John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

1/5/2015

Certified Mail

Robin Halperin
Westerly Wastewater Treatment Plant
3900 Euclid Avenue
Cleveland, OH 44115

Facility ID: 1318002480
Permit Number: P0116499
County: Cuyahoga

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
CDAQ; Pennsylvania

PUBLIC NOTICE
1/5/2015 Issuance of Draft Air Pollution Title V Permit

Westerly Wastewater Treatment Plant
5800 CLEVELAND MEMORIAL SHOREWAY NW,
CLEVELAND, OH 44102
Cuyahoga County
FACILITY DESC.: Sewage Treatment Facilities
PERMIT #: P0116499
PERMIT TYPE: Initial
PERMIT DESC: Initial Title V permit for emissions units N003 and N004 which are two identical multiple hearth sewage sludge incinerators controlled with venturi/impingement tray scrubbers.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1318002480
Facility Name:	Westerly Wastewater Treatment Plant
Facility Description:	Wastewater Treatment Plant
Facility Address:	5800 Cleveland Memorial Shoreway NW, Cleveland, OH 44102
Permit #:	P0116499, Initial

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☐ Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV ☒ NSPS Subpart MMMM

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A An initial Title V permit application is required to be submitted in accordance with the NSPS 40 CFR Part 60, Subpart MMMM rule.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	The CAM requirements apply for emissions units N003 and N004 for particulate emissions. However, the CAM requirements will no longer apply after the permittee achieves full compliance with NSPS Subpart MMMM.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.		Y	Identifying terms that are State-only enforceable.
B.2.	77-07(A)(13)		Identifying insignificant emissions units that are located at the facility.
B.3.		Y	40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)applicability
B.4.		Y	40 CFR Part 60, Subpart MMMM, Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units applicability.
B.5.		Y	40 CFR Part 61, Subpart E, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Mercury applicability.
B.6.		Y	40 CFR Part 64 Identifying emissions units subject to Compliance Assurance Monitoring (CAM) for PE emissions.

C. Emissions Unit Terms and Conditions

Key:

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
N003, N004	1.30 lbs of PE per ton of dry sludge input	OAC rule 3745-31-05(A)(3) (PTI#13-193)		N	Y	Y	N	Y	Y	Y	N	N	OR - Compliance with pressure drop range across the scrubber and restricted sludge feed rate. M&R - Continuousmonitoring and recording of the scrubber pressure drop, and sewage sludge feed rate records. Rp – Quarterly reporting of pressure drop deviations and exceedances of the sewage sludge feed rate restriction. ET- Emissions testing performed per Subpart MMMM.
N003, N004	20% opacity as a six minute avg for opacity	OAC rule 3745-17-07(A)		N	Y	Y	N	Y	Y	Y	N	N	OR - Compliance with pressure drop range across the scrubber and restricted sludge feed rate. M&R - Continuousmonitoring and recording of the scrubber pressure drop, and sewage sludge feed rate records. Rp - Quarterly reporting of pressure drop deviations and exceedances of the sewage sludge feed rate restriction. ET- Compliance determined through Reference Method 9.
N003, N004	None	OAC rule 3745-17-09		Y	N	N	N	N	N	N	N	N	ND- The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation

													established pursuant to OAC rule 3745-31-05(A)(3).
N003, N004	70.56 TPY of NO_x as a rolling, 12-month summation from units N003 and N004 combined.			N	Y	Y	N	Y	Y	Y	N	N	OR - Compliance with the restricted sludge feed rate. M&R – Monthly records of the sewage sludge feed rate and NO_x emission rate. Rp - Quarterly deviation reporting of NOx emission limit and exceedances of the sewage sludge feed rate restriction. ET- Determine NOx emissions monthly and sum monthly emissions to determine annual emissions.
N003, N004	9.0 lbs of NO_x per ton of dry sludge input.			N	Y	Y	N	Y	Y	Y	N	N	OR - Compliance with the restricted sludge feed rate. M&R – Monthly records of sewage sludge feed rate and NO_x emission rate. Rp - Quarterly deviation reporting NOx emission limit and exceedances of the sewage sludge feed rate restriction. ET- Emissions testing performed per Subpart MMMM.
N003, N004	Mercury emissions shall not exceed 3200 grams per 24 hr period.		40 CFR Part 61 Subpart E	N	Y	Y	N	Y	Y	N	N	N	M&R – analyze mercury content of the sludge annually per 40 CFR Part 61 Subpart E. Rp – Reporting of mercury emission rate exceedances. ET- Compliance determined through analysis and calculation requirements in the recordkeeping section. Emissions testing performed per Subpart MMMM.
N003, N004	Emission limits from Table 3 of Subpart MMMM	N	40 CFR Part 60 Subpart MMMM	N	Y	Y	N	Y	Y	Y	N	N	OR – Operating limits and parameters per Subpart MMMM. M&R – Inspections, monitoring and recordkeeping per Subpart MMMM. Rp – Reporting requirements per Subpart MMMM. ET- Emissions testing performed per Subpart MMMM. Compliance based on 40 CFR Part 60 Subpart MMMM.
N003,	CAM	N	40 CFR	N	Y	Y	N	Y	Y	Y	N	N	OR – Compliance with pressure drop range across the

N004			Part 64										scrubber. M&R – Continuousmonitoring and recording of the scrubber pressure drop and monitoring of the capture system upon exceedance of the indicator range. Rp - Quarterly reports of any deviations of the scrubber pressure drop range. ET- Method 5 testing in accordance with 40 CFR Part 60 Subpart MMMM.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Westerly Wastewater Treatment Plant

Facility ID:	1318002480
Permit Number:	P0116499
Permit Type:	Initial
Issued:	1/5/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Westerly Wastewater Treatment Plant

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Authorization

Facility ID:	1318002480
Facility Description:	Wastewater Treatment Plant
Application Number(s):	A0050049
Permit Number:	P0116499
Permit Description:	Initial Title V permit for emissions units N003 and N004 which are two identical multiple hearth sewage sludge incinerators controlled with venturi/impingement tray scrubbers.
Permit Type:	Initial
Issue Date:	1/5/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Westerly Wastewater Treatment Plant
5800 CLEVELAND MEMORIAL SHOREWAY NW
CLEVELAND, OH 44102

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Cleveland Division of Air Quality. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Cleveland Division of Air Quality. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Cleveland Division of Air Quality by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable

requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Cleveland Division of Air Quality unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Cleveland Division of Air Quality concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Cleveland Division of Air Quality) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Cleveland Division of Air Quality with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Cleveland Division of Air Quality as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theCleveland Division of Air Quality.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Cleveland Division of Air Quality. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Cleveland Division of Air Quality in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Cleveland Division of Air Quality must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air

Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Cleveland Division of Air Quality, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units are located at this facility:

EU ID	Operations, Property and/or Equipment Description
B016	#1 Caterpillar #3516 electrical emergency generator (PBR03577)
B017	#2 Caterpillar #3516 electrical emergency generator (PBR03578)

   Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that emissions unit. Insignificant emissions units listed above that are not subject to specific permit-to-install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

   [Authority for term: OAC rule 3745-77-07(A)(13)]

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: B016 and B017. At this time, the Ohio EPA is not accepting delegation for area sources subject to the Maximum Achievable Control Technology NESHAP (MACT) rules. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete NESHAP requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at http://www.ecfr.gov or by contacting the Cleveland Division of Air Quality (Cleveland DAQ).

   [Authority for term: 40 CFR Part 63, Subpart ZZZZ]

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart MMMM, Standards of Performance for New Stationary Sources – Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units: N003 and N004. The complete NSPS requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at http://www.ecfr.gov or by contacting the Cleveland Division of Air Quality (Cleveland DAQ).

   The permittee must comply with all applicable requirements of 40 CFR Part 60, Subpart MMMM. The permittee shall also comply with all the applicable requirements of 40 CFR Part 60, Subpart A (General Provisions). Compliance with all applicable requirements shall be achieved by March 21, 2016.

   [Authority for term: 40 CFR Part 60, Subpart MMMM]

5. The following emissions units contained in this permit are subject to 40 CFR Part 61, Subpart E, National Emissions Standards for Hazardous Air Pollutants for Mercury: N003 and N004. The complete NESHAP requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at http://www.ecfr.gov or by contacting the Cleveland Division of Air Quality (Cleveland DAQ).

The permittee must comply with all applicable requirements of 40 CFR Part 61, Subpart E. The permittee shall also comply with all the applicable requirements of 40 CFR Part 61, Subpart A (General Provisions). Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 61, Subpart E and 40 CFR Part 61, Subpart A.

[Authority for Term: 40 CFR Part 61, Subpart E]

6. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for particulate emissions for emissions units N003 and N004 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units. The CAM requirements shall no longer apply after the permittee achieves full compliance with 40 CFR Part 60, Subpart MMMM.

   [Authority for term: 40 CFR Part 64]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Multiple Hearth Incinerators: N003,N004,

EU ID	Operations, Property and/or Equipment Description
N003	Multiple hearth sewage sludge incinerator No. 1 Emissions are controlled by venturi/impingement tray scrubbers.
N004	Multiple hearth sewage sludge incinerator No. 2 Emissions are controlled by venturi/impingement tray scrubbers.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI# 13-193 issued January 5, 1976)	The particulate emissions shall not exceed 1.30 lbs/ton of dry sludge input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-09(B)	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-09(C)	These emissions units shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.

e.	OAC rule 3745-31-05(D)	See b)(2)a. and b)(2)b. below.
f.	40 CFR Part 60, Subpart MMMMTable 3 [In accordance with 40 CFR these emissions units are existing sewage sludge incineration units and are subject to the emission limitations/control measures specified in this section.]	See b)(2)f., c)(4), d)(6), e)(4), and f)(2) below. See B.4. above.
g.	40 CFR Part 61, Subpart E [In accordance with 40 CFR these emissions units incinerate or dry wastewater treatment plant sludge and are subject to the emission limitations/control measures specified in this section.]	The mercury emissions shall not exceed 3200 grams per 24-hour period. See B.5. above.
h.	40 CFR 61.01-19	Subpart A – General Provisions in 40 CFR 61.01-19.
i.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(2), d)(4), d)(5) and e)(3) below. See B.6. above. The CAM requirements shall no longer apply after the permittee achieves full compliance with 40 CFR Part 60, Subpart MMMM.

(2) Additional Terms and Conditions

a. The NO_x emissions from emissions units N003 and N004 combined, shall not exceed 70.56 TPY as a rolling, 12-month summation.

b. The NO_x emissions from this emissions unit shall not exceed 9.0 lbs/ton of dry sludge input.

c. The permittee operates two multiple hearth sewage sludge incinerators that commenced construction in March 1973 and were placed into service in 1983. Particulate emissions from each emissions unit are controlled using venturi/impingement tray scrubbers.

d. There are no applicable SO_2 emission limitations under OAC Chapter 3745-18 for this emissions unit.

e. This emissions unit is not subject to the beryllium NESHAP (40 CFR Part 61, Subpart C) because the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As defined in 40 CFR 61.31(g), "beryllium containing waste" means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart (40 CFR Part 61, Subpart C).

f. The permittee shall comply with the applicable emission limits and standards required under 40 CFR Part 60, Subpart MMMM, including the following sections:

Applicable Rule	Requirement
60.5035	Final compliance date: March 21, 2016
60.5165; and 60.5180 through 60.5181	Emission limits, and emission standards requirements
Table 3 to Subpart MMMM of Part 60	Emission limits and standards

c) Operational Restrictions

(1) The permittee is prohibited from incinerating sludge in these emissions units simultaneously.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The pressure drop (as an average over any 1-hour period) across the venturi/impingement tray scrubbers shall be continuously maintained at a value of not less than 21 inches of water at all times while the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)and 40 CFR Part 64]

(3) The maximum operating capacity of this emissions unit shall not exceed 1.79 dry tons of sludge per hour, as a monthly average basis.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operating limits required under 40 CFR Part 60, Subpart MMMM, including the following sections:

Applicable Rule	Requirement
60.5130 through 60.5160	Operator training and qualification
60.5170; 60.5175; and 60.5180	Operating limits and requirements
60.5190	Establish operating limits
Table 4 to Subpart MMMM of	Operating parameters

Part 60	

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the amount of sludge incinerated and the time periods of actual incineration for this emissions unit. Based on this data, the permittee shall determine the average hourly operating capacity, in dry tons of sludge per hour.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall record the following information for emissions units N003 and N004, combined, on a monthly basis:

a. the amount of sludge incinerated and the time periods of actual incineration for emissions units N003 and N004, combined;

b. the calculated NO_x emission rate (determined in accordance with f)(1)c. below) in tons per month for emissions units N003 and N004, combined; and

c. the rolling, 12-month summation of NO_x emissions, in tons, for emissions units N003 and N004, combined.

[Authority for term: OAC rule 3745-77-07(C)(1)

(3) The permittee shall analyze the mercury content of the sludge, in accordance with 40 CFR 61.54, at least once each calendar year and shall maintain records for each analysis that include the following:

a. the mercury content of the sludge (on a dry sludge basis, in grams per ton); and

b. the calculated maximum daily mercury emission rate (in grams) based upon the measured mercury content and a feed rate of 1.79 dry tons of sludge per hour.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall operate and maintain equipment necessary to continuously monitor and record the pressure drop across the venturi/impingement tray scrubbers. The permittee shall record the average scrubber pressure drop for each hour during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)and 40 CFR Part 64]

(5) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop range for the venturi/impingement tray scrubber.

The CAM performance indicator range as measured by the venturi/impingement tray scrubber pressure drop is specified in c)(2). When the pressure drops are outside of the indicator range specified in c)(2), corrective action (including, but not limited to, an evaluation of the emissions unit and the control device) will be required.

In addition to the above CAM performance indicator, the facility proposes the additional CAM plan obligations to address the capture system:

a. The incinerators are equipped with an emergency relief stack that opens when pressure within the incinerator exceeds safe levels and/or when critical equipment fails. The permittee will minimize emissions during these events by stopping the biosolids feed to the incinerators.

b. The permittee will verify that the emergency relief cap is properly closed before restarting the biosolids feed to the incinerator.

c. The pemittee will inspect the seal around the emergency relief cap on an annual basis.

Upon detecting an excursion of the particulate emission indicator range listed above, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart MMMM, including the following sections:

Applicable Rule	Requirement
60.5160	Site-specific documentation
60.5185	Demonstrate initial compliance with emission limits
60.5195	Initial air pollution control device inspection
60.5200	Site-specific monitoring plan

60.5205	Continuous compliance with emission limits
60.5210	Demonstrate continuous compliance with operating limits
60.5215	Annual air pollution control device inspections
60.5225	Monitoring and calibration requirements
60.5230	Required records

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 70.56 TPY NO_x emissions, as a rolling, 12-month summation, from emissions units N003 and N004 combined;

ii. 9.0 lbs of NO_x /ton of dry sludge input for this emissions unit; and

iii. the maximum operating capacity of 1.79 dry tons of sludge per hour, as a monthly average basis, for this emissions unit.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit a copy of any record to the Cleveland DAQ that documents a calculated maximum daily mercury emission rate that exceeds 3200 grams. The record shall be submitted within 30 days following the calendar month during which the calculation was performed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber was outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart MMMM, including the following sections:

Applicable Rule	Requirement
60.5085 through 60.5125	Increments of progress
60.5235	Required reports
Table 1 to Subpart MMMM of Part 60	Increments of progress and compliance schedules
Table 6 to Subpart MMMM of Part 60	Summary of reporting requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60Subpart MMMM]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
The particulate emissions shall not exceed 1.30 lbs/ton of dry sludge input.

Applicable Compliance Method:
Compliance shall be determined using U.S. EPA test methods 1-5 of 40 CFR Part 60 Appendix A. See f)(2).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3) PTI# 13-193]

b. Emission Limitation:
Visible particulate emissions from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:
The NO_x emissions from emissions units N003 and N004 combined, shall not exceed 70.56 TPY as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in d)(2) and shall be the sum of the monthly NO_x emission rates.The total, annual NO_x emissions are equal to the sum of the emissions from N003 and N004. To determine compliance with the annual emission rate for NO_x (in tons) from N003 and N004, the permittee shall multiply the NO_x emission factor (in lbsNO_x /ton of dry sludge) for each emissions unit (from the last test conducted in accordance with f)(2)) by the actual monthly amount of sludge incinerated (in dry tons per month) in each emissions unit, sum the products from both emissions units, and divide by 2,000lbs/ton. Sum the monthly emissions to determine the total annual emissions.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D)]

d. Emission Limitation:
The NO_x emissions from this emissions unit shall not exceed 9.0 lbs/ton of dry sludge input.

Applicable Compliance Method:
Compliance shall be determined using U.S. EPA test method 7E of 40 CFR Part 60 Appendix A.

[Authority for term: OAC rules 3745-77-07(C)(1)and 3745-31-05(D)]

e. Emission Limitation:
The mercury emissions shall not exceed 3200 grams per 24-hour period.

Applicable Compliance Method:
Compliance with the mercury emission limitation shall be determined by the sampling, analysis, calculation, and record keeping required in d)(3). Emission tests also may be performed in accordance with 40 CFR 61.53 to demonstrate compliance with the limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 61, Subpart E]

f. Emission Limitation:
Emission limitations from Table 3 of 40 CFR Part 60 Subpart MMMM.

Applicable Compliance Method:
Compliance with the applicable limit(s) shall be demonstrated through f)(2) below.

[Authority for term: 40 CFR Part 60 Subpart MMMM and 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable compliance and testing requirements under 40 CFR Part 60, Subpart MMMM, including the following sections:

Applicable Rule	Requirement
60.5185	Demonstrate initial compliance with emission limits and standards
60.5205	Demonstrate continuous compliance with emission limits and standards
60.5220	Performance testing, monitoring, and calibration requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60Subpart MMMM]

g) Miscellaneous Requirements

(1) None.