John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/26/2013

Certified Mail

Nancy Case
Huron Lime, Inc.
100 Meeker St.
Huron, OH 44839-0451

Facility ID: 0322010062
Permit Number: P0113321
County: Erie

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Sandusky Register. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan

PUBLIC NOTICE
4/26/2013 Issuance of Draft Air Pollution Title V Permit

Huron Lime, Inc.
100 Meeker Street,
Huron, OH 44839-0451
Erie County
FACILITY DESC.: Lime Manufacturing
PERMIT #: P0113321
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit for a lime manufacturing facility.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0322010062
Facility Name:	Huron Lime, Inc.
Facility Description:	Lime manufacturing
Facility Address:	100 Meeker Street, Huron, OH 44839-0451
Permit #:	P0113321, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☒ Carbon Monoxide ☐ Volatile Organic Compounds ☒ Nitrogen Oxides
☒ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	NA
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	F002 and F003 - no PTI P901, P902, and P903 - PTI P0108309 issued 08/16/2011. First year of operation restriction removed. Reference to settling chamber was removed based on a discussion with the facility. P904 - PTI #03-4890 issued 06/13/1990: Fugitive VE check language was removed because there is not an established opacity restriction. P905 - PTI #03-17107 issued 05/08/2008: Pressure drop parametric monitoring was changed to visible emission checks. Appropriate super-ceding language was added.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	P901, P902, and P903 for PE

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	N	40 CFR Part 64	States applicability of CAM rule.

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P901, P902, and P903	100 lbs PE/hr for EU's P901, P902, and P903 combined	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	OR - Water for scrubbers shall be obtained only from settling ponds that are not undergoing excavation. M and R includes scrubber pressure drop and water flow rate, supplemental water flow rates to the ID fan. Also, water flow rate to the quench unit, for P901 and P902 only. A CEM is not economically justified. CAM is applicable.
P901, P902, and P903	Visible PE from the stack shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	OR - Water for scrubbers shall be obtained only from settling ponds that are not undergoing excavation. M and R includes scrubber pressure drop and water flow rate, supplemental water flow rates to the ID fan and quench unit. A COM is not economically justified. CAM is not applicable to opacity, but is applicable to the particulate emissions from these emissions units. ET - The M, R, Rp are sufficient to demonstrate compliance without requiring formal Method 9 observations.
P901, P902, and P903	4.0 lbs SO2/ton of lime produced, from P901, P902 and P903 combined	18-28(F)	N	N	N	Y	N	N	Y	N	Y	N	
P901	0.057 lbHCl/ton lime produced, for EU P901	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	OR - limit of 94,185 tons of lime produced per rolling 12-months. M and R includes tracking of lime feed into kiln and calculation of HCl emissions. A CEM is not economically justified. CAM is not applicable for HCl, but is applicable to particulate emissions for which HCl is a surrogate.
P901	2.68 tons HCl per rolling 12-	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	OR - limit of 94,185tons of lime produced per rolling 12-months. M and R includes tracking of lime feed into kiln and calculation of HCl emissions. A CEM is not economically justified. CAM is not

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	months for EU P901												applicable for this parameter. ET - recordkeeping is sufficient to show compliance, as long as compliance with the emissions factor of 0.057 lbHCl/ton lime produced is met.
P902	0.072 lbHCl/ton lime produced, for EU P902	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	OR - limit of 90,120 tons of lime produced per rolling 12-months. M and R includes tracking of lime feed into kiln and calculation of HCl emissions. A CEM is not economically justified. CAM is not applicable for HCl, but is applicable to particulate emissions for which HCl is a surrogate.
P902	3.24 tons HCl per rolling 12-months for EU P902	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	OR - limit of 90,120 tons of lime produced per rolling 12-months. M and R includes tracking of lime feed into kiln and calculation of HCl emissions. A CEM is not economically justified. CAM is not applicable for this parameter. ET - recordkeeping is sufficient to show compliance, as long as compliance with the emissions factor of 0.072 lbHCl/ton lime produced is met.
P903	0.093 lbHCl/ton lime produced, for EU P903	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	OR - limit of 82,460 tons of lime produced per rolling 12-months. M and R includes tracking of lime feed into kiln and calculation of HCl emissions. A CEM is not economically justified. CAM is not applicable for HCl, but is applicable to particulate emissions for which HCl is a surrogate.
P903	3.83 tons HCl per rolling 12-months for EU P903	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	OR - limit of 82,460 tons of lime produced per rolling 12-months. M and R includes tracking of lime feed into kiln and calculation of HCl emissions. A CEM is not economically justified. CAM is not applicable for this parameter. ET - recordkeeping is sufficient to show compliance, as long as compliance with the emissions factor of 0.093 lbHCl/ton lime produced is met.
P901, P902, P903, P904, P905, F002, and F003	none	17-08(A)	N	Y	N	N	N	N	N	N	N	N	ND- This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(A). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08. M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P901, P902, P903, P904, P905, F002, and F003	none	17-07(B)	N	Y	N	N	N	N	N	N	N	N	ND- This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e). M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P904	1.3 lbs PE/hour 5.7 tons PE/year	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	M,R,Rp – emission limit represents the potential to emit. Compliance was demonstrated by emission testing.
P904 and P905	none	17-11(B)	N	Y	N	N	N	N	N	N	N	N	ND- The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also Table 1 does not apply since the facility is located in Erie County. M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P904 and P905	none	17-07(A)	N	Y	N	N	N	N	N	N	N	N	ND- This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P905	0.67 tons PE/year from fugitive emissions	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	ET - The TPY limitation is calculated by multiplying the 0.61 lbs/hour emission factor by the maximum hourly throughput rate of 25 tons/hr by the capture efficiency of 99% and the maximum annual operating schedule of 8760 and dividing by 2000 lbs/ton. Therefore, provided compliance with the maximum hourly throughput rate is shown, compliance with the TPY limitation will be assumed.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P905	0.44 tons PM10/year from Recovery Baghouse	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	ET - The TPY limitation is calculated by multiplying the 0.02 gr PM!0/dscf emission limitation by the maximum volumetric air flow from the recovery baghouse by the maximum annual operating schedule of 8760 and applying the conversion factors of 60 min/hr, 200 lbs/ton and 7,000 grains/pound. Therefore, provided compliance is shown with the emissions limitation of 0.02 gr PM!0/dscf, compliance shall also be shown with the annual limitation.
P905	Visible particulate fugitive emissions shall not exceed 20% opacity as a 3-minute average												ET - The M, R, Rp are sufficient to demonstrate compliance without requiring formal Method 9 observations.
P905	0.02 grains PM10/dry standard cubic foot	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	ET – This limitation is the established BAT maximum outlet concentration for recovery baghouse BH-2. The permittee shall demonstrate compliance with the mass emission limitation by testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.
P905	Visible particulate emissions from the Recovery Baghouse shall not exceed 5% opacity as a six-minute average	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	ET - The M, R, Rp are sufficient to demonstrate compliance without requiring formal Method 9 observations.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Huron Lime, Inc.

Facility ID:	0322010062
Permit Number:	P0113321
Permit Type:	Renewal
Issued:	4/26/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Huron Lime, Inc.

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Authorization

Facility ID:	0322010062
Facility Description:	Lime manufacturing
Application Number(s):	A0046759
Permit Number:	P0113321
Permit Description:	Renewal Title V operating permit for a lime manufacturing facility.
Permit Type:	Renewal
Issue Date:	4/26/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0109165

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Huron Lime, Inc.
100 Meeker Street
Huron, OH 44839-0451

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall

be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) 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 federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official

that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall

furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. F002, Road/Parking Lot

Operations, Property and/or Equipment Description:

Paved roadways and parking areas; unpaved roadways and parking areas.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-08(A)	See b)(2)c.
b.	OAC rule 3745-17-07(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit are listed below:

i. the main entrance; and

ii. the employee parking area.

b. The unpaved roadways and parking areas that are covered by this permit are listed below:

i. the coal storage pile road;

ii. the load shed road;

iii. the sludge haul road;

iv. the exit road parking lot; and

v. the parking lot.

c. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

d. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

2. F003, Storage Piles

Operations, Property and/or Equipment Description:

Storage piles; load-in and load-out operations.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-08(A)	See b)(2)b.
b.	OAC rule 3745-17-07(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The storage piles that are covered by this permit are listed below:

i. the coal storage pile;

ii. the limestone storage pile;

iii. the agricultural lime storage pile #1;

iv. the agricultural lime storage pile #2; and

v. the agricultural lime storage pile #3.

b. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

3. P901, No. 1 Kiln

Operations, Property and/or Equipment Description:

Rotary Lime Kiln No. 1, with quench unit and wet scrubber in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI # P0108309, issued 08/16/2011)	0.057 lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P901 2.68 tons HCl per rolling, 12-month period for emission unit P901 See b)(2)a. and c)(1).
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
d.	OAC rule 3745-18-28(F)	4.0 lbs SO2/ton of lime produced, from emissions units P901, P902, and P903, combined
e.	OAC rule 3745-17-08(A)	See b)(2)b.
f.	OAC rule 3745-17-07(B)	See b)(2)c.
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(7), d)(12) through d)(14), e)(3) and e)(4).

(2) Additional Terms and Conditions

a. PTI P0108309 establishes a federally enforceable emission limitation of 2.68 tons HCl per rolling, 12-month period for purposes of avoiding applicability of

Maximum Achievable Control Technology (MACT) regulations. The federally enforceable emission limitation is based on the lbsHCl/ton emission limitation and a lime production restriction [See c)(1)].

b. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) The maximum amount of lime produced in emissions unit P901 (kiln #1) shall not exceed 94,185 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of lime produced upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0108309]

(2) Water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI P0108309]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the following parameters during operation of this emissions unit:

a. the water flow rate, in gallons per minute. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate; and

b. the supplemental water flow rate to the ID fan, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(2) The permittee shall properly install, operate, and maintain equipment to monitor the following parameters daily, during operation of this emissions unit:

a. the pressure drop, in inches of water, across the scrubber; and

b. the supplemental water flow rate to the quench unit, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:

a. the pressure drop, in inches of water, across the scrubber;

b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate);

c. the water flow rate, in gallons per minute, to the ID fan; and

d. the water flow rate, in gallons per minute, to the quench unit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:

a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;

b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above);

c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute; and

d. the acceptable value for the supplemental scrubber water flow rate to the quench unit, is a minimum of 275 gallons of water per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.

[OAC rule 3745-77-07(C)(1)and PTI P0108309]

(10) The permittee shall collect and record the following information on a monthly basis:

a. the amount of stone fed to emissions unit P901, in tons;

b. the amount of lime produced by emissions unit P901, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.] by a factor of 2);

c. the rolling, 12-month lime production rates, in tons;

d. the HCl emission rate from lime produced for emissions unit P901, in tons per month, calculated by multiplying the lbsHCl/ton of lime produced emission limitation for this emissions unit by the amount of lime produced [d)(10)b.];

e. the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(12) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the quench unit and wet scrubber in series, controlling this emissions unit are the static pressure drop across the scrubber, scrubber water flow rate, supplemental scrubber water flow rate to the ID fan, and the supplemental scrubber water flow rate to the quench unit which was established during emissions testing which showed compliance with the particulate emissions limit. An operational restriction was also established as a result of emissions testing, that water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

When the static pressure drop across the scrubber, scrubber water flow rate, supplemental scrubber water flow rate to the ID fan, and the supplemental scrubber water flow rate to the quench unit show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(13) At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(14) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-monthHCl emission limitation of 2.68 tons; and

b. allexceedances of the rolling, 12-month lime production restriction of 94,185 tons.

The permittee shall submit the quarterly deviation reports in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)and PTI P0108309]

(2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. the total quantity of coal received each month from each supplier (tons);

b. the weighted* average sulfur content (percent) of the coal received during each calendar month;

c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and

d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

*In proportion to the coal received from each supplier during the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;

d. each period of time when the supplemental water flow rate to the quench unit was less than the applicable limit contained in this permit;

e. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 64 and PTI P0108309]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted at the following time frames:

i. For PE, on an annual basis; and

ii. For SO2 and HCl, in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO2, and HCl;

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A;

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;

iii. for SO2, Method 6 of 40 CFR Part 60, Appendix A; and

iv. forHCl, ASTM Method D6735.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
100 pounds PE/hour, from emissions units P901, P902, and P903, combined

Applicable Compliance Method:
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

b. Emission Limitation:
4.0 pounds SO2/ton of lime produced, from emission units P901, P902 and P903, combined

Applicable Compliance Method:
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

c. Emission Limitation:
0.057 lbHCl/ton lime produced for emissions unit P901

Applicable Compliance Method:
Compliance with the emissions limitation shall be demonstrated by the performance testing required in condition f)(1).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

d. Emission Limitation:
2.68 tons HCl/rolling, 12-month period for emissions unit P901

Applicable Compliance Method:
Compliance with the emissions limitation shall be based upon the record keeping requirements specified in d)(10).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

e. Emission Limitation:
The maximum amount of lime produced in emissions unit P901 (kiln #1) shall not exceed 94,185 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:
Compliance with the emission limitation shall be based upon the record keeping requirements specified in d)(10).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

f. Emission Limitation:
Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

g) Miscellaneous Requirements

(1) None.

4. P902, No. 2 Kiln

Operations, Property and/or Equipment Description:

Rotary Lime Kiln No. 2, with quench unit and wet scrubber in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI #P0108309, issued on 08/16/2011)	0.072lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P902 3.24 tons HCl per rolling, 12- month period for emissions units P902 See b)(2)a. and c)(1).
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
d.	OAC rule 3745-18-28(F)	4.0 lbs SO2/ton of lime produced, from emissions units P901, P902, and P903, combined
e.	OAC rule 3745-17-08(A)	See b)(2)b.
f.	OAC rule 3745-17-07(B)	See b)(2)c.
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(7), d)(12) through d)(14), e)(3) and e)(4).

(2) Additional Terms and Conditions

a. P0108309 establishes a federally enforceable emission limitation of 3.24 tons HCl per rolling, 12-month period for purposes of avoiding applicability of Maximum Achievable Control Technology (MACT) regulations. The federally

enforceable emission limitation is based on the lbsHCl/ton emission limitation and a lime production restriction [See c)(1)].

b. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) The maximum amount of lime produced in emissions unit P902 (kiln #2) shall not exceed 90,120 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of lime produced upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0108309]

(2) Water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI P0108309]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the following parameters during operation of this emissions unit:

a. the water flow rate, in gallons per minute. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate; and

b. the supplemental water flow rate to the ID fan, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(2) The permittee shall properly install, operate, and maintain equipment to monitor the following parameters daily, during operation of this emissions unit:

a. the pressure drop, in inches of water, across the scrubber; and

b. the supplemental water flow rate to the quench unit, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:

a. the pressure drop, in inches of water, across the scrubber;

b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate);

c. the water flow rate, in gallons per minute, to the ID fan; and

d. the water flow rate, in gallons per minute, to the quench unit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:

a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;

b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above);

c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute; and

d. the acceptable value for the supplemental scrubber water flow rate to the quench unit, is a minimum of 275 gallons of water per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(10) The permittee shall collect and record the following information on a monthly basis:

a. the amount of stone fed to emissions unit P902, in tons;

b. the amount of lime produced by emissions unit P902, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.]by a factor of 2);

c. the rolling, 12-month lime production rates, in tons;

d. the HCl emission rate from lime produced for emissions unit P902, in tons per month, calculated by multiplying the lbsHCl/ton of lime produced emission limitation for this emissions unit by the amount of lime produced [d)(10)b.];

e. the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(12) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the quench unit and wet scrubber in series, controlling this emissions unit are the static pressure drop across the scrubber, scrubber water flow rate, supplemental scrubber water flow rate to the ID fan, and the supplemental scrubber water flow rate to the quench unit which was established during emissions testing which showed compliance with the particulate emissions limit. An operational restriction was also established as a result of emissions testing, that water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

When the static pressure drop across the scrubber, scrubber water flow rate, supplemental scrubber water flow rate to the ID fan, and the supplemental scrubber water flow rate to the quench unit show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(13) At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(14) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month HCl emission limitation of 3.24 tons; and

b. allexceedances of the rolling, 12-month lime production restriction of 90,120 tons.

The permittee shall submit the quarterly deviation reports in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. the total quantity of coal received each month from each supplier (tons);

b. the weighted* average sulfur content (percent) of the coal received during each calendar month;

c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and

d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

*In proportion to the coal received from each supplier during the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;

d. each period of time when the supplemental water flow rate to the quench unit was less than the applicable limit contained in this permit;

e. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted at the following time frames:

i. For PE, on an annual basis; and

ii. For SO2 and HCl, in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO2 and HCl;

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A;

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;

iii. for SO2, Method 6 of 40 CFR Part 60, Appendix A; and

iv. forHCl, ASTM Method D6735.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
100 pounds PE/hour, from emissions units P901, P902, and P903, combined

<u>Applicable Compliance Method:</u>
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P010839]

b. <u>Emission Limitation:</u>
4.0 pounds SO2/ton of lime produced from emissions units P901, P902 and P903, combined

Applicable Compliance Method:
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P010839]

c. Emission Limitation:
0.072 lbHCl/ton lime produced, for emissions unit P902

Applicable Compliance Method:
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P010839]

d. Emission Limitation:
3.24 tons HCl/rolling, 12-month period for emissions unit P902

Applicable Compliance Method:
Compliance with the emissions limitation shall be based upon the record keeping requirements specified in d)(10).

[OAC rule 3745-77-07(C)(1) and PTI P010839]

e. Emission Limitation:
The maximum amount of lime produced in emissions unit P902 (kiln #2) shall not exceed 90,120 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:
Compliance with the emission limitation shall be based upon the record keeping requirements specified in d)(10).

[OAC rule 3745-77-07(C)(1) and PTI P010839]

f. Emission Limitation:
Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI P010839]

g) Miscellaneous Requirements

(1) None.

5. P903, No. 3 Kiln

Operations, Property and/or Equipment Description:

Rotary Lime Kiln No. 3, with wet scrubber

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI P0108309, issued on 08/16/2011)	0.093 lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P903 3.83 tons HCl per rolling, 12- month period for emission units P903 See b)(2)a. and c)(1).
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
d.	OAC rule 3745-18-28(F)	4.0 lbs SO2/ton of lime produced, from emissions units P901, P902, and P903, combined
e.	OAC rule 3745-17-08(A)	See b)(2)b.
f.	OAC rule 3745-17-07(B)	See b)(2)c.
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(7), d)(11) through d)(14), e)(3) and e)(4).

(2) Additional Terms and Conditions

a. PTI P0108309 establishes a federally enforceable emission limitation of 3.83 tons HCl per rolling, 12-month period for purposes of avoiding applicability of Maximum Achievable Control Technology (MACT) regulations. The federally

enforceable emission limitation is based on the lbsHCl/ton emission limitation and a lime production restriction [See c)(1)].

b. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) The maximum amount of lime produced in emissions unit P903 (kiln #3) shall not exceed 82,460 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of lime produced upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0108309]

(2) Water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI P0108309]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the following parameters during operation of this emissions unit:

a. the water flow rate, in gallons per minute. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate; and

b. the supplemental water flow rate to the ID fan, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(2) The permittee shall properly install, operate, and maintain equipment to monitor the following parameters daily, during operation of this emissions unit:

a. the pressure drop, in inches of water, across the scrubber.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:

a. the pressure drop, in inches of water, across the scrubber;

b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate); and

c. the water flow rate, in gallons per minute, to the ID fan.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI P0108309]

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:

a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;

b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above); and

c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District

Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(10) The permittee shall collect and record the following information on a monthly basis:

a. the amount of stone fed to emissions unit P903, in tons;

b. the amount of lime produced by emissions unit P903, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.]by a factor of 2);

c. the rolling, 12-month lime production rates, in tons;

d. the HCl emission rate from lime produced for emissions unit P903, in tons per month, calculated by multiplying the lbsHCl/ton of lime produced emission limitation for this emissions unit by the amount of lime produced [d)(10)b.];

e. the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(12) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the wet scrubber, controlling this emissions unit are the static pressure drop across the scrubber, scrubber water flow rate, and the supplemental scrubber water flow rate to the ID fan which were established during emissions testing which showed compliance with the particulate emissions limit. An operational restriction was also established as a result of emissions testing, that water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

When the static pressure drop across the scrubber, scrubber water flow rate, and the supplemental scrubber water flow rate to the ID fan show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(13) At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(14) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month HCl emission limitation of 3.83 tons; and

b. allexceedances of the rolling, 12-month lime production restriction of 82,460 tons.

The permittee shall submit the quarterly deviation reports in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. the total quantity of coal received each month from each supplier (tons);

b. the weighted* average sulfur content (percent) of the coal received during each calendar month;

c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and

d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

*In proportion to the coal received from each supplier during the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

(3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

(4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;

d. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. above where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI P0108309]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted at the following time frames:

i. For PE, on an annual basis; and

ii. For SO2 and HCl, in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO2 and HCl;

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A;

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;

iii. for SO2, Method 6 of 40 CFR Part 60, Appendix A; and

iv. forHCl, ASTM Method D6735.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitation(s) in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. <u>Emission Limitation:</u>
100 pounds PE/hour, from emissions units P901, P902, and P903 combined

<u>Applicable Compliance Method:</u>
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

b. <u>Emission Limitation:</u>
4.0 lbs SO2/ton of lime produced from emissions units P901, P902 and P903, combined

<u>Applicable Compliance Method:</u>
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

c. Emission Limitation:
0.093 lbHCl/ton lime produced, for emissions unit P903

Applicable Compliance Method:
Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

d. Emission Limitation:
3.83 tons HCl/rolling, 12-month period for emissions unit P903

Applicable Compliance Method:
Compliance with the emissions limitation shall be based upon the record keeping requirements specified in d)(10).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

e. Emission Limitation:
The maximum amount of lime produced in emissions unit P903 (kiln #3) shall not exceed 82,460 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:
Compliance with the emission limitation shall be based upon the record keeping requirements specified in d)(10).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

f. Emission Limitation:
Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI P0108309]

g) Miscellaneous Requirements

(1) None.

6. P904, Product Conveying,Crushing, and Screening

Operations, Property and/or Equipment Description:

Lime crushing, lime screening, lime re-screening and material handling operations with 1 baghouse (BH-1).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-4890, issued 06/13/1990)	1.3 lbs particulate emissions (PE)/hour; and 5.7 tons PE/year from the baghouse stack See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)e.
e.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. The best available technology (BAT) control requirement for this emissions unit has been determined to be the following:

i. use of a baghouse (BH-1); and

ii. use of a building enclosure.

b. The emission limitations/control measures in section b)(1) were established in accordance with the best available technology (BAT) requirements in OAC rule 3745-31-05(A)(3) and apply only to the equipment installed under PTI #03-4890. The other equipment and operations associated with emissions unit P904 are existing operations installed prior in January 1974 and are not subject to the BAT requirements in OAC rule 3745-31-05(A)(3).

c. The 1.3 lbs PE/hour emission limitation associated with the equipment permitted under PTI #03-4890, was established by using an emissions factor of 1.8 lbs PE/ton, applying a control efficiency for the baghouse, and establishing a limit of 120% of actuals.

d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also Table 1 does not apply since the facility is located in Erie County.

e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

f. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

g. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. <u>Emission Limitation:</u>
1.3 lbs of PM/hour (emissions from baghouse BH-1); 5.7 tons PM/year

<u>Applicable Compliance Method:</u>
The permittee demonstrated compliance with the lb PM/hour limitation through testing conducted on March 24, 2009. If required, the permittee shall demonstrate compliance with the lb PM/hour limitation through emissions testing conducted in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

The ton per year emission limitation was developed by multiplying the emission limitation of 1.3 lbs PM/hour by the maximum operating schedule of 8760 hours/year and applying the conversion factor of 2000 lbs/ton. Therefore,

provided compliance is shown with the emission limitation of 1.3 lbs PM/hour, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-4890]

g) Miscellaneous Requirements

(1) None.

7. P905, Product Handling

Operations, Property and/or Equipment Description:

Product handling operations

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17107, issued 05/08/2008)	See b)(2)a. and b)(2)b. Fugitive Emissions: 0.67 tons fugitive particulate emissions (PE)/ year Visible particulate fugitive emissions shall not exceed 20% opacity, as a 3-minute average. Emissions from Recovery Baghouse (BH-2): 0.44 ton particulate matter emissions 10 microns or less in size (PM10)/year 0.02 grain PM10/dry standard cubic foot (dscf) See b)(2)c. Visible PE shall not exceed 5% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)e.
e.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirement for this emissions unit has been determined to be the following:

i. totally enclosed design for the new overhead storage bin (bin no. 7) and the new conveyor (C-5).

ii. use of a recovery baghouse (BH-2) for the new Loadout spout (West Loadout) that achieves a maximum outlet concentration of 0.02 grains PM10/dscf.

The emission limitations/control measures in section b)(2)a. were established in accordance with the best available technology (BAT) requirements in OAC rule 3745-31-05(A)(3) and apply only to the new Loadout spout (West Loadout), the new overhead storage bin (bin no. 7), and the new conveyor (C-5). The other equipment and operations associated with emissions unit P905 are existing operations installed prior in January 1974 and are not subject to the BAT requirements in OAC rule 3745-31-05(A)(3).

It should also be noted that the recovery baghouse (BH-2) currently serves some of the existing equipment and operations associated with emissions unit P905. The 2.00 tons PM10/year emission limitation associated with the new Loadout spout (West Loadout) was established by using the volumetric air flow from the recovery baghouse (BH-2) dedicated to the new Loadout spout operation [see f)(2)c. for details].

b. All PE from baghouse stack is PM10.

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also Table 1 does not apply since the facility is located in Erie County.

d. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

e. This emissions unit is exempt from the visible PE emissions limitation specifiedin OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

f. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-17107 issued on May 8, 2008: [d)(1)]. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(2) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-17107 issued on May 8, 2008: [e)(1)]. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(OAC rule 3745-77-07(A)(3)(a)(i)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:
0.67 ton of PE/year (fugitive)

Applicable Compliance Method:
Compliance with the tons of fugitive PE limitation shall be demonstrated by multiplying the AP-42 emission factor from Table 11.17-4 (revised 2/98) of 0.61 lb PE/ton, the maximum hourly throughput rate of 25 tons/hr, the capture efficiency of 99% (1-0.99) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

b. Emission Limitation:
0.02 gr PM10/dscf (emissions from recovery baghouse BH-2)

Applicable Compliance Method:
The 0.02 gr/dscf limitation is the established BAT maximum outlet concentration for recovery baghouse BH-2. The permittee demonstrated compliance with the gr/dscf limitation through testing conducted on April 1, 2008. If required, the permittee shall demonstrate compliance with the gr/dscf limitation through emissions testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

c. Emission Limitation:
0.44 tons of PM10/year (emissions from recovery baghouse BH-2)

Applicable Compliance Method:
The ton per year emission limitation was developed by multiplying the emission limitation of 0.02 gr PM10/dscf by the maximum volumetric air flow from the recovery baghouse BH-2 dedicated to the new Loadout spout operation (584 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.02 gr PM10/dscf, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

d. Emission Limitation:
Visible particulate fugitive emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

e. Emission Limitation:
Visible PE shall not exceed 5% opacity, as a six-minute average (from recovery baghouse BH-2).

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

g) Miscellaneous Requirements

(1) None.