



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CHAMPAIGN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 05-13377

Fac ID: 0511010012

DATE: 9/16/2004

Honeywell Grimes Aerospace
Anthony Bucchi
550 Route 55
Urbana, OH 43078

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/16/2004
Effective Date: 9/16/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 05-13377

Application Number: 05-13377
Facility ID: 0511010012
Permit Fee: **\$0**
Name of Facility: Honeywell Grimes Aerospace
Person to Contact: Anthony Bucchi
Address: 550 Route 55
Urbana, OH 43078

Location of proposed air contaminant source(s) [emissions unit(s)]:
**515 North Russell Street
Urbana, Ohio**

Description of proposed emissions unit(s):
Administrative Modification - explanatory language change.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.


Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the 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 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 cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of

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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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. 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.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	0.44
HAP	0.44

Honey

PTI A

Modification Issued: 9/16/2004

Emissions Unit ID: P009

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - AS/SVE 1 - 20 soil vapor wells, 18 air sparge wells, air sparge compressor and a 2000 lb. activated carbon vessel.	OAC rule 3745-31-05(A)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.05 lb/hour, and 0.22 ton/year.</p> <p>Hazardous Air Pollutant (HAP) emissions shall not exceed 0.05 lb/hour, and 0.22 ton/year.</p> <p>See A.2.a., and A.2.b., below</p>

2. Additional Terms and Conditions

- 2.a The emissions from this unit consist of chlorinated VOCs, predominantly tetrachloroethene (also known as perchloroethene) with minor amounts of tichloroethene and cis-1,2-Dichloroethene. Pilot testing has shown that greater than 99% of the emissions is tetrachloroethene. Chlorinated VOCs are VOCs as well as HAPs. The emission limits listed above are intended to cover the same emissions under both characterizations.
- 2.b This emission unit is permitted at its post-controls potential to emit (PTE) assuming the 99 percent control efficiency of the carbon adsorber device. Therefore, there are no monitoring, record keeping, reporting or testing requirements associated with these VOC limits, but only with the operation of the carbon adsorber control device associated with this unit.
- 2.c Within ninety (90) days of startup of this unit the permittee shall determine the necessary

allowable ranges for gas flow rate and outlet VOC concentration in order to meet the emission limitations set by this permit.

B. Operating Restrictions

1. Gas flow rate through the carbon adsorber system shall be continuously monitored by use of a pitot tube, or a corresponding parameter such as fan operating amperage or voltage. The gas flow rate shall remain within the range determined (per A.2.c) to be sufficient to ensure compliance with the emission limitations established for this emissions unit at all times when the Soil Vapor Extraction system (SVE) is in operation.
2. The inlet and outlet VOC concentrations shall be continuously monitored by use of a flame ionization detector or equivalent system. The outlet VOC concentration shall remain at or below the concentration determined (per A.2.c) to be sufficient to maintain the emission limitations set for this emission unit at all times when the SVE system is in operation.
3. As the carbon adsorption vessels become saturated with VOC, the canisters shall be changed out in a timely manner to ensure compliance with the VOC emission limits listed in Part A, above and the operating restriction listed in B.2, above.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep, for the life of the SVE project, records of the continuous monitoring of the following parameters associated with the carbon adsorber unit:
 - a. The monitored gas flow rate across the unit required in B.1; and
 - b. The monitored VOC inlet and outlet concentrations required in B.2.
2. The permittee shall keep records for the life of the SVE project of the following information related to the carbon adsorber vessels:
 - a. the date of each carbon adsorber unit change; and
 - b. the manner of disposal of each of the saturated carbon adsorber vessels.
3. The permit to install for this emissions unit (P009) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Modification Issued: 9/16/2004

Emissions Unit ID: **P009**

Pollutant: tetrachlorethene

TLV for tetrachlorethene (mg/m³): 169 mg/m³

Maximum Hourly Emission Rate (g/sec): 0.0013

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.8

MAGLC (ug/m3): 4,023 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials emitted, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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Facility ID: 0511010012

Emissions Unit ID: **P009**

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Honey**PTI A****Modification Issued: 9/16/2004**Emissions Unit ID: **P009****D. Reporting Requirements**

1. The permittee shall submit to the Director (Ohio EPA, Southwest District Office) a report detailing the determinations of minimum and maximum gas flow rates and outlet VOC concentrations required to ensure compliance with the emission limitations established in this permit. This report shall include calculations or other explanations sufficient to justify the determined ranges.
2. The permittee shall submit quarterly deviation (excursion) reports that detail all exceedances of the following parametric limits:
 - a. Gas flow rate across the carbon adsorber unit outside the proper range as determined per the requirement in A.2.c; and
 - b. The VOC outlet concentration greater than the proper limit as determined per the requirement in A.2.c.

These quarterly deviation (excursion) reports shall be submitted to the Director (Ohio EPA, Southwest District Office-DAPC, Dayton, Ohio) in accordance with Part I - General Terms and Conditions A.1.c.

E. Testing Requirements

None.

F. Miscellaneous Requirements

1. Should the permittee face monitoring, and/or record keeping requirements related to the site remediation activities that are substantially similar or more stringent than those contained in this permit to install, the permittee may use the monitoring system(s) and records developed pursuant to those requirements in lieu of establishing redundant monitoring or records for this air emissions permit.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 - AS/SVE 2 - 2 soil vapor wells, 1 air sparge well, air sparge compressor and a 400 lb. activated carbon vessel.	OAC rule 3745-31-05(A)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.05 lb/hour, and 0.22 ton/year.</p> <p>Hazardous Air Pollutant (HAP) emissions shall not exceed 0.05 lb/hour, and 0.22 ton/year.</p> <p>See A.2.a., below</p>

2. Additional Terms and Conditions

- 2.a The emissions from this unit consist of chlorinated VOCs, predominantly tetrachloroethene (also known as perchloroethene) with minor amounts of tichloroethene and cis-1,2-Dichloroethene. Pilot testing has shown that greater than 99% of the emissions is tetrachloroethene. Chlorinated VOCs are VOCs as well as HAPs. The emission limits listed above are intended to cover the same emissions under both characterizations.
- 2.b This emission unit is permitted at its post-controls potential to emit (PTE) assuming the 99 percent control efficiency of the carbon adsorber device. Therefore, there are no monitoring, record keeping, reporting or testing requirements associated with these VOC limits, but only with the operation of the carbon adsorber control device associated with this unit.
- 2.c Within ninety (90) days of startup of this unit the permittee shall determine the necessary allowable ranges for gas flow rate and outlet VOC concentration in order to meet the

emission limitations set by this permit.

B. Operating Restrictions

1. Gas flow rate through the carbon adsorber system shall be continuously monitored by use of a pitot tube, or a corresponding parameter such as fan operating amperage or voltage. The gas flow rate shall remain within the range determined (per A.2.c) to be sufficient to ensure compliance with the emission limitations established for this emissions unit at all times when the Soil Vapor Extraction system (SVE) is in operation.
2. The inlet and outlet VOC concentrations shall be continuously monitored by use of a flame ionization detector or equivalent system. The outlet VOC concentration shall remain at or below the concentration determined (per A.2.c) to be sufficient to maintain the emission limitations set for this emission unit at all times when the SVE system is in operation.
3. As the carbon adsorption vessels become saturated with VOC, the canisters shall be changed out in a timely manner to ensure compliance with the VOC emission limits listed in Part A, above and the operating restriction listed in B.2, above.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep, for the life of the SVE project, records of the continuous monitoring of the following parameters associated with the carbon adsorber unit:
 - a. The monitored gas flow rate across the unit required in B.1; and
 - b. The monitored VOC inlet and outlet concentrations required in B.2.
2. The permittee shall keep records for the life of the SVE project of the following information related to the carbon adsorber vessels:
 - a. the date of each carbon adsorber unit change; and
 - b. the manner of disposal of each of the saturated carbon adsorber vessels.
3. The permit to install for this emissions unit (P010) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was

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PTI A

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Emissions Unit ID: **P010**

compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: tetrachlorethene

TLV for tetrachlorethene (mg/m³): 169 mg/m³

Maximum Hourly Emission Rate (g/sec): 0.0003

Emissions Unit ID: P010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.83

MAGLC (ug/m3): 4,023 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials emitted, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Honey**PTI A****Modification Issued: 9/16/2004**Emissions Unit ID: **P010****D. Reporting Requirements**

1. The permittee shall submit to the Director (Ohio EPA, Southwest District Office) a report detailing the determinations of minimum and maximum gas flow rates and outlet VOC concentrations required to ensure compliance with the emission limitations established in this permit. This report shall include calculations or other explanations sufficient to justify the determined ranges.
2. The permittee shall submit quarterly deviation (excursion) reports that detail all exceedances of the following parametric limits:
 - a. Gas flow rate across the carbon adsorber unit outside the proper range as determined per the requirement in A.2.c; and
 - b. The VOC outlet concentration greater than the proper limit as determined per the requirement in A.2.c.

These quarterly deviation (excursion) reports shall be submitted to the Director (Ohio EPA, Southwest District Office-DAPC, Dayton, Ohio) in accordance with Part I - General Terms and Conditions A.1.c.

E. Testing Requirements

None.

F. Miscellaneous Requirements

1. Should the permittee face monitoring, and/or record keeping requirements related to the site remediation activities that are substantially similar or more stringent than those contained in this permit to install, the permittee may use the monitoring system(s) and records developed pursuant to those requirements in lieu of establishing redundant monitoring or records for this air emissions permit.