

Notice

This Engineering Guide was recently converted to a PC format and it has not been proof read by our engineering staff. Therefore, it is subject to change at a later date.

Ohio EPA

Division of Air Pollution Control

Engineering Section

Engineering Guide #38

Question:

If the owner/operator of a new source commits to use only organic compounds such as methyl chloroform, methylene chloride and/or trichlorotrifluoroethane which are exempted from the control requirements contained in OAC Chapter 3745-21, is such a commitment sufficient to comply with the "best available technology" requirements of the Permit to Install regulations? (This question was originated by the Engineering Section of the Division of Air Pollution Control).

Answer:

No. The "best available technology" requirements of the Permit to Install regulations are not limited to criteria pollutants or precursors thereof. Any air contaminant from a new source is subject to these requirements and must be controlled if it is technically feasible and economically reasonable (i.e., cost effective) to do so. A commitment by an owner/operator of a new source to use only exempted organic compounds would not, therefore, be acceptable to the Ohio EPA unless the owner/operator has satisfactorily demonstrated that it is technically infeasible and/or economically unreasonable to control the emissions of such compounds.

OAC rule 3745-31-01 has been revised to clarify this interpretation of the regulations. In paragraph (J) of this rule, "organic compound" has been defined for purposes of Chapter 3745-31. In this definition, methyl chloroform, methylene chloride and trichlorotrifluoroethane are not exempted compounds. As a result, these compounds are subject to all of the provisions of the Permit to Install regulations, including the "best available technology" requirements.

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