

# TITLE V

## Frequently Asked Questions on Title V

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### Overview on Policy Issues

The purpose of this appendix is to provide the answers to several questions asked by DAPC staff and the regulated community regarding [Title V](#).

You can download a copy of this file in Word Perfect 6.1 format, the file name is [policy.zip](#) (61 K)

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### Title V

1. For applicability purposes, do you only include potential PM10 emissions or do you consider potential emissions for total suspended particulate (PM or TSP) to establish whether or not your facility is a 100 TPY major source for particulate?

*You are to base Title V applicability determination on 10 and 2.5.*

2. Does a source operation that meets the definition of a NSPS category or NESHAP category have to include their fugitive emissions for that source operation as required by category if the source is not subject to the NSPS or NESHAP requirement (i.e., was built before the federal rule was in effect)?

*After consultation with USEPA, the source operation [emission unit(s)] that is included in a definition of the NSPS or NESHAP categories is required to include fugitive emissions even though the source might not have to comply with the particular NSPS or NESHAP standard because of an applicability date, etc. Remember this includes only those emission units (not the entire facility) for which the NSPS or NESHAP establishes requirements.*

3. Does a facility that emits methane or ethane have to report these emissions as organic compounds?

*Since methane and ethane can be emitted in large quantities and are not regulated under OAC Chapter 21, DAPC has determined that it will process fee reports at this time which do not include methane and ethane emissions. Our policy may change in the future, if methane or ethane emissions standards are adopted by a future federal or State air pollution control law or regulation.*

4. If an emission unit has limitations that go beyond the SIP that result from a BAT determination in a PTI, are these federally enforceable to take advantage when determining the potential to emit?

*If the PTI that established a BAT beyond the SIP allowable was issued as a direct final, then the BAT is not federally enforceable through the permit and the emissions unit can only take credit for control up to the SIP requirements. If the PTI was issued as a draft then final, DAPC considers those limiting conditions (operational and/or hourly emissions limits) to be federally enforceable through the permit.*

5. Can "bottlenecks" in productions, physical limitations, or seasonal operation be considered when calculating the [potential to emit](#)?

Generally, a facility can not consider these types of limitations unless they establish federally enforceable conditions in a State permit. However, potential to emit under certain circumstances can be bizarre. A strict interpretation can have extremely small air emitting facilities subject to the program. Therefore, common sense needs to be used. If a company actually emits very small quantities of emissions (less than 20 tons for any regulated non-HAP pollutant or less than a 2 tons for any HAP, or less than 5 tons for all HAP's collectively), then Ohio EPA considers the facility a minor that does not require a Title V permit or a PTO with federally enforceable conditions (synthetic minor).

See [Engineering Guide #61](#).

**6.** What is the appropriate method for calculating potential emissions for VOC's and/or OC's from a coating line employing equipment such as spray guns. Since theoretically it is possible to continuously spray coating, should this be how "potential to emit" for these operations be determined?

*"Potential to emit" for the purpose of determining Title V applicability for coating operations should be quantified in accordance with methods and procedures described in [Engineering Guide #45](#) (PDF).*

**7.** The Ohio EPA has launched "Air Services" online as of June 30, 2008. Will the Title V software allow the printing of a copy of the Title V application?

*Yes. The software does have this capability to print all aspects of the Title V application including the emission category forms. The system will also print the fee emission report forms and the emission statement forms.*

**8.** How should trace quantities of [Hazardous Air Pollutants \(HAP\)](#) be identified and quantified? For instance trace quantities (<0.1%) of HAPs are present in coating manufacturer's raw material but are not listed on any [material safety data sheets \(MSDS\)](#). With analytical capabilities at the ppb level, trace quantities of many HAP solvents will be in industrial grade solvents.

*You should make a worse case estimate of the amount of HAPs in your coatings or material. If this estimate shows that the maximum amount of these HAPs is negligible compared to the HAPs threshold levels (10 tons/year for each HAP and 25 tons per year for combined HAPs), then that is all you have to do. Upon request by Ohio EPA, you need to provide the data to support your conclusion that you do not trigger the HAPs threshold.*

*If your evaluation of emissions shows that it is possible to exceed the threshold levels, then you should either get more information on the composition of the coatings from the supplier or you should do your own testing on the components of the coatings.*

*If you are a Title V facility and you have emission units with trace quantities of HAP's, these emission units would be considered insignificant for HAP's if the total potential HAP's for the emission unit is less than one ton.*

**9.** Will maximum available control technology (MACT) early reduction commitments be applicable requirements?

*Yes. These requirements are commitments made by companies to give them more time to comply with a proposed MACT standard.*

**10.** How many tons per year can we put on a grandfathered (pre 1974 construction) reasonable available control technology (RACT) emissions unit?

*Emissions units installed before 1974 are not required to obtain permits to install (unless they are modified). As such, they typically don't have ton per year limits established. Instead, they typically have a short term limit established through existing Ohio rules (RACT). The annual emissions from these emissions units are only limited by the maximum capacity of the emissions unit. This can result in very large federally enforceable potential emissions.*

*If your actual emissions for your facility is under the Title V thresholds, then you can avoid Title V requirements by requesting restrictions on your potential emissions. This is done by requesting the issuance of a permit which restricts your operations and thereby restricts your potential emissions. This process is called a synthetic minor permit. Instructions on how to do this are contained in separate guidance from the Ohio EPA.*

**11.** Are best available technology (BAT) requirements from Ohio EPA permits to install federally enforceable for emissions units which would otherwise be exempt under Ohio's new permits rule (e.g. throughput limits, operating hour limits, record-keeping requirements)?

*The Ohio permit rules and Ohio law were modified in late-1993 and early-1994 to add many small emissions unit exemptions and de minimis exemptions. Under these exemptions, no permit to install or permit to operate is required today. However, in the past, these emissions units needed permits. BAT limits established under these permits are considered "applicable requirements" pursuant to Title V requirements and are also separately, federally enforceable through the permit if the permit to install was issued as a draft permit. If this is true, then these limits are federally enforceable.*

**Note:** *Under these exemptions provided by Ohio law, these small emission units emissions must be counted towards Title V applicability. Also, if you are a Title V facility, these exempt emission units must be identified as insignificant activities on your Title V application.*

**12.** Would Ohio EPA oppose legislative action which would revoke permits for small emissions units now exempt from Ohio permit rules?

*Yes. Ohio EPA sees no advantage in this kind of legislation. Most of these emissions units are on registration status which requires no action by facilities to maintain. For those on permit status (for which a BAT has not been established that limits the emission unit to under the 10 lbs/day cutoff), facilities do not need to renew the permits. Instead, when the permit comes up for renewal, they must notify the Ohio EPA that their emissions unit qualifies for the exemption. At that time, the Ohio EPA will revoke the permit.*

**13.** Do we need to make a roof drawing of all our vents and stacks?

*You are not required to submit a roof drawing with your Title V application. All that will be necessary is for you to provide process flow diagrams for each emissions unit. You will have several different software options to prepare the process flow diagrams. (See STARShip question # 43)*

**14.** Do we calculate particulate matter less than 10 microns (PM10) or total particulate matter (PM)?

*This depends on the regulations which apply to your emissions unit. In most cases, you will need to do PM. But in some cases you will need to include the fraction which is PM10 and/or PM2.5.*

**15.** If your emissions unit is an new source performance standard (NSPS) type emissions unit, but is not NSPS because of the date it was built or because it is lower than the thresholds listed in the NSPS, do you count fugitive emissions when determining if you are a major source?

*Yes. If the emissions unit is a NSPS type emissions unit, then you must count fugitives.*

**16.** Do "de minimis" emissions units, as described by OAC 3745-15-05, need to be identified in the Title V permit application under "Insignificant Activities"?

*Yes. Ohio law was modified under Substitute House Bill number 715 to make this clear and consistent with Federal law.*

**17.** If an emission is a volatile organic compound, but also a HAP, will enhanced monitoring be established only once the MACT is established or will it be required for Title V application?

*It is USEPA's intention to include monitoring requirements in each MACT that will be sufficient to meet the enhanced monitoring requirements. Once the MACT has been established and is issued, you will need to include the monitoring requirements in your Title V application. If the MACT has not yet been developed, then you don't need to include enhanced monitoring requirements in with your Title V application.*

**Note:** *On April 4, 1995, USEPA again withdrew its proposed enhanced rules. We do not believe that enhance monitoring will need to be considered for the first round of Title V permits. (updated 4/12/95)*

**18.** Where can I find examples of alternate operating scenarios?

*An example of alternate operating scenarios would be a metal parts coating line (OAC rule 3745-21-09) that is currently operated but in the future you may want to coat plastic parts also (separate requirements under OAC rule 3745-21-07).*

**Note:** Well written permits should negate the need for detailing alternate operating scenarios in order to allow for reasonable operational flexibility.

**19.** If a facility has more than one industrial grouping or standard industrial code (SIC) and only one group has enough emissions to be a major, can the other group be exempt from Title V application?

*In most cases, the answer would be no. If the two groups are not completely independent then they would be considered one Title V source. In some cases, if they are completely independent operations (automobile manufacturing and furniture manufacturing, for instance), then they would be considered separate for Title V purposes. These questions should be discussed in detail with your Ohio EPA representative. Further, DAPC is currently working on written guidance that should clarify USEPA's past interpretation of these issues as they relate to federal new source permitting [identical facility (major stationary source) definition provided in the Title V legislation]. Engineering Guide #58 (guidance on defining the "facility") has been issued and is incorporated in the STARShip help menu.*

**20.** How should federal applicable requirements be identified in Title V applications in Air Services?

*Enough detail of the federally applicable requirement which is necessary to establish the current SIP requirement. Air Services provides a pick list of current state and federal regulations. Title V applicants will be responsible for understanding which federal requirements are applicable to their facility. Past OEPA permits should provide most of those federal requirements.*

**21.** Will there be an expanded list of insignificant emissions units and activities? The costs and effort to quantify emissions from all minor activities would be significant.

*Yes. Ohio EPA has developed engineering guide identifying recognized "trivial" activities that are so small (e.g., laser jet printers, aerosol spray paint cans, Xerox machines, white out bottles, etc.) that we do not expect them to be quantified and reported as insignificant activities on a Title V application. Engineering Guide #62 covers trivial activities.*

**22. How should a facility determine the potential to emit for HAPS?**

*Generally, this has to be done on a case-by-case basis. In the example of painting operations, HAPs limits would be based on VOC limits assuming all VOC is one or more HAP and assuming the VOC limits are federally enforceable. This would be true unless specific HAPs limits were listed in a permit. USEPA is expected to provide more guidance in this area.*

**23. Are Emergency Episode Plans (under OAC rule 3745-25) applicable requirements?**

*Yes. However, Ohio EPA has developed Engineering Guide 64 negating the need to have this plan on file or identify this requirement on your Title V application at this time. USEPA has determined that this Engineering Guide will be acceptable to them.*

**24. How is the Ohio EPA communicating with its districts in regard to facilitating plants which desire to pursue synthetic minor status, and therefore, have several PTI's (or PTO's) to submit. For example, the federally enforceable limits will be based on the maximum emissions stated when there isn't a SIP provision? Can the EPA and the facility discuss monitoring options prior to the permit issuance?**

*The Ohio EPA has provided training to the District and Local staff concerning synthetic minors and Title V. It is recommended that facilities desiring synthetic minors talk to their field representative about their situation before applying for the permits. Field representatives can give guidance on the best method of restricting potential emissions to avoid Title V. They can also discuss the monitoring or record keeping that will be needed.*

**25. If a facility wants to avoid Title V by restricting their potential emissions, should they use the permit to install process or the permit to operate process?**

*It is recommended that facilities use the permit to operate process. The only time this is not recommended is if the facility discovers emissions units which should have had a permit to install but didn't or they wish to restrict an emission unit which has not been constructed yet. In this case, a permit to install should be processed.*

**26. Is there going to be a help line to help Ohio industry with the Title V rules?**

*You will be able to get guidance from the field offices. Also, there is significant information on the DAPC web pages and the Agency "Answer Place", <http://ohioepa.custhelp.com> that you can review before contacting the appropriate DO/LAA.*

**27. Does a facility which becomes a synthetic minor need to do any reporting to demonstrate this status? In other words, how will the Ohio EPA know that a given facility is a synthetic minor facility and, therefore, doesn't need to apply for a Title V permit or pay the Title V fees?**

*Chapter 3745-78 requires the larger non-Title V facilities to report their potential emissions every two years to establish that they are not Title V. We recommend that your company share its potential to emit analysis with the appropriate DO/LAA. This should minimize the risk of an inadvertent mistake.*

**28. When will my Title V permit application be due?**

*Ohio obtained full approval from USEPA that will be effective on 10/01/95. Therefore, the schedules provided in OAC rule 3745-77-04 were initiated on this date. Therefore, facilities were required to file their Title V applications within the time frames specified below:*

- Appendix A Group 10/01/95 thru 11/29/95(1)

- Appendix B Group 11/30/95 thru 03/28/95(1)
- Appendix C Group 03/29/95 thru 09/29/95(1)

Facilities located in the Appendix A or B groups could request in accordance with the requirements of OAC rule 3745-77-04(B)(4) up to a 90 day extension for submitting their Title V application.

**29. What terms and conditions from OEPA issued PTI's are applicable requirements that must be specified on the Title V application?**

*In Ohio's program, federally enforceable PTI terms and conditions are applicable requirements. Therefore, PTI's that were first issued as a draft and then final will contain federally enforceable terms and condition. SIP-based requirements (e.g., BAT limits) are also considered applicable requirements.*

**30.** Described below are a number of helpful documents associated with Title V or FESOP permitting that you may be interested in obtaining from DAPC's computer :

**Engineering Guide #58** issued final on 3/31/95 provides assistance with establishing what constitutes a "facility" which is imperative for assessing Title V applicability.

**Engineering Guide #61** provides assistance on calculating potential to emit and whether or not a FESOP or Title V permit will be required.

**Engineering Guide #62** identifies "trivial activities" that will not have to be inventoried and considered for Title V applicability nor listed as an insignificant activity on the Title V permit application.

**Engineering Guide #63** identifies when a Title V application must be updated and submitted to Ohio EPA. **NOTE:** Change in a federally required information field. Engineering Guide #63 has been replaced by [New Guidance <http://www.epa.state.oh.us/dapc/title\\_v/tvrevguide.pdf>](http://www.epa.state.oh.us/dapc/title_v/tvrevguide.pdf) (6/3/03)

**FESOP guidance** document provides detailed instructions for how to apply for a FESOP permit (which limits a facility's potential to emit with federally enforceable conditions in an OEPA permit to operate in order to avoid Title V permitting).

**31.** Can facilities that are subject to the MACT be eligible for a FESOP?

*USEPA accepted our FESOP SIP with the provision that allows the state to restrict HAPS; however, some of the source categories (i.e., chrome plating and degreasers) USEPA has decided they must be Title V. Ohio's program of electronic submittal for the Title V applications did not anticipate that small emitters would have to file. **The small business technical assistance program**, supervised by Rick Carleski should be able to assist some facilities. Other MACTcategories remain open as to whether or not they will automatically have to have Title V permits. For more information facilities should contact their **District Office or Local Air Agency.***

**32.** What kind of monitoring requirements are going to be required (ex. asphalt plants with baghouses)?

*This issue will be addressed in a future Engineering Guide. First, it is the facility that proposes how they will demonstrate compliance with the applicable requirements. By the time they go to file the Title V application, there will be a "library" established where they can find the various options for monitoring for each type of control equipment or source category. For example in the case of a baghouse, it could be as simple as recording the differential pressure, use of triboflows, visible emissions taken by the company, or as complicated as an approved O & M plan (using the 1993 guide) and relying on a continuous opacity monitoring system for demonstrating ongoing compliance. If it is a federally enforceable limit that they are*

*trying to show compliance with, such as SO<sub>2</sub>, then a program for fuel sampling or CEMS would be more likely to be approvable than a stack test.*

**33.** USEPA has insisted that all chrome plating operations be in the Title V program; however, most of these emission units are less than 10 tons per year of emissions. What are the fees for these small sources?

*Chromium is charged under the fee program as particulate matter. It is possible that an entity be in Title V because of the MACT, yet pay no fee if the emit less than one ton per year.*

**34.** For those facilities on the **borderline**, that are greater than 20% of the major definition for any pollutant but less than 50%, can they get the two year extension for filing either a FEPTIO or Title V permit if they agree to keep records on site?

Yes, see *Engineering Guide #61*.

**35.** Reserved

**36.** Definition of "insignificant" as it relates to HAPS.

*Insignificant activities excludes HAPS unless de minimus (<1 ton) or is considered a R & D. The history of this confusion stems from USEPA's preamble discussion on how R & D sources would be treated special and then USEPA failed to exempt them from the requirements of Part 70. USEPA promises to fix this oversight in future Part 70 revisions but in the mean time, they would be considered "insignificant" in accordance with the definition in ORC section 3704.01 and the Engineering Guide but would be on the state only side of the permit as far as federal enforceability goes. R & D exemption would prevail over the HAP (that is if it meets the definition of R & D and emits > one ton a year of HAPS, it is still considered "insignificant").*

**37.** Definition of Small Business. What about the HAPS? Who is eligible for assistance through the small business technical assistance program?

*Concern was expressed that if a facility is a small emitter but happens to be in a MACT category, they cannot get assistance because they will automatically be in Title V. The DAPC is using the 50 ton per year definition as actual emissions, not potential to emit. A facility may seem to be small enough to qualify for assistance but if the facility is owned by a parent company, it does not qualify for assistance.*

**38.** For the Title V applications, do facilities have to consider fugitive emissions if not addressed in the NSPS?

*Only fugitive emissions are considered for the 28 major facilities categories. If the NSPS doesn't address fugitive emissions, then it doesn't have to be looked at except for the state side of the permit for BAT.*

**39.** A brick ceramic kiln indicated that its actual emissions of SO<sub>2</sub> taken from a 1989 stack test qualified them as non-Title V (89 tons per year) even though their allowable for both the USEPA and State permits would put them in Title V. Does *Engineering Guide # 61* deal with this situation.

*The stack test is only a snapshot of what the emissions are from the facility. There is no enforceable provision in the current permit to hold them to the quality of clay and operational practices that would ensure continuous compliance with 89 tons per year. They need a FESOP, but more importantly they need to pay a fee. The Engineering Guide #61 enables a facility to delay the need for a Title V permit for 2 years.*

**40.** If a facility's actual emissions are less than the 20% threshold, do they need a ST & C that says if they exceed this it puts them in Title V?

*They do not need to have a ST & C because the rule itself requires the facility to keep records on site and if its emissions do increase, then within the year they have to file for either a FESOP or Title V permit.*

**41.** Asphalt plants. The question arose from a situation where a facility wanted to use AP 42 emission factors taken from 2 stack tests while burning #2 oil that appears in Table 11-1-8, because if they used table 13-2 for fuel combustion sources, it would make them a Title V facility.

*The facility should use 13-2 because it has an "A" rating (versus "D" for table 11-1-8) and if it projects that under the "worst case" fuel scenario that they are > 100 tons, then they need a FESOP. Wouldn't require a stack test until the company refuses to use table 13-2.*

**42.** Are short and long term emission rates needed for facilities subject to NSPS, Subpart I?

*If it is in the NSPS, then it is federally enforceable. If it is not included as part of the NSPS, then it would have to go in as part of the state only side of the permit. It was noted that many asphalt plants would need a FESOP for CO alone.*

**43.** What is the minimum period of time for record keeping that we want to demonstrate that the inherent physical limitation applies (for example production records.)

*From the time that they make the claim forward, no limit on past records.*

**44.** Batch operations not addressed in Engineering Guide # 61, multiple products, multiple units operating together, how are they going to be dealt with?

*Must identify "worst case" batch and extrapolate it out for the whole year. Companies that have taken this approach have come up with some very sophisticated computer models to show the various operating scenarios to determine what worst case is and to justify a FESOP.*

**45.** Comment regarding the apparent contradiction in Engineering Guide # 61 with respect to assuming that all VOC's are HAPS. This would mean that facilities with 2- 5 tons of actual VOC's would exceed the 20% threshold for HAPS.

*DAPC would not consider all VOC's HAPS; however, the facility must keep their records to prove that their HAPS are indeed below the Title V trigger. If during the year they exceed the 20% threshold, then they would need to file for either a FESOP or Title V permit.*

**46.** Does the Title V application allow for submissions due to certain unusual circumstances (ie... PTI's not included in the Ohio SIP)?

*Unusual circumstances not in the Ohio SIP, or required by federal law, or federally enforceable PTI terms and conditions, would not be an applicable requirement and would not be required to be disclosed on the Title V application. However, Ohio EPA can choose to identify these unusual circumstances as the State-only enforceable terms and conditions in Title V permit. For example, special restrictions to avoid air pollution nuisance conditions, etc.*

**47.** What are an entities obligations with regards to applicable requirements which become effective during the term of the Title V permit?

In accordance with [OAC rule 3745-77-03](#) the Title V applicant must state that the facility will meet in a timely manner applicable requirements that become effective during the permit term.

**48.** How do you calculate "potential to emit" when determining whether an emission unit is insignificant?

*In this case you determine the **potential to emit** on the basis of your annual maximum uncontrolled emission rate. Please note that if you have federally enforceable operating schedule restrictions then you base your maximum rate on the federally enforceable maximum hours of operation rather than 8,760 hours of operation.*

**49.** What is the definition of a "Trade Secret" that warrants confidential protection under Ohio Revised Code (ORC) Section 3704.08?

*The definition of "Trade Secret" appears in ORC Section 1333.61(D) that reads as follows: "Trade Secret" means information, including the whole or any portion or phase of any scientific or technical information, design, process, procedure, formula, pattern, compilation, program, device, method, technique, or improvement, or any business information or plans, financial information, or listing of names, addresses, or telephone numbers that satisfies both of the following:*

*(1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.*

*(2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.*

**Note:** *There is considerable case law that clarifies this definition. Should you have questions please contact Bryan Zima, Esq., Ohio EPA Legal Staff for assistance.*

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## **Air Services**

**1.** If you have several sources on one line, and have negotiated a common capture test for an entire line, is it necessary to calculate capture efficiencies for each source?

*Yes, the company will have to give the best estimate possible for emissions from the individual emissions units.*

**2.** Efficiency - Will the flash zones should be included with spray booths?

*Yes, the flash zones should be included with spray booths.*

**3.** There is no guidance for calculating emissions of some HAPS. Will the agency be issuing some guidance?

*HAPS only need to be included as regulated pollutants if there is a specific applicable requirement or the facility is Major for that HAP. The company will have to provide its best estimate for the emissions and there may not be an approved test method for that HAP.*

**4.**Control Equipment/Exhaust Equipment - Does the agency intend to have each water wash in a paint booth created as a control device?

*The water wash would not be considered control equipment. The water wash would be considered exhaust equipment, which is required on the coating/printing operations EAC.*

**5.** Can a facility assume that the DRE (Destruction Rate Efficiency) for VOC is the same as the DRE for OC?

*It is a reasonable assumption that the DRE for VOC would be the same for OC.*

**6.** It is unclear how Ohio EPA is defining "booth". If a coating operation is permitted as one emission unit, but has several booth sections with separate exhausts separated by flash zones or silhouettes, is it considered one booth or is each individual section considered a booth?

*Each enclosure should be listed separately on the Coating/Printing Operations EAC form. If coating application stations are separated physically or have different air systems, they would be considered separate booths. Flash areas would only be listed separately if they are in a separate enclosed area.*

**7.** Reserved

**8.** EAC - Coating/Printing Operations - Must a facility list each and every coating being used or is it sufficient to list coatings by type and list a generic coating?

*The applicant should list one of each "type" of coating, such as primer, topcoat, etc. It may be necessary to subdivide these further if the coatings vary greatly in their solvent characteristics*

**9.** EAC - Coating/Printing Operations - Coating data such as % solids, density, etc., will vary. STARShip will not accept ranges for this data. How should this data be entered into STARShip?

*In general, the worst case for each "type" of coating should be given for coating/ink data required by item #9. Information requested in item #10 need only be submitted for HAP components for emissions units not subject to OAC rule 3745-21-07 (G). For emissions units subject to OAC rule 3745-21-07 (G), item #10 must be completed for all solvents. The information entered into item #10 should be a worst case scenario.*

**10.** What if your gasoline dispensing is exempt from Stage II requirements because it is not required by regulation or you are in an attainment area?

*If you are not required to have Stage II controls, then the information requested for exemption application should be left blank.*

**12.** EAC - Gasoline Dispensing - Stage II - What is entered into the CARB number field if your fill operations do not have a CARB number? Question 5a is a radio button. Which option should be chosen if Stage II is not applicable?

*N/A or Not Applicable should be entered into the field for CARB numbers if the fill operations do not have a CARB number. "Other" should be chosen for question 5a and "None" should be entered in the description field.*

**13.** EAC - Gasoline Dispensing - Stage II - What is the difference between nozzles and dispensors?

*The dispenser is the pump itself and the nozzles are attached to the pump and actually dispense the gasoline/fuel into the vehicle.*

**14.**EAC - Process Operations - Because it is possible to use hundreds of different paints, solvents, catalysts, etc., for one or more products, it would be very burdensome to identify all raw materials by product. Is all of this information necessary?

*The products should be grouped into representative or different product groups (topcoat, primer, stain, etc.). In the table for item 6, the worst case scenario for each group should be given.*

**15.**EAC - Fuel Burning Operations - Annual average fuel consumption may not be available. How should this information be completed? Does this information need to be updated each year? Could a field inspector interpret this number as enforceable limit?

*The company will have to make the best estimated possible for the annual average fuel usage information. The data will be used to calculate emissions and may be used as background information to check emission estimates reported by the company; therefore, this information should be for maximum expected fuel usage. For ash and sulfur content, a weighted average should be used. In no case will the information provided in the EAC forms be considered a limit for the emissions unit, unless Ohio EPA actually issues a permit that includes that limit. In general, the fuel usage information will not have be updated each year.*

**16.** Reserved

**17.** EAC - Solvent Cleaning - Is the information for average and maximum number of parts necessary? How do we handle the situation of having an agitator in the unit, but not presently in use? We also have the situation where the recovery from cold cleaners is handled in groups. How do we handle this?

*Ohio EPA has modified this form and no longer requires the average and maximum number of parts cleaned.*

**18.**Is there a standard way to determine which EAC Form is applicable for a source?

*If it is not obvious which EAC Form to use, the facility should contact the appropriate [Local or District Office](#). The EAC Forms were formally known as appendices and have been required for State PTO applications for years, so most facilities should be aware which EAC forms are appropriate for a specific source.*

**19.**Test Methods for Determining Compliance - Test methods for OC do not have ability to differentiate the OCs into specific HAPS. What methods does industry use to determine compliance with limits for HAPs?

*Industry will have to estimate HAP emissions as best as possible and describe the method used in the Applicable Methods for Determining Compliance Field at the Facility Level Form - Applicable Requirements Tab.*

**20.** Reserved.

**21.**What is the guidance for reporting throughput for standby equipment/sources?

*A facility may not want to use worst case (8,760 hours/yr) to calculate the throughput for a standby source unless the facility feels they need that flexibility. If there are federally enforceable operating limits in a PTI for this equipment, the company should give worst case estimates within the limits of that PTI. If there are no such limits in the PTI, the company may choose to request operating restrictions in the Title V operating permit.*

**22.** Product at Standard Conditions - Information for the product at standard conditions (68 degrees F and std pressure) is requested. However, for molten metal, should we define the physical state at standard conditions or the conditions it is produced?

*There are certain rules where applicability is based on the state of materials at standard conditions. The field for "State at Standard Conditions" should be completed for standard conditions, not operating conditions.*

**23.** Most of the information on the EAC forms is State-only required. The EAC forms should be identified as "state only".

*This issue is addressed in detail in Engineering Guide #59.*

**24.** Reserved.

**25.** If data for control equipment such as operating control efficiency and installation dates is requested but not available, how should the requested be addressed?

*The company should have a reasonable idea of what the control efficiency is for specific equipment. If not, the company may use the design control efficiency. For any installation date before 1974, the company should give a best estimate. The Help will make it clear that for any date prior to 1974, only an estimate is required. The comment "installation date is estimate" can be made in the comment field if this is the case.*

**26.** Two options should be added to the picklist - Marble and Rod Bed Scrubbers. What if there is no water-to-air ratio for these scrubbers? What should be the pH be for these scrubbers?

*These two options will be added to the picklist. N/A should be entered into the pH field and the water-to-air ratio field should be left blank in this case.*

**27.** Why does Ohio EPA ask for information not required by chapter 77? For example, in the EAC form for storage piles, Ohio EPA requests the trade name of chemical suppressants and the EAC form for roadways requests information on oil characteristics (PCB, Hazardous Waste).

*Some of this information is considered State-Only required information. Draft Engineering Guide #59 specifies which information is State only. Ohio EPA will continue to look at information in EAC forms to determine if it is needed.*

**28.** Can several separate emitting operations be grouped as an emission unit? For example, at a steel mill, can the emissions from the combustion stoves and iron tapping be grouped together as a blast furnace emission unit?

*The same criteria used to define a source currently, would be used to define emission unit. See Engineering Guide #25 for Assistance.*

**29.** Reserved

**30.** Ohio EPA should clearly state what forms are required to be submitted by facilities and what fields within all forms are required for each form. This should be addressed in the users manual.

*The online help and QA checks at validation identify which fields are required for the different type of submissions. On some of the fields in the EAC forms, the operation determines whether the field is required or not required. It will not be possible to specify all of these situations. The applicant should contact their local or district office for clarification in those situations.*

**31.** Is there a way to group permits that have only one emission limit? For example, the final paint repair system consists of six booths. Each booth has an individual permit, but the emission limits and reports are combined into one unit as a group. To split the emissions between the individual booths is not an acceptable solution, this involves conjecture on the part of the facility, and may not be a true representation of what is occurring.

*The company will have to make the best estimates as possible. The applicant may indicate in the Comment Field for that emission unit that these emission units are vented to a common stack and that the reported individual emissions are only estimates based on allocation of the emissions among several emission units.*

**32.** How should control systems be handled when they are secondary? For example, if the primary control is multiclone and a small portion (about 10% of the particulate) is exhausted to a baghouse and then routed back to the main exhaust stack. Similarly, there are partial spray booth VOC controls-some stacks are not controlled and others are exhausted to a particulate control (wet ESP/sacrificial carbon) and then to an incinerator. How should this be handled?

*The facility will have to choose what is closest to primary control and what is the closest to secondary control. The process flow diagram will have to be sufficient to clarify the actual situation.*

**33.** Title VI requirements apply to almost all facilities, how should this be handled? Picklist does not allow selection of title VI or pollutants.

*Title VI pollutants were added to the picklist.*

**34.** Has there been a schedule set for **industry training**?

*Online help within Air Services covers all fields in the software. In addition, help on the DAPC web pages and the Agency "Answer Place" provide contextual assistance. Ohio EPA also has the ability to provide web meeting-based assistance.*

**35.** Reserved.

**36.** Reserved.

**37.** For a very large facility, how are the location coordinates determined?

*You should determine the coordinates at a point near or at the center of your facility.*

**38.** Will the HELP section include instructions that the applicant is not to use a Post Office Box address as the facility address?

*It is clear in the help that the facility address not a PO box is needed in this field.*

**39.** For State facility profile control equipment: for control equipment in series should the applicant enter data for each piece of control equipment (ie... same flow rates, etc...)?

Yes.

**40.** Reserved

**41.** Reserved

42. Reserved

43. Reserved

44. Is there a listing of "document types" which can be attached to applications (ie... WordPerfect documents, certain CAD or AutoCAD versions)?

Software	Extension
AutoCAD, AutoCAD Light	*.dxf, .dwg
Bitmap	*.bmp
Computer Graphics Metafiles	*.cgm
Encapsulated Postscript	*.eps
Generic CAD	*.gcd
HP Graphics Language	*.hpg
Lotus PIC	*.pic
Macintosh PICT	*.pct
Micrografx Designer	*.drw
PC Paintbrush	*.pcx
Tagged Image Format	*.tif
Truevision Targa	*.tga
Windows Metafiles	*.wmf
WP Graphics	*.wpg
WP Master	*.mst
WP Presentation	*.shw

45. Regarding the Title V submittal: What level of accuracy is required for the allowable emissions rate determination?

*You will note in Air Services that two questions that require this type of information are located at the Emission Unit Information level - "Emissions" tab where it asks for "estimated maximum emission rate (tons/year)" and "estimated maximum emission rate in units of the applicable requirement." Further the question specifically requires estimated maximum emission rate for which it is expected that the maximum allowable emission rate will be given. However, it is recognized that in some cases it may be very difficult and very expensive to establish with precision the maximum allowable emission rate for the emission unit. Therefore, it is expected that an estimated maximum be provided in this field that the company is comfortable is below the precise maximum allowed emission rate.*

46. Reserved.

47. Reserved.

48. Reserved.

