



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/29/03

**RE: Proposed Title V Chapter 3745-77 Permit
13-18-17-2479 Southerly Wastewater Treatment
Center**

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Southerly Wastewater Treatment Center, has been created in Ohio EPA's State Air Resources System (STARS) on 05/29/03, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit -+0 covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 05/29/03	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 13-18-17-2479 to:
 Southerly Wastewater Treatment Center
 6000 Canal Road
 Cuyahoga Heights, OH 44125

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B002 (Boiler # 2) 69 MMBtu/Hr B&W Boiler (Package Boiler) to produce steam for process and heating	N005 (Incinerator # 1) Incineration of Sewage Sludge	Incineration of Sewage Sludge
B003 (Boiler # 3) 92.88 MMBtu/Hr Nebraska Gas Boiler to produce steam for process and space heating	N006 (Incinerator # 2) Incineration of Sewage Sludge	N008 (Incinerator # 4) Incineration of Sewage Sludge
	N007 (Incinerator # 3)	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Cleveland Division of Air Pollution Control
 1925 St. Clair
 Cleveland, OH 44114
 (216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **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:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-

07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. **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 unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. **Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. **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.

(Authority for term: OAC rule 3745-77-07(A)(5))

5. **Severability Clause**

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

6. **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 reissuance, or modification, or for denial of a permit renewal application.

- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.
- b. 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:
 - i. 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.
 - ii. 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 paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.) *(Authority for term: OAC rule 3745-77-07(I))*

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

F001: paved roadways and parking areas;

P002: vacuum pumps;

P003: sewage sludge wet wells;

P004: TCS thickening tanks;

P005: storage tanks;

Z006: atmospheric separators;

Z007: 5.5 MMBtu/hr boiler; and

Z008: 4.4 MMBtu/hr boiler.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler # 2 (B002)

Activity Description: 69 MMBtu/Hr B&W Boiler (Package Boiler) to produce steam for process and heating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
69.0 MMBtu/hr Babcock & Wilcox natural gas-fired boiler with low NOx burners to produce steam for process and space heating	OAC rule 3745-17-10(B)(1)	.020 lb of particulate emissions per MMBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-18-06(A)	exempt pursuant to OAC rule 3745-18-06(A)
		See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) (PTI 13-2375)	0.15 lb of NOx per MMBtu of actual heat input
		See A.I.2.b and A.II.2.
	OAC rule 3745-31-05(A)(3) (PTI 13-00460)	Particulate emissions shall not exceed 0.030 gr/dscf.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-10, 3745-18-06, 3745-21-08, and 3745-23-06.
	OAC rule 3745-21-08(B)	None, see section A.I.2.c below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.d below.

2. Additional Terms and Conditions

- 2.a** OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit when burning only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- 2.b** This emissions unit shall be equipped with low NOx burners.
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-00460.

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.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-00460.

II. Operational Restrictions

1. The permittee shall only burn natural gas in this emissions unit.
2. The maximum heat input from emissions units B002 and B003 combined shall not exceed 93 MMBtu/hr as a daily average.

If the permittee operates emissions units B002 and B003 at a heat input rate that exceeds the combined maximum heat input limitation for these emissions units, such exceedance shall be treated as a single exceedance of the combined limitation for B002 and B003 and not as two separate exceedances.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information for B002 and B003 combined:
 - a. the amount of natural gas burned (cu. ft./day);
 - b. the number of hours of operation (hours/day);
 - c. the total daily heat input (MMBtu/day) calculated by multiplying the natural gas usage in cu. ft./day by the assumed heat content of natural gas (1000 Btu/cu. ft.) and by 0.000001 MMBtu/Btu; and
 - d. the average hourly heat input (MMBtu/hr) calculated by dividing the value from A.III.2.c (MMBtu/day) above by A.III.2.b (hours/day).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the combined heat input limitation for emissions units B002 and B003.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Emission Limitation -
Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method -

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation -
.020 lb of particulate emissions per MMBtu of actual heat input

Applicable Compliance Method -

Compliance may be demonstrated by dividing the AP-42, Table 1.4-2 (7/98) emission factor for natural gas combustion (1.9 lbs of particulates/MMcu.ft) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

3. Emission Limitation -
0.15 lb of NO_x per MMBtu actual heat input.

Applicable Compliance Method -

Compliance may be demonstrated by dividing the emission factor for natural gas combustion (118 lbs of NO_x/MMcu.ft, based on the permittee's emission tests performed during 1997) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 7.

4. Emission Limitation -
Particulate emissions shall not exceed 0.030 gr/dscf.

Applicable Compliance Method -

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

5. Compliance with the heat input limitation in A.II.2 shall be based on the record keeping in A.III.2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler # 3 (B003)

Activity Description: 92.88 MMBtu/Hr Nebraska Gas Boiler to produce steam for process and space heating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
92.88 MMBtu/hr Nebraska natural gas-fired boiler with low NOx burners to produce steam for process and space heating	OAC rule 3745-17-10(B)(1)	.020 lb of particulate emissions per MMBtu of actual heat input
	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 60, Subpart Dc	Pursuant to 40 CFR Part 60 Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day (see A.III.2).
	OAC rule 3745-18-06(A)	exempt pursuant to OAC rule 3745-18-06(A)
		See A.I.2.a below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 13-2375)	0.15 lb of NOx per MMBtu of actual heat input See A.I.2.b and A.II.2. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average, except for one six minute period every hour. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10, 3745-18-06, 3745-21-08, and 3745-23-06 and 40 CFR 60, Subpart Dc.
	OAC rule 3745-21-08(B)	None, see section A.I.2.c below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.d below.

2. Additional Terms and Conditions

2.a OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit when burning only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

2.b This emissions unit shall be equipped with low NOx burners.

2.c The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-2375.

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.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-2375.

II. Operational Restrictions

1. The permittee shall only burn natural gas in this emissions unit.

II. Operational Restrictions (continued)

2. The maximum heat input from emissions units B002 and B003 combined shall not exceed 93 MMBtu/hr as a daily average.

If the permittee operates emissions units B002 and B003 at a heat input rate that exceeds the combined maximum heat input limitation for these emissions units, such exceedance shall be treated as a single exceedance of the combined limitation for B002 and B003 and not as two separate exceedances.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information for B002 and B003 combined:
 - a. the amount of natural gas burned (cu. ft./day);
 - b. the number of hours of operation (hours/day);
 - c. the total daily heat input (MMBtu/day) calculated by multiplying the natural gas usage in cu. ft./day by the assumed heat content of natural gas (1000 Btu/cu. ft.) and by 0.000001 MMBtu/Btu; and
 - d. the average hourly heat input (MMBtu/hr) calculated by dividing the value from A.III.2.c (MMBtu/day) above by A.III.2.b (hours/day).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the combined heat input limitation for emissions units B002 and B003.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Emission Limitation -
Visible particulate emissions shall not exceed 5% opacity, as a six-minute average, except for one six minute period every hour.

Applicable Compliance Method -

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation -
.020 lb of particulate emissions per MMBtu of actual heat input

Applicable Compliance Method -

Compliance may be demonstrated by dividing the AP-42, Table 1.4-2 (7/98) emission factor for natural gas combustion (1.9 lbs of particulates/MMcu.ft) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

V. Testing Requirements (continued)

3. Emission Limitation -
0.15 lb of NO_x per MMBtu actual heat input.

Applicable Compliance Method -

Compliance may be demonstrated by dividing the emission factor for natural gas combustion (127 lbs of NO_x/MMcu.ft, based on the permittee's emission tests performed during 1997) by the conversion factor (1000 MMBtu/MMcu.ft).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 7.

4. Compliance with the heat input limitation in A.II.2 shall be based on the record keeping in A.III.2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Incinerator # 1 (N005)
Activity Description: Incineration of Sewage Sludge

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.

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.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- 2.c** There are no applicable SO₂ emission limitations under OAC Chapter 3745-18 for this emissions unit.
- 2.d** This emissions unit is not subject to the beryllium NESHAP (40 CFR Part 61, Subpart C) because the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As defined in 40 CFR 61.31(g), "beryllium containing waste" means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart (40 CFR Part 61, Subpart C). See A.IV.3.

II. Operational Restrictions

1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) 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 appropriate Cleveland DAQ.

2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.
 - c. The following test method(s) shall be employed: for particulates, Method 5 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 test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.
 - e. The sludge feed rate during the test(s) shall be recorded.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

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 Cleveland DAQ 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 Cleveland DAQ.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Incinerator # 2 (N006)
Activity Description: Incineration of Sewage Sludge

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.

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.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- 2.c** There are no applicable SO₂ emission limitations under OAC Chapter 3745-18 for this emissions unit.
- 2.d** This emissions unit is not subject to the beryllium NESHAP (40 CFR Part 61, Subpart C) because the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As defined in 40 CFR 61.31(g), "beryllium containing waste" means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart (40 CFR Part 61, Subpart C). See A.IV.3.

II. Operational Restrictions

1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) 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 appropriate Cleveland DAQ.

2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.
 - c. The following test method(s) shall be employed: for particulates, Method 5 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 test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.
 - e. The sludge feed rate during the test(s) shall be recorded.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

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 Cleveland DAQ 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 Cleveland DAQ.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Incinerator # 3 (N007)
Activity Description: Incineration of Sewage Sludge

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.

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.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- 2.c** There are no applicable SO₂ emission limitations under OAC Chapter 3745-18 for this emissions unit.
- 2.d** This emissions unit is not subject to the beryllium NESHAP (40 CFR Part 61, Subpart C) because the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As defined in 40 CFR 61.31(g), "beryllium containing waste" means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart (40 CFR Part 61, Subpart C). See A.IV.3.

II. Operational Restrictions

1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) 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 appropriate Cleveland DAQ.

2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.
 - c. The following test method(s) shall be employed: for particulates, Method 5 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 test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.
 - e. The sludge feed rate during the test(s) shall be recorded.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

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 Cleveland DAQ 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 Cleveland DAQ.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Incinerator # 4 (N008)
Activity Description: Incineration of Sewage Sludge

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
3.6 dry sludge tons per hour (rated capacity), multiple hearth sludge incinerator, equipped with a venturi/impingement scrubber	40 CFR Part 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP)	3200 grams of mercury (Hg)/24-hour period
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of dry material charged.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
	OAC rule 3745-21-08(B)	None, see section A.I.2.a below.
	OAC rule 3745-23-06(B)	None, see section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 13-324)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 61, Subpart E and OAC rules 3745-17-07(A), 3745-17-09, 3745-21-08(B), and 3745-23-06(B).

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.

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.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 13-324.
- 2.c** There are no applicable SO₂ emission limitations under OAC Chapter 3745-18 for this emissions unit.
- 2.d** This emissions unit is not subject to the beryllium NESHAP (40 CFR Part 61, Subpart C) because the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As defined in 40 CFR 61.31(g), "beryllium containing waste" means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart (40 CFR Part 61, Subpart C). See A.IV.3.

II. Operational Restrictions

1. The pressure drop across the venturi/impingement scrubber shall be continuously maintained within the range of 10 to 30 inches of water at all times while the emissions unit is in operation. Compliance with this operational restriction shall be based on a daily average (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).
2. The venturi/impingement scrubber water flow rate shall be continuously maintained within the range of 250 to 800 gallons per minute. Compliance with this operational restriction shall be based on an daily average of the gallons per minute flow rate (the time period encompassing the startup and shutdown of the incinerator shall not be counted towards this daily average).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the venturi/impingement scrubber and the venturi/impingement scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average hourly pressure drop across the venturi/impingement scrubber, in inches of water;
- b. the average hourly venturi/impingement scrubber water flow rate, in gallons per minute; and
- c. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained within the ranges specified in A.II:
 - a. the pressure drop across the venturi/impingement scrubber; and
 - b. the venturi/impingement scrubber water flow rate.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit an annual statement that, to the best of its knowledge, the sewage sludge processed in this emissions unit does not contain any "beryllium containing waste". As the basis for this statement, the permittee shall annually review the latest version of the Ohio Toxic Release Inventory to confirm that there is no facility located within the permittee's service area that reported a release of beryllium or beryllium containing compounds and discharged its wastewater to this facility.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, sludge analyses in accordance with the following requirements:
 - a. The sludge analysis shall be conducted annually.
 - b. The sludge analysis shall be conducted to demonstrate compliance with the allowable mass emission rate for mercury of 3200 grams per 24-hour period.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR, section 61.54. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

A comprehensive written report on the results of each annual sludge analysis shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality (DAQ) 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 appropriate Cleveland DAQ.

2. If required, compliance with the visible emission limitation in Section A.I.1 of these terms and conditions shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for emissions units N005, N006, N007 and N008 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after permit issuance, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration. The emission testing shall be conducted for emissions units N005, N006, N007 and N008 on a rotating basis such that a different emissions unit is tested during each emission test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions.
 - c. The following test method(s) shall be employed: for particulates, Method 5 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 test(s) shall be conducted while the emissions unit is operating at or near the maximum capacity for the type of sludge being burned, unless otherwise specified or approved by the Cleveland DAQ. When solely incinerating thermally conditioned sludge, the maximum capacity of this emissions unit is between 2.3 and 2.7 dry sludge tons per hour. When incinerating a mixture of thermally conditioned sludge and non-thermally conditioned sludge, the permittee shall demonstrate to the Cleveland DAQ what the maximum capacity is for this emissions unit.
 - e. The sludge feed rate during the test(s) shall be recorded.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

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 Cleveland DAQ 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 Cleveland DAQ.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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