

**Ohio EPA**  
**Division of Air Pollution Control**  
**Engineering Guide #75**

**Question:**

This Guide was prepared to respond to numerous questions from the Ohio EPA District Offices and local air agencies and the regulated community concerning the proper application of OAC rules 3745-17-07, 3745-17-08, and 3745-17-11 to fugitive dust sources and/or process equipment. It includes guidance in the form of general examples that illustrate which rules apply in different source scenarios and how those rules are applied in those scenarios. The Guide incorporates and significantly expands on the examples originally prepared by the Canton Air Pollution Control Division after discussions with DAPC staff. These scenarios should cover the most common questions that arise when determining the applicability of these rules.

**Answer:**

Before presenting the general examples of the use of these rules, it is important to bring attention to certain definitions and provisions in these rules that are the basis for determining rule applicability and usage. These definitions and provisions are as follows:

- *“**Fugitive dust**’ means particulate matter which is emitted from any source by means other than a stack.” [OAC rule 3745-17-01(B)(6)]*
- *“**Fugitive dust source**’ means any source which emits fugitive dust or which emitted fugitive dust prior to the installation of any control equipment that was installed on or after February 15, 1972.” [OAC rule 3745-17-01(B)(7)]*
- *“**Stack**’ means any chimney, flue, conduit or duct, including the outlet of any air pollution control equipment, which is arranged to conduct emissions to the ambient air.” [OAC rule 3745-17-01(B)(19)]*

Note that DAPC does not consider roof or wall-mounted ventilation systems, which are used to ventilate general plant air and have no added ducting to the opening or fan housing, to constitute “stacks.” Other egress points that are not considered as “stacks” include building roof monitors, open doors, open windows, and other building openings, and uncontrolled material storage silo vents.

Also, note that by definition any discharge from control equipment is deemed to be from a stack or stacks. This includes any control equipment that is vented inside a building having non-stack openings.

- **“Control equipment”** means any device or contrivance which prevents or reduces emissions.” [OAC rule 3745-15-01(J)]
- **“New source”** means any source the construction or modification of which is commenced on or after February 15, 1972.” [OAC rule 3745-15-01®)]

This definition is presented here because the February 15, 1972 date is used as the cut-off date in the definition of “fugitive dust source” in OAC rule 3745-17-01(B)(7). This date was selected because it represents the first date of Agency regulation of air contaminant sources and a cut-off date was and is needed to prevent sources complying with the requirements of OAC rule 3745-17-08(B) by installing control equipment from being subject to the requirements of OAC rule 3745-17-11 simply because the source now emits particulates through a stack.

Note that only those sources whose installation (or modification) was initiated on or after January 1, 1974 must also provide for the best available technology (“BAT”) pursuant to OAC rule 3745-31-05(A)(3).

- **“Existing source”** means any source the construction of which was commenced prior to February 15, 1972.” [OAC rule 3745-15-01(O)]
- **“Appendix A”** of OAC rule 3745-17-08 specifies the areas where the reasonably available control measure requirements in paragraph (B) of the rule apply. Note that these areas are as they were as of June 18, 1980, the effective date of the rule. Any changes to township, village or city boundaries since that time do not change the original area designations.
- **“Reasonably available control measures”** means the control technology which enables a particular fugitive dust source to achieve the lowest particulate matter emission level possible and which is reasonably available considering technological feasibility and cost-effectiveness.” [OAC rule 3745-17-01(B)(15)]

It is beyond the scope of this Guide to explain what constitutes reasonably available control measures (“RACM”) in each of these scenarios. (See Engineering Guide #24 for an explanation of the procedures for determining RACM and also Ohio EPA’s reference document entitled Reasonably Available Control Measures for Fugitive Dust Sources [September, 1980].) In general, compliance with the RACM requirements is shown, if necessary, by a technical analysis that confirms that the control measures employed achieve the greatest emission reduction of the cost-effective (i.e., in dollars per ton of particulate matter removed) control options available and the resulting visible particulate emissions of fugitive dust comply with the appropriate limit from OAC rule 3745-17-07(B) for any remaining fugitive dust emissions (see OAC rule 3745-17-08©)). Note that an owner or operator of a

fugitive dust source cannot simply comply with the RACM requirement of OAC rule 3745-17-08(B) by showing that the visible particulate emissions from such source comply with the appropriate limitation from OAC rule 3745-17-07(B). Such owner or operator must first employ RACM and then assess compliance with the appropriate visible particulate emission limitation. [See OAC rule 3745-17-08©].]

- *OAC rule 3745-17-11(A)(1) states the following: “This rule applies to any operation, process, or activity which releases or may release particulate emissions into the ambient air except: ..... (f) The generation of fugitive dust which the director has determined is subject to rule 3745-17-08 of the Administrative Code; .... ”*

Note that there has been an incorrect interpretation of the above provision. Some have assumed that emissions units in non-Appendix A areas are not subject to OAC rule 3745-17-08 and, therefore, the fugitive dust source is subject to the requirements of OAC rule 3745-17-11. This is incorrect since OAC rule 3745-17-08 applies Statewide; however, the control requirements in OAC rule 3745-17-08(B) do not apply in non-Appendix A areas.

- Lastly, note that applying the requirements of OAC rule 3745-17-08(B) to a fugitive dust source that is located in a non-Appendix A area or is exempt pursuant to OAC rule 3745-17-08(A)(3) and that is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02, must be performed through the use of consensual or unilateral Director’s Findings and Orders (F&Os). If unilateral F&Os are necessary, they would need to be issued first as a proposed action with hearing rights. Thus, only final F&Os invoke those requirements.

The following scenarios are provided as examples of the use of these rules and definitions (assume in these examples that the emissions units are not “de minimis” pursuant to OAC rule 3745-15-05). In order to quickly find a specific scenario, the following table is provided:

Scenario #	App. A (A)/Non App. A (NA)?	Emissions Unit Located Inside (I)/Outside (O) Building?	Fug. (F)/ Stack (S) Emission Egress?	New (N) or Existing (E) Emissions Unit?	Date of Capture and/or Control Equipment Installation?	Date Non-Capture/ Control Measures Installed?	In Violation of OAC Rule 3745-15-07 or 3745-17-02 (Y/N)?
1	NA	O	F	E	-	-	N
2	NA	O	F	N	-	-	N
3	A	O	F	E	-	-	N
4	A	O	F	N	-	-	N
5	A	O	F	E	-	<2/15/72	N

Scenario #	App. A (A)/Non App. A (NA)?	Emissions Unit Located Inside (I)/Outside (O) Building?	Fug. (F)/ Stack (S) Emission Egress?	New (N) or Existing (E) Emissions Unit?	Date of Capture and/or Control Equipment Installation?	Date Non-Capture/ Control Measures Installed?	In Violation of OAC Rule 3745-15-07 or 3745-17-02 (Y/N)?
6	A	O	F	N	-	\$2/15/72	N
7	NA	O	F	E	-	-	Y
8	NA	O	F	N	-	-	Y
9	A	O	F	E	-	-	Y
10	A	O	F	N	-	-	Y
11	A	O	F	E	-	<2/15/72	Y
12	A	O	F	N	-	\$2/15/72	Y
13	NA	I	F	E	-	-	N
14	NA	I	F	N	-	-	N
15	A	I	F	E	-	-	N
16	A	I	F	N	-	-	N
17	A	I	F	E	-	<2/15/72	N
18	A	I	F	N	-	\$2/15/72	N
19	NA	I	F	E	-	-	Y
20	NA	I	F	N	-	-	Y
21	A	I	F	E	-	-	Y
22	A	I	F	N	-	-	Y
23	A	I	F	E	-	<2/15/72	Y
24	A	I	F	N	-	\$2/15/72	Y
25	A or NA	I	S	E	-	-	N
26	A or NA	I	S	N	-	-	N
27	A or NA	I	S	E	<2/15/72	-	N
28	A or NA	I	S	N	<2/15/72	-	N
29	A	I	F 6 S	E	\$2/15/72	-	N
30	A	I	F 6 S	N	\$2/15/72	-	N

Scenario #	App. A (A)/Non App. A (NA)?	Emissions Unit Located Inside (I)/Outside (O) Building?	Fug. (F)/ Stack (S) Emission Egress?	New (N) or Existing (E) Emissions Unit?	Date of Capture and/or Control Equipment Installation?	Date Non-Capture/ Control Measures Installed?	In Violation of OAC Rule 3745-15-07 or 3745-17-02 (Y/N)?
31	NA	I	F 6 S	E	\$2/15/72	-	N
32	NA	I	F 6 S	N	\$2/15/72	-	N
33	A or NA	I or O	S	E or N	Not Appl.	-	N
34	A	I	F & S	N	\$2/15/72	-	N
35	N	I	F & S	E	<2/15/72	-	N
36	A	I	F & S	E	<2/15/72	-	N
37	N	I	F & S	N	\$2/15/72	-	N
38	A	I	F 6 F&S	E	-	-	N
39	A	I	F	E	\$2/15/72	-	N
40	A	I	F 6 F&S	N	\$2/15/72	-	N
41	A	I	F & S	N	\$2/15/72	-	N
42	A	I	F 6 S	E	\$2/15/72	-	N
43	A	I	F 6 F&S	E	\$2/15/72	-	N

**Scenario #1:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is not located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. Although OAC rules 3745-17-07 and 3745-17-08 apply to the emissions unit, there are no applicable emission or control requirements in such rules. The emissions unit is exempt from the control requirements of OAC rule 3745-17-08(B) because it is not located in an Appendix A area of OAC rule 3745-17-08 and there is no violation of OAC rule 3745-15-07 or 3745-17-02. Also, pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located in an Appendix A area the visible emission limitation in OAC rule 3745-17-07(B)(1) is not applicable.

Compliance method(s): none required

Applicable emissions unit ID: FXXX

**Scenario #2:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. It is not located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. Although OAC rules 3745-17-07 and 3745-17-08 apply to the emissions unit, there are no applicable emission or control requirements in such rules. The emissions unit is exempt from the control requirements of OAC rule 3745-17-08(B) because it is not located in an Appendix A area of OAC rule 3745-17-08 and there is no violation of OAC rule 3745-15-07 or 3745-17-02. Also, pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located in an Appendix A area the visible emission limitation in OAC rule 3745-17-07(B)(1) is not applicable. The emissions unit also is a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #3:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to the fugitive dust emissions unless exempted by rule.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

Applicable emissions unit ID: FXXX

**Scenario #4:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. It is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to the fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #5:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972. Control measures that do not involve capture and control equipment were implemented prior to

February 15, 1972, but some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to any remaining fugitive dust emissions unless exempted by rule. The fact that control measures not involving control equipment were installed prior to February 15, 1972 has no effect in this scenario since some fugitive dust continues to be emitted.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

Applicable emissions unit ID: FXXX

**Scenario #6:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972. Control measures that do not involve capture and control equipment were implemented at the time of installation of the emissions unit or thereafter, and some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to any remaining fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter. The fact that control measures not involving control equipment were installed at the time of source installation or thereafter has no effect in this scenario since fugitive dust continues to be emitted after installation of the control

measures.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #7:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is not located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. It has no emission or control requirements from OAC Chapter 3745-17 because it is not located in an Appendix A area of OAC rule 3745-17-08. However, because the emissions unit is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02, the requirements of OAC rules 3745-17-08(B) and 3745-17-07(B) become applicable upon issuing final unilateral Director's Final Findings and Orders to the emissions unit owner or operator.

Compliance method(s): (after issuance of final Orders)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

Applicable emissions unit ID: FXXX

**Scenario #8:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is causing or contributing to a violation of

OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. It is not located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. It has no emission or control requirements from OAC Chapter 3745-17 because it is not located in an Appendix A area of OAC rule 3745-17-08. However, because the emissions unit is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02, the requirements of OAC rules 3745-17-08(B) and 3745-17-07(B) become applicable upon issuing final unilateral Director's Final Findings and Orders to the emissions unit owner or operator. Furthermore, the emissions unit is also a "new source," but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s): (after issuance of final Orders)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #9**

An emissions unit is located outside a building and emits only fugitive dust into the ambient air, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure ("RACM") requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to the fugitive dust emissions unless exempted by rule. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the

requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

Applicable emissions unit ID: FXXX

**Scenario #10:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission requirements of OAC rule 3745-17-07(B) apply to the fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM and BAT requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #11:** An emissions unit is located outside a building, emits only fugitive dust into the ambient air, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972. Control measures that do not involve capture and control equipment were implemented prior to February 15, 1972, but some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission requirements of OAC rule 3745-17-07(B) apply to any remaining fugitive dust emissions unless exempted by rule. The fact that control measures not involving control equipment were installed prior to February 15, 1972 has no effect in this scenario since some fugitive dust continues to be emitted. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

Applicable emissions unit ID: FXXX

**Scenario #12:** An emissions unit is located outside a building, emits only fugitive dust

into the ambient air, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972. Control measures that do not involve capture and control equipment were implemented at the time of installation of the emissions unit or thereafter and some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08.

Applicable rule(s): This emissions unit is a fugitive dust source because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission requirements of OAC rule 3745-17-07(B) apply to any remaining fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter. The fact that control measures not involving control equipment were installed at the time of installation to the emissions unit or thereafter has no effect in this scenario since some fugitive dust continues to be emitted. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM and BAT requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #13:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to

February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is not located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. Although OAC rules 3745-17-07 and 3745-17-08 apply to the emissions unit, there are no applicable emission or control requirements in such rules. The emissions unit is exempt from such requirements because it is not located in an Appendix A area of OAC rule 3745-17-08 and there is no violation of OAC rule 3745-15-07 or 3745-17-02.

Compliance method(s): none required

Applicable emissions unit ID: FXXX

**Scenario #14:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. It is not located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. Although OAC rules 3745-17-07 and 3745-17-08 apply to the emissions unit, there are no applicable emission or control requirements in such rules. The emissions unit is exempt from such requirements because it is not located in an Appendix A area of OAC rule 3745-17-08 and there is no violation of OAC rule 3745-15-07 or 3745-17-02. However, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #15:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is not causing or contributing to a violation of OAC rule 3745-15-07 or

3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to the fugitive dust emissions unless exempted by rule.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

Applicable emissions unit ID: FXXX

**Scenario #16:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. It is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to the fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #17:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972. Control measures that do not involve capture and control equipment were implemented prior to February 15, 1972, but some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to any remaining fugitive dust emissions unless exempted by rule. The fact that control measures not involving control equipment were installed prior to February 15, 1972 has no effect in this scenario since some fugitive dust continues to be emitted.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

Applicable emissions unit ID: FXXX

**Scenario #18:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972. Control measures that do not involve capture and control equipment were implemented at the time of installation of the emissions unit or thereafter and some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not

been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to any remaining fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter. The fact that control measures not involving control equipment were installed at the time of source installation or thereafter has no effect in this scenario since fugitive dust continues to be emitted after installation of the control measures.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #19:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is not located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. It has no emission or control requirements from OAC Chapter 3745-17 because it is not located in an Appendix A area of OAC rule 3745-17-08. However, because the emissions unit is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02, the requirements of OAC rules 3745-17-08(B) and 3745-17-07(B) become applicable upon issuing final unilateral Director’s Final Findings and Orders to the emissions unit owner or operator.

Compliance method(s): (after issuance of final Orders)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

Applicable emissions unit ID: FXXX

**Scenario #20:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. It is not located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust. It has no emission or control requirements from OAC Chapter 3745-17 because it is not located in an Appendix A area of OAC rule 3745-17-08. However, because the emissions unit is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02, the requirements of OAC rules 3745-17-08(B) and 3745-17-07(B) become applicable upon issuing final unilateral Director's Final Findings and Orders to the emissions unit owner or operator. Furthermore, the emissions unit is also a "new source," but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s): (after issuance of final Orders)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #21**

An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) applies to the fugitive dust emissions unless exempted by rule. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

Applicable emissions unit ID: FXXX

**Scenario #22:**

An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission requirements of OAC rule 3745-17-07(B) apply to the fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM and BAT requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #23:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972. Control measures that do not involve capture and control equipment were implemented prior to February 15, 1972, but some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission requirements of OAC rule 3745-17-07(B)

apply to any remaining fugitive dust emissions unless exempted by rule. The fact that control measures not involving control equipment were installed prior to February 15, 1972 has no effect in this scenario since some fugitive dust continues to be emitted. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

Applicable emissions unit ID: FXXX

**Scenario #24:** An emissions unit is located inside a building, emits only fugitive dust into the ambient air through building openings that are not stacks, and is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972. Control measures that do not involve capture and control equipment were implemented at the time of installation of the emissions unit or thereafter and some fugitive dust is still emitted. The emissions unit, control measures, and emission egress have not been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure I.)**

Applicable rule(s): This emissions unit is a fugitive dust source by definition because it emits fugitive dust, and it is subject to the reasonably available control measure (“RACM”) requirements of OAC rule 3745-17-08(B) because it is located in an Appendix A area. Also, the appropriate visible particulate emission requirements of OAC rule 3745-17-07(B) apply to any remaining fugitive dust emissions unless exempted by rule. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter. The fact that control measures not involving control equipment were installed at the time of installation to the emissions unit or thereafter has no effect in this scenario since some fugitive dust continues to be emitted. Since the emissions unit is already subject to OAC rule 3745-17-08(B) by location, there is no need

to invoke the requirements of that rule pursuant to OAC rule 3745-17-08(A)(2). If compliance with the RACM and BAT requirements is insufficient to resolve the violation of OAC rule 3745-15-07 or 3745-17-02, additional control measures are necessary.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-15-07: elimination of the nuisance or ambient air quality standard violation(s)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #25:** An emissions unit is located inside a building. Emissions are not captured, are vented into the ambient air through a building stack or stacks, and are not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun prior to February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in either an Appendix A area or a non-Appendix A area of OAC rule 3745-17-08. **(See Figure II.)**

Applicable rule(s): This emissions unit is subject to the particulate emission limitations in OAC rule 3745-17-11 since emissions have been vented into the ambient air through stacks since February 15, 1972. There has never been any fugitive dust emitted into the ambient air in this case. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A)(1) apply to the stack(s) of this emissions unit unless exempted by rule. It does not matter whether or not this emissions unit is located in an Appendix A area of OAC rule 3745-17-08 since it is not a fugitive dust source.

Compliance method(s):

for OAC rule 3745-17-07(A)(1): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: PXXX

**Scenario #26:** An emissions unit is located inside a building. Emissions are not captured, are vented into the ambient air through a building stack or stacks, and are not causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02. Initiation of installation of the unit was begun on or after February 15, 1972, and the emissions unit and its emission egress have never been modified. The unit is located in either an Appendix A area or a non-Appendix A area of OAC rule 3745-17-08. **(See Figure II.)**

Applicable rule(s): This emissions unit is subject to the particulate emission limitations in OAC rule 3745-17-11 since emissions have been vented into the ambient air through stacks since initial operation. There has never been any fugitive dust emitted into the ambient air in this case. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A)(1) apply to the stack(s) of this emissions unit unless exempted by rule. It does not matter whether or not this emissions unit is located in an Appendix A area of OAC rule 3745-17-08 since it is not a fugitive dust source. Furthermore, the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A)(1): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: PXXX

**Scenario #27:** An emissions unit is located inside a building. Emissions are totally captured and vented into the ambient air through a stack or stacks. No control equipment is employed. Initiation of installation of the unit was begun prior to February 15, 1972, and the capture system was installed prior to February 15, 1972. The emissions unit, capture system, and emission egress have not been subsequently modified. The unit is located in either an Appendix A area or a non-Appendix A area of OAC rule 3745-17-08. **(See Figure III.)**

Applicable rule(s): This emissions unit is subject to the particulate emission limitations in OAC rule 3745-17-11 since emissions have been vented into the ambient air through a stack or stacks since February 15, 1972. There has never been any fugitive dust emitted

into the ambient air in this case. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A)(1) apply to this emissions unit unless exempted by rule. It does not matter whether or not this emissions unit is located in an Appendix A area of OAC rule 3745-17-08 since it is not a fugitive dust source.

Compliance method(s):

for OAC rule 3745-17-07(A)(1): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: PXXX

**Scenario #28:** An emissions unit is located inside a building. Emissions are totally captured and vented into the ambient air through a stack or stacks. No control equipment is employed. Initiation of installation of the unit was begun on or after February 15, 1972, and the capture system was installed at the same time as the emissions unit. The unit is located in either an Appendix A area or a non-Appendix A area of OAC rule 3745-17-08. **(See Figure III.)**

Applicable rule(s): This emissions unit is subject to the particulate emission limitations in OAC rule 3745-17-11 because emissions have been vented into the ambient air through a stack or stacks since the emissions unit was initially operated. There has never been any fugitive dust emitted into the ambient air in this case. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A)(1) apply to this emissions unit unless exempted by rule. It does not matter whether or not this emissions unit is located in an Appendix A area of OAC rule 3745-17-08 since it is not a fugitive dust source. The emissions unit is a “new source,” but there are no emission or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A)(1): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: PXXX

**Scenario #29:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. Initiation of installation of the unit occurred prior to February 15, 1972. The capture system was installed on or after February 15, 1972. Prior to installation of the capture system, the emissions were vented into the ambient air through non-stack building openings. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that were captured are subject to the appropriate particulate emission limitation in OAC rule 3745-17-11 since the emissions unit has been modified to change its egress. The remaining fugitive dust emissions continue to be subject to OAC rule 3745-17-08(B) since the emissions unit is located in an Appendix A area. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A) apply to the stack discharge from the capture system. Furthermore, the visible particulate emission requirements of OAC rule 3745-17-07(B) apply to the fugitive dust emissions escaping the building.

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

Applicable emissions unit ID: P9XX

**Scenario #30:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. Initiation of installation of the unit occurred on or after February 15, 1972. The capture system was installed after the emissions unit was installed. Prior to installation of the capture system, the emissions were vented into the ambient air through non-stack building openings. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that were captured are subject to the appropriate particulate emission limitation in OAC rule 3745-17-11 since the emissions unit has been modified to change its egress. The remaining fugitive dust emissions continue

to be subject to OAC rule 3745-17-08(B) since the emissions unit is located in an Appendix A area. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A) apply to the stack discharge from the capture system. Furthermore, the visible particulate emission requirements of OAC rule 3745-17-07(B) apply to the fugitive dust emissions escaping the building. The emissions unit is a “new source,” but there are no emission or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: P9XX

**Scenario #31:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. Initiation of installation of the unit occurred prior to February 15, 1972. The capture system was installed on or after February 15, 1972. Prior to installation of the capture system, the emissions were vented into the ambient air through non-stack building openings. The unit is not located in an Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that were captured are subject to the appropriate particulate emission limitation in OAC rule 3745-17-11 since the emissions unit has been modified to change its egress. The remaining fugitive dust emissions continue to be subject to OAC rule 3745-17-08; however, there are no control requirements since the emissions unit is not located in an Appendix A area. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A) apply to the stack discharge from the capture system. Furthermore, the visible particulate emission requirements of OAC rule 3745-17-07(B) do not apply to the fugitive dust emissions escaping the building since the unit is located in a non-Appendix A area.

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: P9XX

**Scenario #32:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. Initiation of installation of the unit occurred on or after February 15, 1972. The capture system was installed after the emissions unit was installed. Prior to installation of the capture system, the emissions were vented into the ambient air through non-stack building openings. The unit is not located in an Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that were captured are subject to the appropriate particulate emission limitation in OAC rule 3745-17-11 since the emissions unit has been modified to change its egress. The remaining fugitive dust emissions continue to be subject to OAC rule 3745-17-08(B); however, there are no control requirements since the emissions unit is not located in an Appendix A area. Also, the visible particulate emission requirements of OAC rule 3745-17-07(A) apply to the stack discharge from the capture system. Furthermore, the visible particulate emission requirements of OAC rule 3745-17-07(B) do not apply to the fugitive dust emissions escaping the building since the unit is located in a non-Appendix A area. The emissions unit is a “new source,” but there are no emission or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the BAT provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: P9XX

**Scenario # 33:** An emissions unit is located inside or outside a building and all its emissions have always been either controlled or uncontrolled and vented into the ambient air through a stack or stacks.

Applicable rule(s): Since there has never been any fugitive dust emitted from this emissions unit, the particulate emissions from the stack or stacks are subject to OAC rules 3745-17-11 and 3745-17-07(A).

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: PXXX

**Scenario #34:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. The fugitive dust emissions are released through non-stack openings. Initiation of installation of the unit and the capture system were begun at the same time on or after February 15, 1972. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that are captured are subject to the appropriate limitations in OAC rules 3745-17-07(A) and 3745-17-11. The emissions escaping capture are fugitive dust emissions that are subject to the RACM requirements of OAC rule 3745-17-08(B) and the appropriate visible particulate emission limitation in OAC rule 3745-17-07(B) because the emissions unit is located in an Appendix A area. Note that in this case the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the best available technology (“BAT”) provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A)(1): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: P9XX

**Scenario #35:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. The fugitive dust emissions are released through non-stack openings. Initiation of installation of the unit and the capture system were begun at the same time prior to February 15, 1972. The unit is located in a non-Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that are captured are subject to OAC rules 3745-17-07(A)(1) and 3745-17-11. The emissions escaping capture are fugitive dust emissions that have no requirements under OAC rule 3745-17-08(B) or OAC rule 3745-17-07(B) because the emissions unit is located in a non-Appendix A area.

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11: OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: P9XX

**Scenario #36:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. The fugitive dust emissions are released through non-stack openings. Initiation of installation of the unit and capture system were begun prior to February 15, 1972. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that are captured and controlled and emitted through a stack or stacks are subject to the appropriate limitation in OAC rule 3745-17-11 and the visible particulate emission limitations in OAC rule 3745-17-07(A). The emissions escaping capture are fugitive dust emissions that are subject to the RACM requirements of OAC rule 3745-17-08(B) and the appropriate visible particulate emission limitation of OAC rule 3745-17-07(B) since the emissions unit is located in a Appendix A area.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11: OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: P9XX

**Scenario #37:** An emissions unit is located inside a building. Some, but not all, of the emissions are captured and vented into the ambient air through a stack or stacks. No control equipment is employed. The fugitive dust emissions are released through non-stack openings. Initiation of installation of the unit and the capture system were begun at the same time on or after February 15, 1972. The unit is located in a non-Appendix A area of OAC rule 3745-17-08. **(See Figure IV.)**

Applicable rule(s): The particulate emissions that are captured and controlled and emitted through a stack or stacks are subject to the appropriate limitation in OAC rule 3745-17-11 and the visible particulate emission limitations in OAC rule 3745-17-07(A). The emissions escaping capture are fugitive dust emissions that have no requirements under OAC rule 3745-17-08(B) or OAC rule 3745-17-07(B) because the emissions unit is located in a non-Appendix A area. Note that in this case the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the best available technology (“BAT”) provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A)(1): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: P9XX

**Scenario # 38:** An emissions unit was installed prior to February 15, 1972, is located inside a building, and emitted only fugitive dust into the ambient air through building openings that are not stacks.

Sometime on or after February 15, 1972, building openings that are stacks were installed to vent all of the emissions into the ambient air. The emissions unit and its egress have never been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure II.)**

Applicable rule(s): This emissions unit was originally a fugitive dust source by definition because it emitted fugitive dust. When the method of egress was changed from building openings to a building stack or stacks, the emissions unit was modified and could possibly have required a PTI for the modification. Since no control equipment was involved, the definition of “fugitive dust source” in OAC rule 3745-17-01(B)(7) does not apply. Thus, the emissions unit became subject to OAC rules 3745-17-11 and 3745-17-07(A).

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: PXXX

**Scenario #39:**

An emissions unit was installed prior to February 15, 1972, is located inside a building, and emitted only fugitive dust into the ambient air through building openings that are not stacks. Sometime on or after February 15, 1972, building openings that are stacks were installed to vent a portion of the emissions into the ambient air. The emissions unit and its egress have never been subsequently modified. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure V.)**

Applicable rule(s): This emissions unit was originally a fugitive dust source by definition because it emitted fugitive dust. When the method of egress was partially changed from building openings to a building stack or stacks, the emissions unit was modified and could possibly have required a PTI for the modification. Since no control equipment was involved in the change in the method of egress, the definition of “fugitive dust source” in OAC rule 3745-17-01(B)(7) does not apply to the emissions vented through the stack or stacks. Thus, these emissions became subject to OAC rules 3745-17-11 and 3745-17-07(A). The remaining fugitive dust emissions continue to be subject to OAC rule 3745-17-08(B) and 3745-17-07(B) unless exempted by rule.

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-11(B): OAC rule 3745-17-03(B)(10)

Applicable emissions unit ID: P9XX

**Scenario #40:** An emissions unit was installed prior to February 15, 1972 and is located inside a building. The emissions unit was uncontrolled and emissions were vented to the ambient air through non-stack building openings. On or after February 15, 1972, a capture system and control equipment were installed. The capture system collects all of the emissions previously generated. The control equipment is vented directly into the ambient air through a stack or stacks. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure VI.)**

Applicable rule(s): This scenario fits the definition of “fugitive dust source” in OAC rule 3745-17-01(B)(7) in that fugitive dust was emitted prior to the installation of control equipment that was installed on or after February 15, 1972. Therefore, this emissions unit continues to be subject to the requirements of OAC rule 3745-17-08. The control equipment discharge serving the emissions unit is subject to the 0.030 gr/dscf limit or the no visible particulate emission limit, whichever is less stringent, of OAC rule 3745-17-08(B)(3) and the visible particulate emission limitation of OAC rule 3745-17-07(A) [if the gr/dscf limit is applicable], unless exempted by rule. Since all of the former fugitive dust emissions are captured by the control system, no other rules are applicable.

Compliance method(s):

for OAC rule 3745-17-07(A) [if applicable]: OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-08(B)(3): OAC rule 3745-17-03(B)(7) for the 0.030 gr/dscf limit or Method 22 of 40 CFR, Part 60, Appendix A, for the no visible PE limit

Applicable emissions unit ID: FXXX

**Scenario #41:** An emissions unit was installed on or after February 15, 1972 and is located inside a building. The emissions unit was

uncontrolled and emissions were vented to the ambient air through non-stack building openings. On or after February 15, 1972 and after installation of the emissions unit, a capture system and control equipment were installed. The capture system collects all of the emissions previously generated. The control equipment is vented directly into the ambient air through a stack or stacks. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure VI.)**

Applicable rule(s): This scenario fits the definition of “fugitive dust source” in that fugitive dust was emitted from this emissions unit prior to the installation of control equipment that was installed on or after February 15, 1972. The control equipment discharge serving the emissions unit is subject to the 0.030 gr/dscf limit or the no VE limit, whichever is applicable, of OAC rule 3745-17-08(B)(3) and to the VE limits of OAC rule 3745-17-07(A) [if the gr/dscf limit is applicable]. Since all of the former fugitive dust emissions are captured by the control system, no other rules are applicable. Note that in this case the emissions unit is also a “new source,” but there are no emission and/or control requirements from OAC Chapter 3745-31 unless initiation of installation of the unit began on or after January 1, 1974 and emission and/or control requirements are required by the best available technology (“BAT”) provisions under that Chapter.

Compliance method(s):

for OAC rule 3745-17-07(A) [if applicable]: OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-08(B)(3): OAC rule 3745-17-03(B)(7) for the 0.030 gr/dscf limit or Method 22 of 40 CFR, Part 60, Appendix A, for the no visible PE limit

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

**Scenario #42:** An emissions unit was installed on or after February 15, 1972 and is located inside a building. The emissions unit was uncontrolled and emissions were vented to the ambient air through non-stack building openings. On or after February 15, 1972 and after installation of the emissions unit, a capture system and control equipment were installed. The capture system partially collects the emissions previously generated. The control equipment is vented directly into the ambient air through a stack or stacks. The unit is located in an Appendix A area of OAC rule 3745-17-08. **(See Figure VII.)**

Applicable rule(s): This scenario fits the definition of “fugitive dust source” in that fugitive dust was emitted from this emissions unit prior to the installation of control equipment that

was installed on or after February 15, 1972, and fugitive dust continues to be emitted from the portion not controlled. The control equipment discharge serving the emissions unit is subject to the 0.030 gr/dscf limit or the no VE limit, whichever is applicable, of OAC rule 3745-17-08(B)(3) and to the VE limits of OAC rule 3745-17-07(A) [if the gr/dscf limit is applicable]. In addition, the uncaptured emissions are subject to OAC rules 3745-17-08(B) and the applicable VE limitation from OAC rule 3745-17-07(B).

Compliance method(s):

for OAC rule 3745-17-07(B): OAC rule 3745-17-03(B)(3) or (B)(4), depending on the type of fugitive dust source

for OAC rule 3745-17-08(B): OAC rule 3745-17-08©)

for OAC rule 3745-17-07(A)[if applicable]: OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-08(B)(3): OAC rule 3745-17-03(B)(7) for the 0.030 gr/dscf limit or Method 22 of 40 CFR, Part 60, Appendix A, for the no visible PE limit

for OAC rule 3745-31-05(A)(3): compliance with PTI terms and conditions

Applicable emissions unit ID: FXXX

Example: A casting shakeout is installed in 1975 at a gray iron foundry pursuant to a PTI that contains no emission limitations or control requirements. (See Figure VII.) The gray iron foundry is located in an Appendix A area, and the shakeout is located inside a building that contains a roof monitor for ventilation (i.e., a non-stack egress). As a result of the June 18, 1980 fugitive dust control requirements of OAC rule 3745-17-08, it was determined that RACM consisted of capture hooding over the shakeout with ventilation to a wet scrubber, which was installed in 1981. The capture hooding does not collect all of the fugitive dust emissions, and there are some visible PEs from the scrubber stack.

Pursuant to the definition in OAC rule 3745-17-01(B)(7), the scrubber stack discharge is subject to the 0.030 gr/dscf limit of OAC rule 3745-17-08(B)(3) or no VEs, whichever is less stringent, and to the visible PE limits in OAC rule 3745-17-07(A) [if the gr/dscf limit is applicable]. The uncaptured fugitive dust emissions remain subject to OAC rule 3745-17-08(B) and the applicable visible PE limit from OAC rule 3745-17-07(B).

**Scenario #43:** An emissions unit is located inside a building. Prior to February 15, 1972, a portion of the emissions from the unit were captured and vented to control equipment and the remaining emissions were discharged through building openings that were not stacks. After February 15, 1972, the remaining fugitive emissions were captured and vented to the same control equipment. The unit is located in an

Appendix A area of OAC rule 3745-17-08. **(See Figure VI.)**

Applicable method(s): The particulate emissions that were captured and vented to the control equipment prior to February 15, 1972 are subject to OAC rule 3745-17-11 since they were never fugitive dust emissions by definition. The fugitive emissions that were captured and vented to the same control equipment remain subject to OAC rule 3745-17-08 per the definition of "fugitive dust source." Specifically, these fugitive emissions are subject to OAC rule 3745-17-08(B)(3). Furthermore, the particulate emissions from the control equipment are subject to the visible particulate emission limitations of OAC rule 3745-17-07(A).

Compliance method(s):

for OAC rule 3745-17-07(A): OAC rule 3745-17-03(B)(1)

for OAC rule 3745-17-08(B)(3): OAC rule 3745-17-03(B)(7) for the 0.030 gr/dscf limit or Method 22 of 40 CFR, Part 60, Appendix A, for the no visible PE limit

for OAC rule 3745-17-11: OAC rule 3745-17-03(B)(10)

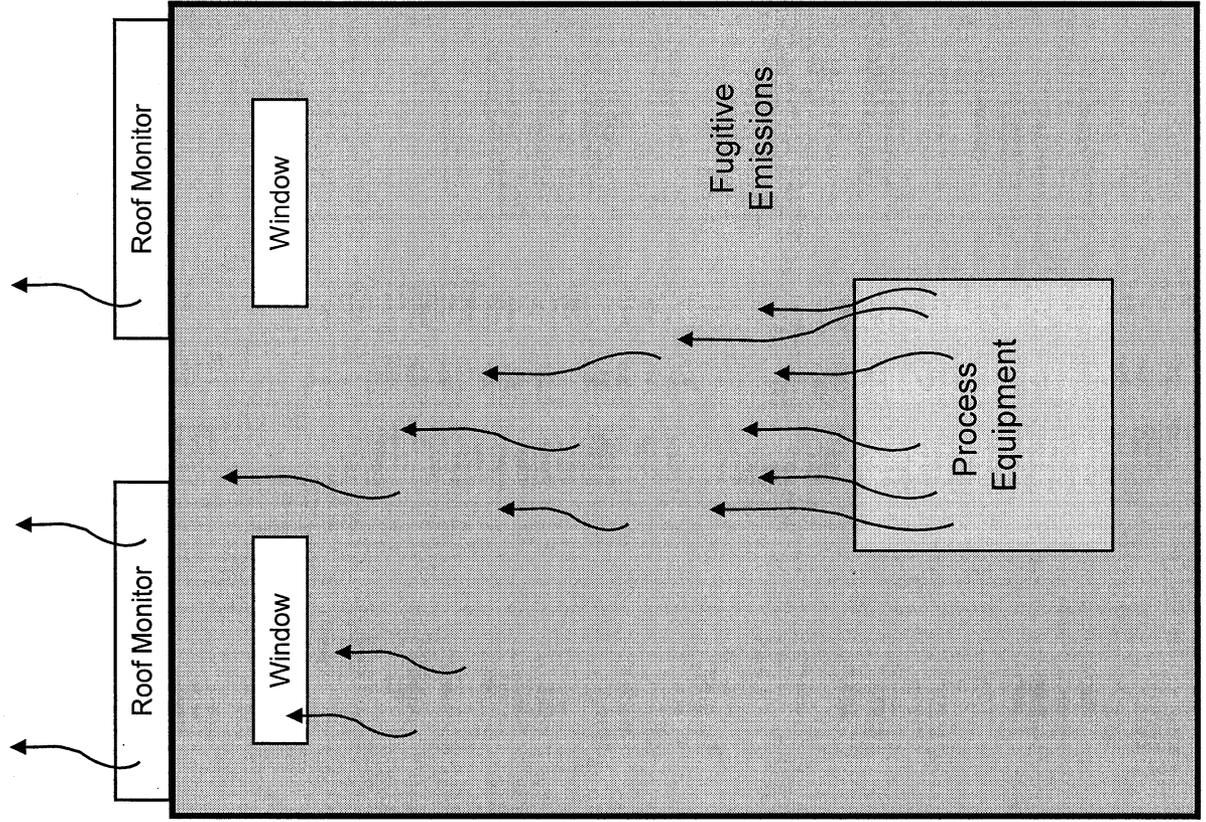
Applicable emissions unit ID: P9XX

Note that it may not be possible to isolate the particulate emissions subject to OAC rule 3745-17-08(B)(3) and those subject to OAC rule 3745-17-11 for testing. In that case, the total particulate emissions from the control equipment should be determined by testing and the compliance status established by comparing the tested value to an allowable calculated by summing (a) the particulate emission limitation from OAC rule 3745-17-11 and (b) 0.030 gr/dscf times the measured flow rate of exhaust gases from the fugitive dust source, times a conversion factor to pounds per hour.

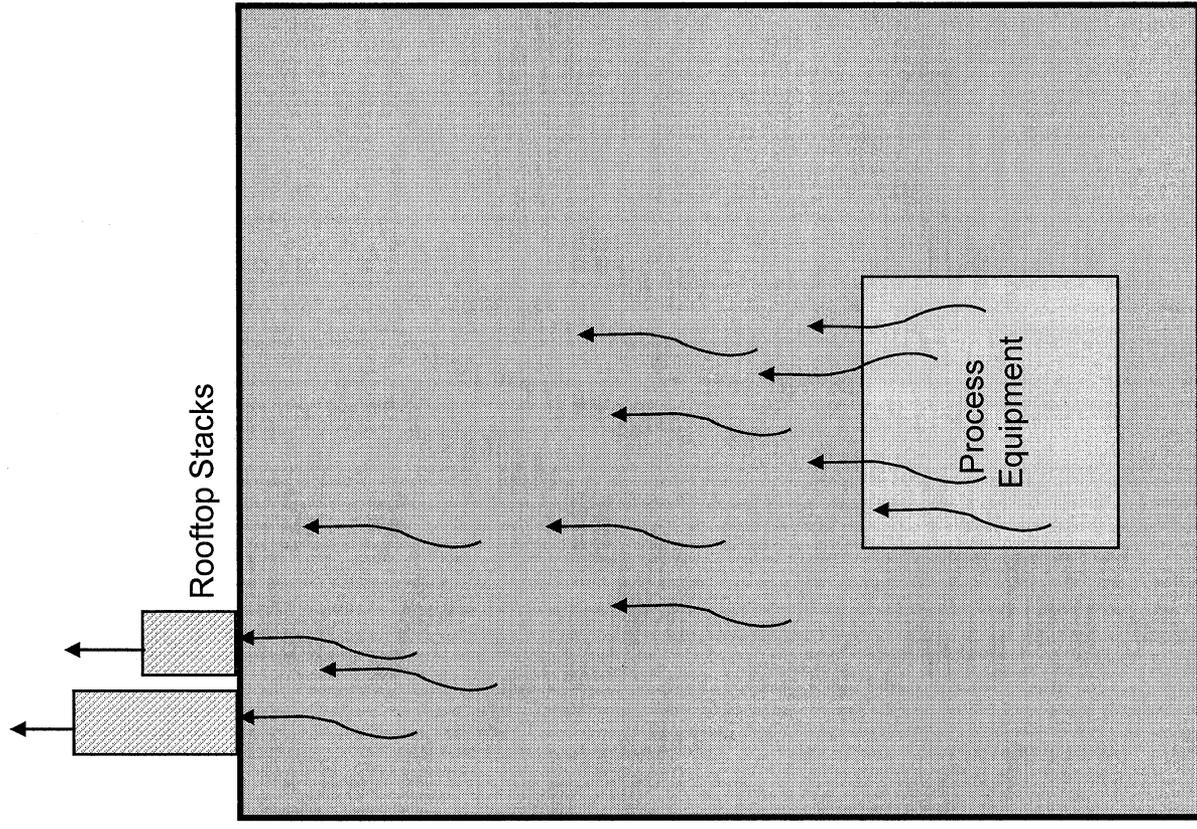
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(Issued March 6, 2009)

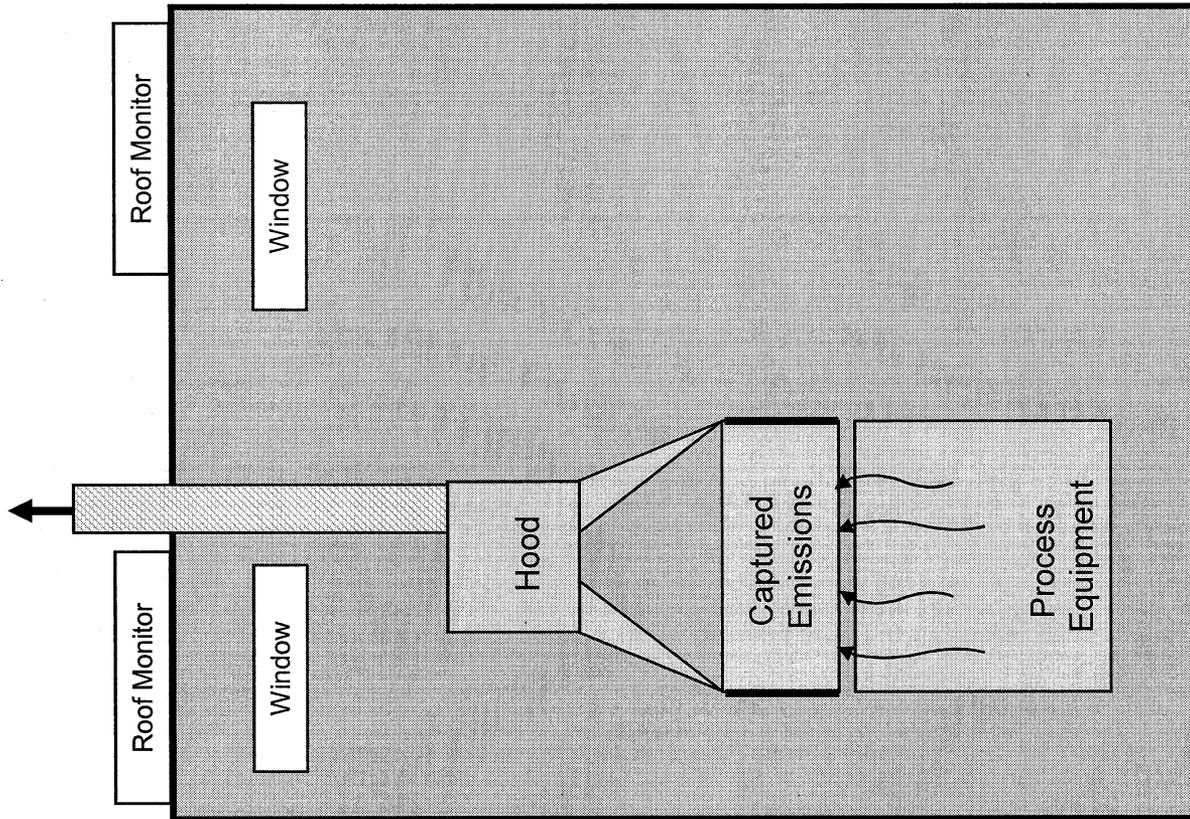
**Figure I: Equipment Configuration for Scenarios 13 - 24**



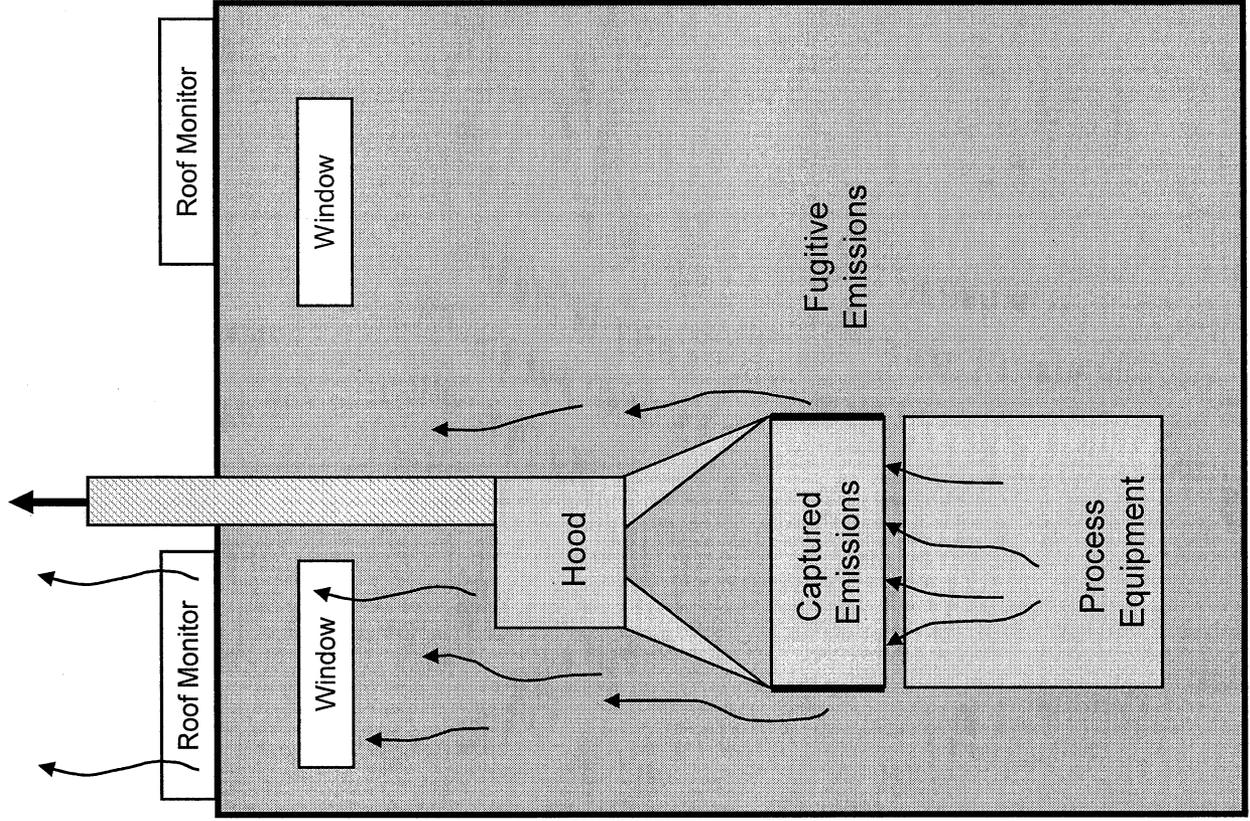
**Figure II: Equipment Configuration for Scenarios 25, 26, and 38**



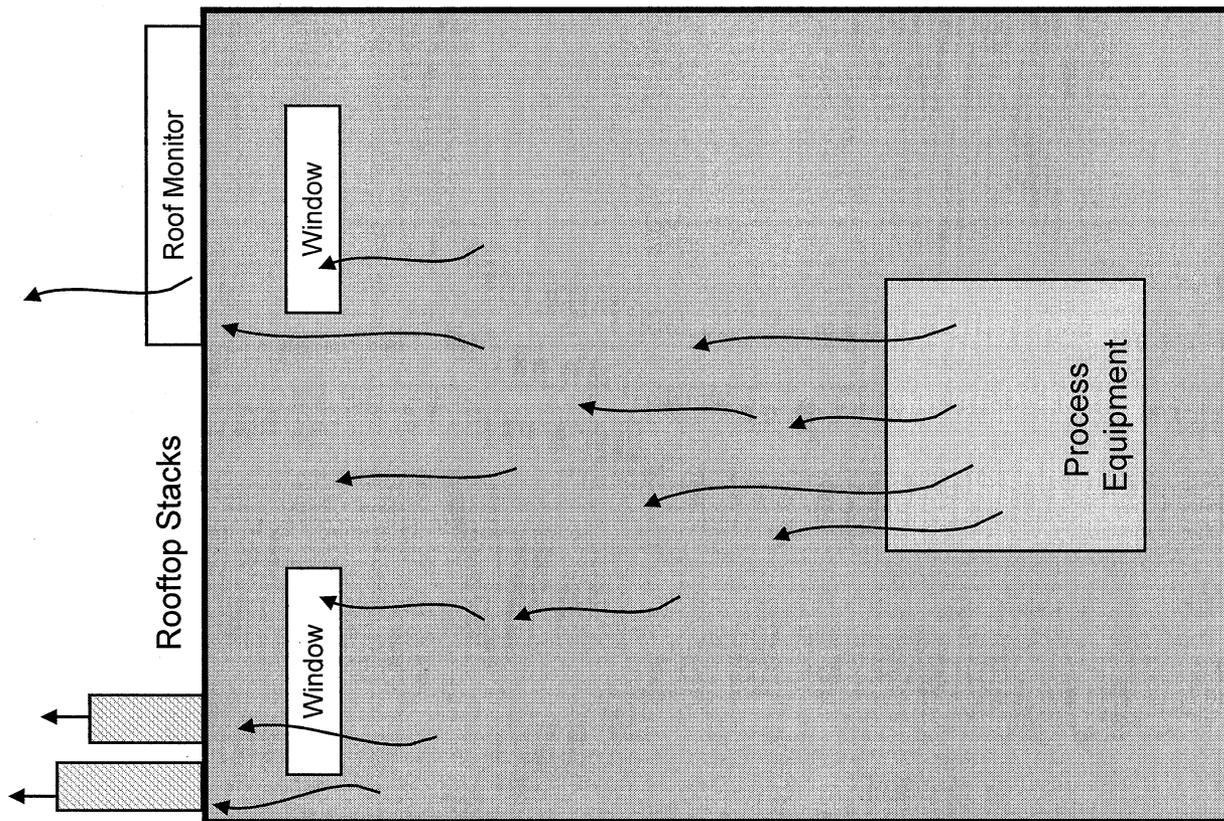
**Figure III: Equipment Configuration for Scenarios 27 and 28**



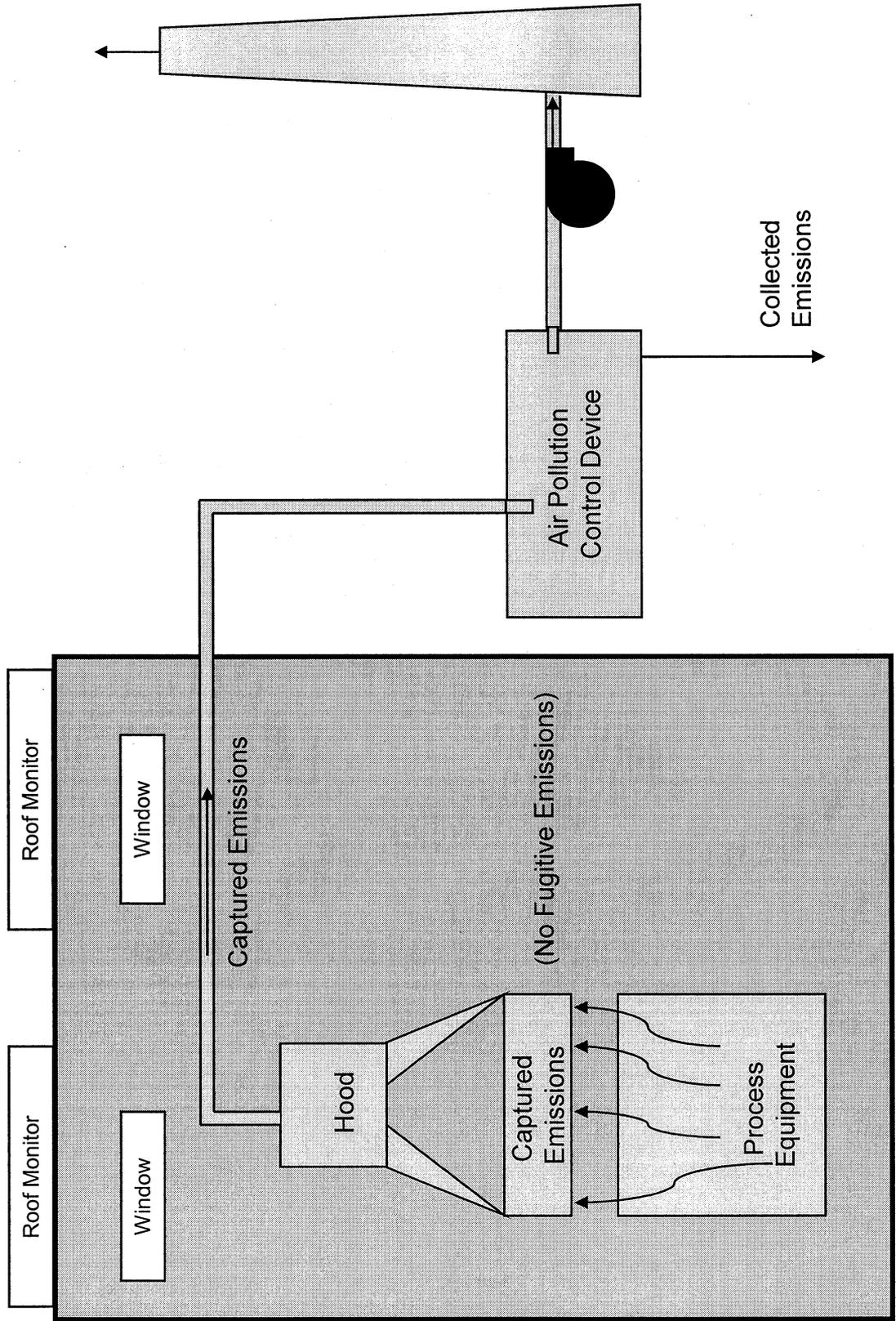
**Figure IV: Equipment Configuration for Scenarios 29 - 32 and 34 - 37**



**Figure V: Equipment Configuration for Scenario 39**



**Figure VI: Equipment Configuration for Scenarios 40, 41, and 43**



**Figure VII: Equipment Configuration for Scenario 42**

