

Office of Compliance Assistance and Pollution Prevention: How Can We <u>Help</u> You?

Jeremy Scoles and Tom Cikotte Division of Environmental and Financial Assistance, OCAPP June 15, 2021











Our Division

Division of Environmental and Financial Assistance (DEFA)

Office of Financial Assistance (OFA)

Office of Compliance Assistance and Pollution Prevention (OCAPP)





Strategic Vision





Office of Financial Assistance





- Provides low interest loans to:
 - Drinking water plants
 - Wastewater treatment plants
- Restores wetlands and waterways.
- Provides free \$\$\$
 - Home septic systems
 - School lead testing





Division of Environmental and Financial Assistance





- POTW Compliance Assistance
 Unit (Andy Gall 419-373-3003)
- Office of Compliance
 Assistance and Pollution
 Prevention
- Recycling and Litter Prevention
 Grants Program
- Outreach and Customer
 Support



Environmental Compliance Assistance

Provide

- Environmental Assistance
 - Held in strict confidence and not subject to public records

Help

• Complete and Submit Permit Applications and Forms

Develop

• Record Keeping





Beyond Compliance

Fund

- Provide grant recycling
 - \$4 million annual fund

Conduct

• Free on-site compliance, recycling and waste reduction visits

Recognize

• Encouraging Environmental Excellence (E3) program



How district OCAPPers can help you



Need Help with Environmental Issues?



Resolve NOVs

- Complete paperwork
 - Permits, reports, record keeping, etc.
- Find alternative materials
- Reduce waste

Assist with every program

Free and Confidential

Ohio Environmental Protection Agency



Confidentiality

Established by law

- Air-specific compliance assistance ORC 3704.08(B)
- Confidentiality to all programs ORC 3745.017

Narrow Exceptions

- Egregious
- Clear and immediate danger
- Criminal





How district OCAPPers can help you



Need Help with Environmental Issues?



Start-Up/Expansions

- Organize and facilitate meetings
 - Explain requirements and timelines
- Work with permit writers
 - Ensure timely and complete applications



What OCAPP Cannot Do

Cannot Cite Violations

Cannot Breach Confidentiality (one exception)

We Have No Regulatory Authority



Questions In Your Mind???

What happens if OCAPP sees compliance issues at a site?

Are all OCAPP services confidential?

Can an inspector use what OCAPP finds as part of enforcement case against a facility?





Beyond Regulations





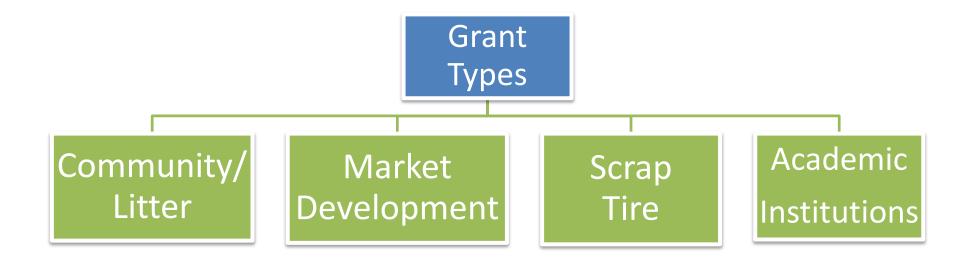
Conference, Workshops and Webinars

- Compliance Assistance Conference
- Virtual Compliance Assistance Conference
- Sustainability Conference
- In Your Community Webinars
- And More!





Recycling and Litter Prevention Grant Program





2019 Total: \$4,000,000+



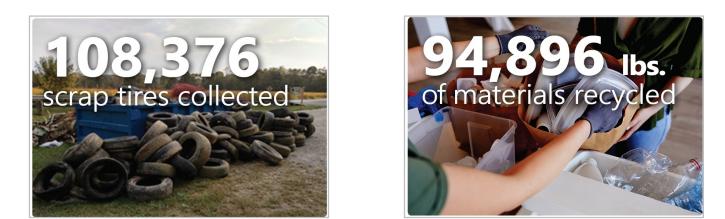


Grant Available	Term	Applicant Match	Business Eligibility	Amount Available
Community and Litter	1 year	25%	Νο	\$200,000
Market Development	2 years	100%	Yes	\$200,000
Scrap Tire	2 years	100%	Yes	\$300,000
Academic Institution (K-12 and colleges/universities)	1 year 2 years* *scrap tire projects	25% 100%* *scrap tire projects	Νο	\$100,000 \$300,000* *scrap tire projects





Recycling and Litter Prevention Money at Work











- ≻ Air
- > Water
- > Waste





Air Pollution



What needs an air permit?

4 Rules of Thumb:

- Something with a stack, vent, or dust collector
- Something that uses solvents, paints, inks, or adhesives
- Something that burns fuel
- Something that causes smoke, dust or odors



Common Things Needing Air Permits







Does everything need an air permit? **NO!**

- 1) Permanent exemptions [Ohio Administrative Code (OAC) 3745-31-03]
 - Lists 60+ types of equipment and processes that do not need air permits
 - No EPA notification required



Non-vented machining operations

Small solvent parts washers w/nonchlorinated solvent



Solvent reclaiming units < 20 gallon capacity



Lab fume hoods



Storage tanks <19,800 gallons





Air permit exemptions (cont.)

- 2. "<u>De minimis" source</u> <u>exemption</u> OAC 3745-15-05
- Emits less than 10 lbs/day of air pollutants and;
- Less than 1 ton/yr of hazardous air pollutants
- Can't be subject to federal rules
- Requires emission calculations kept on-site
- No requirement to notify Ohio EPA



Permit-by-Rule provisions - OAC 3745-31-03(A)(4)

- Emergency generators
- Plastic parts molding
- •Small crushers (<150 tons/hr)
- •Ground water/soil cleanup

- •Auto body shops
- •Gas stations
- •Gas-fired boilers
- Printing shops

Pre-defined operating conditions and recordkeeping; Simple 1-page notification required, no waiting and no fees!



Types of Air Permits

Permit to Install and Operate (PTIO)

- <u>Permit needed before installing</u> <u>and operating equipment</u>.
- 1-6 months to get, depends on complexity.
- One-time installation fee & bi-annual emissions fee thereafter.
- Allows 18 months to start construction.

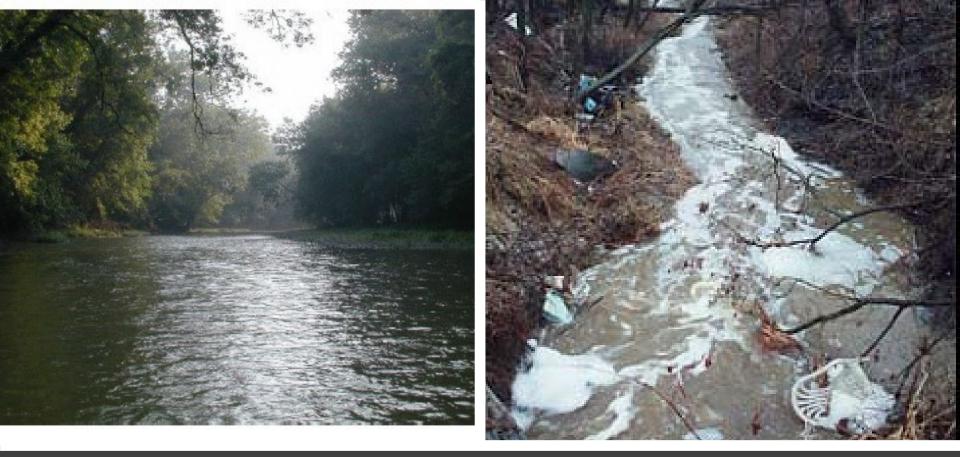


Types of Air Permits (cont.)

General PTIO

- "Canned permit" can view beforehand, available on website
- 45 day or less processing time
- Simplified application form usually no calculations!
- Certain operations and sizes only:
 - -Dry cleaning
 - -Boilers
 - -Ready-mix concrete
 - -Metal parts painting -Fugitive dust (roads and storage piles) & others





Water



3 Types of Water Discharges

- Sanitary Waste Water
- Process Waste Water
- Storm Water



Sanitary Waste Water

What to ask yourself . . .



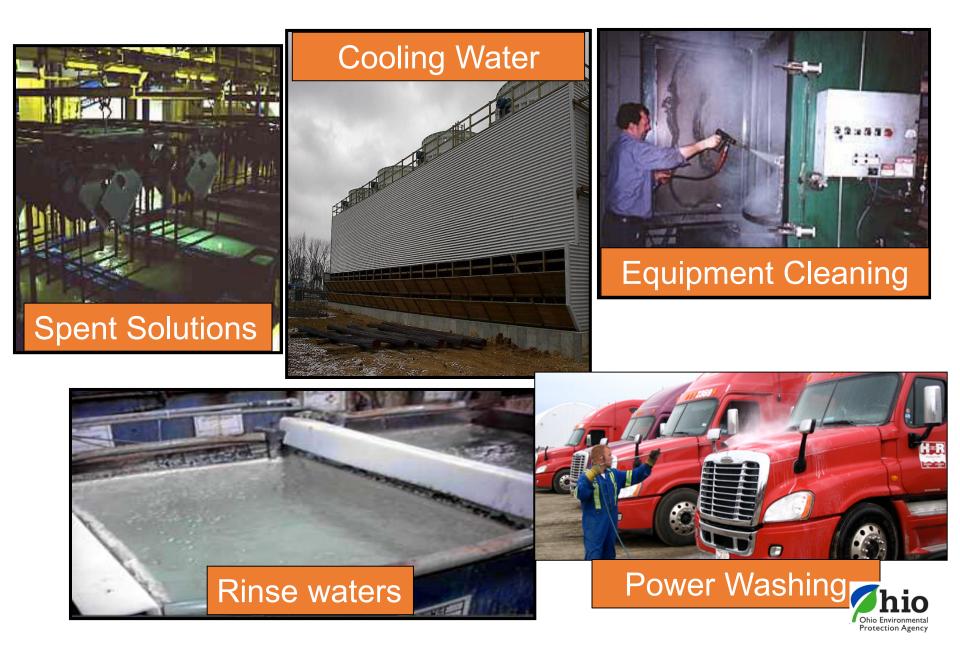
✓ Where does my sewage go?

- If you have your own on-site sewage treatment plant you need an National Pollutant Discharge Elimination System (*NPDES) permit for the discharge.
- Septic and Leach Field

(*Anyone discharging or planning to discharge pollutants to "waters of the state")



Process Waste Water



Examples of questions to ask yourself

✓ Are you generating any liquid wastes or process waste waters?

- If these are discharged from your site to waters of the state, you need a NPDES permit.
- Are you discharging waste water to a local waste water treatment plant?
 - You need permission from the waste water plant for this discharge and an indirect discharge permit from them <u>or</u> Ohio EPA's Division of Surface Water (DSW) (depends who has authorization)
- ✓ Will you treat your waste water on-site?
 - You may need a permit-to-install (PTI) from Ohio EPA's DSW











Storm Water





Examples of questions to ask yourself...

- ✓ Are you a manufacturing, recycling or transportation-related business?
- May need an industrial general storm water permit from the Division of Surface Water
- SIC Dependent



Examples of questions to ask yourself...

- ✓ Are you involved in construction activities that will disturb over one (1) acre of land?
- May need a construction storm water permit from the Division of Surface Water





Hazardous Waste "Cradle-To-Grave" Management



Generator

Transporter

T reatmentS torageD isposalF acility





Managing your waste: It's all about the trash

Don't throw any waste into the trash unless you have confirmed and demonstrated that it is NOT a hazardous waste.



Every business must determine if each type of waste is hazardous or not

If <u>non-hazardous</u> recycle or put in dumpster.

If <u>hazardous</u> recycle or store for pickup by hazardous waste transporter.



Do you generate hazardous waste?

May need a U.S. EPA identification number

- Assigned by Ohio EPA
- Must complete and submit 9029 site ID form





Common Waste Streams

- Electronics
- Used Oil & Oil Filters
- Aerosol Cans
- □ Antifreeze
- **Paint and Paint Related Waste**
- □Shop Towels & Rags
- □Fluorescent Lights
- **Used Batteries**



Used Oil & Oil Filters

Management options:

- Recycle (Used Oil)
 - Label your containers with the words "Used Oil"
 - Send to used oil recycler
 - Used oil processors/re-refiners
 - Used oil burners (not space heaters)
 - Burn your used oil in your used oil space heater
 - Send to another business to be burned in their space heater
 - Must have analysis that shows the oil meets certain specifications
 - Do not mix used oil with anything
- Recycle (Used Oil Filters)
 - Hot drain & recycle as scrap metal



LUO LARD PLOT



Universal Waste Rules

Subset of hazardous waste rules

Promote recycling by reducing regulatory requirements

7 waste streams (3 recently added)

- Mercury containing devices
- Recalled/suspended pesticide
- Aerosol cans New
- Antifreeze New
- Paint and paint related waste (inks) New
- Fluorescent bulbs (LED)
- Batteries



Universal Waste Rules

Common Elements of all Universal Wastes

- Does NOT count towards generator status
- Waste evaluation is not required
- Recycling encouraged
- No manifesting
- One-year accumulation
- Date and label container





OCAPP: 1-800-329-7518 Free and confidential hotline

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