

AIR EMISSION SUMMARY

The air emissions units (EU) listed below comprise the Permit to Install for Lafarge/Systech located in Paulding County. The emissions units listed below shall not exceed the emission limits / control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA EU Number</u>	<u>Emissions Unit Identification / Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control and Usage Requirements</u>
T010	Waste Derived Fuel Storage Tank	Compliance with the Terms and Conditions of this Permit	OAC 3745-31-05  40 CFR 61 Subpart FF (NESHAPs - Benzene Waste Operations)  40 CFR 60 Subpart Kb (NSPS - Storage Tanks for VOC)	280 lb/yr OC  99% OC destruction efficiency during kiln operation  Operational Restrictions (see Special Terms & Conditions)  (see Terms and Conditions - NSPS Requirements)
T011	Same as Above	Same as Above	Same as Above	Same as Above
T012	Same as Above	Same as Above	Same as Above	Same as Above
T013	Same as Above	Same as Above	Same as Above	Same as Above

SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons / Year</u>
OC	0.56

## **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

### **Introduction:**

The company is adding four 150,000 gallon waste derived fuel storage tanks (emissions units T010, T011, T012, and T013). This Permit to Install (PTI) allows for the installation of these four new tanks.

This facility is subject to 40 CFR 61 Subpart FF (benzene waste operations). These tanks specifically are subject to 40 CFR 60 Subpart Kb (storage tanks for VOC). Compliance with the organic emissions destruction requirements of Subpart FF for the closed-vent system(s) is being accomplished with the operation of the cement kilns (emissions units P014 and P015) under 40 CFR 266 Subpart H (RCRA hazardous waste requirements). By complying with the requirements of Subpart FF for these tanks, compliance with the applicable requirements of Subpart Kb is also achieved. Facility-wide compliance with Subpart FF and Subpart H also accomplishes compliance with 40 CFR 63 Subpart DD (off-site waste and recovery), as provided in 40 CFR 63.683(c)(1), as it may otherwise have applied to these tanks.

Additional notes: The primary requirement of Subpart FF for the facility is the 99 percent destruction efficiency requirement for benzene in the waste derived fuel. This and other facility requirements from Subpart FF (not applying specifically to the tanks) will be addressed further in the Title V permit process.

### **A. Applicable Emission Limitations and/or Control Requirements**

1. The permittee shall operate, and maintain a control device that reduces organic emissions in the closed-vent system(s) by 99 percent by weight.

### **B. Operational Restrictions**

1. The permittee shall install, operate, and maintain, fixed-roof(s), and closed-vent system(s) that routes all organic vapors vented from emissions units T010, T011, T012, and T013 to a control device.
2. The closed-vent system(s), and the cover and all openings on the fixed roofs (e.g., access hatches, sampling ports, and gauge wells), shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).
3. Each opening on the fixed-roofs shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in emissions units T010, T011, T012, and T013 except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.
4. All gauging and sampling devices in the closed-vent system(s) shall be gas-tight except when gauging or sampling is taking place.
5. One or more devices which vent directly to the atmosphere may be used on the closed-vent system(s) provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system(s) resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

6. The closed-vent system(s) and control device shall be operated at all times when waste is placed in emissions units T010, T011, T012, and T013 except when maintenance or repair of the control device cannot be completed without a shutdown of the control device.

**C. Monitoring and Recordkeeping Requirements**

1. Each fixed-roof, seal, access door, and all other openings referenced in conditions (B)(3) shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly.
2. Except as provided in condition (C)(6), when a broken seal or gasket or other problem is identified from inspection according to condition (C)(1), or when detectable emissions from locations other than for the closed-vent system(s) are measured according to condition (B)(2), first efforts at repair shall be made as soon as practicable but not later than 45 calendar days after identification.
3. The closed-vent system(s) and control device shall be visually inspected initially and quarterly thereafter. The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.
4. Except as provided in condition (C)(6), if visible defects are observed during an inspection under condition (C)(3), or if other problems are identified, or if detectable emissions are measured, a first effort to repair the closed-vent system(s) and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed.
5. The permittee shall demonstrate with either engineering calculations or performance tests that the reduction efficiency specified in condition (A)(1) is achieved. Engineering calculations shall be performed in accordance with requirements specified in 40 CFR 61.356(f), and performance tests shall be performed in accordance with 40 CFR 61.355.
6. Delay of repair under conditions (C)(2) and (C)(4) will be allowed if the repair is technically impossible without a complete or partial facility or unit shutdown. Repair of such equipment shall occur before the end of the next facility or unit shutdown.
7. Facility-wide compliance with applicable emissions monitoring requirements of 40 CFR 266 shall constitute compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.
8. Facility-wide compliance with applicable recordkeeping requirements of 40 CFR 61.356 shall constitute compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.
9. The permittee shall record the date, time, and duration, of all periods of control device downtime.

**D. Reporting Requirements**

1. Quarterly written reports of any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, the probable cause of such deviations, and 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. 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 quarterly, i.e., 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.)

2. The permittee shall submit annual reports which specify the total OC emissions for emissions units T010, T011, T012, and T013 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
4. Facility-wide compliance with applicable reporting requirements of 40 CFR 61.357 shall constitute further reporting compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.

**E. Testing Requirements/ Compliance Method Determinations**

1. Emissions Limitation:  
Emissions Units T010, T011, T012, and T013; 280 lb OC /yr each

Applicable Compliance Method:  
USEPA Tanks 3.0 computer program, with representative waste-derived fuel composition and maximum throughputs

2. Emissions Limitation:  
99 percent destruction efficiency during kiln operation

Applicable Compliance Method:  
Facility-wide compliance with applicable test methods, procedures, and compliance provisions of 40 CFR 61.355 shall constitute compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.

**F. Miscellaneous Requirements**

None

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