

## **DO/LAA Supervisory Review performed by DO/LAA PRM(Permit Review Manager).**

### Pre-Draft Strategy Review

1. Potential Approaches
  - a. The DO/LAA PRM may elect to forego a pre-draft review and wait for the Draft to be completed.
  - b. Advantages to pre-draft review.
    - i) It may help in training the permit writer.
    - ii) It may help the permit writer with ideas.
    - iii) Can discuss permitting options, like using the new grouping of similar EUs allowed by STARS2. Can discuss which EUs are similar enough to group, and which EUs have enough differences that separate terms are required.
  - c. Pre-draft review
    - i) Follow the standard review tasks outlined in this section to evaluate pre-draft strategy.
    - ii) The DO/LAA PRM updates the Workflow in STARS2 and assigns the pre-draft strategy to DAPC CO Reviewer.
2. The DO/LAA Permit Writer gives permit package to the DO/LAA PRM; package includes:
  - a. Printed copy of permit application or note that the application is in STARS2;
  - b. Printed copy of permit Terms and Conditions;
  - c. Printed copy of SOB Document;
  - d. Renewal checklist for renewal permits;
  - e. Main Title V permit facility file; and
  - f. Any pertinent supporting information that was used to prepare the permit recommendation. (Correspondence or emails with facility or their consultant.)
3. Conduct initial review of hard copy of permit recommendation; this review focuses on permit structure.

- a. Assure that correct spelling, grammar, punctuation and format has been used (see Appendices J and K).
4. Review Terms and Conditions for each emission unit ensuring that:
    - a. All emissions units are addressed (may need to count significant EUs in STARS2 application and/or facility profile);
    - b. In each EU all pollutants are identified;
    - c. In each EU any recommended PTI modifications are initiated;
    - d. In each EU all correct rules are cited;
    - e. Any emissions units identified as being insignificant units are, in fact, “Insignificant” and divided into two separate permit terms;
      - i) Insignificant emissions units that are subject to federally approved SIP limits and/or have an issued PTI are both State and federally enforceable (note, facility must submit an EAC form for this type of insignificant emissions unit and they should be listed in Section B); and
      - ii) Insignificant emissions units that are either de minimis or not subject to any applicable air pollution control requirements are State only enforceable (note, this term should be identified in section B.1 as State only, should check STARS2 application to assure all listed EUs are included).
5. Review additional elements in the Terms and Conditions for each emissions unit.
    - a. Review application for emissions unit installation and/or modification dates.
    - b. Certify that all PTIs and PTI modifications have been issued as appropriate.
    - c. Review application for control equipment combinations (multiple EUs vented to a control system, or an EU vented to multiple control systems or devices); verify that control equipment listed in application is included in permit and appropriate operational restrictions or monitoring requirements are included.
    - d. Ensure that emissions unit descriptions match rules, requirements, operational restrictions and additional Terms and Conditions (e.g., coating line – VOC, grinding operation – PM, etc.).

- e. Review list of federal and OAC rules to determine which apply. ( i.e., MACT, area source MACT, NSPS, CAM, BAT)
  - f. Check each pollutant emitted by each emissions unit along with applicable emission limits for each pollutant.
  - g. Check emissions unit descriptions in application with permit write-up.
  - h. Determine if any alternative operating scenarios are possible - these should be identified in the application. Many MACTs allow alternative operating scenarios. For example, the Auto MACT has different lb HAP/gal coating solids deposited, that depends on which EUs the facility wishes to group for record keeping purposes.
6. Review permit Terms and Conditions.
- a. Continue check of each allowable emissions limitation or other requirement for follow-through in Terms and Conditions (Follow-through” means ensuring that for each emission limit in the permit, there are associated operational restrictions, monitoring, record keeping, reporting and testing requirements as appropriate):
    - i) Operational restrictions;
    - ii) Monitoring;
    - iii) Record keeping;
    - iv) Reporting; and
    - v) Testing. Check to see if emissions testing is required. When was the last test performed? Borderline compliance? Refer to Engineering Guide 16 to determine frequency. Cut and paste errors for emission limits are common when testing requirements are used from other EUs in this or another permit.
  - b. Continue to ensure that the correct and most up-to-date Terms and Conditions are in the permit. Uses permit T&C Library.
  - c. Identify PTI "streamlining language" as necessary. This is used when language in the Title V permit is modified from what was in the PTI.
  - d. Ensure that all terms in the permit for both Part B and Part C have the proper “authority for term” cited.
  - e. Apply technical experience in reviewing each permit.

- i) Continue to check permit content. Ensure that the permit makes sense for each emissions unit (e.g., applying VOC rules for coating lines).
  - ii) Continue to ensure that there is proper parametric monitoring included for each emission unit.
- f. The permit is a building process where each successive section of the permit builds on the previous section of the permit (e.g., monitoring/record keeping builds on operational restrictions).

7. Check each term and condition for consistency.

- a. Continue to check sections of permit making sure that the Terms and Conditions used are up-to-date i.e., T&C Library used, rule changes, rule citation changes, MACTs recently issued, etc.:
  - i) Additional terms;
  - ii) Operational restrictions;
  - iii) Monitoring;
  - iv) Record keeping;
  - v) Testing; and
  - vi) Miscellaneous requirements.
- b. Review similar permits that have been issued including the following:
  - i) DO/LAA file of some standard terms that have been supplied by DAPC Central Office in the past;
  - ii) STARS2 Terms and Conditions;
  - iii) DO/LAA PRM and DO/LAA Permit Writer knowledge and experience of terms from past work efforts; and
  - iv) If needed, DO/LAA can request updated Terms and Conditions from DAPC Central Office Reviewer.
- c. Identify any generally applicable facility-wide requirements for inclusion in Part B, Facility-Wide Terms and Conditions.

- i) Assure that PTI number(s) and date of issuance are listed for post-1974 insignificant emissions unit(s).
8. Review Statement of Basis document (SOB).
  - a. Ensure that all emission limits for each emissions unit have been included in the SOB and that the proper monitoring, record keeping, reporting and testing have been identified for each emission limit.
  - b. Ensure that current SOB form has been used. The SOB template should be generated in STARS2 and then save a copy to L:\Data\Facilities.
9. After thorough review, mark changes on hard copy of pre-draft permit recommendation and SOB and return documents and supporting information to the DO/LAA Permit Writer for any needed changes.
  - a. Corrections should be clearly marked in red (or other distinguishing color) and/or highlighted by DO/LAA PRM. Alternatively, Track Changes in Word can be used to identify the needed changes.
  - b. The permit recommendation can be Looped Back to the DO/LAA Permit Writer in STARS2 at the discretion of the DO/LAA PRM.
10. The DO/LAA Permit Writer makes the revisions and highlights the changes to ensure that all the changes have been made. Writers should be encouraged to discuss any changes they do not understand.
11. The permit recommendation is returned to DO/LAA PRM for further review.
12. DO/LAA PRM makes additional changes as needed and returns to the DO/LAA Permit Writer.
13. When there are no further changes, DO/LAA Permit Writer sends the permit recommendation to the facility to allow opportunity to comment. The permit action should be placed on Referral in STARS2.
14. Facility provides any suggested changes and DO/LAA Permit Writer modifies the recommendation as needed in concurrence with DO/LAA PRM.
15. When there are no further changes, DO/LAA PRM submits the permit recommendation to CO. DO/LAA PRM uploads the permit recommendation, SOB, and renewal checklist (if applicable) in STARS2 and sends an e-mail to CO Reviewer or the PRM may request the permit writer do this.