



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 13, 2007

Re: Coshocton County
Clow Water Systems Company
Facility ID # 0616010006
Warning Letter

Heather A. Klesch, Environmental Manager
Clow Water Systems Company
P.O. Box 6001
2266 South Sixth Street
Coshocton, OH 43812-6001

Dear Ms. Klesch:

This letter serves to notify the Clow Water Systems Company ("Clow") of violations of state and federal air pollution rules and regulations that were discovered by Ohio EPA's Division of Air Pollution Control ("DAPC"), Southeast District Office ("SEDO") while working on Permit-to-Install ("PTI") # 06-07432, the PSD permit for the 1989 and 1998 modifications of the cupola (emissions unit P901). In addition, this letter identifies a violation that was discovered upon review of the Intent to Test ("ITT") notification dated March 14, 2007 submitted by Air Compliance Testing, Inc. for the Jolt Line modification emissions testing. A few minor/preliminary questions and comments on Clow's December 2004 Title V renewal application are also included.

Violations:

(1) ***PTIs Required***

Ohio Administrative Code ("OAC") rule 3745-31-02

Except as provided in rule 3745-31-03 of the Administrative Code, no person shall cause, permit, or allow the installation of a new source of air pollutants, or cause, permit, or allow the modification of an air contaminant source, without first obtaining a PTI from the director. New source is defined as any air contaminant source for which an owner or operator undertakes a continuing program of installation or modification or enters into a binding contractual obligation to undertake and complete, within a reasonable time, a continuing program of installation or modification, after January 1, 1974, and that at the time of installation or modification, would have otherwise been subject to the provisions of this chapter.

- (a) In Ohio EPA's Title V inspection letter dated October 8, 2004, Clow was asked to provide the installation and modification dates of all of the emissions units at Clow's Coshocton facility. In an Email dated November 9, 2004, Patrick Huth responded that the emissions unit information would be provided in Clow's

Title V renewal application. This application was received by Ohio EPA on December 10, 2004 and revisions were received on December 20, 2004. The installation and modification data provided in the renewal application was retrieved from STARS and was compared to Ohio EPA's permitting records for the facility, and it was determined that the following non-exempt emissions units were installed or modified without first obtaining PTIs:

- F018 (formerly Z003) - centrifugal casting machines 1-6; installed in June 1972 and modified in January 1979
- K006 - pipe paint operation (small line); installed in June 1972 and modified in June 1993; and
- P020 - annealing oven; installed in June 1977.

To resolve these violations, Clow must apply for and obtain PTIs for the emissions units listed above. Please note that emissions units K006 and P020 have been included in Clow's PSD permit for the cupola modifications for the purposes of obtaining federally enforceable emissions limitations and natural gas usage restrictions to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards ("NAAQS"). However, the PTIs for these two units do not address the BAT requirements in OAC rule 3745-31-05(A)(3) or any other requirements that would have been applicable when the units were installed or modified.

- (b) No installation or modification dates were provided for emissions unit Z129 which is identified as exempt per Ohio Revised Code § 3704.036. Clow must provide Ohio EPA with the installation and modification dates for this unit and the company's evaluation of whether a PTI should have been obtained for this unit. If a PTI was required, Clow must submit a complete PTI application.

(2) ***Emissions Testing***

Part III.A.V.2 of PTI # 06-07603 for emissions units F007 and P007, issued on June 13, 2006 and modified on October 12 and December 28, 2006, requires emissions testing to demonstrate that the baghouse serving emissions units F004, F007 and P007 is in compliance with the combined emissions limitation for PE. This testing was required to be conducted within 6 months after the modification of the emission units. The installation certification provided by Clow indicated that the modification was completed on September 19, 2006, so the testing was required to be completed on or before March 19, 2007.

The ITT notification received by Ohio EPA on March 19, 2007 states that the emissions testing for these units will be conducted on April 17, 2007, approximately one month late. No further action is required at this time to address this violation.

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Title V Permit Renewal Application Questions and Comments:

- (1) Emissions unit F022, formerly emission unit Z073, was added in the Title V renewal application. However, emissions unit Z073 was not identified as shut down. Clow's renewal application must be revised to identify emissions unit Z073 as permanently shut down.
- (2) PTI # 06-08030 was issued on April 19, 2006 for emissions unit P034. This unit needs to be added to the Title V renewal application.
- (3) PTI # 06-08238 was issued on January 30, 2007 for emissions units P035, P036, P037 and P038. These units need to be added to the Title V renewal application.
- (4) Emissions units Z009, Z057, Z076, and Z077 are identified in the application as non-Title V only. Please elaborate on why these units were added to Clow's Title V renewal application.

Within 30 days of your receipt of this letter, please submit to this office the information requested above. Clow must provide Ohio EPA a compliance plan and schedule that outlines the steps that the company will take to ensure compliance with the applicable permit conditions and state and federal air pollution regulations as indicated above.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you are unable to respond to any part of this request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5245 or via email at kim.reinbold@epa.state.oh.us.

Sincerely,



Kimbra Reinbold
Division of Air Pollution Control
Southeast District Office

KR/mlm