

Facility ID: 1318172479 Issuance type: Title V Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

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

F001: paved roadways and parking areas;
P002: vacuum pumps;
P003: sewage sludge wet wells;
P004: TCS thickening tanks;
P005: storage tanks;
Z006: atmospheric separators;
Z007: 5.5 MMBtu/hr boiler; and
Z008: 4.4 MMBtu/hr boiler.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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- [Go to Part III for Emissions Unit B003](#)
- [Go to Part III for Emissions Unit N005](#)
- [Go to Part III for Emissions Unit N006](#)
- [Go to Part III for Emissions Unit N007](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318172479 Emissions Unit ID: B002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
69.0 MMBtu/hr Babcock & Wilcox natural gas-fired boiler with low NOx burners to produce steam for process and space heating	OAC rule 3745-17-10(B)(1)	.020 lb of particulate emissions per MMBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-18-06(A)	exempt pursuant to OAC rule 3745-18-06(A)
	OAC rule 3745-31-05(A)(3) (PTI 13-2375)	See A.I.2.a below. 0.15 lb of NOx per MMBtu of actual heat input
	OAC rule 3745-31-05(A)(3) (PTI 13-00460)	See A.I.2.b and A.II.2. Particulate emissions shall not exceed 0.030 gr/dscf.
	OAC rule 3745-21-08(B) OAC rule 3745-23-06(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-10, 3745-18-06, 3745-21-08, and 3745-23-06. None, see section A.I.2.c below. None, see section A.I.2.d below.

2. Additional Terms and Conditions

- a. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit when burning only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- b. This emissions unit shall be equipped with low NOx burners.
- c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-00460.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-00460.

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II. Operational Restrictions

1. The permittee shall only burn natural gas in this emissions unit.
2. The maximum heat input from emissions units B002 and B003 combined shall not exceed 93 MMBtu/hr as a daily average.

If the permittee operates emissions units B002 and B003 at a heat input rate that exceeds the combined maximum heat input limitation for these emissions units, such exceedance shall be treated as a single exceedance of the combined limitation for B002 and B003 and not as two separate exceedances.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information for B002 and B003 combined:
 - a. the amount of natural gas burned (cu. ft./day);
 - b. the number of hours of operation (hours/day);
 - c. the total daily heat input (MMBtu/day) calculated by multiplying the natural gas usage in cu. ft./day by the assumed heat content of natural gas (1000 Btu/cu. ft.) and by 0.00001 MMBtu/Btu; and
 - d. the average hourly heat input (MMBtu/hr) calculated by dividing the value from A.III.2.c (MMBtu/day) above by A.III.2.b (hours/day).

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the combined heat input limitation for emissions units B002 and B003.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Emission Limitation -
Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method -
If required, compliance shall be determined through visible emissions 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).
2. Emission Limitation -
.020 lb of particulate emissions per MMBtu of actual heat input

Applicable Compliance Method -
Compliance may be demonstrated by dividing the AP-42, Table 1.4-2 (7/98) emission factor for natural gas combustion (1.9 lbs of particulates/MMcu.ft) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.
3. Emission Limitation -
0.15 lb of NOx per MMBtu actual heat input.

Applicable Compliance Method -
Compliance may be demonstrated by dividing the emission factor for natural gas combustion (118 lbs of NOx/MMcu.ft, based on the permittee's emission tests performed during 1997) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 7.

- 4. Emission Limitation -
Particulate emissions shall not exceed 0.030 gr/dscf.

Applicable Compliance Method -
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.
- 5. Compliance with the heat input limitation in A.II.2 shall be based on the record keeping in A.III.2.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318172479 Emissions Unit ID: B002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318172479 Emissions Unit ID: B003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
92.88 MMBtu/hr Nebraska natural gas-fired boiler with low NOx burners to produce steam for process and space heating	OAC rule 3745-17-10(B)(1)	.020 lb of particulate emissions per MMBtu of actual heat input
	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 60, Subpart Dc	Pursuant to 40 CFR Part 60 Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day (see A.III.2). exempt pursuant to OAC rule 3745-18-06(A)
	OAC rule 3745-18-06(A)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) (PTI 13-2375)	0.15 lb of NOx per MMBtu of actual heat input
		See A.I.2.b and A.II.2.
		Visible particulate emissions shall not exceed 5% opacity, as a six-minute average, except for one six minute period every hour.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10, 3745-18-06, 3745-21-08, and 3745-23-06 and 40 CFR 60, Subpart Dc.
	OAC rule 3745-21-08(B)	None, see section A.I.2.c below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.d below.

2. Additional Terms and Conditions

- a. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit when burning only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- b. This emissions unit shall be equipped with low NOx burners.
- c. The permittee has satisfied the "best available control techniques and operating practices" required

pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-2375.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-2375.

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II. Operational Restrictions

1. The permittee shall only burn natural gas in this emissions unit.
2. The maximum heat input from emissions units B002 and B003 combined shall not exceed 93 MMBtu/hr as a daily average.

If the permittee operates emissions units B002 and B003 at a heat input rate that exceeds the combined maximum heat input limitation for these emissions units, such exceedance shall be treated as a single exceedance of the combined limitation for B002 and B003 and not as two separate exceedances.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information for B002 and B003 combined:
 - a. the amount of natural gas burned (cu. ft./day);
 - b. the number of hours of operation (hours/day);
 - c. the total daily heat input (MMBtu/day) calculated by multiplying the natural gas usage in cu. ft./day by the assumed heat content of natural gas (1000 Btu/cu. ft.) and by 0.000001 MMBtu/Btu; and
 - d. the average hourly heat input (MMBtu/hr) calculated by dividing the value from A.III.2.c (MMBtu/day) above by A.III.2.b (hours/day).

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the combined heat input limitation for emissions units B002 and B003.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Emission Limitation -
Visible particulate emissions shall not exceed 5% opacity, as a six-minute average, except for one six minute period every hour.

Applicable Compliance Method -
If required, compliance shall be determined through visible emissions 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).
2. Emission Limitation -
.020 lb of particulate emissions per MMBtu of actual heat input

Applicable Compliance Method -
Compliance may be demonstrated by dividing the AP-42, Table 1.4-2 (7/98) emission factor for natural gas combustion (1.9 lbs of particulates/MMcu.ft) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests

performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

3. Emission Limitation -
0.15 lb of NOx per MMBtu actual heat input.

Applicable Compliance Method -
Compliance may be demonstrated by dividing the emission factor for natural gas combustion (127 lbs of NOx/MMcu.ft, based on the permittee's emission tests performed during 1997) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 7.
4. Compliance with the heat input limitation in A.II.2 shall be based on the record keeping in A.III.2.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1318172479 Emissions Unit ID: B003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318172479 Emissions Unit ID: N005 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. **Additional Terms and Conditions**

- a. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- (a) On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- b. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- c. There are no applicable SO2 emission limitations under OAC Chapter 3745-18 for this emissions unit.
- d. 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). See A.IV.3.

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II. Operational Restrictions

1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Cleveland DAQ.

2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions 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).

3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.
 - c. The following test method(s) shall be employed: for particulates, Method 5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.
 - e. The sludge feed rate during the test(s) shall be recorded.
 Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

 Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

 A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1318172479 Emissions Unit ID: N005 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318172479 Emissions Unit ID: N006 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09,

3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- a. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- (a) On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- b. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- c. There are no applicable SO2 emission limitations under OAC Chapter 3745-18 for this emissions unit.
- d. 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). See A.IV.3.

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1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

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1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Cleveland DAQ.

2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions 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).
3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.

- c. The following test method(s) shall be employed: for particulates, Method 5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.

- e. The sludge feed rate during the test(s) shall be recorded. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1318172479 Emissions Unit ID: N006 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1318172479 Emissions Unit ID: N007 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- a. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- (a) On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- b. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- c. There are no applicable SO2 emission limitations under OAC Chapter 3745-18 for this emissions unit.
- d. 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). See A.IV.3.

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II. Operational Restrictions

- 1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
- 2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and

c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Cleveland DAQ.
2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions 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).
3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.
 - c. The following test method(s) shall be employed: for particulates, Method 5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.
 - e. The sludge feed rate during the test(s) shall be recorded.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test (s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318172479 Emissions Unit ID: N007 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318172479 Emissions Unit ID: N008 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- a. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- (a) On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- b. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- c. There are no applicable SO2 emission limitations under OAC Chapter 3745-18 for this emissions unit.
- d. 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). See A.IV.3.

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II. Operational Restrictions

- 1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range

of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Cleveland DAQ.
2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions 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).
3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.

c. The following test method(s) shall be employed: for particulates, Method 5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.

e. The sludge feed rate during the test(s) shall be recorded. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318172479 Emissions Unit ID: N008 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None