

APPENDIX B: File Review for OH NSR Program Evaluation, 2005

The file review part consisted of review of each of the following type of permits: a PSD permit with a BACT analysis, a netting permit, a nonattainment NSR permit, a permit with public interest, and a synthetic minor permit. The choice of the permits was at OEPA's discretion, and the permits chosen were:

- A. Johns Manville (PSD permit)
- B. GM Lordstown (netting permit)
- C. Chrysler - Toledo (non-attainment NSR permit)
- D. Kenmore Asphalt (public interest permit)
- E. Enamelac (synthetic minor permit)

A. Johns Manville

Johns Manville is an example of a PSD permit issued by OEPA. The state's Johns Manville file contains the source's permit application, the draft permit, the final permit, the installation certificate, and a copy of the public notice. The file also includes comments from USEPA and the subsequent resolution e-mail, a Permit Review Form which lists basic and specific information about the source including regulatory applicability, reasoning for BACT, and PTI fee calculations. Also included in the file is evidence that the permit was sent to adjacent states, and also a letter requesting rush permit status for the project.

B. GM Lordstown (permit number 02-17027)

GM Lordstown is an example of a permit issued by OEPA that relies on net emission credits to avoid PSD. The state's GM Lordstown file contains the source's permit application, the draft permit, the final permit, meeting notes, and an installation certificate. The file also contains USEPA comments and OEPA's response to these comments.

C. Chrysler - Toledo (permit number 04-01356-59)

Chrysler - Toledo is an example of a nonattainment NSR permit issued by OEPA. The state's permit file contains in chronological order: information from two pre-application meetings, e-mails regarding allowables and modeling, conference call notes where

Chrysler requested expedited processing of the application, e-mails regarding LAER limits, a 12-page e-mail from Chrysler to OEPA with Chrysler's response to questions. The file also contains the source's permit application, an internal e-mail saying that PM-10 should include condensibles and that EPA test methods 201 and 202 should be used. Also contained in the file was the public notice of the draft permit, a response to comments from a public hearing, a response to Region 5 comments, notes from a second public hearing, and the final permit.

D. Kenmore Asphalt (permit number 16-02032)

Kenmore Asphalt is an example of a permit issued by OEPA that generated significant public interest. The state's Kenmore Asphalt file contains the source's permit application, the draft permit, the final permit, modeling review, compliance test summary, and deviation reports. The file also contains modeling information, many public comments, response to comments document, and a public hearing transcript. There was a short extension to the comment period for this permit. Also contained in the file are a copy of a newspaper article on this, and the public notice of the permit which includes the production limits and also information as to where the public can access supporting information for this permitting action. The permit portion of the file was disorganized because the permit to install was mixed in with the permit to operate.

E. Enamelac (permit number 06-07474)

Enamelac is an example of a synthetic minor permit issued by OEPA. The state's Enamelac file contains the source's permit application, draft permit, and final permit. The file also contains the permit review form which includes: a description of the project, the potential to emit, notes on the proposed permit action and applicability, emissions calculations, and a hazardous air pollutants summary.