



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

7/16/2010

BRIAN A PRINZ
CURRENT OF WARREN INC
30 TYLER ST
EAST HAVEN, CT 06512

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0278080650
Permit Number: P0106268
Permit Type: Renewal
County: Trumbull

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at 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 pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CURRENT OF WARREN INC**

Facility ID: 0278080650
Permit Number: P0106268
Permit Type: Renewal
Issued: 7/16/2010
Effective: 7/16/2010
Expiration: 7/16/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
CURRENT OF WARREN INC

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Authorization

Facility ID: 0278080650
Application Number(s): A0039423
Permit Number: P0106268
Permit Description: Renewal permit for coating line
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/16/2010
Effective Date: 7/16/2010
Expiration Date: 7/16/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CURRENT OF WARREN INC
455 N RIVER RD
Warren, OH 44482

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:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

Authorization (continued)

Permit Number: P0106268
Permit Description: Renewal permit for coating line

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

Emissions Unit ID:	K001
Company Equipment ID:	Egan Coater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Ohio EPA DAPC, Northeast District Office 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 submitting¹ 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 emissions 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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions



1. K001, Egan Coater

Operations, Property and/or Equipment Description:

Egan Coater coating line

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. 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) (PTI 02-4263)	<p>Volatile organic compound (VOC) emissions shall not exceed 2.84 pounds per gallon of coating, excluding water and exempt solvents.</p> <p>VOC emissions shall not exceed 87.2 tons per year.</p> <p>See c)(1) and c)(2)</p>
b.	OAC rule 3745-21-09(F)	<p>The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p> <p>VOC emissions shall not exceed 4.8 pounds VOC per gallon of solids from the paper coating line, if a control system is employed.</p>
c.	OAC rule 3745-21-09(G)	The emission limitation specified by this



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p> <p>VOC emissions shall not exceed 4.8 pounds VOC per gallon of solids from the fabric coating line, if a control system is employed.</p>
d.	40 CFR Part 60, Subpart VVV	See b)(2)a

(2) Additional Terms and Conditions

a. While the total amount of VOC used on coating line K001 is less than 95 Mg (104.7 tons) per 12-month period, this emissions unit is subject only to the record keeping and reporting requirements of d)(1) and e)(1). If the amount of VOC used is 95 Mg or greater in any 12-month period, the affected emissions units shall become subject to all of the requirements of 40 CFR Part 60, Subpart VVV. Once an emissions unit has become subject to the requirements of Subpart VVV, it will remain subject to those requirements regardless of changes in annual VOC use.

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 60,000 gallons based upon a rolling, 12-month summation of the coating usage figures.
- (2) Except where employing only compliant materials, all of the VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for the coating and cleanup materials applied in this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the uncontrolled VOC emissions from all coatings applied, i.e., the summation of the products of "b" x "c";
 - e. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;

- f. the total controlled VOC emissions from all coatings applied, i.e., “d” x “e”;
 - g. the name and identification of each cleanup material employed;
 - h. the VOC content of each cleanup material, in pounds per gallon;
 - i. the number of gallons of each cleanup material employed;
 - j. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of “h” x “i”, in pounds; and
 - k. the total VOC emissions from all coatings and cleanup materials employed during the day, i.e., “f” + “j”, in pounds.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the thermal oxidizer during any period of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- (3) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained at the facility for a period of no less than 3 years.
- (4) The permittee shall collect and record the following information each day the thermal oxidizer is required to demonstrate compliance with the VOC limitation contained in this permit:
- a. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit; and
 - b. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range.
- These records shall be maintained at the facility for a period of three years.
- (5) To comply with 40 CFR Part 60, Subpart VVV, the permittee shall record semiannually:
- a. an estimate of projected VOC use in emissions unit K001; and
 - b. the actual 12-month VOC use in emissions unit K001.
- (6) The permittee shall maintain monthly records of the following information:

- a. the coating usage for each month ; and
 - b. the rolling, 12-month summation of the coating usage
- e) Reporting Requirements
- (1) 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- The permittee shall identify the following information in the annual permit evaluation report:
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and required to be vented to the thermal oxidizer, and the process emissions were not vented to the thermal oxidizer;
 - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
 - f. all exceedances of the rolling, 12-month coating usage limitation;
 - g. the total VOC emissions from this emissions unit for the previous calendar year; and
 - h. to comply with 40 CFR Part 60, Subpart VVV, the permittee shall:
 - i. report the first semiannual estimate in which projected annual VOC use exceeds 95 Mg/yr; and
 - ii. report the first 12-month period in which the actual VOC use exceeds 95 Mg/yr.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 87.2 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the summation of the record keeping requirements specified in d)(1).

b. Emission Limitation:

VOC emissions shall not exceed 2.84 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

c. Emission Limitation:

VOC emissions shall not exceed 4.8 pounds VOC per gallon of solids from the coating line, if a control system is employed.

Applicable Compliance Method:

Compliance is based upon a stack test done on 8/16/1994, showing an actual emission of 1.67 pounds VOC per gallon of solids.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements, if the existing thermal oxidizer is replaced:

- a. The emission testing shall be conducted within 3 months of replacement of the existing thermal oxidizer.
- b. The emission testing shall be conducted to demonstrate compliance with the emission limitation for VOC specified in b)(1)b and c.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25 or 25A, 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast 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 Northeast 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 Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA Northeast 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast 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 Northeast District Office.

g) **Miscellaneous Requirements**

- (1) None.