



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
HAMILTON COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

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Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-03931**

**DATE:** 10/24/2002

MSD - Little Miami WWTP  
Mike Heitz  
1600 Gest Street  
Cincinnati, OH 45204

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 10/24/2002  
Effective Date: 10/24/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-03931

Application Number: 14-03931  
APS Premise Number: 1431072069  
Permit Fee: **\$500**  
Name of Facility: MSD - Little Miami WWTP  
Person to Contact: Mike Heitz  
Address: 1600 Gest Street  
Cincinnati, OH 45204

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**225 Wilmer Ave  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**Administrative Modification for Fluidized Bed Incinerator for sewage sludge with venturi and impingement tray scrubbers.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

  
Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements Related to Monitoring and Record keeping Requirements

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 the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

#### 3. Records Retention Requirements

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.

#### 4. 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.

**5. Scheduled Maintenance/Malfunction Reporting**

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 appropriate Ohio EPA District Office or local air agency 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).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### **15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

#### **B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

**Pollutant**

**Tons Per Year**

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PM	17.1
PM <sub>10</sub>	5.8
SO <sub>2</sub>	97.2
OC	36.1
NO <sub>x</sub>	65.7
CO	124.8
Arsenic	0.3
Beryllium (Be)	0.004
Cadmium	0.7
Chromium	8.3
Lead	1.9
Mercury (Hg)	1.3
Nickel	9.9

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
N003 - 72 dry ton-per-day fluidized bed incinerator for sewage sludge with venturi and impingement tray scrubbers	40 Code of Federal Regulations (CFR) Part 60, Subpart O
	40 CFR Part 61 Subpart C
	40 CFR Part 61 Subpart E
	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)

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	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-17-07	1.30 lbs PM/ton dry sludge input;	10.6 lbs/day Lead, 1.9 TPY Lead;
OAC rule 3745-17-09	See term A.2.c.  10 grams Beryllium (Be)/24-hour period.  3200 grams Mercury (Hg)/24-hour period.	141.1 lbs/day Nickel, 9.9 TPY Nickel;  1.3 TPY Hg;  0.004 TPY Be.
OAC rule 3745-21-08(B)	93.6 lbs/day PM, 17.1 TPY PM;	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart O, 40 CFR Part 61, Subpart C & E, 40 CFR Part 503, OAC rule 3745-17-09, OAC rule 3745-21-08(B) and OAC rule 3745-23-06(B).
OAC rule 3745-23-06(B)	31.7lbs/day PM <sub>10</sub> , 5.8 TPY PM <sub>10</sub> ;	
40 CFR Part 503	532.8 lbs/day SO <sub>2</sub> , 97.2 TPY SO <sub>2</sub> ;	
	198.0 lbs/day OC, 36.1 TPY OC;	
	360.0 lbs/day NO <sub>x</sub> , 65.7 TPY NO <sub>x</sub> ;	
	684.0 lbs/day CO, 124.8 TPY CO;	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart O.
	1.6 lbs/day Arsenic, 0.3 TPY Arsenic;	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart O.
	4.0 lbs/day Cadmium, 0.7 TPY Cadmium;	See term B.10.
	45.7 lbs/day Chromium, 8.3 TPY Chromium;	See Section A.2.d.
		See Section A.2.e.
		See Section A.2.a.

**2. Additional Terms and Conditions**

- 2.a** This emissions unit is subject to the applicable provisions of the Standards for the use or disposal of sewage sludge as promulgated by the United States Environmental Protection Agency under 40 CFR Part 503 Subpart E, which applies to facilities that incinerate sewage sludge.
- 2.b** The emissions from this emissions unit shall not exceed the following:
- (1) The maximum allowable emissions for particulate matter shall not exceed 1.30 pounds of particulate matter per ton of dry sludge input according to 40 CFR 60.152. Compliance shall be determined using the test methods and equations specified in 40 CFR 60.154.
  - (2) Beryllium emission from this emissions unit shall not exceed 10 grams of beryllium over a 24-hour period according to 40 CFR 61.32.
  - (3) Mercury emissions from this emission unit shall not exceed 3200 grams of mercury per 24-hour period according to 40 CFR 61.52(b).
- 2.c** The permittee shall not discharge into the atmosphere any gases which exhibit twenty percent (20%) opacity or greater according to 40 CFR 60.152.
- 2.d** All new stationary carbon monoxide emission sources shall minimize carbon monoxide emissions by use of the best available control techniques and operating practices in accordance with best current technology.
- 2.e** All new stationary nitrogen oxide emission sources shall minimize nitrogen oxide emissions by use of the latest available control techniques and operating practices in accordance with best current technology.
- 2.f** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of venturi and impingement tray scrubbers and compliance with all applicable emission limitations.

**B. Operational Restrictions**

1. The combined scrubber system operating parameters shall be based on results of the most recent performance test which demonstrated compliance. The total pressure drop of the gas flow and the scrubber liquid flow rate range through the combined scrubber system shall be determined

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during the most recent performance test in which compliance is demonstrated.

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2. An exceedance of the pressure drop operating level is considered to have occurred when the pressure drop across the combined scrubber system decreases below an allowable percentage of the average scrubber pressure drop measured during the most recent performance test and as calculated in 40 CFR 60.155(a)(1) for a duration of 15 minutes or more in a calendar hour and measured only when the sludge is being charged to the incinerator (i.e., excluding downtime, start-up, and shut-down periods.)
3. The average oxygen content of the incinerator exhaust gas (measured as specified in term and condition B.5.c.) for each one-hour incinerator operation period, shall not exceed the oxygen content measured during the most recent performance test by more than 3 percent.
4. The bed of the fluidized bed incinerator shall be maintained at a temperature to be determined during a performance test in which compliance is demonstrated. The operation of the sewage sludge incinerator shall not exceed the maximum or minimum combustion temperatures (averaged over each one-hour incinerator operation period) as determined during the performance test of the sewage sludge incinerator.
5. The permittee shall install, calibrate, maintain, and operate the following monitoring devices:
  - a. A flow measuring device which can be used to continuously determine either the mass or volume of sludge charged to the incinerator. The flow measuring device shall be certified by the manufacturer to have an accuracy of plus or minus 5 percent over its operating range. The amount of sludge charged shall be recorded during all periods of operation.
  - b. A monitoring device that continuously monitors and records the pressure drop of the gas flow through the combined wet scrubber system. This device shall be certified by the manufacturer to be accurate within plus or minus 1 inch water gauge and shall be calibrated on an annual basis in accordance with the manufacturer's instructions.
  - c. An oxygen content monitoring device that continuously measures and records the oxygen content of the incinerator exhaust gas. The oxygen monitor shall be located upstream of any rabble shaft cooling air inlet into the incinerator exhaust gas stream, fan, ambient air recirculation damper, or any other source of dilution air.

The oxygen monitoring device shall be certified by the manufacturer to have a relative accuracy of plus or minus 5 percent over its operating range and shall be calibrated according to the methods prescribed by the manufacturer at least once each 24 hour operating periods.

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- d. A monitoring device that monitors the water flow rate through the scrubber so that proper operation of the scrubber can be verified.
  - e. Continuous temperature measuring devices to measure and record temperatures in the bed and outlet of the fluidized bed incinerator. Each temperature measuring device shall be certified by the manufacturer to have an accuracy of plus or minus 5 percent over its operating range.
  - f. Continuous measuring device for measuring fuel flow to the incinerator. Each fuel flow measuring device shall be certified by the manufacturer to have an accuracy of plus or minus 5 percent over its operating range.
- 6.** Little Miami WWTP shall provide access to the sludge charged so that a well-mixed representative grab sample of the sludge can be obtained. Except as provided in paragraph 40 CFR 60.153(d), this facility shall collect a representative grab sample of the sludge fed to the fluidized bed incinerator once per day. This facility shall analyze the sample for volatile solids content and dry sludge content once per day. The grab sample shall be analyzed according to the method specified under 40 CFR 60.154 (c) (2), except that step 3(b) of the method may be deleted.
- 7.** If the particulate matter emission rate measured during the performance test required under 40 CFR 60.153 (d) is less than 0.75 lb/ton, this facility shall not be required to operate continuous monitoring devices for the mass or volume of sludge charged to the incinerator, temperature of the incinerator bed, and the fuel flow to the incinerator. If exempt from continuous monitoring of the mass or volume of sludge, then the facility shall maintain daily records of the amount of sludge charged.
- 8.** Beryllium and mercury shall be monitored as specified under 40 CFR 61 Subparts C and E respectively and as outlined in Section E, Testing Requirements, terms 1-7 and Section C, term 1.
- 9.** The following quality assurance/quality control requirements shall apply:
- a. Fuel flow continuous monitoring - quarterly calibration error checks.
  - b. Temperature continuous monitoring - quarterly calibration error checks.
  - c. Rate of sludge charged to the incinerator continuous monitoring - quarterly calibration error check.
- 10.** The incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

### C. Monitoring and/or Record keeping Requirements

1. The Little Miami Wastewater Treatment Plant shall maintain the following monitoring records and retain the following information in its files for a period of not less than five (5) years:
  - a. A continuous or daily record of the pressure drop of the gas flow through the combined scrubber and the 15 minute average of the pressure drop.
  - b. A continuous or daily record of the rate of sludge charged to the incinerator according to additional term and condition B.7.
  - c. A daily record of the sludge sampling, dry sludge content, and the volatile solids content of the sludge charged to the incinerator\*.
  - d. A continuous record of the fuel flow to the incinerator\*.
  - e. A continuous record of the temperatures in the bed and outlet of the fluidized bed incinerator\*.
  - f. A continuous record of the oxygen content of the exhaust gas.
  - g. Records of any information that indicates the requirements of the 40 CFR 61 Parts C and E have been met.
  - h. Daily records identifying the maximum and minimum value of each operating parameter (e.g. temperature of the incinerator bed and outlet, combined scrubber pressure drop, scrubber liquid flow range, oxygen content of the incinerator exhaust gas) that is not to be exceeded. These levels are based on the results of the performance test during which compliance was demonstrated.
  - i. Records of monitoring equipment calibration checks.

The information shall be made available to the Director or any authorized representative of the Director, for review during normal business hours.

\* A record and report of the fuel flow, total solids and volatile solids content of the sludge charged to the incinerator, and incinerator bed temperature is not required if emissions tests of the incinerator demonstrate that particulate matter (PM) emissions are less than 0.75 pounds PM per ton of dry sludge input.

**D. Reporting Requirements**

1. This facility shall submit semi-annual exceedance reports which provide records of the operating conditions of the fluidized bed incinerator for each calendar day when:
  - a. For each period of 15 minute duration or more, the total pressure drop across the combined scrubber system is less than, by a percentage specified in 40 CFR 60.155 and as calculated in 40 CFR 60.155(a), the average scrubber pressure drop measured during the most recent performance test.
  - b. The incinerator bed temperature falls below a minimum temperature, determined during the most performance test in which compliance was demonstrated.
  - c. The oxygen content of incinerator exhaust gas exceeds the average oxygen content measured during the most recent performance test by more than three (3) percent for any 1-hour period.
2. The semi-annual exceedance report (described in Term D.1) shall include records, for each calendar day that the scrubber pressure drop, incinerator bed temperature, or oxygen content of the exhaust gas is outside the allowable limits specified above, of the following:
  - a. The scrubber pressure drop average over each 1-hour incinerator operation period.
  - b. The oxygen content in the incinerator exhaust average over each 1-hour incinerator operation period.

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- c. The temperature of the bed and outlet of the fluidized bed incinerator, averaged over each 1-hour incinerator operating period.
- d. The rate of sludge charged to the incinerator averaged over each 1-hour incinerator operating period.
- e. The incinerator fuel use averaged over each 8-hour incinerator operating period.
- f. The moisture and volatile solids content of the daily grab sample of sludge charged to the incinerator.

These semi-annual reports shall be submitted by January 30 and July 30 of each year and shall cover the previous six calendar months (January through June and July through December, respectively).

#### **E. Testing Requirements**

1. As specified in 40 CFR 60.8, each performance test shall consist of at least three separate runs at the same operating conditions. A control efficiency for a pollutant shall be based on the arithmetic mean of the results from the three runs.
2. All continuous monitoring systems and monitoring devices shall be installed, operational, and calibrated prior to conducting performance tests.
3. This permittee shall test emissions from emissions unit N003 for beryllium to comply with 40 CFR 61, Subpart C. The permittee shall conduct a performance test for beryllium within 90 days after initial startup, using Method 103 or 104 in Appendix B and described in 40 CFR 61.33 or Method 29 determine maximum emissions over a 24 hour period.
  - a. Samples shall be analyzed and emissions determined within 30 days after the emissions unit performance stack test.
  - b. If test results show that beryllium emissions do not exceed 10 grams per 24-hour period, further testing for beryllium emissions shall be done on a bi-annual basis. This future testing upon EPA approval may be performed using sludge analysis methods.
4. This permittee shall test emissions from emissions unit N003 for mercury to comply with 40 CFR 61, Subpart E by conduction:
  - a. An annual stack test using Method 101A or 104 in Appendix B and paragraph 61.54 of 40 CFR 61 or Method 29; or

- b. An annual sludge sampling test using Method 105 in Appendix B and paragraph 61.54 of 40 CFR 61.

Samples shall be taken over such a period as necessary to determine accurately the maximum emissions which will occur in a 24-hour period. Samples shall be analyzed and emissions determined within 30 days after the emissions unit performance stack test.

If test results show that mercury emissions do not exceed 1600 grams per 24-hour period, further testing for beryllium emissions shall be done on a bi-annual basis. This future testing upon EPA approval may be performed using sludge analysis methods.

5. Particulate emission tests shall be conducted in accordance with the test methods and procedures specified in 40 CFR 60.154. Beryllium and mercury emission tests shall be conducted in accordance with the test methods and procedures specified in 40 CFR 61 or Method 29. The nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), organic compounds (OCs) and metals tests shall be conducted in accordance with test methods and procedures approved by the Hamilton County Dept. of Environmental Services.

<b><u>Pollutant</u></b>	<b><u>Test Method</u></b>
Particulate Matter	40 CFR 60.154
Nitrogen Oxides	7
Carbon Monoxide	10
Sulfur Dioxide	6
Organic Compounds	25A
Beryllium, mercury	29, 101A, 103 or 104
Metals	29

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**F. Miscellaneous Requirements**

None