CLOW

CLOW WATER SYSTEMS COMPANY

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

August 11, 2004

RECEIVED
AUG 23 2004
AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Ohio EPA
Paul Koval
Division of Air Pollution Control
P.O. Box 1049
Columbus, OH-43215

U.S. EPA Region V
George Czerniak
77 W. Jefferson Blvd.
Chicago IL 60604

OEPA-SEDO
Division of Air Pollution Control
2195 Front Street
Logan, Ohio 43138

Reference: MMPP and Iron and Steel Foundry MACT notification

Our company, Clow Water Systems Company Inc., is in the process of evaluating our existing permits and operations to determine if it is feasible for our company to achieve and maintain status as a "synthetic minor" source for Hazardous Air Pollutants (HAPS).

Until this effort is completed, however, we are assuming that we will be a major source under the Maximum Achievable Control Technology (MACT) regulations for the Miscellaneous Metal Parts and Products and the Iron and Steel Foundry category.

Attached is the Notification Report.

Sincerely,

W. Patrick Huth
Environmental Manager

Initial Notification Report

In compliance with with 40 CFR 63 Subpart A, §63.9(b)

Applicable Rule: 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Initial notification is being made in accordance with §63.9(b).

Note: Initial notification reports are due not later than 120 calendar days after the effective date of the relevant standard, or within 120 calendar days after the source becomes subject to the relevant standard. Sources may also use the application for approval of construction or reconstruction under §63.5(d) to fulfill the initial notification requirement.

If you are a new or reconstructed major source, you must also include information required under 63.5(d) and 63.9(b)(5) - the Application for Approval of Construction or Reconstruction. You may use the Application for Approval of Construction and Reconstruction as your initial notification. (§63.5(d)(1)(ii)).

SECTION I
GENERAL INFORMATION

A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)	Facility I.D. Number (OPTIONAL)
06-16-01-0006	

Responsible Official's Name/Title
Jeff S. Otterstedt

Street Address
2266 South 6th Street

City	State	ZIP Code
Coshocton	Oh	43812

Facility Name (if different from Responsible Official's Name)
Clow Water Systems Inc

Facility Street Address (If different than Responsible Official's Street Address)

Facility Local Contact Name	Title	Phone (OPTIONAL)
W. Patrick Huth	Environmental Manager	740 622 6651

City	State	ZIP Code
Coshocton	Ohio	43812

B. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
Iron and Steel Foundry and MMPP MACT	

SECTION II
SOURCE DESCRIPTION

A. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))

Clow operates a Iron foundry that produces ductile iron pipe and fitting for the water industry. This includes a Cupola, pipe casting, annealing oven, painting and cement lining operation and a fittings foundry.

B. Briefly describe the types of emission points within the affected source and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

Types of Emission Points

Emission point include among others, a cupola, casting machines, an annealing oven, green sand molding, pouring and shakeout, and painting

Types of HAPs Emitted

Both inorganic and organic.

C. Check the box that applies: (§63.9(b)(2)(v))

☑ My facility is a major source of Hazardous Air Pollutants (HAPs)
☐ My facility is an area source of HAPs

NOTE: A major source is a facility that emits or has the potential to emit greater than 10 tons per year of any one HAP or 25 tons per year of multiple HAPs. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.

SECTION III

CERTIFICATION *(Note: you may edit the text in this section as deemed appropriate)*

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Jeff S. Otterstedt	GM and Vice President	8/11/04
Signature of Responsible Official		

Note 1: Initial notification forms should be sent to the EPA Regional Office servicing your area and to your State or local Air Pollution Control Agency. Part 70 permit applications can be used in lieu of an initial notification provided: (1) the same information is contained in the permit application as required by this rule; (2) the State has an approved Title V program under Part 70; (3) the State has received delegation of authority by the EPA; and (4) the Title V permit application has been submitted to the permitting authority. (§63.9(a))

Note 2: Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.