Clow #15 Document

CLOW

CLOW WATER SYSTEMS COMPANY
2266 South Sixth Street
P. O. Box 6001
Coshocton, Ohio 43812
(740) 622-6651
FAX (740) 622-8551

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AIR ENFORCEMENT BRANCH,
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April 24, 2004

Zach Hamlin
Division of Air Pollution Control
Ohio Environmental Protection Agency Southeast District Office
2195 Front Street
Logan, Ohio 43138-9031

Reference: 1st Quarter 2004 – Deviation Report

Dear Mr. Zach Hamlin,

Enclosed is the 1st quarter report. As requested Clow is including the below verbiage from the General Terms and Conditions in the Title V Permit. "Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete."

Sincerely

Jeff S. Otterstedt
Vice President and General Manager

1st Quarter 2004 Report

I have reviewed the 1st quarter records on the following emission units and have found the following:

Unit	Parameters	Findings
F002	Visible emissions	No deviations
F014	VOC limits Visible emissions	No deviations No deviations
K002	Non-compliant coatings Filtration system	None used No deviations
K005	Non-compliant coatings	None used
K006	Non-compliant coatings Filtration system	None used No deviations
K007	Non-compliant coatings	None used
K008	Non-compliant coatings	None used
K009	Non-compliant coatings VOC limits	None used No deviations
P033	Non-compliant fuels	None used
P901	1) Exhaust gases burned at 1300°F min. 2) Minimum 35" H_2O DP across venturi	See attached See attached

Emission Unit P901 – Cupola

Afterburner Temperature < 1300 F

Date	Duration (minutes)	Cause	Conclusion
1/5/04	45	Unsteady state conditions	Waited for system to stabilize
1/6/04	49	Unsteady state conditions	Waited for system to stabilize
1/7/04	74	Unsteady state conditions	Waited for system to stabilize
1/8/04	110	Unsteady state conditions	Waited for system to stabilize
1/9/04	48	Unsteady state conditions	Waited for system to stabilize
1/12/04	33	Unsteady state conditions	Waited for system to stabilize
1/13/04	7	Unsteady state conditions	Waited for system to stabilize
1/23/04	51	Unsteady state conditions	Waited for system to stabilize
1/27/04	78	Unsteady state conditions	Waited for system to stabilize
2/2/04	21	Unsteady state conditions	Waited for system to stabilize
2/3/04	38	Unsteady state conditions	Waited for system to stabilize
2/4/04	104	Unsteady state conditions	Waited for system to stabilize
2/5/03	105	Unsteady state conditions	Waited for system to stabilize
2/6/04	128	Unsteady state conditions	Waited for system to stabilize
2/9/04	37	Unsteady state conditions	Waited for system to stabilize
2/10/04	184	Unsteady state conditions	Waited for system to stabilize
2/11/04	3	Unsteady state conditions	Waited for system to stabilize
2/12/04	43	Unsteady state conditions	Waited for system to stabilize
2/16/04	15	Unsteady state conditions	Waited for system to stabilize
2/17/04	122	Unsteady state conditions	Waited for system to stabilize
2/18/04	26	Unsteady state conditions	Waited for system to stabilize
2/19/04	60	Unsteady state conditions	Waited for system to stabilize
2/23/04	27	Unsteady state conditions	Waited for system to stabilize
2/25/04	23	Unsteady state conditions	Waited for system to stabilize
3/1/04	13	Unsteady state conditions	Waited for system to stabilize
3/10/04	70	Unsteady state conditions	Waited for system to stabilize
3/16/04	19	Unsteady state conditions	Waited for system to stabilize
3/19/04	1	Unsteady state conditions	Waited for system to stabilize
3/24/04	28	Unsteady state conditions	Waited for system to stabilize
3/25/04	35	Unsteady state conditions	Waited for system to stabilize
3/29/04	25	Unsteady state conditions	Waited for system to stabilize
3/30/04	8	Unsteady state conditions	Waited for system to stabilize
3/31/04	54	Unsteady state conditions	Waited for system to stabilize

Missing data on 1/26/04, 1/28/04, 1/29/04, 1/30/04 , (1:00 to 8:00, DAS was not plugged in), 2/2/04 (1:00 to 6:00, 3:43 TO 4:47) 2/6/04 (1:00 to 6:00), 3/23/04 (1:55 to 4:24)

Delta Pressure < 35 inches

Date	Duration (hrs)	Cause	Conclusion
1/8/04	1	Unknown	None
1/12/04	1.5	Pressure lines plugged	Unplugged pressure lines
1/16/04	.5	Unknown	None
1/19/04	.5	Unknown	None
1/23/04	1	Unknown	None
1/28/04	.5	Pressure line plugged	Unplugged pressure line
2/3/04	5.5	Pressure line plugged	Unplugged pressure line
2/5/04	9	Unknown	None
2/6/04	.5	Unknown	None
2/9/04	1.5	Unknown	None
2/12/04	.5	Unknown	None
2/17/04	.5	Unknown	None
3/8/04	2	Unknown	None
3/9/04	2.5	Unknown	None
3/22/04	1	Unknown	None
3/24/04	.5	Unknown	None
3/29/04	2.5	Unknown	None

cc: J. Otterstedt (with enclosure)
J. Carter (with enclosure)
J. Loth (with enclosure)
J. Brierley (with enclosures)
File: ~~Correspondence~~ 2004 1st Quarter Deviation report

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Street, Apt. No.; or PO Box No. 2195 Front Street

City, State, ZIP+ 4 Logan Ohio 43138-903

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Zach Hanlin
Division of Airpollution Control
OEPA, SEDO
2195 Front Street
Logan, Ohio 43138-9031

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