



## Memorandum of Response

**To:** Paula Steele, Regulatory Policy Advocate  
**From:** Mandi Payton, Rules Coordinator  
**Date:** December 6, 2013  
**Re:** Memorandum of Response to CSI Review – Permits to Install New Sources (OAC Rules 3745-31-01, 3745-31-02, 3745-31-04, and 3745-31-06 to 3745-31-32)

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### Recommendations

On December 16, 2013, Ohio EPA received the Recommendations for the Division of Air Pollution Control's – Permits to Install New Sources Rule Package (OAC Rules 3745-31-01, 3745-31-02, 3745-31-04, and 3745-31-06 to 3745-31-32).

The CSI memorandum stated that:

“The BIA identifies the impacted business community as any business that is emitting air pollutants. Those businesses must apply for a permit. The time to complete an application varies depending on the type and size of facility. Applications can take a few hours or a few months to prepare and the costs range from \$100 to more than \$30,000. In addition, once the permit application is approved, installation permit fees ranging from \$50 to thousands of dollars must be paid. These fees are prescribed in ORC 3745.11 and are based on the annual amount and type of pollutants emitted from a facility. PTIO permits must be renewed every 10 years and the renewal costs are estimated to be approximately half of the initial permit costs.

Upon review of the proposed rules, BIA, response to comments and the summary of rule changes made due to stakeholder input, the CSI Office has determined that the rule satisfactorily meets the standards espoused by the CSI Office, and the purpose of the rule is justified.”

“For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.”

“Based on the above comments, the CSI Office concludes that the Ohio Environmental Protection Agency should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.”

### Next Steps

At this time, it is Ohio EPA's plan to move forward with the original filing of this rule package with the Joint Committee on Agency Rule Review.

If you have any questions please contact Mandi Payton at 614-644-2782.