

**Stars2/ Permitting
Call
4/19/2016
9:30AM-11:30AM**

<https://ohioepa.webex.com>

- Meeting found under "Meeting Center"
- Password for meeting: **stars24u**
- Call in # 1-877-668-4490 Access code: 639 921 250

#	Topic	Speaker
1	<p><u>Tim Fischer – NEDO</u></p> <p>We were told recently that if facility-wide emission limit related to a synthetic minor restriction is relaxed, that all the units it covers would need to receive a Chpt 31 mod. The example is an FEPTIO facility with four coating booths. The FEPTIO requires that the facility stay under 40 TPY of VOC, keeping it out of the Title V program. The facility then wants to increase the facility-wide limit to 60 TPY, but not change any individual emissions unit limits. In this case all four coating booths would need to receive a Chpt 31 mod and be subject to BAT, despite not wanting to change individual emissions unit limits.</p> <p>One facility contemplating an increase in their facility-wide limit at this time has several coating lines. If they increase the facility-wide limit all the lines would have to go through BAT and some of the older lines would not be able to meet the control efficiency we would require as BAT today. I want to make sure that we are in agreement that BAT would be revisited under this scenario.</p> <p>Another situation we have seen in the past is a foundry increasing its synthetic minor facility-wide HAP limit but still staying under MACT thresholds. Should we have made them apply for a Chapter 31 mod for all the sources at the facility that emit HAPs?</p>	Mike Hopkins/ Andrew Hall
2	<p>Sandra Colegrove – SEDO Regarding Oil and Gas General Permits, for example 12.1:</p> <p>P001 Dehydration system. This EU has specific emissions limitations for a flare to control the dehy emissions. The description says:</p> <p><i>Up to two glycol dehydration unit(s) (includes contact tower or absorption column and glycol dehydration unit reboiler) and gas-condensate-glycol (GCG) separator (flash separator), which may be vented to a condenser or BTEX (benzene, toluene, ethyl benzene, xylene) elimination system with condenser, and/or flare (less than 10 MMBtu/hr) or a facility-wide flare (see P004).</i></p> <p>P004 Facility-wide flare. The description states: <i>Enclosed or Open Flare(s)/Combustion Device(s) with a maximum combined capacity heat input of no more than 250 MMBtu/hr and operated at no more than 10 MMBtu per hour combined heat input from all the sources vented to the combustion device(s), except during an emergency¹</i></p>	Mike Hopkins/ Andrew Hall

¹ This emissions unit applies when a facility chooses to use a flare/combustion device to control VOCs emitted from the entire facility (including, but not limited to, flash vessel/storage tanks, truck loading for water and/or petroleum liquids, and the dehydrator). If a separate flare is used to control dehydrator emissions, then the flare requirements found in the dehydrator emissions unit terms govern the dehydrator flare.

	<p>Number 13 qualifying criteria for 12.1 asks: <i>Except under emergency conditions (i.e., the gas cannot be managed due to a malfunction or unforeseen conditions), will any combustor/flare control system be operated at a heat input capacity less than or equal to 10 MMBtu/hr?</i></p> <p>So the question is: can a facility have a maximum operated 10 MMBtu/hr flare that controls the dehydration system and an additional 10MMBtu/hr flare that controls emissions from any other EU at the facility for a facility-wide total of 20 MMBtu/hr?</p>	
3	<p><u>Duane LaClair– Akron Local</u></p> <p>Desired outcome: Discussion for consistency / ask each office what they do currently</p> <p>The new inspection for states to attach the follow up letter to the evaluation report. Should it be attached to in the Correspondence section of STARS instead or both places</p>	Elisa Thomas
4	<p>Stars2 Deploy v 2.3.2 – April 1st</p> <ul style="list-style-type: none"> • Enhancement showing facility profile checked out on Air Services side (demo) 	Elisa Thomas
5	<p>Procedures for Requesting new Pollutants to Test Methods</p>	Elisa Thomas
6	<p>Friendly Reminder(s)</p> <p>Monthly Call agendas are not distributed to everyone. Only Managers/Supervisors/ES3 Up to them to route to staff to ask for topics.</p>	Elisa Thomas
7	<p>LAA IT Issues</p> <p>CITRIX Roll out update</p>	Erica Engel-Ishida