

Ohio EPA

Division of Air Pollution Control

Engineering Section

Engineering Guide #60

Question:

How should OEPA source numbers and PTI fees be assigned for processes (other than dry cleaners, gasoline dispensing facilities, and gasoline loading racks) that have fugitive VOC emissions which are subject to leak detection programs? (This question was submitted by Fred Klingelhafer of our Southeast District Office on December 5, 1989.)

Answer:

Processes that have fugitive VOC emissions, with or without other vented VOC gas streams, which are subject to leak detection requirements should be so indicated by assigning a P8XX number for the process line or operation. Such fugitive emissions may be subject to a leak detection program required by NSPS, NESHAP, BAT, OAC rule 3745-21-09(T), or OAC rule 3745-21-09(DD).

The fee for a PTI shall be based upon the process weight rate (pounds per hour) for each permitted source covered by the PTI.

There have been two administrative approaches for handling leak detection and repair programs for fugitive VOC emissions from processes. One approach has been the assignment of source number P8XX for a PTO that covers only the leak detection and repair programs for all process units at a facility that produce Appendix A (3745-21-09 [DD]) organic chemicals. The other approach has been the inclusion of the leak detection and repair programs within the PTI and/or PTO for the individual process line or operation.

This second approach is the one required by this guideline for the following reasons:

- (1) This approach recognizes that the process is the "source" or "emission unit," not the fugitive VOC emissions or the leak detection programs.
- (2) This approach eliminates any difficulties in

establishing a fee for a PTI which covers only the leak detection and repair programs.

- (3) This approach obviates the need to specifically exempt fugitive VOC emissions from the process description, applicable rule(s), and allowable emissions specified in the primary PTI and/or PTO for the source or emissions unit (if those fugitive VOC emissions are addressed by a totally separate permit).
- (4) This approach allows for the easy separation of leak detection programs subject to NSPS subpart VV, from leak detection programs subject to OAC rule 3745-21-09 (DD).

FK/JO/ts

March 2, 1995