



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

8/22/2008

Certified Mail

Robert Dominak  
Westerly Wastewater Treatment Plant  
3900 Euclid Ave  
Cleveland, OH 44115

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
Yes	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1318002480  
Permit Number: P0094399  
Permit Type: Renewal  
County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Cleveland Division of Air Quality  
Penton Media Building, 4th Floor  
1300 East 9th Street  
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

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

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





# Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Northeast Regional Sewer District (NEORS) owns and operates three major wastewater treatment plants (WWTP): Easterly, Southerly and Westerly. The District is responsible for wastewater treatment facilities and interceptor sewers in the greater Cleveland Metropolitan Area. This service area encompasses the City of Cleveland and all or portions of 59 suburban municipalities in Cuyahoga, Summit and Lorain Counties and includes a diversified group of manufacturing and processing industries. At the WWTPs, sanitary sewage and storm water are prepared for incineration by various processes. All of the sludge removed from the wastewater at Westerly is thickened, chemically conditioned, and dewatered by centrifuges. Approximately 98% of the sludge is incinerated in the two multiple hearth sewage sludge incinerators. The balance is hauled to a municipal solid waste landfill. The sources permitted are two multiple hearth sewage sludge incinerators N003 and N004.

3. Facility Emissions and Attainment Status:

The facility is located in the City of Cleveland, in Cuyahoga County. Cuyahoga County is non-attainment for Ozone and PM 2.5 emissions.

4. Source Emissions:

The Westerly WWTP is a Title V source for NOx. The potential calculations, based on operating each emissions unit for 8760 hours per year is 193.81 TPY of NOx emissions. Westerly WWTP proposes that the NOx emissions from emissions units N003 and N004 combined be limited to 85.1 TPY as a rolling 12-month summation. The emission sources N003 and N004 will not run simultaneously. Since the emissions are based on the amount of sludge incinerated and the time periods of actual incineration, hours of operation do not need to be limited for emissions on any of the units.

These restrictions will result in the following maximum emissions:

Sources	Potential NOx Emissions in TPY	Allowable NOx emissions in TPY
B001	1.14	1.14
B002	1.14	1.14
B003	0.85	0.85

B004	0.85	0.85
B009	0.85	0.85
B010	0.85	0.85
B011	1.04	1.04
B012	1.04	1.04
B013	1.61	1.61
B014	1.61	1.61
B015	1.61	1.61
Z001 (PBR emergency generator at 500 hrs/yr)	5.11	0.24
Z002 (PBR emergency generator at 500 hrs/yr)	5.11	0.24
N003 & N004 combined	171.0	85.1
<b>Total N0x emissions</b>	<b>193.81</b>	<b>98.17</b>

5. Conclusion:

The emission limits contained in these FESOP's are adequate to provide federally enforceable limitations for assuring that applicable Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>Nox</u>	<u>85.1 (N003 and N004 combined)</u>

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Westerly Wastewater Treatment Plant

Issue Date: 8/22/2008  
Permit Number: P0094399  
Permit Type: Renewal  
Permit Description: Federally Enforceable Renewal PTIO  
Facility ID: 1318002480  
Facility Location: Westerly Wastewater Treatment Plant  
5800 CLEVELAND MEMORIAL SHOREWAY NW,  
CLEVELAND, OH 44102  
Facility Description: Sewage Treatment Facilities

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, Penton Media Building, 4th Floor 1300 East 9th Street or (216)664-2297. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install and Operate**  
for  
Westerly Wastewater Treatment Plant

Facility ID: 1318002480  
Permit Number: P0094399  
Permit Type: Renewal  
Issued: 8/22/2008  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





**Air Pollution Permit-to-Install and Operate**  
for  
Westerly Wastewater Treatment Plant

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0094399

**Facility ID:** 1318002480

**Effective Date:** To be entered upon final issuance

# Authorization

Facility ID: 1318002480  
Application Number(s): A0025906  
Permit Number: P0094399  
Permit Description: Federally Enforceable Renewal PTIO  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 8/22/2008  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

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

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
Penton Media Building, 4th Floor  
1300 East 9th Street  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0094399

**Facility ID:** 1318002480

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0094399

Permit Description: Federally Enforceable Renewal PTIO

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID:**

**N003**

Company Equipment ID:

Multiple hearth incinerator No.1

Superseded Permit Number:

General Permit Category and Type:

Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0094399

**Facility ID:** 1318002480

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0094399

**Facility ID:** 1318002480

**Effective Date:** To be entered upon final issuance

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0094399

**Facility ID:** 1318002480

**Effective Date:** To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0094399

**Facility ID:** 1318002480

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. N003, Multiple hearth incinerator No.1**

**Operations, Property and/or Equipment Description:**

Multiple hearth sewage sludge incinerator

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d, b)(2)a, b)(2)b, c)(3), d)(1), d)(2), e)(1), f)(1)c, and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(PTI# 13-193 issued January 5, 1976)	The particulate emissions shall not exceed 1.30 lbs/ton of dry sludge input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-09	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V.	See b)(2)a and b)(2)b.
e.	40 CFR Part 61, Subpart E	The mercury emissions shall not exceed 3200 grams per 24-hour period.



(2) Additional Terms and Conditions

- a. The NOx emissions from emissions units N003 and N004 combined, shall not exceed 85.1 TPY as a rolling, 12-month summation.
- b. The NOx emissions from this emissions unit shall not exceed 10.85 lbs/ton of dry sludge input.
- c. The permittee operates two multiple hearth sewage sludge incinerators that commenced construction in March 1973 and were placed into service in 1983. Particulate emissions from each emissions unit are controlled using venturi/impingement tray scrubbers.
- d. There are no applicable SO2 emission limitations under OAC Chapter 3745-18 for this emissions unit.
- e. This emissions unit is not subject to the beryllium NESHAP (40 CFR Part 61, Subpart C) because the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As defined in 40 CFR 61.31(g), "beryllium containing waste" means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart (40 CFR Part 61, Subpart C).

c) Operational Restrictions

- (1) The permittee is prohibited from incinerating sludge in this emissions unit simultaneously with N004.
- (2) The pressure drop (as an average over any 1-hour period) across the venturi/impingement tray scrubbers shall be continuously maintained at a value of not less than 21 inches of water at all times while the emissions unit is in operation.
- (3) The maximum operating capacity of this emissions unit shall not exceed 1.79 dry tons of sludge per hour, as a monthly average basis.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of sludge incinerated and the time periods of actual incineration for this emissions unit. Based on this data, the permittee shall determine the average hourly operating capacity, in dry tons of sludge per hour.
- (2) The permittee shall record the following information for emissions units N003 and N004, combined, on a monthly basis:
  - a. the amount of sludge incinerated and the time periods of actual incineration for emissions units N003 and N004, combined;
  - b. the calculated NOx emission rate (determined in accordance with f)(1)c below) in tons per month for emissions units N003 and N004, combined; and



- c. the rolling, 12-month summation of NOx emissions, in tons, for emissions units N003 and N004, combined.
- (3) The permittee shall analyze the mercury content of the sludge, in accordance with 40 CFR 61.54, at least once each calendar year and shall maintain records for each analysis that include the following:
- a. the mercury content of the sludge (on a dry sludge basis, in grams per ton); and
  - b. the calculated maximum daily mercury emission rate (in grams) based upon the measured mercury content and a feed rate of 1.79 dry tons of sludge per hour.
- (4) The permittee shall operate and maintain equipment necessary to continuously monitor and record the pressure drop across the venturi/impingement tray scrubbers. The permittee shall record the average scrubber pressure drop for each hour during which the emissions unit is in operation.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - 85.1 TPY NOx emissions, as a rolling, 12-month summation, from emissions units N003 and N004 combined
    - 10.85 lbs/ton of dry sludge input for this emissions unit
    - Maximum operating capacity of 1.79 dry tons of sludge per hour, as a monthly average basis, for this emissions unit
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.



- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall submit a copy of any record to the Cleveland DAQ that documents a calculated maximum daily mercury emission rate that exceeds 3200 grams. The record shall be submitted within 30 days following the calendar month during which the calculation was performed.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
The particulate emissions shall not exceed 1.30 lbs/ton of dry sludge input.  
  
Applicable Compliance Method:  
Compliance shall be determined using U.S. EPA test methods 1-5 of 40 CFR Part 60 Appendix A. See f)(2).
    - b. Emission Limitation -  
Visible particulate emissions from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.  
  
Applicable Compliance Method -  
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). See f)(2).
    - c. Emission Limitation -  
The NO<sub>x</sub> emissions from emissions units N003 and N004 combined, shall not exceed 85.1 TPY as a rolling, 12-month summation.  
  
Applicable Compliance Method -  
Compliance shall be determined based on the recordkeeping specified in section C.2 and shall be the sum of the monthly NO<sub>x</sub> emission rates.  
The total, annual NO<sub>x</sub> emissions are equal to the sum of the emissions from N003 and N004. To determine compliance with the annual emission rate for NO<sub>x</sub> (in tons) from N003 and N004, the permittee shall multiply the NO<sub>x</sub> emission factor (in lbs NO<sub>x</sub>/ton of dry sludge) for each emissions unit (from the last test conducted in accordance with f)(2)) by the actual annual amount of sludge incinerated (in dry tons per month) in each emissions unit, sum the products from both emissions units, and divide by 2000. Sum the monthly emissions to



determine the total annual emissions.

- d. Emission Limitation -  
The NOx emissions from this emissions unit shall not exceed 10.85 lbs/ton of dry sludge input.

Applicable Compliance Method -  
Compliance shall be determined using U.S. EPA test method 7E of 40 CFR Part 60 Appendix A. See f)(2).

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

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

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration of this permit.

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate, opacity, and NOx emissions.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1-5 of 40 CFR Part 60 Appendix A for particulate emissions, Method 7E of 40 CFR Part 60 Appendix A for NOx emissions, and Method 9 for opacity. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at no less than 90% of its maximum permitted capacity unless otherwise specified or approved by the Cleveland DAQ.

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



State of Ohio Environmental Protection Agency  
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**Draft Permit-to-Install and Operate**

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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.

g) Miscellaneous Requirements

(1) None.