Facility Name:Hadronics, Inc.
Application Number: 14-4583
Date: Draft Permit (Date will be entered upon final issuance)

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Ohio EPA Source Number			

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Hadronics, Inc** located in **Hamilton** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P005	Hard Chrome Electroplating Tank #1 Controlled with a Composite Mesh Pad	The use of a composite mesh pad and compliance with 40 CFR Part 63 Subpart N	3745-31-05 40 CFR Part 63 Subpart N 3745-17-11* 3745-17-07(A)* 3745-15-07 *The emission limitation established by this rule is less stringent than those established by OAC rule 3745-31-05(BAT).	

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Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Ohio EPA Source Number			
3745-31-05			
Permit Allowable Mass Emissions and/or Control/Usage Requirements	See General Terms		
0.0015 TPY of Total Chromium			
0.015 mg/dscm of Total Chromium			
Less stringent that OAC 3745-31-05 and MACT.			
Less stringent than OAC			

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Chromium	0.0015

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Department of Environmental Services, Air Quality Programs, 1632 Central Parkway, Cincinnati, Ohio 45210.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Department of Environmental Services, Air Quality Programs, 1632 Central Parkway, Cincinnati, Ohio 45210.**
Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 mg/dscm.

2. Visible particulate emissions shall not exceed 0% percent opacity.

B. Operational Restrictions

1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

2. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Hamilton County Dept. of

Environmental Services, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the Hamilton County Dept. of Environmental Services may require that the permittee make changes to the operation and maintenance plan if that plan:

a. Does not address a malfunction that has occurred;

b. Fails to provide for the operation of the emissions unit, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or

c. Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

4. The permittee shall prepare an operation and maintenance plan to be implemented no later than the startup of the emissions unit. The plan shall be incorporated by reference into the Title V permit and include the following elements:

a. the plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment;

b. the O/M plan shall incorporate the following work practice standards;

i. vsually inspect the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural

integrity of the device;

ii. visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist;

iii. visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks;

iv. perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations;

c. if a pitot tube is used for monitoring, the O/M plan shall incorporate the following work practice standards to be performed at least once per quarter:

i. backflush with water, or remove from the duct and rinse with fresh water;

ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained; and

iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued;

d. the plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;

e. the plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions;

f. if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the

time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs;

g. if actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Hamilton County Dept. of Environmental Services;

h. the permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Hamilton County Dept. of Environmental Services for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Hamilton County Dept. of Environmental Services for a period of five years after each revision to the plan; and

i. the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

C. Monitoring/Recordkeeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance

a. During the initial performance test, the permittee shall determine the outlet chromium concentration

using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.

b. the permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept ±1 inch of water column from this value as the compliant range.

c. On and after the date on which the initial performance test is required to be completed under §63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emissions unit is operating. To be in compliance, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

3. The permittee also shall maintain the following records:

a. inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a

checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;

b. records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment;

c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;

d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;

e. other records, which may take the form of checklists, necessary to demonstrate consistence with the provisions of the operation and maintenance plan;

f. test reports documenting results of all performance tests;

g. all measurements as may be necessary to determine the conditions of performance tests;

h. records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;

i. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment;

j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other

than malfunction of the process, add-on air pollution control device, or monitoring equipment;

k. the total process operating time of the emissions unit during the reporting period;

l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and §63.9 and §63.10 of 40 CFR Part 63, subpart A.

4. All records shall be maintained for a period of five years.

D. Reporting Requirements

1. The permittee shall fulfill all reporting requirement as outlined in 40 CFR part 63 subpart A. These reports shall be made to the Hamilton County Dept. of Environmental Services and shall be sent by U.S. mail, fax or by another courier.

   a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.

   b. Submittals sent by other methods shall be received by the Hamilton County Dept. of Environmental Services on or before the specified date.

2. The permittee shall submit to the Hamilton County Dept. of Environmental Services a notification report of the date when construction was commenced. This report shall be submitted no later than 30 calendar days after such date.

3. The permittee shall submit to the Hamilton County Dept. of Environmental Services a notification report of the actual date of startup of the emissions unit. This report shall be submitted no later than 30 calendar days after such date.

4. The permittee shall submit a Notification of Compliance Status to the Hamilton County Dept. of Environmental Services 90 days after the performance test is

completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:

a. the applicable emission limitations and the methods there were used to determine compliance with this limitation;

b. if a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common add-on air pollution control device;

c. the type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device. (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement);

d. for each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;

e. the methods that will be used to determine continuous compliance;

f. a description of the air pollution control technique used for each emission point;

g. a statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards; and,

h. a statement by the owner or operator as to whether

the emissions unit is in compliance.

5. The permittee shall report to the Hamilton County Dept. of Environmental Services the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status report required by this section.

6. The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Hamilton County Dept. of Environmental Services to document the ongoing compliance status of the emissions unit. This report shall include the following:

   a. the company name and address of the emissions unit;

   b. an identification of the operating parameter that is monitored for compliance determination;

   c. the relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section;

   d. the beginning and ending dates of the reporting period;

   e. the total operating time of the emissions unit during the reporting period;

   f. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to

process upsets, control equipment malfunctions, other known causes, and unknown causes;

g. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;

h. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;

i. a description of any changes in monitoring, processes, or controls since the last reporting period;

j. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and,

k. the date of the report.

7. The permittee shall submit semiannual reports if the following conditions are met:

a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and

b. the total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.

8. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.

9. The Hamilton County Dept. of Environmental Services may

determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.

10. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site if all of the following conditions are met:

    a. for one full year (e.g., two semiannual or four quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit;

    b. the permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit; and,

    c. the Hamilton County Dept. of Environmental Services does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:

        i. the permittee notifies the Hamilton County Dept. of Environmental Services in writing of its intentions to make such a change. The local air agency or district office may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission

limitations and work practice standards. If the permittee's request is disapproved, the Hamilton County Dept. of Environmental Services will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based.

in the absence of a notice of disapproval within 45 days, approval is automatically granted; and

ii. if monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.

11. The permittee shall submit required reports in the following manner:

a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Environmental Services; and,

b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Environmental Services.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

12. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the Hamilton County Dept. of Environmental Services:

    a. A brief description of the affected emissions unit and the components to be replaced.

    b. A brief description of the present and proposed emission control technique.

    c. An estimate of the fixed capital cost of the replacments and of construction a comparable entirely new emissions unit.

    d. The estimated life of the affected emissions unit after the replacements.

    e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the Hamilton County Dept. of Environmental Services satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.

E. Compliance Methods/Testing Requirements

1. Performance test results shall be documented in complete test reports that contain the following information:

   a. a brief process description;

   b. sampling location description(s);

   c. a description of sampling and analytical procedures and any modifications to standard procedures;

   d. test results;

   e. quality assurance procedures and results;

   f. records of operating conditions during testing, preparation of standards, and calibration procedures;

   g. raw data sheets for field sampling and field and laboratory analyses;

   h. documentation of calculations; and,

   i. Any other information required by the test method.

   The test plan shall be made available to the Hamilton County Dept. of Environmental Services prior to testing, if requested.

   The results of tests conducted prior to December 1991, in which Method 306A was used to demonstrate the performance of a control technique, are not acceptable.

2. If the permittee conducts performance testing at startup to obtain a permit to install, the results of such testing may be used to demonstrate compliance if:

   a. the test methods and procedures identified in this permit were used during the performance test;

   b. the performance test was conducted under representative operating conditions;

c. the performance test report contains the elements of paragraph 1.a. through 1.i. in this section; and,

d. the permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

3. The permittee shall use the following test methods to conduct an initial performance test:

a. Method 306 or Method 306A, "Determination of Chromium Emissions From Decorative and Hard Chromium Electroplating and Anodizing Operations" shall be used to determine the chromium concentration from hard or decorative chromium electroplating tanks or chromium anodizing tanks.

i. The sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.7 dscm (60 dscf), respectively.

ii. Methods 306 and 306A allow the measurement of either total chromium or hexavalent chromium emissions. Emissions units using chromic acid baths can demonstrate compliance with the emission limits by measuring either the total chromium or hexavalent chromium concentration. Hence, the hexavalent chromium concentration measured by these methods is equal to the total chromium concentration for the affected operations; and,

b. The California Air Resources Board (CARB) Method 425 may be used to determine the chromium concentration from hard and decorative chromium electroplating tanks and chromium anodizing tanks if the following conditions are met:

i. if a colorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33-66 micrograms of catch in the sampling train;

ii. if an Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography (with a Post-column Reactor (ICPCR) analyses) is used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR); and,

iii. a minimum of three separate runs must be conducted. The other requirements of §63.7 of 40 CFR Part 63, subpart A must also be met.

4. The performance test shall be conducted within 180 days after the initial startup of the emissions unit.

5. Compliance with the visible emissions limitation in Section A.2. of these terms and conditions shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(1).