State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION** **CERTIFIED MAIL**
**MUSKINGUM COUNTY**

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**Application No: 06-08210**
**Fac ID:** 0660960062
**DATE: 1/23/2007**

Mar-Zane Portable Generator No. 7
Anthony Ruggiero
PO Box 1585
Zanesville, OH 43702

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 of the Director is final 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 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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **SEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install** **Issue Date: 1/23/2007**
**Terms and Conditions** **Effective Date: 1/23/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-08210

| | |
|---|---|
| Application Number: | 06-08210 |
| Facility ID: | 0660960062 |
| Permit Fee: | **$100** |
| Name of Facility: | Mar-Zane Portable Generator No. 7 |
| Person to Contact: | Anthony Ruggiero |
| Address: | PO Box 1585<br>Zanesville, OH 43702 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**101 W. Emerling Rd.**
**Akron**, **Ohio**

Description of proposed emissions unit(s):
**Modification to separate portable generator from Plant 24 (0660010242) PTI No. 06-07137.**

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

Laura Powell
Acting 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 (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.)

#### 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 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 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.

**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

| Pollutant | Tons Per Year |
|---|---|
| NOx | 24.2 |
| SO2 | 4.1 |
| VOC | 0.8 |
| CO | 5.7 |
| PE | 0.4 |

Emissions Unit ID: **P001**

## 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.

**Operations, Property, and/or Equipment - (P001) - 1005 HP 750 KVA diesel Generator (SIC Code: 3621)**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3) | Emissions shall not exceed:<br><br>4.07 pounds per hour (lb/hr) sulfur dioxide ($SO_2$);<br><br>24.12 lbs/hr nitrogen oxides ($NO_x$);<br><br>0.71 lb/hr volatile organic compounds (VOC); and<br><br>5.62lbs/hr carbon monoxide (CO).<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-11(B)(5)(b) and 3745-17-07(A). |
| OAC rule 3745-17-11(B)(5)(b) | Particulate emissions shall not exceed 0.35 lb/million Btu actual heat input.<br>See A.2.a below.<br>Particulate emissions shall not exceed 0.062 lb/million Btu actual heat input.<br>See A.2.b below. |
| OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average. |
| OAC rule 3745-18-06(G) | See A.2.c below. |
| OAC rule 3745-21-08(B) | See A.2.d below. |
| OAC rule 3745-23-06(B) | See A.2.e. below. |

| | |
|---|---|
| OAC rule 3745-31-05(C)<br><br>(Synthetic minor to avoid Title V applicability when located with similar sources.) | Emissions shall not exceed the following as a rolling, 12-month summation:<br><br>24.2 tons NOx;<br>5.7 tons CO;<br>4.1 tons SO2;<br>0.8 tons VOC; and<br>0.4 tons PE.<br><br>See Section B.2 below. |

**2. Additional Terms and Conditions**

**2.a** The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/million Btu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.

**2.b** This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

**2.c** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

**2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

**2.e** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B).

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule

revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

Emissions Unit ID: **P001**

## B. Operational Restrictions

1. The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.

2. The permittee has requested a limitation on operating hours for purposes of limiting potential to emit to avoid state modeling and to avoid Title V requirements associated with relocation of a portable source with other similar sources. Therefore, the maximum number of operating hours for emissions unit P001 shall not exceed 2,000 hours per 12 month rolling summation. To ensure enforceability during the first 12 calendar months of operation following the startup of emissions unit P001, the permittee shall not exceed the operating hours specified in the following table:

| Month(s) | Maximum Cumulative Operating Hours |
|---|---|
| 1 | 1,250 |
| 1-2 | 2,000 |
| 1-3 | 2,000 |
| 1-4 | 2,000 |
| 1-5 | 2,000 |
| 1-6 | 2,000 |
| 1-7 | 2,000 |
| 1-8 | 2,000 |
| 1-9 | 2,000 |
| 1-10 | 2,000 |
| 1-11 | 2,000 |
| 1-12 | 2,000 |

After the first 12 calendar months of operation following the startup of emissions unit P001, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

## C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than low sulfur No. 2 or diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

2. The permittee shall maintain documentation on the sulfur content of all fuels received.

3. The permittee shall maintain monthly records of the following information:

   a. The operating hours for each month.

b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the hours of operation.

c. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than low sulfur No. 2 or diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit deviation (excursion) reports which identify the following exceedances:

   a. the rolling, 12-month hours of operation limitation;

   b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.

   c. sulfur content fuel restriction described in condition B.1.

   These deviation (excursion) reports shall be submitted in accordance with the general terms and conditions of this permit.

## E. Testing Requirements

1. <u>Emission Limitation</u>**:**
   Emissions of nitrogen oxides ($NO_x$) shall not exceed 24.12 lbs/hr and 24.2TPY as a rolling, 12-month summation.

   <u>Compliance Method</u>**:**
   Compliance with the lb/hr emission limitation is based is demonstrated by multiplying the emissions factor from AP-42, Table 3.4-1, 10/1996 (0.024 lb/HP-hr) by the maximum rated capacity of P001 (1005 HP).

   Annual emissions shall be determined by multiplying the hourly $NO_x$ emission rate by the total number of hours of operation each year and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 7. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

2. Emissions Limitation:
Emissions of carbon monoxide (CO) shall not exceed 5.62 lbs/hr and 5.7 TPY, as a rolling, 12-month summation.

Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emissions factor from AP-42, Table 3.4-1, 10/1996 (0.0055 lb/HP-hr) by the maximum rated capacity of P001 (1005 HP).

Annual emissions shall be determined by multiplying the hourly CO emission rate by the total number of hours of operation each year and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 1-4 and Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

3. Emission Limitation:
Emissions of VOC shall not exceed 0.71 lb/hour and 0.8 TPY, as a rolling, 12-month summation.

Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.4-1, 10/1996 (0.000705 lb/HP-hr) by the maximum rated capacity of P001 (1005 HP).

Annual emissions shall be determined by multiplying the hourly VOC emission rate by the total number of hours operated per year and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 1-4 and Method 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

4. Emissions Limitation:
Emissions of $SO_2$ shall not exceed 4.07 lbs/hour and 4.1 TPY, as a a rolling, 12-month summation.

Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the

emission factor from AP-42, Table 3.4-1, 10/1996 [(0.00809 times the sulfur content (0.5) in percent) lb/HP-hr] by the maximum rated capacity of P001 (1005 HP).

Annual emissions shall be determined by multiplying the hourly $SO_2$ emission rate by the total number of hours operated per year and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 1-4 and Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

5. Emission Limitation:
Particulate emissions shall not exceed 5.7 TPY, as a rolling, 12-month summation.

Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.4-2, 10/1996 (0.062 lbs/mmBtu) by the rated capacity of P001, in mmBtu/hr.

Annual emissions shall be determined by multiplying the hourly PE emission rate by the total number of hours operated per year and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 1-5. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

6. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.

Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

7. Emission Limitation:
Particulate emissions shall not exceed 0.35 lb/million Btu actual heat input.

Compliance Method:
Compliance shall be based upon an emission factor of 0.062 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

8. Emission Limitation:
   Particulate emissions shall not exceed 0.062 lb/million Btu actual heat input.

   Compliance Method:
   Compliance shall be based upon an emission factor of 0.062 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

   If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

## F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

   a. The portable emissions unit is equipped with the best available control technology for such portable emissions unit;

   b. The portable emissions unit is operating pursuant to a currently effective permit to install, permit to operate or registration;

   c. The applicant has provided proper notice of intent to relocate the portable emissions unit to the Southeast District Office (SEDO) and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and,

   d. In the SEDO's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

   a. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;

   b. The portable emissions unit is equipped with best available technology;

c. The portable emission unit owner has identified the proposed site to Ohio EPA;

d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;

e. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;

f. The owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and,

g. The portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to this section, shall be valid for no longer than three years and are subject to renewal.

3. In order for the SEDO and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the SEDO (2195 Front Street, Logan, Ohio 43138) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the SEDO and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

4. The permittee should be advised that when portable emission units are located at a stationary source or at a source comprised of portable emission units, potential emissions from the portable emission units are included in the facility potential to emit calculations for Title V and PSD applicability.

The permittee shall include a potential to emit analysis of facility-wide emissions (including the portable sources) for the proposed relocation in the "Notice of Intent to Relocate".