

Suttman, Cheryl

From: Stanfield, Matthew <Matthew.Stanfield@toledo.oh.gov>
Sent: Friday, August 12, 2011 8:06 AM
To: Suttman, Cheryl
Cc: Granata, Karen
Subject: RE: Natural Gas Well GP calculations

Cheryl,

Here are some additional items for the gas drilling general permit. Didn't have time to check incorporation by reference for these.

Also, for P001 in yesterdays email, I meant to say that modeling may be required if qualifying for the MACT exemption from control, rather than stating that modeling is required. The terms I reviewed didn't indicate if air toxics were greater than 1 TPY. If air toxics are > 1 TPY and the unit is qualifies for the exemption from control under the MACT, then modeling would be required.

1. P002 identifies emissions greater than 10 tons/yr for and NOx, CO, VOC, however, b)(2)b. says BAT doesn't apply since emissions are less than 10 tons per year. Shouldn't ORC 3704.03(T) be cited for CO, NOx and VOC emissions?

When the 206 BAT rules are approved by USEPA, the 2001 BAT established for PE will no longer in effect, and 3745-17-11(B)(5)(a) will no longer be less stringent.

To be consistent with other OEPA permits, it's recommended that f)(2)a. specify "Emission Limitation", rather than "Opacity Limitation"

2. P003 – paragraph numbering is off beginning at b). b)(2) should be b)(1), b)(3) should be b)(2), d)(4) should be d)(1) and the rest of d) needs re-numbered, e)(8) should be e)(1), f)(11) should be f)(1)

Recommend changing f)(11)g. to "Emission Limitation", rather than "Sulfur Content Limitations for Diesel Fuel"

f)(11)h. states "The heating value of the diesel fuel may be adjusted to that provided by the supplier as part of the compliance method, however, it does not appear that heating value is used in the calculation. Should this statement be deleted from f)(11)h.

3. F001 - Do the restrictions in b)(2)h. require a OAC rule 3745-31-05(D) citation to avoid the BAT SIP requirement?

f)(1)a. and f)(1)b. formatting is off a bit. (i.e. for f)(1)a. 0.053 ton/year should align with "Emission Limitations")

Recommend using the current General Permit Roadway compliance method for f)(1)a. rather than the full AP-42 citation provided in this Draft GP.

4. T002-T008 – If the Qualifying Criteria document would state submerged fill is required for tanks, then a permit would not be required for T001-T008 due to OAC rule 3745-31-03(A)(1)(I)(iv) exemption.
5. P005 cites 40 CFR 60.18(c)(1), however, there is not an NSPS cited in the permit. Does 60.18 apply to this emissions unit, and if so, should an NSPS subpart be listed?

Is 3745-31-05(D) required to be cited to avoid BAT for VOC?

g)(8) should be g)(1)

6. Should P006 be identified as P801, since equipment leaks are assigned a P8** ID?

f)(1) is should state "emission limitations in b)"

7. In response to your below comment about scratching Method 21, the reason I scratched Method 21 from the compliance method is that Method 21 does not directly correlate to the tons/yr limitation. I think it would be good to keep Method 21, but also think that the calculation I provided is also needed in addition to Method 21 to show how to demonstrate compliance with tons/yr the emission limitation.

Thanks

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