

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

BEFORE THE

OHIO E.P.A.  
NOV 13 2008

OHIO ENVIRONMENTAL PROTECTION AGENCY

By: Donda Lassiter Date: 11-13-08

ENTERED DIRECTOR'S JOURNAL

In the Matter of:

Marietta Industrial Enterprises : Director's Final Findings  
County Road 10 : and Orders  
Marietta, OH 45750 :

**I. JURISDICTION**

These Director's Final Findings and Orders ("Orders") are issued to Marietta Industrial Enterprises ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 3704.03 and 3745.01.

**II. PARTIES BOUND**

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of the Respondent or of the Facility (as hereinafter defined) shall in anyway alter Respondent's obligations under these Orders.

**III. DEFINITIONS**

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3704 and the rules promulgated thereunder.

**IV. FINDINGS**

The Director of Ohio EPA has determined the following findings:

1. Respondent owns and operates a facility located on County Road 10 in Warren Township, Washington County, Ohio ("Facility"), which is identified by Ohio EPA as Facility ID number 0684000148. The Facility is involved in processing and distribution of a number of solid materials. Primarily, the Facility processes include the drying of magnetite; screening, crushing and sizing of a number of materials, including ferroalloys; and barge loading of materials such as coal. The Facility also serves as a storage yard for a number of materials including road salt.

2. On July 12, 2002, pursuant to Ohio Administrative Code ("OAC") Chapter 3745-77, a Title V permit was issued to the Respondent for the Facility. The Title V permit establishes terms and conditions under which the emissions units at the Facility were to be operated in order to ensure compliance with state and federal air pollution control laws and

regulations. Specifically, Respondent's continuing Title V permit requirements, in part, established emission testing requirements for emissions units ("EUs") F017 (fine screening and briquetting), F022 (crushing system), F024 (loading station), F912 (smico screeners), P012 (rotex), P901 (crushing and screening system), P903 (briquetting plant), P904 (crushing and screening system), P905 (packaging system), P907 (stedman sizing system), P908 (air bagger), P910 (fume storage pile), P911 (ball & pebble mill), P916 (crushing and screening system), P917 (ferroalloy brick press), P921 (rod mill), P923 (picking operation), P924 (drying and screening system), P926 (manganese ore milling operation) and P928 (pelletizer). Each of these EUs is an "air contaminant source" as defined in OAC Rule 3745-15-01(C) and (W), and emits "particulate matter" as defined in OAC Rule 3745-17-01(B)(12) and/or manganese, a hazardous air pollutant ("HAP"). The Title V permit required testing for particulate emissions approximately 2.5 years after the permit issuance, i.e., January 13, 2005, and within six months of the permit's expiration, i.e., January 13, 2007 for EUs F022, F024, P901, P903, P904, P907, P908, P911, P916, P921, P923, P924 and P926. In addition to particulate testing, EU P901 was required to be tested for manganese emissions. By letter dated June 20, 2008, Respondent notified Ohio EPA that EUs P903, P907, P910, P911, P916 and P917 were permanently shut down.

3. On June 15, June 22 and July 20, 2006, Ohio EPA conducted compliance inspections at the Facility. As a result of these inspections, Ohio EPA determined that Respondent had, inter alia, failed to conduct the required emission testing due by January 13, 2005, for EUs F024, P901, P904, P907, P916, P921, P924 and P926, in violation of Part III.A.V.2. of the continuing Title V permit terms and conditions and ORC § 3704.05(C) and (J)(2).

4. ORC § 3704.05(C) and (J)(2) state, in part, that no person shall violate any terms or conditions of a permit issued under ORC § 3704.03.

5. By letter dated August 22, 2006, Ohio EPA notified Respondent of the violations referenced in Finding No. 3 of these Orders.

6. On April 8, 2008, Respondent attempted to conduct a formal emission test for EU P924. EU P924's permitted allowable emission limitation is 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device (baghouse) serving the EU or no visible particulate emissions, whichever is less stringent. During the first test run of the required compliance demonstration, Ohio EPA representatives documented visible particulate emissions from the baghouse stack serving this EU. Therefore, the required emission tests had to demonstrate compliance with the grain loading limitation referenced above. At the end of the first test run, the emission testing company performed the required leak check of the emission sampling equipment ("sampling train"). The sampling train did not pass the leak check requirements. The excess leakage would negatively bias the sampled particulate emission concentration. Due to time constraints, the compliance demonstration was discontinued for the day. To date, the overdue compliance demonstration for EU P924 has not been rescheduled, the testing required by January 13, 2005 and January 13, 2007 for the other EUs has not been

performed and, therefore, Respondent remains in violation of Part III.A.V.2. of the Title V permit terms and conditions and ORC § 3704.05(C) and (J)(2).

7. In addition to the requirements of Part III.A.V.2 of the Title V permit, ORC § 3704.03(I) authorizes the Director of Ohio EPA to require any persons responsible for any air contaminant source to sample the emissions, at such intervals, and in such a manner as the Director prescribes.

8. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with the following Orders and their relation to benefits to the people of the State be derived from such compliance.

## **V. ORDERS**

The Director hereby issues the following Orders:

1. Within thirty (30) days after the effective date of these Orders, Respondent shall prepare and submit to Ohio EPA a comprehensive and accurate inventory of all materials processed through each of the EUs identified in Finding No. 2, except those EUs that have been permanently shut down, during the months of September 2007 through September 2008. This inventory shall include the weight in tons, of each such material; percentage, by weight, of manganese in each of the materials being processed; and how such percentages were determined.

2. Within ninety (90) days after the effective date of these Orders, Respondent shall achieve and demonstrate compliance with the limitation of 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases for EU P924 by conducting the required particulate emission testing, as outlined in the Title V permit. Within the same time period, Respondent also shall test the emissions from EU P924 for manganese in accordance with Method 29 of 40 CFR Part 60, Appendix A, if the inventory referenced in Order No. 1 identifies manganese-containing material as being processed through this EU. Respondent shall complete and submit the required Intent-to-Test notification form (see Attachment 1 to these Orders) within sixty (60) days after the effective date of these Orders. The testing of manganese emissions, in terms of pounds per hour, shall be performed while EU P924 is being operated at maximum capacity while processing available material(s) that will result in the highest manganese emission rate.

3. Within thirty (30) days after the tests referenced in Order No. 2 are completed, a written test report shall be submitted to Ohio EPA as provided in the Title V permit.

4. Within one hundred and twenty (120) days after the effective date of these Orders, Respondent shall achieve and demonstrate compliance with applicable particulate emission limitations for EUs F024, P901, P904, P907 (now a part of P901), P916, P921 and P926 by conducting the required emissions tests, as outlined in the Title V permit.

Within the same time period, Respondent shall also achieve and demonstrate compliance with the applicable manganese emission limitation of 0.9 pound per hour for EU P901 by conducting the required emissions tests, as outlined in the Title V permit. If the inventory referenced in Order No. 1 identifies manganese-containing material as being processed through any of the EUs listed in this paragraph, excluding EU P901, then Respondent also shall test those EUs for manganese emissions in accordance with Method 29 of 40 CFR Part 60, Appendix A, within one hundred and twenty (120) days after the effective date of these Orders. Respondent shall submit the required Intent-to-Test notification forms (see Attachment 1 to these Orders) within ninety (90) days after the effective date of these Orders. The testing of manganese emissions, in terms of pounds per hour, shall be performed while each of the above EUs is being operated at maximum capacity while processing available material(s) that will result in the highest manganese emission rates.

5. Within thirty (30) days after the tests referenced in Order No. 4 are completed, a written test report shall be submitted to Ohio EPA as provided in the Title V permit.

6. Should the inventory referenced in Order No. 1 identify manganese-containing materials as being processed through any of EUs F017, F022, F912, P012, P905, P908, P923 or P928 at the Facility, then, within one hundred and twenty (120) days after the effective date of these Orders, Respondent shall test each EU that processes manganese-containing material for manganese emissions in accordance with Method 29 of 40 CFR Part 60, Appendix A. Respondent shall submit the required Intent-to-Test notification form (see Attachment 1 to these Orders) within ninety (90) days after the effective date of these Orders. The testing of manganese emissions, in terms of pounds per hour, shall be performed while each of the above EUs is being operated at maximum capacity while processing available material(s) that will result in the highest manganese emission rates.

7. Within thirty (30) days after the tests referenced in Order No. 6 are completed, a written test report shall be submitted to Ohio EPA as provided in the Title V permit.

## **VI. TERMINATION**

Respondent's obligations under these Orders shall terminate when the Respondent certifies in writing and demonstrates to the satisfaction of the Ohio EPA the Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Air Pollution Control acknowledges, in writing, the termination of these Orders.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate, and complete."

The certification shall be submitted by the Respondent to the Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is the person authorized to sign in OAC Rule 3745-77-01(GG)(1) for a

corporation or duly authorized representative of the Respondent, as that term is defined in the above-referenced rule.

### **VII. OTHER APPLICABLE LAWS**

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, State and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

### **VIII. RESERVATION OF RIGHTS**

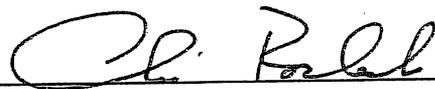
Nothing contained herein shall be construed to prevent Ohio EPA from seeking legal or equitable relief to enforce the terms of these Orders or from taking other administrative, legal or equitable action as deemed appropriate and necessary, including seeking penalties against Respondent for noncompliance with these Orders and/or for the violations described herein. Nothing contained herein shall be construed to prevent Ohio EPA from exercising its lawful authority to require Respondent to perform additional activities pursuant to ORC Chapter 3704 or any other applicable law in the future. Nothing herein shall restrict the right of Respondent to raise any administrative, legal or equitable claim or defense with respect to such further actions which Ohio EPA may seek to require of Respondent. Nothing in these Orders shall be construed to limit the authority of Ohio EPA to seek relief for violations not addressed in these Orders.

### **IX. EFFECTIVE DATE**

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

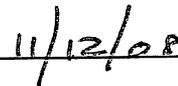
### **IT IS SO ORDERED:**

Ohio Environmental Protection Agency



Chris Korleski  
Director

Date



# **ATTACHMENT 1**

# GENERAL TESTING AND REPORTING REQUIREMENTS

Ohio EPA requires that an Ohio Intent to Test ("ITT") form be filed with the appropriate Ohio EPA representative at least 30 days (or more if required by regulation) prior to the testing event. If a test witness is required by Ohio EPA, witnesses are scheduled on a first-come-first-served basis, so test date flexibility may be necessary. Ohio EPA expects to see the required testing and sample recovery/analysis performed per the applicable methods, without any modifications. If ANY modification to the specified test methods, as published, is planned, the modification is required to be detailed in the ITT with justification as to why the modification is necessary. Alternate procedures spelled out within a given method are considered modifications, and must also be noted on the ITT. All proposed modifications are subject to the approval of Ohio EPA, and depending on the nature of the modification, Ohio EPA may require the testing company or facility to obtain written approval of the modification from USEPA. Do not expect Ohio EPA to approve any modifications on-site, or without adequate advance notice.

Incomplete ITTs may be returned for more information.

Below are commonly overlooked testing and reporting requirements. Please review test methods being proposed in the ITT for a complete listing of the requirements that are expected to be met.

## TEST EVENT REQUIREMENTS:

### All testing

- All field data sheets are to be filled out in pen, not pencil.
- Correction fluid is not permissible on any data sheet. Changes or mistakes are to be corrected with a single line strikeout, and initialed by the person making the change.
- All applicable pre-survey work should be available for review on-site.
- Testing must be scheduled so it can be completed within a normal workday (8:00 am - 4:30 pm). At the discretion of Ohio EPA, other test times may be available, but must be pre-approved. In addition, Ohio EPA expects that testing must begin no later than 12:00 p.m. on the scheduled date, unless an alternative testing time has been pre-approved by Ohio EPA. It is the responsibility of the facility and the stack-testing consultant to ensure that this happens. If testing has not begun by noon, Ohio EPA staff may leave the facility unless, in their professional opinion, the start of testing is imminent. At the point when Ohio EPA staff leave the facility because testing has not begun, the testing shall be rescheduled to a mutually agreed upon date and time.
- Tests must be completed such that each applicable "units of the standard(s)" can be determined.
- All method required leak checks are expected to be completed pursuant to the method(s) being used.
- All Reference Method data being recorded electronically on site must be available in hard-copy form, or on media supplied by personnel completing the testing in a .PDF format.
- For testing that occurs with no Ohio EPA witness present, Ohio EPA reserves the right to require that a copy of all field data collected during a testing event be sent via email in a .PDF format within 24 hours of the end of the testing event.
- Test runs must be made consecutively (back to back), and completed within 24-hour of the start of the test, unless Ohio EPA has pre-approved an alternate test schedule.
- For emissions units that have multiple stacks or outlets, all stacks or outlets must be tested simultaneously for emissions rate determinations. Destruction efficiency determinations require all inlet and outlet points be tested simultaneously.
- It is understandable that a test may need to be postponed due to circumstances that would not allow representative conditions to be established, such as recent maintenance or modification, equipment failure, or the absence of key personnel. However, concern that a test will result in a determination of non-compliance is not a valid reason for postponement, and a facility decision to postpone without a valid reason may result in enforcement action against the facility.

### Methods 1-4

- Stack diameter and sample point measurements must be available for review and verification on-site.
- Documentation of compliance with the specifications displayed in Figures 2-2, 2-3, 2-4, 2-7, and 2-8 of EPA Method 2 must be available for review on-site.
- The time of dry molecular weight analysis must be recorded per EPA Method 3, Section 8.2.4
- For emission rate corrections, O<sub>2</sub>/CO<sub>2</sub> measurements are made utilizing an instrumental analyzer or an Orsat analyzer in which the time of analysis is recorded as per EPA Method 3B, Section 8.2.4.

- A meter box check must be performed prior to testing per Section 9.2 of Method 5, and a copy of the meter box calibration made available on-site.
- On-site determination of Method 4 moisture content is required.
- Good condition, indicating-type silica gel must be used for Method 4 moisture determinations. Water in the bottom of the silica gel impinger, or indications of breakthrough in the silica gel, will invalidate the associated test run.

#### Methods 5, 6, 8 and 29/Isokinetic

- Nozzles used during testing must be made available for on-site verification that Method 5, Section 6.1.1.1 specifications are being met.
- Paperwork indicating that thermocouple and barometric pressure readings are within Method 5 specifications must be available on-site and included in the test report.
- Filter temperature must be monitored by a thermocouple that is in contact with the sample gas stream per EPA Method 5, Section 6.1.1.7. This temperature must also be recorded at a frequency in keeping with other sample train temperatures.
- Equipment must be available to allow for the on-site recovery of the sample probe, impingers and the nozzle.
- All samples recovered for off-site analysis must be sealed and labeled, and a "record of custody" must be completed prior to leaving the site.
- Solutions must be labeled with preparation date and time to confirm compliance with EPA Method 6, Section 7.1.3 / Method 8 Section 7.1.4 / Method 29, Section 7.3.2 requirements.
- Probe temperatures must be recorded.

#### Method 7E

- On-site NOx converter check pursuant to Section 8.2.4 (or an Ohio EPA prior approved alternative NOx converter check) must be completed prior to each emissions unit-testing event.

#### Method 9

- Visible emission readers must have photo identification and a copy of their current Method 9 certification paperwork, available for review on-site.

#### Method 18

- Method 18 spike recoveries must be performed per the specification of the applicable section.
- Spike and recovery analysis must be performed for compliance methane analysis for subtraction from a total VOC number.

#### Method 25/25A

- The methodology selected for the measurement of VOC must be in accordance with USEPA Emission Measurement Center Guidance Document 033 (GD-033).

#### Method 26

- The filter temperature must be maintained at 248 degrees Fahrenheit or above.

#### All instrumental test methods

- Copies of all reference method calibration gas certifications must be available for review on-site. Ambient air, scrubbed or otherwise, will not be allowed for use as a calibration standard (zero air generators will be allowed, however.)
- If a calibration gas dilution system is utilized, Emission Measurement Technical information Center Test Method 205 (EMTIC TM-205) must be performed, on site, to validate system performance prior to testing. Calibration gas dilution systems shall not be used for 40 CFR Part 75 testing events.

Compliance testing using instrumental test methods 6C, 7E, 10 and 20 (and test method 3A when data is being used for anything other than molecular weight determinations)

- With the sample train in the testing configuration, response time tests completed in accordance with test method 7E, Section 8.2.6, must be completed prior to stratification testing, and data must be available for review on site.
- Stratification testing in accordance with test method 7E, Section 8.1.2, must be completed prior to each testing event, and data must be available for review on site.
- All sampling points as dictated by the results of the stratification test are required to be sampled. The sampling time at each point is required to be two times the response time. (Please note that this may cause compliance test runs to last for more than 60 minutes, depending on the response times and the number of points that must be sampled.)

Relative accuracy test audits ("RATA")

- Relative accuracy determinations are required for each unit of the standard.
- Flow and molecular weight determinations, where required to convert data to units of the standard, are required for each RATA run.
- Moisture determinations are required for each RATA run. Ohio EPA may approve the use of one moisture determination for two RATA runs, depending on the type of source/process, but prior approval is required.
- The use of multi-hole sample probes will not be allowed.

**REPORTING REQUIREMENTS:**

In addition to the above-mentioned conditions, please note that Ohio EPA must receive test results in a report format consistent with the USEPA Emission Measurement Center Guidance Documents 042 and 043 (GD-042 and GD-043) within 30 days of the test event unless additional time is allowed pursuant to permit conditions or rule requirements that have not been incorporated into the permit. Acceptable test reports must contain the following:

All test reports

- Testing data reported in units of the applicable standard(s).
- Names and contact information for all members of the test team.
- Facility representative name and contact information.
- Emission unit identification(s), including Ohio EPA assigned emissions unit I.D.
- Copies of all field data sheets and measurements.
- Copies of the completed "record of custody" for all samples removed from the testing site - if applicable.
- Full outside laboratory reports with supporting documentation (please call if greater than 25 pages long) - if applicable.
- Copies of all relevant emissions unit process/operational data.
- All formulas used in calculating emission rates if different than specified in the applicable reference methods.
- An explanation of all disruptions encountered during the test period, (i.e., Meter box changes, process shutdowns, broken glassware, etc.)
- All applicable pre-survey work should be included in the final test report.
- Production records and parametric monitoring data recorded during testing must be included in the final report.

Methods 1-4

- Copies of the calibrations performed on all Pitots, meter boxes, thermocouples, barometers, balances, and nozzles used during testing and analysis.
- Copies of the certificates verifying the accuracy of the equipment utilized to calibrate the meter boxes and thermocouples utilized during testing.

Method 5

- Copies of the gravimetric analysis performed on the particulate matter samples complete with laboratory conditions (ambient temperature, barometric pressure, humidity, and time of measurement).

Method 7E

- Copies of the on-site converter check performed per EPA Method 7E, Section 8.2.4.

Method 25/25A

- Test results must be reported in terms of actual VOC, and not VOC as carbon or propane, unless specified by the permit.

All continuous emission monitoring system ("CEMS") Methods

- Copies of all gas certification sheets for every calibration gas utilized.
- Response times for every analyzer in the configuration utilized in the field (EPA Method 7E, Section 8.2.6).

All RATA reports must also include:

- The make, model and serial number of each analyzer that is part of the facility CEMS being tested.
- 7-day drift check data for all CEMS that are undergoing initial certification.
- Linearity data, where required, for all CEMS that are undergoing initial certification.
- Relative accuracy determinations must be reported in each required units of the standard(s) for which the CEMS are being used to demonstrate compliance.
- Facility process data indicating that the facility operated at 50 percent or more of the normal load (EPA Performance Specification 2, Section 8.4.1).

Failure to follow the above guidance may result in Ohio EPA rejecting all or part of the associated test or testing results.

INTENT TO TEST NOTIFICATION (One Emissions Unit Per Sheet)

Agency use only
Date Received _____
Assigned _____

Proposed Test Date \_\_\_\_\_  
 Proposed Start Time \_\_\_\_\_

Facility Premise No. \_\_\_\_\_  
 Emissions Unit PTI No. \_\_\_\_\_  
 SCC Number \_\_\_\_\_

A. Facility Contact Information:

Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Contact Person \_\_\_\_\_  
 Telephone (O) \_\_\_\_\_ (Cell) \_\_\_\_\_  
 E-mail \_\_\_\_\_

Testing Firm Information:

Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Contact Person \_\_\_\_\_  
 Telephone (O) \_\_\_\_\_ (Cell) \_\_\_\_\_  
 E-mail \_\_\_\_\_  
 Address \_\_\_\_\_  
 Telephone (O) \_\_\_\_\_ (Cell) \_\_\_\_\_

B. Test Location Information:

Name \_\_\_\_\_  
 Contact Person \_\_\_\_\_

C. Test Plan and Emissions Unit Information Table: List the applicable information under each respective column heading.

Emission Unit # / Description	Control Equipment	Monitoring Equipment	Pollutant(s) to be Tested	EPA Test Method(s)	Number of Sampling Points	Total Time for Sample Run	Number of Sampling Runs

Are any modifications, or alternatives as spelled out within the test methods, being proposed? Yes  No  If "no", then no modifications or alternatives, however minor, will be accepted. If yes, list each test method and section being modified, and attach a detailed modification description and justification: \_\_\_\_\_

Source is testing to comply with (check all that apply): State PTI  State PTO  Title V  NSPS  MACT  BIF  Title IV  Other (explain) \_\_\_\_\_

D. What is the maximum rated capacity or throughput of the emissions unit given in its permit-to-install or permit-to-operate? \_\_\_\_\_  
 Has the facility scheduled production or throughput so that the emissions unit can be operated at the maximum capacity given in its permit-to-install or permit-to-operate during the test? Yes  No  If no, attach explanation. \_\_\_\_\_

Specify how the operating rate will be demonstrated during testing: \_\_\_\_\_  
 Will Cyclonic flow check(s) be conducted? Yes  No

Sampling Location(s): Inlet  Outlet  Simultaneous  Other  If other, specify: \_\_\_\_\_  
 Fuel Sampling: Coal - Proximate  Ultimate  Other  If other, specify: \_\_\_\_\_

Emission rate to be calculated using: F-Factor  Ultimate Coal Analysis  Other  If other, specify: \_\_\_\_\_  
 Has any maintenance or parts replacement been performed on the emissions unit or the control equipment within the last year? Yes  No

If yes, briefly describe: \_\_\_\_\_

(Note: Some maintenance, such as installing new filter bags in a baghouse, or replacing the activated carbon in an adsorber, may disqualify the emissions unit from a performance test until a sufficient amount of time has elapsed to ensure a test which will be representative of normal operations.)

F. Sample Train Calibration: All affected measuring and monitoring equipment should be calibrated within 60 days of the scheduled testing.

THE FOLLOWING ADDITIONAL INFORMATION SHALL BE SUBMITTED AS ATTACHMENTS:

F. Sample Train Information:

- A schematic diagram of each sampling train.
- The type or types of capture media to be used to collect each gas stream pollutant. (Include filter specification sheets)
- Sample probe type, (e.g., glass, teflon, stainless steel, etc.)
- Probe cleaning method and solvent to be used, if applicable.

G. Laboratory Analysis:

- A description of the laboratory analysis methods to be used to determine the concentration of each pollutant.

H. Description of Operations:

- A description of any operation, process, or activity that could vent exhaust gases to the stack being tested. This shall include the description and feed rate of all materials capable of producing pollutant emissions used in each separate operation. Maximum process weight rate, or coating rate, and parameters such as line speed, VOC content etc. should be specifically documented with calculations to confirm worst case scenario emissions.

Note 1: All compliance demonstration testing shall be performed at maximum rated capacity as specified by the equipment manufacturer, or at the maximum rate actually used in the emissions unit operation, whichever is greater, or at any other rate as agreed upon with Ohio EPA.

Note 2: If the emissions unit is not operated at maximum capacity, or as close as possible thereto, the emissions unit might be derated to the production capacity achieved during testing.

I. Stack and Vent Description:

- A dimensional sketch or sketches showing the plan and elevation view of the entire ducting and stack arrangement. The sketch should include the relative position of all processes or operations venting to the stack or vent to be tested. It should also include position of the ports relative to the nearest upstream and downstream gas flow disturbance or duct dimensional change. The sketches should include the relative position, type, and manufacturer's claimed efficiency of all gas cleaning equipment.
- A cross sectional dimensional sketch of the stack or duct at the sampling ports, showing the position of sampling points. In case of a rectangular duct, show division of duct into equal areas.
- For fugitive emissions testing, a sketch illustrating the specific emissions points to be observed must be included.

J. Safety:

- Describe all possible safety hazards including such items as the presence of toxic fumes, high noise levels, areas where eye protection is required, etc. Note: Conditions considered unsafe at the time of the test will cause postponement.