

# Interoffice Memo



Environmental  
Protection Agency

To: (See distribution list.)

From:  Tom Kalman through  Bob Hadanbosi, Chief, DAPC

Date: 01/06/2011

Re: revised Engineering Guide #71, concerning emission reporting requirements for low-emitting emissions units

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This Engineering Guide has been reviewed and updated to address the new emission reporting requirements for sources of lead emissions. This Guide was revised in December 2010, however an oversight was found that required a subsequent revision.

Attached is a copy of the updated Guide, which will be posted on the DAPC's web site. Please provide a copy of the attached to all of your staff who maintain engineering guide notebooks.

If there are any questions concerning this Engineering Guide, please direct them to Erica Engel-Ishida.

w/ attachment

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Engineering Guide #71

**Question:** What are the requirements for reporting emissions from very low-emitting emissions units in the annual Synthetic Minor Title V and Title V fee emission reports (FER), emissions inventory summaries (EIS), and emissions statements (ES)?

**Answer:** Due to the negligible effect on the final fee amount and often cumbersome work required to collect and review emissions data for very low-emitting emissions units, the following guidance is provided. This guidance applies only to reporting non-HAP emissions for the annual FER/EIS/ES.

- (1) For any emissions unit that is not “de minimis” or exempt from permitting as described in (2) and (3) below it is necessary to report actual emissions for all non-HAP pollutants emitted if the unit has actual emissions of one ton per year or greater of any reportable pollutant during the reporting period. In addition, if combined facility-wide actual emissions of lead are 0.5 ton per year or greater, the lead emissions must be reported for every contributing emissions unit at the facility regardless of the amount of lead emitted by any one individual emissions unit.

Example: For the reporting period, Company X has determined that emissions units A, B, and C are not “de minimis” or exempt from permitting and have the following actual emissions:

|                                    | Unit A  | Unit B  | Unit C  |
|------------------------------------|---------|---------|---------|
| Organic Compounds (OC)             | 10 TPY  | 0.9 TPY | 0 TPY   |
| Sulfur Dioxide (SO <sub>2</sub> )  | 8 TPY   | 0.4 TPY | 0 TPY   |
| Nitrogen Oxides (NO <sub>x</sub> ) | 0.5 TPY | 0.8 TPY | 0 TPY   |
| Particulate Matter (PM)            | 0 TPY   | 0 TPY   | 0.9 TPY |
| Lead (Pb)                          | 0 TPY   | 0 TPY   | 0.5 TPY |

Unit A - All of the emissions for non-HAP pollutants must be reported because OC and SO<sub>2</sub> are greater than 1 TPY.

Unit B - No emissions for unit B must be reported.

Unit C - Only the lead emissions must be reported for unit C because lead was the only pollutant triggering reporting for that emissions unit.

- (2) For any emissions unit that is a “de minimis” emissions unit pursuant to OAC rule 3745-15-05, it is not necessary to determine or include actual annual emissions data for any pollutants emitted unless, beginning with calendar year 2010 emissions, lead emissions from the “de minimis” emissions unit contribute to the combined facility-wide actual emissions of 0.5 ton per year or greater. However, only the lead emissions need to be reported for each contributing “de minimis” emissions unit.

Example: Company Y's emissions unit D is "de minimis" under OAC rule 3745-15-05 because its potential to emit for each pollutant is less than 10 lbs/day. Company Y is not required to report the annual emissions from emissions unit D in the FER/EIS/ES, even if it is possible that the actual emissions of a pollutant other than lead exceeded the 1 ton per year reporting threshold described in (1). However, lead emissions only must be reported for emissions unit D if the actual combined facility-wide actual emissions of lead are 0.5 ton per year or greater.

Please note that if emissions unit D's actual emissions (rather than potential emissions) of each pollutant are less than 10 lbs/day, Company Y would still be required to track and maintain records of the actual emissions for each pollutant where the potential emissions are greater than 10 lbs/day for emissions unit D.

- (3) For any emissions unit that is exempt from permitting pursuant to OAC rule 3745-31-03(A)(1), 3745-31-03(A)(2) or 3745-31-03(A)(3), it is not necessary to determine or include the actual annual emissions data for any pollutants emitted unless<sup>i</sup>, beginning with calendar year 2010 emissions, actual lead emissions from the "permit exempt" emissions unit contribute to the combined facility-wide actual emissions of 0.5 ton per year or greater. However, only the lead emissions need to be reported for each contributing "permit exempt" emissions unit.

DAPC has determined that it will accept and process FER/EIS/ES that follow the above-mentioned guidance. Please note that all emissions from these very low-emitting emissions units must be counted in calculating the potential to emit and determining whether or not a facility is subject to the Title V permitting requirements in OAC Chapter 3745-77.

MWA/JLH/EEI

August 6, 2001

(revised on January 16, 2003, December 30, 2010, January 5, 2011)

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<sup>i</sup> U.S. EPA published revised ambient monitoring network requirements for lead on December 27, 2010 as part of implementing the 2008 revision to the lead National Ambient Air Quality Standard. Ohio EPA requests reported actual lead emissions at a facility that are greater than 0.5 ton per year beginning with 2010 emissions in order to develop and submit an approvable monitoring network plan as identified in the December, 2010 federal action. No other pollutants are required to be reported other than lead for any emissions unit where the default reporting status is overridden in order to report lead.