

## TITLE V

### Frequently Asked Questions on Title V Overview

This document supplements the Policy Issues. It contains questions and answers to commonly asked questions regarding [Title V](#).

#### Title V

1. What is the "application shield", and how does a facility qualify for it?

*If a Title V application is submitted by its deadline, and the Ohio EPA does not determine within 60 days that the application is incomplete, then the facility receives the "application shield", which means that the facility cannot be held in violation of OAC Chapter 77 or ORC section 3704 for failure to have a Title V permit. The facility retains this application shield unless the Ohio EPA determines at a later date that the application is technically incomplete, and the applicant fails to provide the information that is requested through the process described in OAC rule 3745-77-05(B).*

2. A facility is located in a rural RACT county (i.e., a county where there is a 100 TPY threshold for the applicability of RACT), and a federally enforceable limitation is established in a permit that keeps the total VOC emissions from the facility below 100 TPY. Would the emissions units at the facility be subject to the RACT requirements in OAC rule 3745-21-09?

*No, the emissions units at the facility would not be subject to the RACT requirements. However, this would be true only for existing emissions units and would not apply to any "new source" that would be required to obtain a PTI.*

3. We operate an activated sludge wastewater treatment system at our facility. Do we need to consider the VOC emissions from this source for Title V? If so, where can I find guidance on developing estimates?

*This activated wastewater treatment system may or may not be a permittable air contaminant source. Both organic compounds (OC) and volatile organic compounds (VOC) are regulated air pollutants. If an air emissions unit emits more than 10 lbs/day or 1 ton/yr of VOCs that are also hazardous air pollutants (HAPs), it is not exempt from obtaining a permit to install and a permit to operate from the Ohio EPA (according to the "de minimus" rule, OAC rule 3745-15-05). For the purpose of determining Title V applicability, methane and ethane are not considered to be VOCs per OAC rule 3745-21-01; therefore, emission units with methane and ethane emissions only are not subject to the VOC regulations of OAC rule 3745-21-09. Methane and ethane are gases at standard temperature and pressure (STP) and, therefore, are not subject to the liquid organic material regulations of OAC rule 3745-21-07. 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.*

*For a facility which is subject to Title V, the wastewater treatment system may not need to be included in a Title V application, if the wastewater treatment system meets the definition of a trivial activity in engineering guide #62.*

4. I have a question about the Title V permit and the Facility Level Applicable Requirements section. While some of the Facility Level Applicable requirements are present in the general terms and conditions section of the Title V permit, many general facility requirements are not.

How specific does the facility need to be in incorporating facility level requirements into the Title V application? For example, if a facility has an insignificant natural gas fired boiler, does OAC 3745-15/17/18/21/23/25/31 need to be listed under the facility level requirements, and if so is it adequate to note the general chapters as applying, or do specific applicable sections need to be listed?

*Title V applicants should only list federally applicable requirements that contain emissions limitations, control requirements, operational restrictions, etc. List only the part of the regulation that applies to your operation. For insignificant sources, no emission unit level applicable requirements need to be listed. For noninsignificant sources, only certain emission unit level applicable requirements need to be listed. For example, if a boiler is non-insignificant and is subject to OAC rule 3745-17-10(B)(1), then this would be an emission unit specific applicable requirement (for particulate). Just listing 3745-17 would not be adequate. An example of a facility level requirement would be 3745-15-06 (malfunction of equipment, scheduled maintenance and reporting).*

5. The Ohio SIP includes OAC rule 3745-21-08 regulations for CO emissions. This is part of the SIP that is available on region V dated June 1995. Have there been any new changes done on this rule since then? Should this regulation be included in the Title V application?

*If an emissions unit is subject to an OAC rule that is included in the Ohio SIP in STARShip, you are required to list the rule as an applicable requirement in your application.*

6. A plastics treatment system generates ozone and then converts the ozone (93% control) to oxygen. The White Paper, Attachment A to Engineering Guide #62, lists "ozone generators" as trivial. Would the trivial definition apply to this emissions unit?

*What is the size of these ozone generators? Are they electric powered? Trivial activity #11 in Engineering Guide #62 is for small electric powered generators like laboratory generators. Are there any other air contaminant emissions from these generators? If there are other air contaminant emissions from these generators, they may not be trivial activities.*

7. If a portable asphalt plant is located at a site for which a permanent asphalt plant is located, is the portable emission unit to be considered part of the permanent facility for Title V applicability purposes?

*The portable emission unit is to be included as part of the Title V facility unless the company is willing to make a declaration under the temporary source requirements that indicates that this portable (temporary) emission unit will not be at this location for more than two years.*

**8.** A facility has two boilers that are 100 Horsepower each and three that are 80 Horsepower each, and needs to determine if the boilers are trivial. Based on Engineering Guide # 62, these boilers are trivial if their output is less than 4 million BTU/hr. What is the correct formula for converting Horsepower to BTU/HR?

*The correct conversion from Boiler Horsepower output to Boiler Heat output is  $1 \text{ hp} = 35,475 \text{ BTU/hr}$ . To convert from Boiler Heat output to Boiler Heat input (which is what the trivial exemption is based upon), you need to know the Boiler Efficiency. For this information contact the boiler manufacturer or read the boiler manual (the efficiency is usually related to the type of fuel burned: natural gas, #2 fuel oil, etc.). For example, a 100 HP boiler =  $3,547,500 \text{ BTU/hr}$ . If the efficiency is 80%, then Heat Input =  $3,547,500/0.80 = 4,434,375 \text{ BTU/hr}$ . This is more than the trivial level (4 MM BTU/hr) but less than the state permit requirements for PTI/PTO (10 MM BTU/hr), so it needs to be identified as an insignificant source in the Title V application.*

**9.** Can you please confirm that "trivial emissions units" as defined in Engineering Guide #62 do not have to be reported in the fee emissions report?

*In accordance with OAC 3745-78-02(A), each Title V facility shall submit a Fee Emissions Report for ACTUAL emissions for the facility. ACTUAL is a broad term and can be interpreted as everything that is emitted from the facility. However, it will be burdensome for facilities to count trivial activities (Engineering Guide #62) since they are not required to be reported in the Title V application. Since trivial activities are not reported in the Title V application, they should not be reported in the Fee Report.*

**10.** A facility has coaters that are required to comply with a rule through the use of test method 24 for determining VOC content. However, their state permit does not currently require them to perform Method 24 testing and these coatings have never been tested with a Method 24. The applicant proposes to begin Method 24 testing with the Title V permit.

a) Do they need to state that they are not in compliance since they are not currently performing this test? They believe they are in compliance with the VOC limitation from an MSDS review, but since part of the applicable requirement is also to perform this test, is that considered non-compliant?

*a) Perhaps the field office is not aware that the source has not performed the required VOC test(s). The applicant should ask the field office this question. The field office can tell you if they consider a source to be "in compliance."*

b) Question #9 in the EAC form for Coating and Printing Operations that deals with coating data asks, "Is the data entered for this material determined in accordance with USEPA approved methods?" Is there any consequence to answering "no" to this question since they have not had the coatings tested?

*b) No, you may submit the method in which the coating formulation was determined. It will be subject to review by the field office, the central office, and USEPA. If necessary, it may need to be revised to an approved method and resubmitted.*

**11.** OAC 3745-21-07(G)(2) states that a person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance ... for "employing", applying, evaporating, or drying any photochemically reactive material . . .

What does the category "employing" include?

*"Employing" would include the use of photochemically reactive materials in any type of production equipment in normal, day-to-day work functions. It could also mean the use of photochemically reactive materials in any type of equipment that a company uses to form a final product or intermediate (by-product) that the company sells.*

**12.** OAC 3745-21-09(F) requires that paper coating lines use coatings with less than 2.9 lb of VOC per gallon of coating, excluding water and exempt solvents, or if a control system is employed, 4.8 lb of VOC per gallon of solids. The SIP in STARShip only lists the 2.9 lb VOC/gal part of this rule. Is the 2.9 lb VOC/gal the only part approved or was the 4.8 just accidentally left out?

*Yes, 4.8 lb VOC/gal solids is part of 21-09(F) and part of the SIP, and should be included as an applicable requirement for the Title V application.*

**13.** (a) If OAC rule 3745-18-37 is applicable to a source, testing is required per 3745-18-04(D)(7) & (8) (I found out this is in the SIP, even though not in STARShip's SIP). Is this rule to be interpreted that (7) **or** (8) is required or that (7) **&** (8) are required?

(b) If 3745-18-04(D)(8) is required, how do you determine if 8a, b, c, or d is applicable?

*(a) Both 18-04(D)(7) and (D)(8) are applicable. OAC rule 3745-18-04(D)(7) specifies test methods and OAC rule 3745-18-04(D)(8) specifies monitoring, recordkeeping, and reporting requirements.*

(b) 18-04(D)(8)(a) through (8)(e) are all applicable.