers, sand blasters, routine equipment cleaning operations, paint booths, equipment leaks
- ▶ Figure out the date of installation or shutdown

Emission Unit Inventory – Spreadsheet Example

EU ID	Description	Control Device	Title V Classification	Permit Exemption	Permit Number	Potential Emissions (
						CO	NOX	SO2	VOC	PM1
F001	Facility Roadways	None	Significant	N/A	PTI P011111					
L001	Cold Cleaner	None	Insignificant (No Applicable Requirements)	De minimis	N/A					
B001	Boiler 1	None	Insignificant	Permit Exempt	N/A					
P001	Process 1	Baghouse	Insignificant	N/A	PTI P022222					

- ▶ Other potential information to capture:
 - Dates of installation/commence operation
 - CAM applicability
 - Applicable requirements (citations)

Title V Insignificant Emission Units (IEUs)

- ▶ OAC 3745-77-01 (V) – “Insignificant activities and emission levels”:
 - All source categories excluded from the requirements to obtain installation permits or operating permits under section 3704.011 of the Revised Code or Chapter 3745-15, 3745-31, or 3745-35 of the Administrative Code
 - All source categories specifically exempted under 40 CFR Part 70
 - Any emission unit with uncontrolled potential emissions of five tons or less per year of any regulated air pollutant other than a hazardous air pollutant and not more than twenty per cent of an applicable major source threshold under the Act.
 - Any research and development source that is by itself not a major source.
- ▶ In most cases, requires potential emission calculations to confirm IEU status
- ▶ Trivial emission units can be excluded from all aspects of the application
 - Ohio EPA Engineering Guide #62

Title V Insignificant Emission Units (IEUs)

- ▶ Must differentiate IEUs with applicable requirements vs. IEUs without
 - IEUs without applicable requirements are excluded from the Title V application
 - For IEUs with applicable requirements, Ohio EPA requires EAC forms
 - Don't forget federal rules (NSPS, MACT, GACT) or SIP rules, CAM

Missing IEU EAC
does not trigger a
validation error

Title V Insignificant Emission Units (IEUs)

- ▶ IEUs with no applicable requirements are no longer identified in the Title V Permit!

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
P007	Diesel Emergency Generator (PBR11089 issued 08/19/13)

Potential-to-Emit Calculations

- ▶ Emission calculations are required as part of a renewal application
 - **Excluding a calculation attachment does not trigger a validation error!**
 - Can be a significant undertaking if not already in place
 - **Calculation methodology changes since last permit issuance?!**
 - ◆ Revised AP-42 emission factors,, new stack test data, outdated software (e.g., storage tanks), etc.
 - ◆ Should you adjust your permit limits?
- ▶ Facility-wide PTE important for source classification
 - Major source status
 - ◆ HAP – Major or Area
 - ◆ Title V – Major for which pollutant?
 - ◆ Major NSR – Existing Major or Existing Minor Source for future projects?
 - ◆ Synthetic Minor Strategy
- ▶ EU PTE Documentation and Permit Language
 - When an EU is permitted at PTE, the permit writer may describe the emission calculations to use in a compliance demonstration as part of the new permit

Non-TV – EU Emissions Information

3. Emissions Information

The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.

- If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if "Emissions before controls (max), lb/hr" multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
- Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, "Emissions before controls" will be the same as "Actual emissions".
- Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
- If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
- Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

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

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

Pollutant Category	Emissions before controls (max)* (lb/hr)	Actual Emissions* (lb/hr)	Actual Emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)
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Greenhouse Gas Pollutants :

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)
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* 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.

Title V – Emission Unit PTE

▼ Emission Unit Potential to Emit (PTE)

Provide the PTE for all regulated pollutants for which the emissions unit is considered Major as well as those pollutants for which the emissions unit is not considered Major but have applicable requirements. In addition, a PTE for each individual HAP associated with a promulgated MACT category must be listed.

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		

Green House Gas Pollutants :

Pollutant	**PTE (ton/year)	***CO2 Equivalent (ton/year)	*PTE Determination Basis	Reason Determination Basis is a Trade Secret
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*Reference the rule or synthetic minor permit and issue date if the PTE is established through either of these mechanisms.

**PTE for purposes of MACT applicability may include controlled emissions.

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

Title V – Facility-wide PTE

▼ Facility-wide Potential to Emit (PTE)

For Revision/Modification/Reopening, the emissions unit total PTE reflects only those eus that are part of this Revision/Modification/Reopening request. Please be sure to identify the facility PTE in the adjustment column to the right of the emission unit PTE column in the facility-wide PTE table below before adding or excluding emissions units from this Revision/Modification/Reopening.

Criteria Pollutants :

Pollutant	PTE (ton/year)		Major Status
	EU Total*	Facility PTE	
PM10 - Primary PM10 (Includes Filterables + Condensibles) (PM<10 Microns)	0		Not Applicable
NOx - Nitrogen Oxides	0		Not Applicable
SO2 - Sulfur Dioxide	0		Not Applicable
Pb - Lead	0		Not Applicable
PM2.5 - Primary PM2.5 (Includes Filterables + Condensibles) (PM<2.5 Microns)	0		Not Applicable
VOC - Volatile Organic Compounds	0		Not Applicable
CO - Carbon Monoxide	0		Not Applicable
PM2.5 (FILT) - Primary PM2.5, Filterable Portion Only	0		Not Applicable
PM10 (Filt) - Primary PM10, Filterable Portion Only	0		Not Applicable

Hazardous Air Pollutants (HAPs) :

Pollutant	PTE (ton/year)		Major Status
	EU Total*	Facility PTE	
HAP - Single Hazardous Air Pollutants	0.0		Not Applicable
HAPS - Total Combined Hazardous Air Pollutants	0		Not Applicable

Green House Gas Pollutants :

Pollutant	EU Total*	Facility PTE	PTE (ton/year)
			CO2 Equivalent (ton/year)**

* Ohio EPA Calculated.

** Ohio EPA Calculated - The CO2 Equivalent given for the Total Combined GHG Pollutants is a sum of the CO2 equivalent for each pollutant. It is NOT calculated from the Facility PTE value given for the Total Combined GHG Pollutants.

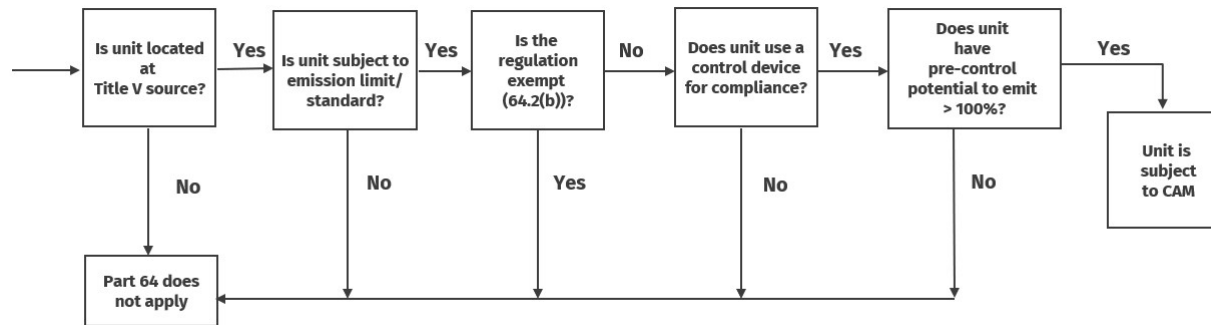
Applicable Requirements

- ▶ Regulatory Review Required
 - Look for changes to regulations
 - ◆ New/Revised VOC and NOX RACT Rules
 - ◆ MACT Risk and Technology Review (RTR) rule revisions
 - ◆ Missed or incorrect applicability in current permit
- ▶ Title V Sites
 - Must identify and certify compliance with all applicable requirements
 - Compliance Assurance Monitoring (CAM)
- ▶ Non-TV sites
 - Detailed applicable requirement review is recommended but not a required part of application
 - High-level regulatory applicability (MACT, NSPS, PSD/NANSR, RMP)
 - Best Available Technology (BAT) section
 - ◆ BAT is not required to be re-evaluated for a permit renewal!
 - Request for federally enforceable restrictions
 - ◆ “Yes” requires attachment of synthetic minor strategy document!

Title V Compliance Assurance Monitoring (CAM)

- ▶ CAM establishes monitoring procedures to provide reasonable assurance of compliance
 - Identify performance indicators
 - Document continued operation of control device within specified indicator ranges
- ▶ As part of a Title V Renewal Application:
 - Review any CAM Plans submitted as part of the previous application for any necessary updates
 - ◆ New control devices, shutdown equipment, updated performance indicators based on recent stack tests, etc.
 - Review CAM applicability for any **new** EUs installed after last renewal permit was issued
 - Review CAM applicability for **modified** EUs (that were not previously subject to CAM)

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

CAM – Air Services

▼ Compliance Monitoring Equipment/Enhanced Monitoring

Are there any compliance monitoring equipment activities or enhanced monitoring required by section 114(a)(3) of the Act associated with this emissions unit?

Yes

Please describe each one:

See attached CAM plan.

Will this emissions unit comply on a timely basis with any applicable enhanced monitoring and compliance certification requirements of the Act?

Yes

- ▶ Do not forget that each EU has a form field in a Title V renewal application in Air Services to indicate applicability of CAM and to certify compliance with the requirements of CAM.

How is Environmental Justice (EJ) Impacting Industry?

- ▶ EJ initiatives are “in motion” across the country
- ▶ Facilities should recognize the need for:
 - Increased **understanding of surrounding community**
 - ◆ Demographics, neighboring sources, local impacts, data and tools
 - Increased **community engagement**
- ▶ EJ is impacting:
 - **Permitting (construction & operation/renewals)**
 - ◆ Public notice/comments could result in approval delays, additional analyses (e.g., modeling), more stringent requirements

Reasons to Start Early!



- ▶ Updates to Facility Profile
- ▶ Updates to PTE Calculations
 - Confirm permit exemption claims
 - Confirm IEU exemption claims
 - Clarify major source status
 - Calculation methodology updates!
- ▶ Applicable Requirements
 - Must certify compliance with all applicable requirements for Title V
- ▶ CAM
 - Applicability for new/modified EUs?
 - Attach updated plans
- ▶ EJ
 - Increased public participation expected?





AMERICAN NITRILE

Permit Renewals on the Regulated Side

JJ Bilimek, CSP | EHS Manager

Topics

1. Intro to American Nitrile Operations, LLC
2. Preparing for renewal
3. Renewal Submission, Draft Review, and Making Draft Changes
4. Handling Public comments & Environmental Justice





Intro to American Nitrile

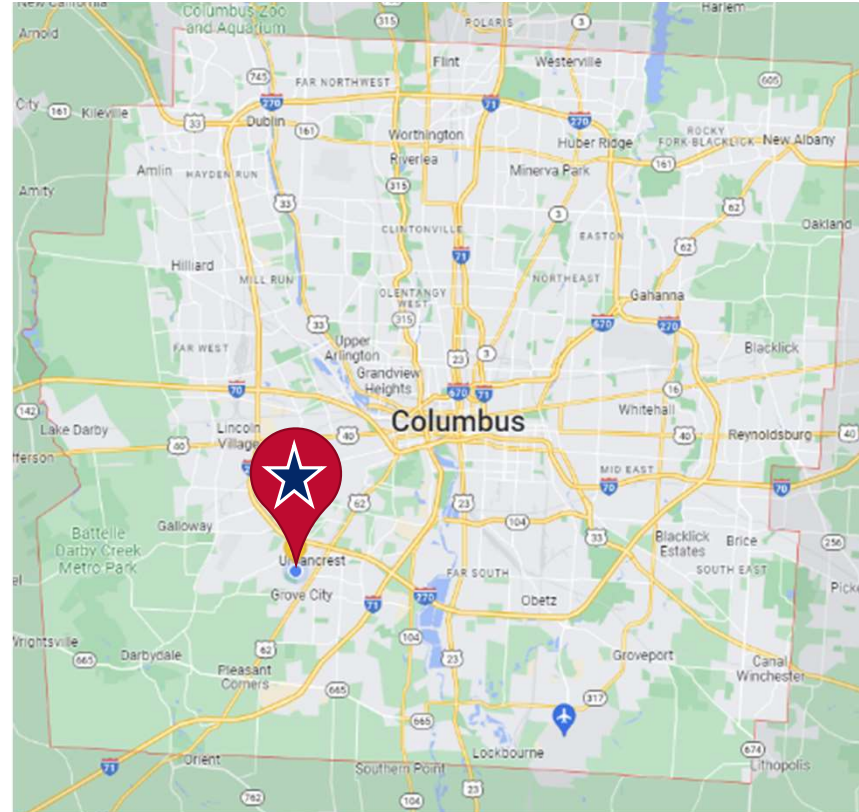
AMERICAN NITRILE

Jacob Block, Founder and CEO

Native to Bexley, Ohio
(Columbus)

Founded 2021 in a response to
pandemic-related medical glove
PPE shortages and price gouging
by Asian manufacturers and
importers.

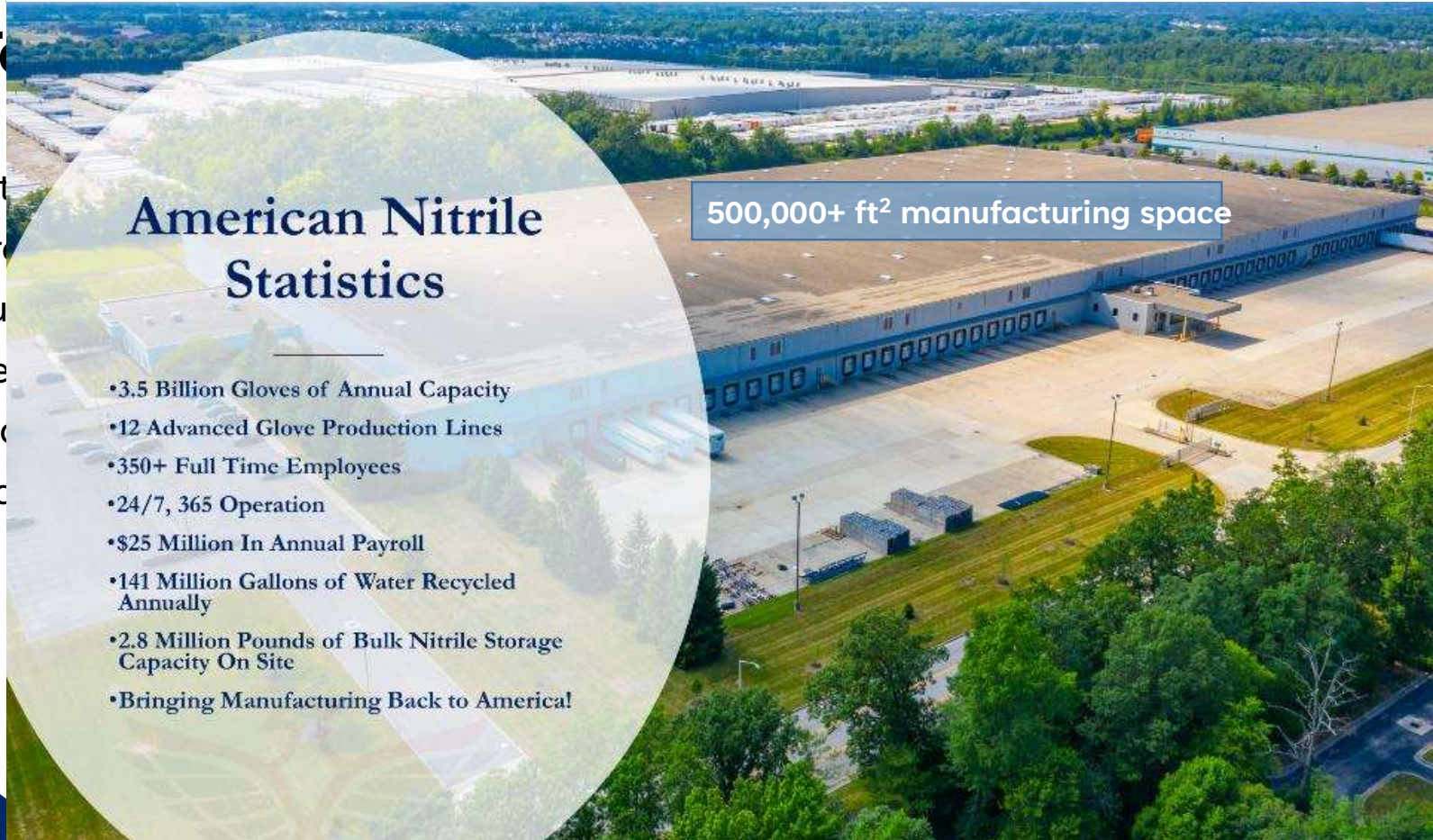
Producing Medical and
Industrial grade gloves.





Intro to American Nitrile

AMERICAN NITRILE



American Nitrile Statistics

500,000+ ft² manufacturing space

- 3.5 Billion Gloves of Annual Capacity
- 12 Advanced Glove Production Lines
- 350+ Full Time Employees
- 24/7, 365 Operation
- \$25 Million In Annual Payroll
- 141 Million Gallons of Water Recycled Annually
- 2.8 Million Pounds of Bulk Nitrile Storage Capacity On Site
- Bringing Manufacturing Back to America!



American Nitrile Glove Making Process

Former
Cleaning & Drying

Coagulant
Dipping

Nitrile
Dipping

Nitrile
Drying

Leaching

Chlorination

Stripping and
Packaging

Compounding



Nitrile Dipping



Glove Stripping



Glove Packaging



Preparing for renewal

- Read your permit(s) to understand when things happen:
 - Usually found in Section A: Standard Terms and Conditions
 - “When does my PTIO Expire...?”
 - Or found in Section C: Emission Unit Terms and Conditions
 - “Testing Requirements”



Preparing for renewal

- Ohio EPA will send a renewal notice 6 months prior to expiry
- Build yourself reminders! Outlook, iCal, EHS Software – especially helpful for changes in responsibilities
- Some permits require stack testing to be performed prior to renewal. Requirements vary (for example, 6 or 12 months)
- Contact a reputable Stack Testing company EARLY!



Renewal Submission, Draft Review, and Making Draft Changes

Permittee should Request to Review the Draft before the Public Comment Period.

- It allows the permittee to review the language and ensure the terms are clear and specific enough to meet your compliance obligations
 - Vague Example: permit may only say “continuously monitor”
 - Specific Example: “Continuously Monitor (readings at least once per hour)”
- Note any and / or statements!
 - Permit may have more than one way to demonstrate compliance
 - Real example: burning natural gas results in emissions which per the permit could be monitored continuously by a CEMS –or–
 - Calculated using approved method.



Renewal Submission, Draft Review, and Making Draft Changes

Permittee should Request to Review the Draft before the Public Comment Period.

- Review any calculations in the draft permit and compare against any calculations submitted – ensure no “key-stroke” errors have occurred
- Focus energy on reading & understanding every word of Section B and C
 - Section A is the Standard Terms on most permits.
 - Highlight compliance action items and build reminders to complete them on-time – consider SOPs
- Ask questions of your permit write on anything unclear
- This is permittee’s chance to make changes more easily before the public comment period



Handling Public comments & Environmental Justice

Know your local municipality

- Consider proactively involving them (i.e. BZA, council members, mayor, etc.)
 - Tour the facility, explain the process being permitted, explain environmental controls
 - Be open and answer questions
- Request any public comments by municipality be submitted early in the comment period to avoid unnecessary delay.
- Ohio EPA Receives public comments and responds to them. Permittee may need to provide additional information such as air modeling.
- Consultants should be able to inform you of potential items that may be required. Having the work done ahead of time will save time!



Learn About Environmental Justice

Environmental justice (EJ) is the **fair treatment** and **meaningful involvement** of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

Meaningful involvement means:

- People have an opportunity to participate in decisions about activities that may affect their environment and/or health;
- The public's contribution can influence the regulatory agency's decision;
- Community concerns will be considered in the decision making process; and
- Decision makers will seek out and facilitate the involvement of those potentially affected.



President Clinton signing the EJ Executive Order in 1994.

Source:

<https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>



Handling Public comments & Environmental Justice

Prepare for Environmental Justice

- Extremely hazardous substances (EHSs like Formaldehyde & Chlorine) are more likely to garner more attention and public comments
- Try to understand likelihood of EJ Activists in your area, for your industry, for your facility.
- Understand if your project or company is high profile and likely to attract EJ Activists
- Consider receptors of downstream emissions
- Understand your MAGLC – maximum allowable ground level concentration



Handling Public comments & Environmental Justice

Prepare for Environmental Justice

Put yourself in “the Public’s” shoes – what questions would you ask, and how would you answer them?

Remember: People are members of the Public.



Questions?

Thank you!
JJ Bilimek, CSP
EHS Manager
American Nitrile



Environmental Permitting in Ohio Workshop K

Robert Hodanbosi, Chief
Division of Air Pollution Control
July 21, 2022

Topics

- Need for renewal of permits
 - Why it is important to have correct renewal applications/permits
- Typical problems



Purpose of Renewal

- 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

Overall Permit Review Process

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



Common Application Problems

- Incorrect forms
 - Find links to forms (Section I and II and EAC)s
 - <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/permit-application-forms>
 - No original signature
- Process flow diagram missing or does not match the application forms
- Insufficient information
 - Blank spaces on forms
 - No calculations
 - Missing pages

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

Technical Review

- 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)

Technical Review 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?



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Citizen/U.S. EPA Comments

- Some permits need comment period
- Receive comments from citizens, U.S. EPA, etc.
- Most comments are resolved easily
- To resolve others, we need your help
- Either way, you will review our responses

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



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Title V Renewal Steps

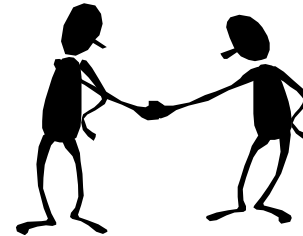
- Draft – anyone comments
- Preliminary Proposed Permit – Company comments
- Proposed Permit – U.S. EPA comments
- Final (appealable)

FESOP/PTIO Renewal Steps

- Some – Draft, then Final
- Most – just issued Final

Permit has been issued...Now what?

- Read and understand your permit
- Set up record keeping now
 - Make as simple as possible
 - Train employees
- Submit timely reports
- Know what is happening at your facility (make sure that you are in the communication loop)
- 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 works and is easy to live with
- Work with your Ohio EPA representative to get a permit that works for you
- Don't be afraid to ask for assistance

Important Renewal Topics

- Make sure the Title V Renewal is submitted on time. No earlier than 18 months before expiration and no later than 6 months. This is a federal deadline. Ohio EPA sends out two reminders that the expiration is coming at 18 months and 9 months prior to expiration.
- Make sure that the annual compliance certifications are submitted on time.
- Renewal of state PTOs should also 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 – each of you should know who the permit review person for your facility
- Some of our field offices have had personnel turnover – need to make sure that you know who is your facility contact

Questions?

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Biographical Information

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Amanda Jennings is a Managing Consultant in Trinity's Westerville, Ohio, office and provides air quality support for several industries in Ohio, including but not limited to, petroleum refining/distribution, chemical manufacturing, surface coating, asphalt processing/shingle manufacturing, and fiberglass and foam insulation manufacturing. She graduated from Ohio University with a Bachelor of Science Degree in Chemical Engineering. Amanda has completed numerous projects over her 18 years of consulting experience ranging from minor and major source state construction permit to install (PTI) or permits to install and operate (PTIO) applications, Fee Emissions Reports (FERs), emissions inventories, Toxic Release Inventory Reports (TRIs), Title V operating permit renewal and modification applications, MACT and GACT general consulting/compliance assistance, and regulatory applicability analyses. Also, she routinely teaches Trinity's *Strategic Air Permitting in Ohio* training course.

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JJ Bilimek is the corporate Environmental, Health, and Safety Manager at American Nitrile. American Nitrile is a new Ohio-based manufacturing company that will produce 4 Billion disposable nitrile gloves for medical and industrial users at its state-of-the-art Grove City location. JJ is establishing the company's EHS policies and systems as the facility prepares to start-up later this year (2022). He is experienced in managing Title V and Synthetic Minor Title V air permits, and other environmental compliance duties. He is also experienced in traditional hard-hat safety, as well as PSM/RMP and facilitating PHAs. JJ graduated from The University of Findlay with a B.S. in Environmental, Safety, and Occupational Health Management. He obtained his Certification as a Safety Professional (CSP) in 2015.

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Bob Hodanbosi became chief of the Division of Air Pollution Control (DAPC), Ohio Environmental Protection Agency (Ohio EPA) in September 1992. His current duties include being responsible for the air pollution control program for the state of Ohio and development of the programs needed to comply with the Clean Air Act Amendments. In 2004, Bob was selected to represent state permitting authorities on the Title V Permit Performance Task Force that was formed by the U.S. EPA's Clean Air Act Advisory Committee (CAAAC). Bob has also had the opportunity to testify at U.S. House and Senate committees on Clean Air Act impacts on facilities in Ohio. From May 1987 to September 1992, his position was assistant chief of DAPC and manager of the Air Quality Modeling and Planning Section, DAPC, Ohio EPA. From April 1978 to May 1987, as manager of the Air Quality Modeling and Planning Section, his main duties included: development of the technical support for air pollution control regulations for criteria air pollutants; atmospheric dispersion modeling; air quality designations under Section 107 of the Clean Air Act; development of new source review procedures; Since the 1980's, Bob has represented Ohio EPA on the Ohio Coal Development Office, Technical Advisory Committee. From January 1977 to April 1978, his position was supervisor of the Environmental Assessment Unit, DAPC, Ohio EPA. The main responsibilities of this position involved the supervising of all air quality evaluation and atmospheric dispersion modeling activities for DAPC. From June 1973 to December 1976, he held a position in the Northeast District Office/Engineering Services Section, DAPC, Ohio EPA. The main function of this position involved the engineering review of air pollution permit applications. Bob has lectured extensively on topics relating to the requirements under the Clean Air Act and the controls needed to meet air quality standards. Finally, Bob is a current member of CAAAC through August of 2021.