



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

2/3/2010

Certified Mail

Heather Klesch  
Clow Water Systems Company  
P. O. Box 6001  
2266 South Sixth Street  
Coshocton, OH 43812-6001

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0616010006  
Permit Number: P0105615  
Permit Type: Administrative Modification  
County: Coshocton

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov>.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA DAPC, Southeast District Office

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





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install  
for  
Clow Water Systems Company**

Facility ID: 0616010006  
Permit Number: P0105615  
Permit Type: Administrative Modification  
Issued: 2/3/2010  
Effective: 2/3/2010





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
for  
Clow Water Systems Company

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105615  
**Facility ID:** 0616010006  
**Effective Date:** 2/3/2010

# Authorization

Facility ID: 0616010006  
Facility Description: Ductile Iron Pipe and Fittings.  
Application Number(s): M0000603  
Permit Number: P0105615  
Permit Description: Administrative modification of PTI #06-07432 issued on 7/8/09 for emissions unit P901 to correct the SO2 emissions limitations based on recent compliance test results.  
Permit Type: Administrative Modification  
Permit Fee: \$625.00  
Issue Date: 2/3/2010  
Effective Date: 2/3/2010

This document constitutes issuance to:

Clow Water Systems Company  
P. O. Box 6001  
2266 South Sixth Street  
Coshocton (Tuscarawas Twp, OH 43812-6001

Of a Permit-to-Install 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:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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

**Final Permit-to-Install**  
**Permit Number:** P0105615  
**Facility ID:** 0616010006  
**Effective Date:** 2/3/2010

## Authorization (continued)

Permit Number: P0105615  
 Permit Description: Administrative modification of PTI #06-07432 issued on 7/8/09 for emissions unit P901 to correct the SO2 emissions limitations based on recent compliance test results.

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

<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	CUPOLA
Superseded Permit Number:	06-07432
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105615  
**Facility ID:** 0616010006  
**Effective Date:** 2/3/2010

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



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. **Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. **Compliance Requirements**

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- 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 state-only required 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 Ohio EPA DAPC, Southeast District Office. 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



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## **10. Applicability**

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

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. 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.

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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105615  
**Facility ID:** 0616010006  
**Effective Date:** 2/3/2010

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105615  
**Facility ID:** 0616010006  
**Effective Date:** 2/3/2010

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105615  
**Facility ID:** 0616010006  
**Effective Date:** 2/3/2010

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



**1. P901, CUPOLA**

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

85 TPH cupola furnace for molten iron production controlled by an afterburner and wet scrubber; this unit was installed in 1949 so an installation permit was not required; however, Chapter 31 major modifications of this emissions unit occurred in 1989 and 1998 that increased the production rate and resulted in emissions increases above PSD significance levels so this permit imposes the PSD and BAT requirements applicable at the time of the modification; the permittee has also requested federally-enforceable operating restrictions on throughput of molten iron and hours of operation to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS); administrative modification of PTI #06-07432 issued on July 8, 2009 for emissions unit P901 to correct the SO<sub>2</sub> emissions limitations based on recent compliance test results

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	<p>Emissions of particulate matter (PM) from the stack shall not exceed 0.078 pound per ton of molten iron produced; 6.63 pounds per hour.</p> <p>Emissions of particulate matter less than 10 microns (PM<sub>10</sub>) from the stack shall not exceed 5.44 pounds per hour.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions from the stack shall not exceed 0.029 pound per ton of molten iron produced; 2.47 pounds per hour.</p> <p>Carbon monoxide (CO) emissions from the stack shall not exceed 0.51 pounds per ton of molten iron produced; 43.35 pounds per hour.</p> <p>Volatile organic compounds (VOC) emissions from the stack shall not exceed 22.95 pounds per hour.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Nitrogen oxides (NO<sub>x</sub>) emissions from the stack shall not exceed 37.40 pounds per hour.</p> <p>Visible particulate emissions (PE) of fugitive dust shall not exceed 20% opacity, as a 3-minute average.</p> <p>Best available control measures shall be implemented that are sufficient to minimize or eliminate emissions of fugitive dust.</p> <p>See b)(2)a. and b. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC 3745-31-05(D), OAC rule 3745-31-10 through 20, and OAC rule 3745-21-08(D).</p>
b.	OAC rule 3745-31-10 through -20	<p>PM<sub>10</sub> emissions from the stack shall not exceed 0.064 pound per ton of molten iron produced.</p> <p>PM<sub>10</sub> emissions shall not exceed 10.27 tons based on a rolling, 12-month summation.</p> <p>VOC emissions from the stack shall not exceed 0.27 pound per ton of molten iron produced.</p> <p>VOC emissions shall not exceed 37.13 tons based on a rolling, 12-month summation.</p> <p>NO<sub>x</sub> emissions from the stack shall not exceed 0.44 pound per ton of molten iron produced.</p> <p>NO<sub>x</sub> emissions shall not exceed 60.50 tons based on a rolling, 12-month summation.</p> <p>See b)(2)c.-e. below.</p>
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	PM emissions shall not exceed 12.63 tons based on a rolling, 12-month



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	requirements and to ensure compliance with the NAAQS)	summation.  SO <sub>2</sub> emissions shall not exceed 3.99 tons based on a rolling, 12-month summation.  CO emissions shall not exceed 70.12 tons based on a rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-21-08(D)	See b)(2)d. below.
f.	OAC rule 3745-17-08	See b)(2)f. below.
g.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	Director's Final Findings and Orders issued December 30, 2004, Section V.2.	See b)(2)g.-i. below.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on the cupola furnace for the purpose of minimizing or eliminating emissions of fugitive dust. In accordance with the permittee's application, the permittee shall maintain enclosures to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- c. As part of the BACT determination for PM<sub>10</sub>, the cupola emissions must be vented to an operating scrubber system with a control efficiency of at least 99.4%. Compliance with the control efficiency requirement shall be demonstrated by compliance with the short term PM<sub>10</sub> emission limits in b)(1)a.
- d. As part of the BACT determination for VOC, the cupola emissions must be vented to an afterburner. VOC and CO gases generated during the operation of this emission unit shall be burned at 1300 degrees Fahrenheit for 0.3 seconds or greater in a direct-flame afterburner or equivalent device equipped with an



indicating pyrometer which is positioned in the working area at the operator's eye level.

- e. As part of the BACT determination for NO<sub>x</sub>, the cupola emissions must be vented to an afterburner equipped with low NO<sub>x</sub> burners.
- f. This facility is not located in an area identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions are exempt from the visible particulate emission limitation and the reasonably available control measures established in OAC rule 3745-17-07 (B) and OAC rule 3745-17-08 (B), respectively.
- g. The permittee shall maintain and implement the preventive maintenance and malfunction abatement plan (PMMAP) required by Order #2 of the Director's Final Findings and Orders issued December 30, 2004 that was received by Ohio EPA on March 10, 2005, as well as any modifications of the PMMAP that have been approved by Ohio EPA. The PMMAP for the afterburner and wet scrubber systems is designed to prevent, detect, and correct malfunctions or equipment failures which could result in emissions exceeding any applicable law.
- h. The permittee shall maintain operation and maintenance records, as required by the PMMAP, to demonstrate that the PMMAP is fully implemented.
- i. Modifications to the PMMAP shall be prepared in accordance with applicable Ohio EPA guidance. The PMMAP shall be periodically updated and revised as necessary with prior approval from SEDO. If SEDO does not approve or deny a modification to the PMMAP within 30 days of receipt of the modified PMMAP, the permittee is authorized to conduct the activities described in the modified PMMAP provided the modified PMMAP complies with applicable Ohio EPA guidance and OAC rule 3745-15-06.

c) Operational Restrictions

- (1) The maximum production rate for this emissions unit shall not exceed 275,000 tons of molten iron produced based on a rolling, 12-month summation; and
- (2) This emissions unit shall operate for no more than 20 hours per day.
- (3) The cupola capture and collection system shall meet accepted engineering standards, such as those published by the American Conference of Governmental Industrial Hygienists, and be designed such that emissions from the cupola are conveyed under negative pressure through the two wet scrubbers.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop, in inches of water, across the wet scrubber system (venturi scrubber, ring jet scrubber, packed bed and demister) during operation of this emissions unit, including periods of startup and shutdown, per the PMMAP. The permittee shall record the 3-hour average static pressure drop, in inches of water, across the scrubber. The monitoring equipment shall be installed, calibrated, operated, and



maintained in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

For each continuous parameter monitoring system (CPMS) for pressure drop, the permittee shall: (i) locate the pressure sensor in or as close as possible to a position that provides a representative measurement of the pressure drop and that minimizes or eliminates pulsating pressure, vibration, and internal and external corrosion; (ii) use a gauge with a minimum measurement sensitivity of 0.5 inch of water or a transducer with a minimum measurement sensitivity of 1 percent of the pressure range; (iii) check the pressure tap for pluggage daily; (iv) using a manometer, check gauge calibration quarterly and transducer calibration monthly; (v) conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range, or install a new pressure sensor; and (vi) at least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.

The wet scrubbers for the cupola will be operated so that the 3-hour average total pressure drop across the entire control system (venturi scrubber, ring jet scrubber, packed bed and demister) does not fall below the minimum levels established during the initial or subsequent successful stack test (which shall not be less than 48 inches of water column).

When determining three-hour average static pressure drop the following periods shall not be included: (1) the first 15 minutes of start up at the beginning of the operating day, (2) the last 30 minutes during cupola "melt out" at the end of the operating day, and (3) periods when the cupola is off-blast and for 15 minutes after going on-blast from an off-blast condition.

*Off-blast* means those periods of cupola operation when the cupola is not actively being used to produce molten metal. Off-blast conditions include cupola startup when air is introduced to the cupola to preheat the sand bed and other cupola startup procedures as defined in the startup, shutdown, and malfunction plan. Off-blast conditions also include idling conditions when the blast air is turned off or down to the point that the cupola does not produce additional molten metal.

*On-blast* means those periods of cupola operation when combustion (blast) air is introduced to the cupola furnace and the furnace is capable of producing molten metal. On-blast conditions are characterized by both blast air introduction and molten metal production.

- (2) The permittee shall install, operate and maintain a continuous temperature monitor and recorder which measures and records the exhaust gas temperature when the emission unit is in operation per the PMMAP. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

During operation of the cupola, the temperature during the following periods will not be included in the three-hour average: (1) the first 15 minutes of start up at the beginning of the operating day, (2) the last 30 minutes during cupola "melt out" at the end of the



operating day, and (3) periods when the cupola is off-blast and for 15 minutes after going on-blast from an off-blast condition.

*Off-blast* means those periods of cupola operation when the cupola is not actively being used to produce molten metal. Off-blast conditions include cupola startup when air is introduced to the cupola to preheat the sand bed and other cupola startup procedures as defined in the startup, shutdown, and malfunction plan. Off-blast conditions also include idling conditions when the blast air is turned off or down to the point that the cupola does not produce additional molten metal.

*On-blast* means those periods of cupola operation when combustion (blast) air is introduced to the cupola furnace and the furnace is capable of producing molten metal. On-blast conditions are characterized by both blast air introduction and molten metal production.

- (3) The permittee shall install, operate and maintain two (2) water flow meters, one to measure the water flow rate to the venturi scrubber and one to measure the flow rate to the ring jet scrubber. The 3-hour average water flow rate to the venturi scrubber and the ring jet scrubber will be recorded when the unit is in operation per the PMMAP and units shall be in gallons per minute. The water flow meters and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

For each water flow meter, Clow will: (i) Locate the flow sensor and other necessary equipment in a position that provides a representative flow and that reduces swirling flow or abnormal velocity distributions due to upstream and downstream disturbances; (ii) use a flow sensor with a minimum measurement sensitivity of 2 percent of the flow rate; (iii) conduct a flow sensor calibration check at least semiannually according to the manufacturer's instructions; and (iv) at least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.

The minimum flow rate for each wet scrubber shall be established during the initial or subsequent successful stack test. Average water flow over a three hour period shall be maintained at the minimum flow rate established during the initial or subsequent successful stack test.

- (4) The permittee shall install pressure gauges on the two pumps supplying water to the venturi scrubber and the ring jet scrubber. In the event that any of the water flow meters installed on the two wet scrubbers fails, water pressure shall be monitored on the pump that is supplying water to that venturi scrubber and/or ring jet scrubber for a period not to exceed 30 days while the water flow meter is repaired or replaced.

Calibration of the pressure gauge shall be verified within 24 hours of use following a water flow meter failure. The minimum water pressure for each wet scrubber shall be established during the initial or subsequent successful stack test. During this period, the permittee will operate that scrubber such that the three-hour average pump pressure does not fall below level established during the initial or subsequent successful stack tests.

- (5) The permittee shall collect and record the following information each day:



- a. the hours per day this emissions unit is operated; and
  - b. all control equipment downtime, per the PMMAP.
- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit per the Clow Work Instructions as provided for in the PMMAP and any applicable preventative maintenance procedures. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The permittee shall collect and record the following information each month for this emissions unit:
- a. the total weight of metal produced (in tons) in this emissions unit; and
  - b. the rolling, 12-month summation of metal produced, in tons (i.e., the metal produced rate for the current month added to the metal produced rate for the previous 11 calendar months).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which provide the following information for each period during which the static pressure across the wet scrubber system falls outside of the applicable range:
- a. the date of the excursion;
  - b. the time interval over which the excursion occurred;
  - c. the static pressure during the excursion;
  - d. the cause(s) for the excursion, if known; and
  - e. the corrective action which has been or will be taken to prevent similar excursions.



The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit quarterly deviation (excursion) reports which provide the following information for each 3-hour averaging period during which the exhaust gas temperatures fall below 1300 degrees Fahrenheit:
- a. the date of the excursion;
  - b. the time interval over which the excursion occurred;
  - c. the temperature values during the excursion;
  - d. the cause(s) for the excursion, if known; and
  - e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall submit quarterly deviation (excursion) reports which provide the following information for each period during which the water flow rate to the venturi scrubber and/or ring jet scrubber fall below the applicable rates:
- a. the date of the excursion;
  - b. the time interval over which the excursion occurred;
  - c. the temperature values during the excursion;
  - d. the cause(s) for the excursion, if known; and
  - e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (4) When required to monitor the water pressure, the permittee shall submit quarterly reports which provide the following information for each period during which the pump water pressure to the venturi scrubber and/or ring jet scrubber fall below the applicable rates :
- a. the date of the excursion;
  - b. the time interval over which the excursion occurred;
  - c. the pump water pressure during the excursion;
  - d. the cause(s) for the excursion, if known; and
  - e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (5) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.



- (6) The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month production limitations specified in c)(1) or any day during which the 20-hour limit on operations in c)(2) is exceeded. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
  - (7) The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month emissions limitations specified in b)(1). The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- 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 Limitations:  
PM emissions from the stack shall not exceed 0.078 pound per ton of molten iron produced; 6.63 pounds per hour.  
  
Applicable Compliance Method:  
The pounds per ton of molten iron produced emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by a control efficiency of 99.435% (the control efficiency the permittee committed to U.S.EPA to meet), which equals 0.078 pounds per ton of molten iron produced.  
  
The pounds per hour emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by 85 tons of gray iron produced per hour (maximum operating rate) multiplied by the 99.435% control efficiency which equals 6.63 pounds per hour.  
  
Compliance shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).
    - b. Emission Limitations:  
SO<sub>2</sub> emissions from the stack shall not exceed 0.029 pound per ton of molten iron produced; 2.47 pounds per hour.  
  
Applicable Compliance Method:  
Compliance shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).
    - c. Emission Limitations:  
CO emissions from the stack shall not exceed 0.51 pounds per ton of molten iron produced; 43.35 pounds per hour.  
  
Applicable Compliance Method:



Compliance shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).

d. Emission Limitation:

If required, visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

e. Emission Limitations:

PM<sub>10</sub> emissions from the stack shall not exceed 5.44 pounds per hour.

PM<sub>10</sub> emissions from the stack shall not exceed 0.064 pound per ton of molten iron produced.

Applicable Compliance Method:

The pounds per hour emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by 77.7% (percent of particulate emission that are less than 10 microns per 1/95 AP-42 Table 12.10-9) multiplied by 85 tons of gray iron produced per hour (maximum operating rate) multiplied by the 99.4% BACT control efficiency which equals 5.44 pounds per hour.

The pounds per ton of molten iron produced emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by 77.7% (percent of particulate emission that are less than 10 microns per 1/95 AP-42 Table 12.10-9) by the 99.4% BACT control efficiency which equals 0.064 pounds per ton of molten iron produced.

Compliance shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", or 40 CFR Part 51, Appendix M, Method 201, or 40 CFR Part 51, Appendix M, 201A as appropriate. See f)(2).

f. Emission Limitations:

VOC emissions from the stack shall not exceed 22.95 pounds per hour.

VOC emissions from the stack shall not exceed 0.27 pound per ton of molten iron produced.

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or an approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentrations, and on a consideration of the potential presence of interfering gases. See f)(2).

g. Emission Limitations:

NO<sub>x</sub> emissions from the stack shall not exceed 37.4 pounds per hour.



NO<sub>x</sub> emissions from the stack shall not exceed 0.44 pound per ton of molten iron produced.

Applicable Compliance Method:

Compliance shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).

h. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 10.27 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equations:

$$E = (M \times EF_s \times 1/2000) + (M \times EF_f \times (1 - 0.999) \times 1/2000)$$

Where:

E = the emission rate, in tons, based on a rolling, 12-month summation;

M = the molten iron production rate, in tons, during the rolling, 12-month period from d)(7)b.;

EF<sub>s</sub> = the most recent emission factor for each pollutant, in pounds of pollutant per ton of molten iron, determined from the most recent emissions test; and

EF<sub>f</sub> = 13.8 pounds PM X 0.777 (uncontrolled emission factor for PM from AP-42 Table 12.10-3 (1/95) adjusted to PM<sub>10</sub> fraction).

i. Emission Limitation:

PM emissions shall not exceed 12.63 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equations:

$$E = (M \times EF_s \times 1/2000) + (M \times EF_f \times (1 - 0.999) \times 1/2000)$$

Where:

E = the emission rate, in tons, based on a rolling, 12-month summation;

M = the molten iron production rate, in tons, during the rolling, 12-month period from d)(7)b.;

EF<sub>s</sub> = the most recent emission factor for each pollutant, in pounds of pollutant per ton of molten iron, determined from the most recent emissions test; and

EF<sub>f</sub> = 13.8 pounds PM (uncontrolled emission factor for PM from AP-42 Table 12.10-3 (1/95)).

j. Emissions Limitations:

VOC emissions shall not exceed 37.13 tons based on a rolling, 12-month summation.

NO<sub>x</sub> emissions shall not exceed 60.50 tons based on a rolling, 12-month summation.



SO<sub>2</sub> emissions shall not exceed 3.99 tons based on a rolling, 12-month summation.

CO emissions shall not exceed 70.12 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equations:

$$E = M \times EF / 2000 \text{ lbs/ton}$$

where:

E = the emission rate, in tons, based on a rolling, 12-month summation;

M = the molten iron production rate, in tons, during the rolling, 12-month period from d)(7)b.; and

EF= the most recent emission factor for each pollutant, in pounds of pollutant per ton of molten iron, determined from the most recent emissions test.

k. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

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

a. The emission testing shall be conducted within three months after issuance of the permit.

b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for PM, PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO and VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PM, Methods 1-5 of 40 CFR Part 60, Appendix A

For PM<sub>10</sub>, Methods 1-4 and 201 or 201A of 40 CFR Part 51, Appendix M

For NO<sub>x</sub>, Methods 1-4 and 7 or 7E of 40 CFR Part 60, Appendix A

For SO<sub>2</sub>, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A

For CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

For VOC, Methods 1-4 and 25 and/or 18 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 testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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 Ohio EPA, Southeast District Office refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA, Southeast District Office 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
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office 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 Ohio EPA, Southeast District Office.

g) **Miscellaneous Requirements**

- (1) The emissions testing of emissions unit P901 required by f)(2) in PTI #06-07432, issued on July 9, 2009, was completed on September 29-30, 2009. No further testing is being required by this administrative modification.