

Ohio EPA

Division of Air Pollution Control

Engineering Guide # 59

Question:

Which fields in the Title V application form are required to meet the completeness and application shield provisions of OAC Chapter 3745-77? Which fields are required only by State law?

Answer:

The sections below contain a listing of the Title V application fields as they will appear on the electronic Title V application form. The fields required under State/federal law are **in bold print** and the fields required only under State law are in *italics*.

It is presumed that the information contained in the emission activity category forms is required only by State law; however, if Ohio EPA determines that certain information on the EAC forms was not provided by the applicant and it is determined that this missing information would also be required under the provisions of OAC rule 3745-77-03, then that information would be considered "federally required" and the applicant would be so notified.

The attached list also includes a "field type" description for each data element. The various "field types" for the data are:

1. text- an alphanumeric entry with limited character length
2. numeric- number entry, including decimal places where appropriate
3. memo- unlimited text entry
4. date- fixed data entry formats for dates
5. picklist- selection of an option from on-screen list of items

A. General Facility Information:

<u>Field</u>	<u>Data Description</u>
1. numeric-	10-digit facility ID (Premise #)
2. text-	Bulletin Board Service (BBS) facility short name
3. text-	Full Facility Name
4. numeric-	Primary Facility SIC Code (4-digit)
5.	Primary Facility Address:
text-	-Street
text-	-City/Village or Twnshp
text-	-County
6. text-	Primary facility contact

- 7. numeric Primary facility contact phone #
- 8. Facility Mailing Address:

- text- -Street
- text- -Mail Stop/P.O. Box
- text- -City/Village or Twnshp
- text- -State
- numeric- -Zip Code

B. General Emissions Unit Information:

- 1. text- Company Emissions Unit ID
- 2. text- Ohio EPA ID (4-digit alphanumeric number)
- 3. memo- Company description for emissions unit
- 4. picklist- Emissions Unit type (insignificant or non-insignificant)

C. Emissions Egress Point Data

- 1. text- Company ID for emissions egress point
- 2. picklist- Egress Point Description (vertical stack, vertical-obstructed stack, horizontal stack or vent or fugitive)

D. Emissions Control Equipment Information

- 1. text- *Manufacturer*
- 2. text- *Model Number*
- 3. text- **Company ID**
- 4. date- *Month/Year Installed*
- 5. picklist- **Pollutant(s) Controlled**
- 6. numeric- **Average Design Control Efficiency (%) -by pollutant controlled**
- 7. numeric- *Operating Control Efficiency (%) -by pollutant controlled*
- 8. text- *Maximum Controlled Pollutant(s) Emissions Rate (lbs/hour)*
- 9. numeric- *Inlet gas flow rate (acfm)*
- 10. numeric- *Inlet gas flow temperature (F)*
- 11. memo- **Comment field (optional)**
- 12. picklist- **Equipment Type (with following choices):**
 - Fabric Filter
 - Electrostatic Precipitator
 - Flame incinerator
 - Catalytic Incinerator
 - Flare
 - Wet scrubber
 - Condenser
 - Carbon adsorber
 - Cyclone or Multiclone
 - Settling Chamber
 - Concentrator
 - Other, describe

The following additional information must be provided for each type of emissions control equipment utilized:

Fabric Filter

- picklist** -Pressure type
- picklist* -Pressure Cleaning Mechanism
- text** -Pressure Drop Range (Max/Min Inches water)

ESP

- picklist** -Type
- numeric* -Number of fields

Catalytic Incinerator

- numeric** -Minimum inlet gas temperature (deg. F)
- numeric* -Residence Time (seconds)
- numeric* -Minimum temperature difference across catalyst during venting of emissions (deg. F)

Flame Incinerator

- numeric** -Minimum Combustion chamber exhaust gas temperature (deg. F prior to any heat exchanger)
- numeric-** Residence Time (seconds)

Flare

- picklist** -Type
- picklist** -Flame presence sensor (yes/no)

Wet scrubber

- picklist** -Type
- numeric* -Liquid to gas ratio (gal/min per 1000 cubic feet)
- text** -Pressure Drop Range (min./max., inches of water)
- text* -PH operating range [for gaseous pollutants] (min/max.)

Condensers

- picklist** -Type
- numeric** -Maximum Exhaust Gas Temperature (deg. F)
- picklist* -Coolant Type
- numeric* -Design Coolant Inlet Temperature (deg. F)
- numeric* -Design Coolant Outlet Temperature (deg. F)
- numeric* -Design Coolant Flow Rate (gpm)

Carbon Adsorber

- picklist** -Type
- numeric** -Maximum Design Outlet Solvent Concentration (ppmv)
- text* -Maximum Carbon replacement Frequency (months) or regeneration cycle time (minutes)

Concentrator

numeric -Minimum combustion chamber exhaust gas
temperature (deg F)

numeric -Maximum design regeneration cycle time (minutes)

Cyclones or Multiclones

picklist -Type

Settling Chamber

picklist -Type

Other

memo -describe

E. Specific Facility Information

1. text- Facility Owner(s)
2. text- Responsible Official name
3. text- Statutory Agent name
4. Statutory agent mailing address:
 - text- -street/mail drop
 - text- -city/village/twnshp
 - text- -state
 - numeric -zip code
5. text- On-site facility contact
- numeric- On-site facility contact phone #
6. picklist- Identification of all applicable facility SIC codes and associated products/services
7. picklist- Facility type (stationary, portable or both)
8. memo- Alternative SIP limit requests (variance requests)
9. picklist- 112(r) plan submittal compliance status
10. picklist- Verification of Title IV applicability (yes/no)
11. Estimated pollutant emissions information: (for the most recent calendar year for each regulated pollutant)
 - picklist- -pollutant name
 - numeric- -emissions (tons/year)
 - memo- -emissions rate determination basis
 - picklist- -pollutant major/minor status
12. Applicable requirements:(for each applicable requirement applying to facility operations provide the following):
 - picklist -Regulation type (facility requirement, grouped limit or emissions unit specific requirement)
 - picklist -Emissions Unit(s) covered by applicable requirement
 - text -A description (paraphrasing is acceptable) of the applicable requirement.
 - picklist -Pollutant(s) regulated by applicable requirement
 - picklist -Regulatory basis for the applicable requirement

(rule citation)
picklist -Applicable USEPA reference test methods for
determining compliance with applicable requirement

- memo -Proposed certification schedule for applicable requirement
- memo -Proposed approach for demonstrating compliance with applicable requirement
- memo -Proposed compliance reporting method for applicable requirement
- memo -Proposed compliance monitoring method for applicable requirement
- memo -Proposed compliance record-keeping method for applicable requirement
- memo -Proposed compliance test method for applicable requirement

13. Insignificant activities: (for each insignificant activity that is insignificant due to size or production rate, provide the following)

- picklist -Emissions unit ID (from picklist generated from emissions unit data entry under item B)
- picklist -Basis for insignificant classification (rule or statute citation)

14. Confidentiality claim for facility information:

- picklist -Application item(s) claimed confidential
- memo -Basis (justification) for confidential claim

F. Specific Emissions Unit Information:

- 1. picklist- Emission Unit ID/company description of emissions unit (selected from picklist for facility emissions unit data entry under item B above)
- 2. text- Emission unit activity description
- 3. text- Emissions unit equipment description
- 4. memo- Special comment/information on emissions unit(optional)
- 5. date- Initial installation date (mm/yy)
- 6. date- Initial startup date (mm/yy)
- 7. date- Most recent modification date (mm/yy)-(as defined in OAC rule 3745-31-01(J))-(optional)
- 8. numeric- Number of proposed operating scenarios
- 9. memo- Description and quantification of emissions for each proposed operating scenario
- 10. Normal operating schedule:
 - numeric -hours/day
 - numeric -hours/year
- 11. graphics Process flow diagram (may be submitted electronic or as hard copy with BBS receipt)
- 12. picklist- Enhanced monitoring compliance status

13. picklist- certification
Certification of compliance with applicable enhanced monitoring and compliance certification requirements on a timely basis.

- 14. picklist- Certification of compliance with all future applicable requirements the emissions unit is subject to on a timely basis
- 15. picklist- Compliance status certification of emissions unit with all current applicable requirements

Note: if the emissions unit is identified as out of compliance with an applicable requirement(s) at the time of application the following

memo -Identification of each applicable requirement the emissions unit is out of compliance with

memo -A general description of how the facility proposes to bring the emissions unit into compliance and, if the compliance plan and schedule exceeds six months in length, a proposed schedule for submittal of certified progress reports of not less than six months frequency.

If the installation of add-on emissions control, or process equipment is needed to achieve compliance, then a compliance schedule containing the following milestone dates must be provided:

date -Submittal of final control plan
date -Contract award date(s) for installation
date -On-site construction initiation
date -On-site construction completion
date -Achieve and demonstrate final Compliance

- 15. Estimated maximum emissions rates: (for each regulated air pollutant [for which there is an applicable requirement] emitted from the emissions unit)
 - numeric- In units of ton/year
 - text- In units of any applicable requirement(s) for the emissions unit
 - memo- The emissions rate determination basis for the ton/year calculation
- 16. Emissions egress point data
 - picklist- Egress point id (selected from list generated from data entry from item C)
 - picklist- Egress point description (note egress point data is selected from the general egress point data (item C) entered above for the facility)

17. Add-on emissions control equipment data

picklist -Company id

picklist -All data specified under item D above for
emissions control equipment and specific type

(note upon company id entry, all information previously
entered (item D) for emissions control equipment is
automatically carried into application)

18. Confidential data

picklist -Item(s) for emissions unit claimed confidential

memo -Basis for confidential claim

G. Emissions Activity Category (EAC) forms:

All information on the EAC's is presumed to be required only by State law; however, if Ohio EPA determines that certain information on the EAC forms was not provided by the applicant and it is determined that this missing information would also be required under the provisions of OAC rule 3745-77-03, then that information would be considered "federally required" and the applicant would be so notified.

H. Other information fields not identified:

Any other information fields that are required in the development of an electronic Title V application and are not listed or discussed in this Engineering Guide will be presumed to be required only under State law.

December 27, 1995

Engineering Guide Supporting Documents Attached

1. November 29 letter from Robert Hodanbosi, Ohio EPA to Robert Brubaker and Janet Henry, Porter, Wright, Morris and Arthur regarding how Ohio EPA plans to final issue Engineering Guide #59.
2. November 8, 1995 letter from Robert Brubaker and Janet Henry from Porter, Wright, Morris, and Arthur to Robert Hodanbosi, Thomas Rigo, and Jeanne Mallett, Ohio EPA regarding further comments with Draft Engineering Guide #59.
3. October 2, 1995 letter from Cheryl Newton, U.S. EPA to Robert Hodanbosi, Ohio EPA regarding the Office of Air Quality Planning and Standards review of Draft Engineering Guide #59 and Region V's August 21, 1995 response.
4. September 13, 1995 (note, letter was erroneously dated September 13, 1994) letter from Robert Hodanbosi, Ohio EPA to Lydia Wedman, Office of Air Quality Planning and Standards regarding a request to review the disputed issues (raised by Ohio industry) of Engineering Guide #59 and the response provided by Region V on these issues.
5. August 21, 1995 letter from Cheryl Newton, U.S. EPA to Tom Rigo, Ohio EPA regarding Ohio EPA's request for clarification on whether or not certain information on the Emission Activity Category forms would be State/federal required.
6. August 2, 1995 letter from Tom Rigo, Ohio EPA to Genevieve Nearmyer, U.S. EPA requesting U.S. EPA's position on whether certain information in the Emission Activity Category Forms is State/federal required. The following relevant correspondence was attached:
 - a. April 7, 1995 letter from Janet Henry, Porter, Wright, Morris & Arthur, to Tom Rigo, Ohio EPA providing comments on Draft Engineering Guide #59.
 - b. July 24, 1995 letter from Janet Henry, Porter, Wright, Morris & Arthur, to Tom Rigo, Ohio EPA providing additional comments on Draft Engineering Guide #59 and U.S. EPA's "White Paper" policy.
 - c. March 10, 1995 Draft Engineering Guide #59 from Tom Rigo, Ohio EPA (similar to the final Guide, not attached).