EHS FACT SHEET

Air Permitting

Fuel combustion and the emission of volatile organic compounds are two of the most significant causes of air pollution in Ohio. The state has imposed regulatory requirements on the use and operation of a wide variety of combustion equipment, including boilers and emergency generators. These regulations are implemented by the Ohio Environmental Protection Agency (OEPA).

Permits, and preconstruction permits, are required by the OEPA for many activities which could result in discharges to the atmosphere. Activities requiring a permit generally involve the construction, reconstruction or alteration of a facility, or a change in its use or operation. In general, two types of permits can be required:

1. A Permit-to-Install (PTI), which is based on the review and approval of the permit application submitted; and

2. A Permit-to Operate (PTO), which identifies the specific requirements that a facility owner/operator must adhere to as a condition of continued operation of the facility. The PTO can be incorporated into the Title V permit and for minor sources a combined Permit to Install and Operate (PTIO). Many activities are subject to permitting thresholds, above which a permit may be required. Another important concept is that PTOs/PTIOs are often issued for an established range of operating conditions; the addition or modification of an emission unit at an existing facility may require a modification of an existing PTO or require a new PTI.

The Ohio State University (OSU) Columbus campus is permitted under a “Title V Permit”. Alteration of existing permits is required if there are changes to the emission sources at the facility. Even if a new source such as a boiler may not in itself be subject to a PTI; the impact of these small or exempt sources must be tracked to determine the aggregate effect of all emission units over time, and to evaluate the impact of the exempt activities on the status of the facility's existing Operating Permit. If the emissions of individual air pollutants from one of these sources exceed 1 ton per year, it must be reported to the OEPA in an annual report.

This Fact Sheet provides only a brief overview of major categories of activities at the University which are subject to air quality permitting. Operational requirements may be found in other Fact Sheets (e.g., the Emergency Generator Fact Sheet) developed by the office of Environmental Health & Safety (EHS), or in the operation and maintenance manuals for the various equipment or emission sources. EHS maintains the permits for the Columbus Campus and also for each regional campus.

If you have questions regarding permitting or regulatory requirements for equipment usage or operation, contact EHS for assistance.

RESPONSIBILITIES

Do You Need a Permit?

If you are planning a new project or construction that will involve an air contaminant source, or, if you have questions about your current activity, please contact EHS for assistance. An air contaminant source is any operation that emits

air pollution. While this covers many different types of processes, there are four rules of thumb that can often help in identifying an air contaminant source:

1. The process has a stack, dust collector or vent to the outside air. Examples: shot blasters, grinders, and storage tanks.

2. A process using paints, solvents, adhesives or inks. Examples: paint booths, printing presses, and solvent cleaning tanks.

3. A process which burns a fuel. Examples: boilers, furnaces, process heaters.

4. A process which produces visible dust or smoke or produces odors. Examples: incinerators, unpaved roadways, material handling.

The checklist at the end of this document contains a list of activities and equipment that typically require some kind of environmental permit or *prior* agency approval. Audit your facility and please submit the completed checklist to EHS at 1314 Kinnear Road, Room 106.

PROCEDURES

Training

Review of this Fact Sheet is recommended for management and project personnel who are responsible for the development and implementation of projects, which could be expected to result in the generation of air emissions. For case-by-case review of permitting applicability and specific requirements, contact EHS.

Reporting

For any emissions unit which is subject to preconstruction permitting a permit application must be filed with the OEPA prior to installation. Permit application requirements and formats vary, depending on the nature and complexity of the particular project. EHS submits emission reports to the OEPA on an annual basis and also maintains the University's Title V Permit and individual operating permits. To comply with OEPA requirements, the planned addition of any new emission unit at the University should be reported to EHS as soon as possible.

Recordkeeping

Regulations require that OSU maintain documentation of the date of construction, substantial reconstruction or alteration of emission sources. In addition, OSU is required to substantiate emission levels or thresholds for air emission sources, which are exempted from regulation. These records must be up-to-date and readily available for OEPA examination upon demand. EHS also maintains an inventory of the emission sources at the University.

NEED MORE INFORMATION?
Air Compliance and Permitting Request | Ohio EPA Air Permitting

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Potential Air Emission Source Permitting Check List

Contact Name: _____phone _____

Date: _____email _____

Building/Room No.: _____

Project Name: _____

Are any of the following processes or equipment expected to be present in the finished project or installed in the future? Please check all that apply.

☐ *Boiler or combustion unit, heat input rating _____ million British thermal units per hour (MMBtu/hr) Natural Gas No. 2 Oil Other Fuel (Please specify)

☐ *Emergency Generator, rating _____ HP _____ KW

☐ Diesel ☐ Natural Gas ☐ Other Fuel (please specify) _____

☐ *Storage Tank with capacity greater than 700 gallons – Material stored:

_____

☐ Dry-cleaning unit

☐ Solvent recycling or reclaiming unit with greater than 20 gallons capacity

☐ *Printing Press

☐ *Incinerator

☐ Solvent cold cleaner that has a liquid surface area greater than 10 square feet

☐ *Grinding and machining activities

☐ *Wood working activities

☐ Gasoline dispensing facility that has an individual maximum annual throughput greater than six thousand gallons of gasoline per year

☐ *Compressor engines, rating _____ MMBtu/hr

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☐ Any air contaminant sources at research and development operations (e.g., use of organic materials, coating and/or paint spray booth, automotive testing cell, engine testing cell, ethylene oxide sterilizer, cold cleaners, woodworking activities).

List: _____

_____

_____

☐ Any non-research and teaching activities to be conducted including laboratories or operations which provide or are intended to provide a service or product for a fee to outside entities. (e.g., the Veterinary teaching hospital provides animal care services to non-OSU entities for a fee).

Explain: _____

_____

☐ Outside vendors using OSU property. Outside vendors operating at OSU and making significant contributions (>50%) of their products or services to the operation of the OSU main campus (e.g., food services).

Explain: _____

_____

☐ Other items of interest – List below:

_____

_____

_____

_____

Note * The emissions units/activities might be exempt from permitting requirements based on size and/or quantity of emissions; certain record keeping requirements might still apply. Please contact EHS at 292-1284 to determine air permitting and/or record keeping requirements.

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