



Michigan Department of Natural Resources & Environment
Air Quality Division

EFFECTIVE DATE: January 1, 2011

REVISION DATE(S):

ISSUED TO

WARREN WASTE WATER TREATMENT PLANT

State Registration Number (SRN): B1792

LOCATED AT

32360 WARKOP, WARREN, Michigan 48093

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1792-2011

Expiration Date: December 31, 2015

Administratively Complete ROP Renewal Application Due Between July 1, 2014 and July 1, 2015

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B1792-2011

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Natural Resources and Environment

Christopher Ethridge, Acting Southeast Michigan District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY.....3

A. GENERAL CONDITIONS4

Permit Enforceability4

General Provisions.....4

Equipment & Design5

Emission Limits5

Testing/Sampling5

Monitoring/Recordkeeping6

Certification & Reporting6

Permit Shield.....7

Revisions8

Reopenings.....8

Renewals9

Stratospheric Ozone Protection9

Risk Management Plan.....9

Emission Trading9

Permit To Install (PTI)10

B. SOURCE-WIDE CONDITIONS.....11

C. EMISSION UNIT CONDITIONS.....12

EMISSION UNIT SUMMARY TABLE12

EUIncinerator14

EUWetwell18

EUGritBox20

EUGenerator.....22

EUHouseGenerator24

D. FLEXIBLE GROUP CONDITIONS27

FLEXIBLE GROUP SUMMARY TABLE27

FGSOLIDPROCESS.....28

FGCOLDCLEANERS.....30

E. NON-APPLICABLE REQUIREMENTS.....32

APPENDICES.....33

Appendix 1. Abbreviations and Acronyms33

Appendix 2. Schedule of Compliance34

Appendix 3. Monitoring Requirements34

Appendix 4. Recordkeeping.....34

Appendix 5. Testing Procedures34

Appendix 6. Permits to Install34

Appendix 7. Emission Calculations34

Appendix 8. Reporting35

Appendix 9: CAM PLAN.....35

AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Natural Resources and Environment (MDNRE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-B1792-2011 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. 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 conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner’s or operator’s expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
- The date, location, time, and method of sampling or measurements.
 - The dates the analyses of the samples were performed.
 - The company or entity that performed the analyses of the samples.
 - The analytical techniques or methods used.
 - The results of the analyses.
 - The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
- For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP.
(R 336.1210(7))

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216.
(R 336.1213(12))

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDNRE.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDNRE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUIncinerator	Multiple hearth incinerator-Processed sewage sludge solids are dried and combusted with natural gas as a supplemental fuel during the incineration process. The Nichols Herreshoff sludge incinerator has 25' 9" outside diameter and 10 hearths. Particulate matter emissions are controlled by Impingement wet scrubber.	6/15/1972	FGSOLIDPROCESS
EUBeltPress	Two belt presses- Three 2.2 meter sewage sludge presses are used to dewater the liquid sludge to form a sludge cake that is approximately 80% water and 20% solid material.	6/1/1982	FGSOLIDPROCESS
EUWetWell	Wet well. Raw sewage (influent) flows into the wet well and from there it is pumped to the Grit Chamber where the wastewater treatment process begins. Exhaust from wet well is treated using a chemical scrubber odor control system. The odor control system includes a reaction chamber, air compressors, and a chemical feed system with pH monitoring.	12/1/1987	NA
EUGritBox	Grit chamber and Primary Splitting Box-The air from enclosure around the grit chamber and primary splitting box is captured and treated through a carbon adsorption treatment unit during times when wastewater temperature is above 60°F. The carbon adsorption unit has three sampling points (25%, 50% and 75%).	6/1/1996	NA

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUGenerator	Less than 10 MMBTU/hr (2.1MW, 2,855 HP), diesel fuel fired, compression ignition, emergency generator for backup electrical supply	8/1/1971	NA
EUHouseGenerator	Less than 10 MMBTU/hr, (60 KW, 82 hp), 4 cylinders with a displacement of 3.92 liters (0.98 liter/ cylinder), diesel fired emergency generator needed to start the backup power generator (EUGenerator) after total loss of Edison power and a total blackout in the area.	10/23/2006	NA
EUCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	NA	FGCOLDCLEANERS
EUColdCleaner	Cold cleaner for parts cleaning using mineral spirit	12/31/2006	FGCOLDCLEANERS

**EUIncinerator
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Multiple hearth incinerator-Processed sewage sludge solids are dried and combusted with natural gas as a supplemental fuel during the incineration process. The Nichols Herreshoff sludge incinerator has 25' 9" outside diameter and 10 hearths. The incinerator emissions are controlled by Impingement Type Wet Scrubber for particulate matter emissions and chemical (oxidizing) spray scrubber for odor control.

Flexible Group ID: FGSOLIDPROCESS

POLLUTION CONTROL EQUIPMENT

Impingement Type Wet Scrubber, Chemical Spray Scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.2 pounds ²	Per 1,000 pounds of exhaust air, corrected to 50% excess air	Multiple Hearth Incinerator	Section III, Section V Section VI, Section VII, Section IX	R336.1201(3) R336.1331(1)
2. Mercury (Hg)	3200 grams ²	Over a 24-hour period	Multiple Hearth Incinerator	Section V	R336.1201(3) 40 CFR 61.52(a)
3. Beryllium (Be)	10 grams	Over a 24-hour period	Multiple Hearth Incinerator	Section V	40 CFR 61.32(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not operate the incinerator unless the 3-stage Impingement Type Wet Scrubber is installed and operating properly. **(R336.1201(3)), R336.1910**
2. Permittee shall equip and maintain the 3-stage impingement Type Wet Scrubber with a flow indicator **(R336.1201(3)), (R336.1910)**
3. The permittee shall maintain an adequate water flow through the wet scrubber at all times. **(R336.1213(3)), R336.1910**
4. The permittee shall, at all times, maintain the wet scrubber differential pressure monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Permittee shall analyze the mercury content of the sludge feed to the incinerator and the ash from the incinerator. **(R336.1213(3))**
2. Permittee shall calculate the mercury emission rate from the incinerator operations. **(R336.1213(3))**
3. Permittee shall utilize Method 105 of Appendix B of 40 CFR Part 61 or Method 7471A of EPA document SC-846 for mercury analysis. **(R336.1213(3))**
4. Permittee shall analyze the beryllium content of the sludge feed to the incinerator and ash from the incinerator. **(R336.1213(3))**
5. Permittee shall calculate the beryllium emission rate from the incinerator operations. **(R336.1213(3))**
6. Permittee shall utilize the Method 7090 of the USEPA document SW-846 for the beryllium analysis. **(R336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Permittee shall analyze the mercury content of the sludge once a month. **(R336.1213(3))**
2. Permittee shall analyze the mercury content of the ash once per year. **(R336.1213(3))**
3. Permittee shall perform the mercury emission rate calculations once a month. **(R336.1213(3))**
4. Permittee shall keep records of mercury content of the sludge feed to the incinerator, mercury content of the ash from the incinerator and the mercury emission rates. **(R336.1213(3))**
5. Permittee shall analyze the beryllium content of the sludge once a month. **(R336.1213(3))**
6. Permittee shall analyze the beryllium content of the ash once a year. **(R336.1213(3))**
7. Permittee shall perform the beryllium emission rate calculations once a month. **(R336.1213(3))**
8. Permittee shall retain the records of emission test results and other data needed to determine total emissions of beryllium at the facility for a period of five (5) years and made available to AQD upon request. **(40 CFR 61.33(e))**
9. Permittee shall keep records of beryllium content of the sludge feed to the incinerator, beryllium content of the ash from the incinerator, and beryllium emission rates. **(R336.1213(3))**
10. To ensure proper operation of the wet scrubber, the permittee shall measure the differential pressure across the impingement type wet scrubber. A differential pressure transducer shall be used to measure the static pressure upstream and downstream of the wet scrubber. **(40 CFR 64.6(c)(1)(i and ii))**
11. The permittee shall continuously measure the pressure differential at 1 minute intervals. Valid 1-minute readings shall be averaged by hour for compliance reporting purposes. A 1-hour compliance average shall consist of at least one valid 1-minute reading per two 15-minute periods of a given operating hour. The

permittee shall maintain the differential pressure transducer in proper operating condition, according to the manufacturer's recommendations, and calibrate the transmitter at least annually. **(40 CFR 64.6(c)(1)(iii))**

12. The permittee shall use the scrubber differential pressure to ensure compliance with the particulate matter (PM) limit. An excursion of PM shall be a pressure differential that drops below 4.0 inches of water column (W.C.). **(40 CFR 64.6(c)(2))**
13. The permittee shall monitor the scrubber differential pressure and record data at all required intervals, at all times that EUIncinerator is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for the purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 64.6(c)(1), 40 CFR 64.6(c)(3), 40 CFR 64.7a, 40 CFR 64.7(c))**
14. In response to an excursion (i.e. the differential pressure falls below 4.0 inches W.C.), corrective action shall be initiated. This includes, but is not limited to, an inspection, corrective action and documentation and reporting of the excursion. **(40 CFR 64.7(d))**
15. The permittee shall conduct all required monitoring for EUIncinerator per the AQD approved CAM plan and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9. Changes to the plan may be made upon written approval by the AQD District Supervisor. **(40 CFR 64.6(c)(3), 40 CFR 64.7(a))**
16. The permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). **(40 CFR 64.9(b))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semi-annual reporting of monitoring and deviations shall include summary information on the number, duration, and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were excursions and/or exceedances. **(40 CFR 64.9(a)(2)(ii))**
5. Each semi-annual report or monitoring and deviations shall include summary information on monitor downtime. If there are no periods of monitor downtime in the reporting period, then this report shall include a statement that there were not periods of monitor downtime. **(40 CFR 64.9(a)(2)(iii))**

See Appendix 8

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV007	48 ²	67 ²	R336.1201(3))

IX. OTHER REQUIREMENT(S)

1. The permittee shall promptly notify the AQD of the need to modify the impingement type wet scrubber monitoring requirements if the existing plan is found to be inadequate and shall submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**
2. The permittee shall comply with all applicable requirements of 40 CFR Part. 64. **(40 CFR Part 64)**
3. Permittee shall comply with all applicable requirements of 40 CFR Part 61, Subpart C-National Emission Standard for Beryllium. **(40 CFR 61.30)**
4. Permittee shall comply with all applicable requirements of 40 CFR Part 61, Subpart E-National Emission Standard for Mercury. **(40 CFR 61.50)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUWetwell
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Wet well. Raw sewage (influent) flows into the wet well and from there it is pumped to the Grit Chamber where the wastewater treatment process begins. Exhaust from wet well is treated using a chemical scrubber odor control system. The odor control system includes a reaction chamber, air compressors, and a chemical feed system with pH monitoring.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT

Chemical (oxidizing) Scrubber Odor Control System

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall equip and maintain the chemical scrubber odor control system (oxidizing scrubber) with a liquid flow indicator.² **(R336.1201(3)), (R336.1910)**
- The Permittee shall equip the chemical scrubber with a chemical feed system and a pH monitor for the effluent from the scrubber. **(R336.1213(3)), (R336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- The permittee shall record the chemical feed to the chemical (oxidizing) scrubber on a weekly basis. **(R336.1213(3)), (R336.1910)**
- The permittee shall keep records of hours and days of operation of the chemical (oxidizing) scrubber and shall be made available to the AQD upon request.² **(R336.1201(3))**

- The permittee shall monitor and record the pH of the effluent from the chemical scrubber on a daily basis. If the pH is less than 7.0, permittee shall identify, correct and keep records as described below:

Corrective Action Trigger: pH of the effluent from the chemical scrubber is less than 7.0

Corrective Action Period: Inspect the system for proper operation and identify the problem within 24 hours of discovery. Implement a solution within seven days.

Inspection: Inspection of the system shall include, but not limited to, chemical flow to the system, nozzles, pumps, etc.

Recordkeeping: Date and time the problem discovered, cause of the problem, date and time, and nature of corrective actions taken. **(R336.1213(3), (R336.1910))**

- The permittee shall keep a daily record of pH measurement of the effluent from the scrubber on file. **(R336.1213(3), R336.1910)**

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV006	42 ²	42 ²	R336.1201(3)

IX. OTHER REQUIREMENTS

- When exhausting emissions from the raw sewage wet well through the oxidizing scrubber, permittee shall operate the oxidizing scrubber as described in the permit application.² **(R336.1201(3))**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUGritBox
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Grit chamber and Primary Splitting Box- The air from enclosure around the grit chamber and primary splitting box is captured and treated through a carbon adsorption treatment unit during times when wastewater temperature is above 60°F. The carbon adsorption unit has three sampling points (25%, 50% and 75%).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall operate the blower when the waste water temperature is greater than or equal to 60°F.²
(R336.1201(3))
- The permittee shall not operate the blower unless the blower exhaust gases are routed to the carbon adsorption unit.²
(R336.1201(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- Permittee shall continuously monitor the waste water temperature and activate visible signal when the waste water temperature is greater than or equal to 60°F.
(R336.1213(3))
- Permittee shall keep records of the following:
 - Daily waste water temperature
 - Date and time when the blower is turned on or off
(R336.1213(3))

3. The permittee shall monitor the carbon bed for carbon saturation level at least once a year until 25% saturation level is reached. Thereafter the saturation level shall be monitored once per quarter year until 50% saturation level is reached. Upon exceeding the 50% saturation level, the saturation level shall be monitored once per month until the 75% saturation level is reached. If the bed has reached 75% saturation level, the bed shall be regenerated. **(R336.1213(3))**
4. The permittee shall keep the records of the carbon bed sampling data on file and made available to AQD upon request. **(R336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

IX. OTHER REQUIREMENTS

1. NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUGenerator
 EMISSION UNIT CONDITIONS**

DESCRIPTION : Less than 10 MMBTU/hr (2.1 MW, 2855 HP), diesel fuel fired, compression ignition, emergency generator for backup electricity supply, installed on 8/1/1971.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Permittee shall maintain records of the size (BHP or MW), installation date, hours of operation, and type of fuel used in EUGENERATOR.

(R336.1213(3)(b)), (40 CFR 63, Subpart ZZZZ)

2. Permittee shall keep records of hour of operation of EUGENERATOR, including how many hours are spent for emergency operation and how many hours are spent for non-emergency operation.

(R336.1213(3)(b))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

IX. OTHER REQUIREMENTS

1. Permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines (RICE). **(R336.1213(3)), (40 CFR 63, Subpart ZZZZ)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUHouseGenerator
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Less than 10 MMBTU/hr, (60 KW, 82 hp), 4 cylinders with a displacement of 3.92 liters (0.98 liter/ cylinder), diesel fired emergency generator needed to start the backup power generator (EUGenerator) after total loss of Edison power and a total blackout in the area.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.NO _x	9.2 (6.9)	g/KW-Hr (g/HP-hr)	EUHouseGenerator	Section VI	40 CFR 60.4205(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- Beginning October 1, 2007, permittee shall use diesel fuel with a maximum sulfur content of 500 parts per million (ppm) and with a Cetane Index of 40 or a maximum aromatic content of 35 volume per cent.
(40 CFR 60.4207(a)), 40 CFR 80.510(a)
- Beginning October 1, 2010, permittee shall use diesel fuel with a maximum sulfur content of 15 ppm for nonroad (NR) diesel fuel and with a Cetane Index of 40 or with a maximum aromatic content of 35 volume percent.
(40 CFR 60.4207(b)), 40 CFR 80.510(b)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- Permittee shall install a non-resettable hour meter on EUHouseGenerator prior to startup of the engine.
(40 CFR 60.4209(a))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- Permittee must comply with the emission standards specified in 40 CFR 60, Subpart IIII, and operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine

manufacturer. In addition, permittee may only change those settings that are permitted by the manufacturer. Permittee must also meet the requirements of 40 CFR parts 89. **(40 CFR 60.4211(a))**

2. Permittee must demonstrate compliance with the emission standards specified in 40 CFR 60.4205(a), according to one of the methods specified in paragraphs 40 CFR 60.4211 (b)(1) through (5), as stated below:
 - a Purchasing an engine certified according to 40 CFR part 89 or 40 CFR part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.
 - b Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.
 - c Keeping records of engine manufacturer data indicating compliance with the standards.
 - d Keeping records of control device vendor data indicating compliance with the standards.
 - e Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in 40 CFR 60.4212, as applicable.

(40 CFR 60.4211(b))

3. Permittee may operate the emergency stationary ICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units are limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. **(40 CFR 60.4211(e))**
4. Permittee shall not operate the EUHouseGenerator for any operation other than emergency operation, and maintenance and testing as permitted in 40 CFR 60.4211. **(40 CFR 60.4211(e))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions(inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. Permittee shall comply with the applicable requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines-for the compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP (EUHouseGenerator). **(R336.1213(3)), (40 CFR 63.6580)**
2. Permittee must meet the requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines-by meeting the requirements of 40 CFR part 60 subpart IIII-Standards of Performance for Compression Ignition Internal Combustion Engines, for the compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP (EUHouseGenerator). No other requirements apply for such engines under 40 CFR 63, Subpart ZZZZ. **(R336.1213(3)), (40 CFR 63.6590(c))**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGSOLIDPROCESS	Flexible group for the solid process section (incinerator and belt press) controlled by a common odor control (oxidizing scrubber).	EUIncinerator EUBeltPress
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUColdCleaner EUCOLDCLEANERS

**FGSOLIDPROCESS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Flexible group for the solid process section (incinerator and belt press) controlled by a common odor control (oxidizing scrubber).

Emission Units: EUIncinerator, EUBeltPress

POLLUTION CONTROL EQUIPMENT

Oxidizing (chemical) Scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NAp

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Permittee shall equip and maintain the chemical (oxidizing) scrubber with a liquid flow indicator.²
(R336.1201(3))
2. Permittee shall continuously monitor the ambient temperature with instrumentation equipped with an alarm. When the ambient temperature exceeds 55°F, the alarm shall be on.
(R336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETERS

1. NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep records of the hours and days of operation of the chemical (oxidizing) scrubber and made available to AQD upon request.²
(R336.1201(3))
2. The permittee shall maintain the pH of the effluent from the chemical scrubber to more than 8.0
(R336.1213(3)), (R336,1910)

3. The permittee shall record the chemical feed to the monitor on a weekly basis.
(R336.1213 (3), (R336.1910))
4. The permittee shall keep daily records of pH measurement of the effluent from the scrubber on file.
(R336.1213(3), (R336.1910))
5. The permittee shall keep daily records of the ambient temperature.
(R336.1213 (3), (R336.1910))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.
(R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. When ambient temperature exceeds 55°F, permittee shall not operate FGSOLIDPROCESS unless the 3-stage impingement type wet scrubber and the oxidizing scrubber are installed and operating properly.²
(R336.1201(3), R336.1910)
2. When exhausting emissions from the incinerator and/or the sludge filter presses through the oxidizing scrubber, the permittee shall operate the oxidizing scrubber as described in the permit application.²
(R336.1201(3))

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUCOLDCLEANERS, EUColdCleaner

I. EMISSION LIMITS: NA

II. MATERIAL LIMITS

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING: NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis.
(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.
(R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Natural Resources and Environment	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H ₂ S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO ₂	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfuction Abatement Plan	µg	Microgram
MDNRE	Michigan Department of Natural Resources and Environment	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-B1792-2005. **This includes any PTI that were incorporated into the Source-wide PTI No MI-PTI-{B1792}-{2005} through amendments or modifications and any PTI that remained off-permit until this ROP renewal.**

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
MI-PTI-B1792-2005	Source-wide permit to install	FGSOLIDPROCESS EUGritBox EUWetWell
MI-PTI-B1792-2005a	Source-wide permit to install	FGSOLIDPROCESS EUGritBox EUWetWell
MI-PTI-B1792-2005b	Source-wide permit to install	FGSOLIDPROCESS EUGritBox EUWetWell

Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the attached approved format for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

Appendix 9: CAM PLAN

Michigan Department of Environmental Quality - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

Form Type AI-001	SRN B1792
1. Operator's Additional Information Id AI-EUINCINEU-003	
Additional Information	
2. Is This Information Confidential?	No
3. Narrative	

1. CAM Plan

Applicable Emission Unit ID: EUINCINERATOR

Applicable Emission Limit: 0.2 pounds/1000 pounds of exhaust air, corrected to 50% excess air

In accordance with a letter dated May 8, 2007 from the Air Quality Division, it was determined that a pre-control particulate matter (PM) emissions from the multiple hearth incinerator has the potential to exceed 100 tons per year. As a result, the Warren WWTP is subject to the Compliance Assurance Monitoring Rule (40 CFR Part 64). Emissions from the incinerator are controlled by an impingement wet scrubber.

Warren WWTP has prepared a CAM plan. The CAM plan proposes to use the differential pressure across the scrubber as an indicator of proper operation of the scrubber. An excursion is defined as a differential pressure that falls below 4.0 inches of w.c. (water column). The relation of differential pressure to emission rate was confirmed by testing conducted on July 17, 2007.

COMPLIANCE ASSURANCE MONITORING PLAN

I. Background

A. Emission Unit

Description:

Multiple Hearth Incinerator controlled by Impingement type wet scrubber to reduce particulate emissions.

Identification:

EUINCINERATOR, ROP No.: MI-ROP-B1792-2005b, Facility: Warren WWTP 32360 Warkop Warren, MI 48093

B. Applicable Regulation, Emission Limit Monitoring Requirements

Regulation: State Rule R336.1331(1)(a)

Emission Limits Particulate matter: 0.2 lb/1000 lbs. exhaust air corrected to 50% excess air

Monitoring Requirements: Differential pressure across the scrubber

C. Control Technology Description

Impingement type wet scrubber

II. Monitoring Approach

The key elements of the monitoring approach are presented in Table 1 below. The indicator of performance is the differential pressure across the scrubber.

Table 1: Monitoring Approach

A. Indicator

Measurement Approach

Scrubber differential pressure

The pressure drop is monitored with a differential pressure transducer

B. Indicator Range

An excursion is defined as differential pressure that falls below 4.0 inches of w.c. (water column). Excursions trigger an inspection, corrective action, and a reporting requirement

C. Performance Criteria

1. Data Representativeness

The differential pressure transducer monitors the static pressures upstream and downstream of the scrubber. Its minimum accuracy is

+/- 1 percent.

2. Verification of Operational Status

The differential pressure is an indicator of proper operation of the scrubber and will be monitored daily while the incinerator is operating.

3. QA/QC Practices and Criteria

The transmitter is factory calibrated for the specified range. Field calibration is done using a precision pressure calibrator unit and 4-20

loop calibrator. Factory specification indicates less than 2% period. Calibration is done annually and should be reading is thought to be questionable.

ma signal drift over a 12 month sufficient or as needed if

Michigan Department of Environmental Quality - Air Quality Division
RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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Form Type AI-001	SRN B1792
1. Operator's Additional Information Id AI-EUINCINEU-003	
Additional Information	
2. Is This Information Confidential? No	
3. Narrative	

5. Data Collection Procedures 1-minute readings are displayed on PC. The PC then stores these readings. The 1-minute readings that are valid will be averaged by hour for compliance reporting purposes.

6. Averaging Period 15 minute periods of a given operating hour). 1-hour compliance averages (at least one valid 1-minute reading per two

III. Monitoring Approach Justification

A. Background

The pollutant-specific emissions unit (PSEU) is particulate matter (PM) from a multiple hearth incinerator, in which processed sewage sludge solids are dried and combusted with natural gas as a supplemental fuel during the incineration process. PM from the incinerator's exhaust stream is controlled by an impingement type wet scrubber. The pressure drop between the upstream and downstream of the scrubber is monitored.

B. Rationale for Selection of Performance Indicators

The scrubber differential pressure was selected as the indicator of control device performance. The differential pressure is proportional to the water flow and air flow through the scrubber and is an indicator of the energy across the scrubber and the proper operation of the scrubber within established conditions. Pressure drop is an indicator of the water level in the scrubber. Maintaining an adequate water flow insures adequate particulate removal. The feed rate to the multiple hearth incinerator is fairly steady with PM concentrations to the scrubber being relatively constant. It is expected that a higher differential pressure will result in increased PM removal efficiency while a lower differential pressure will result in lower removal efficiency. Site-specific emissions test data confirm these expectations.

C. Rationale for Selection of Indicator Ranges

The selected pressure differential range is based on the results of the performance test conducted on the multiple hearth incinerator on July 17, 2007. Testing was conducted using a normal process throughput rate. The scrubber normally operates at 5.5 to 6.5 "w.c. A chart of typical differential pressure readings from August 14, 2007, are shown in Chart 1 for reference. In order to determine emission rate variability as differential pressure varies, the PM emission rate was measured at three differential pressures (4.89, 6.48 and 8.05 "w.c.). The testing confirmed that at a lower differential pressure the emission rate is higher. The higher the differential pressure the lower the emission rate. Table 2 summarizes the test results. The fourth value on the table is extrapolated from the test results at 4.0 "w.c. As a result, an excursion was defined as a differential pressure of less than 4.0 "w.c.