



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

8/27/2013

Certified Mail

Michael Klenda  
Carmeuse Lime, Inc. - Maple Grove Operations  
1967 W County Road 42  
PO Box 708  
Bettsville, OH 44815

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0374000010  
Permit Number: P0107351  
Permit Type: Administrative Modification  
County: Seneca

No	TOXIC REVIEW
Yes	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Canada



## Response to Comments

Facility ID:	0374000010
Facility Name:	Carmeuse Lime, Inc. - Maple Grove Operations
Facility Description:	Lime plant.
Facility Address:	1967 W County Road 42 PO Box 708 Bettsville, OH 44815 Seneca County
Permit:	P0107351, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Advertiser Tribune on 07/27/2013. The comment period ended on 08/26/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

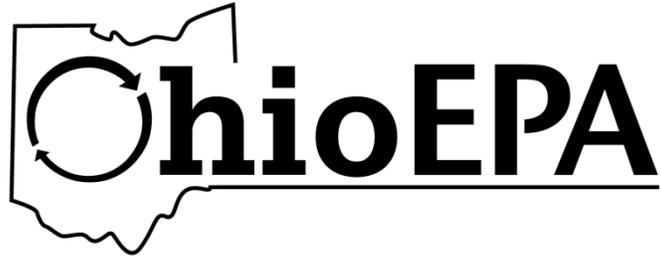
The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: None**

- a. Comment: None
- b. Response: None





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install**

for

**Carmeuse Lime, Inc. - Maple Grove Operations**

Facility ID: 0374000010  
Permit Number: P0107351  
Permit Type: Administrative Modification  
Issued: 8/27/2013  
Effective: 8/27/2013





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Carmeuse Lime, Inc. - Maple Grove Operations

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## Authorization

Facility ID: 0374000010  
Facility Description: Lime plant.  
Application Number(s): A0040904  
Permit Number: P0107351  
Permit Description: Administrative modification to perform revisions of PTI 03-13527 (PSD permit issued 10-14-03) to add a baghouse that was not included in the original application and to amend applied emission factors.  
Permit Type: Administrative Modification  
Permit Fee: \$625.00  
Issue Date: 8/27/2013  
Effective Date: 8/27/2013

This document constitutes issuance to:

Carmeuse Lime, Inc. - Maple Grove Operations  
1967 W County Road 42  
PO Box 708  
Bettsville, OH 44815

of a Permit-to-Install for the emissions unit(s) identified on the following page.

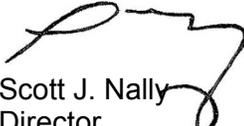
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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 Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



**Final Permit-to-Install**  
Carmeuse Lime, Inc. - Maple Grove Operations  
**Permit Number:** P0107351  
**Facility ID:** 0374000010  
**Effective Date:**8/27/2013

## Authorization (continued)

Permit Number: P0107351  
Permit Description: Administrative modification to perform revisions of PTI 03-13527 (PSD permit issued 10-14-03) to add a baghouse that was not included in the original application and to amend applied emission factors.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P905</b>
Company Equipment ID:	Lime Kiln Dust Handling
Superseded Permit Number:	03-13527
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Carmeuse Lime, Inc. - Maple Grove Operations  
**Permit Number:** P0107351  
**Facility ID:** 0374000010  
**Effective Date:** 8/27/2013

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. 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 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.

#### **4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.



- c) 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 ORC section 3704.08.
  - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.



**Final Permit-to-Install**  
Carmeuse Lime, Inc. - Maple Grove Operations  
**Permit Number:** P0107351  
**Facility ID:** 0374000010  
**Effective Date:** 8/27/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
Carmeuse Lime, Inc. - Maple Grove Operations  
**Permit Number:** P0107351  
**Facility ID:** 0374000010  
**Effective Date:** 8/27/2013

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.



**Final Permit-to-Install**  
Carmeuse Lime, Inc. - Maple Grove Operations  
**Permit Number:** P0107351  
**Facility ID:** 0374000010  
**Effective Date:**8/27/2013

## **C. Emissions Unit Terms and Conditions**



**1. P905, Lime Kiln Dust Handling/Load-Out**

**Operations, Property and/or Equipment Description:**

Lime Kiln Dust (LKD) Handling Operation – including (1) box/dump truck load-out operation and (1) pneumatic/dry bulk tank truck load-out operation

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)	See b)(2)a.
b.	OAC rules 3745-31-10 through -20	<p><b>Best Available Control Technology:</b> See b)(2)b.</p> <p><b>Fugitive Emissions:</b> 4.01 tons particulate emissions (PE) per rolling, 12-month period</p> <p>3.49 tons particulate matter ≤ 10 microns (PM<sub>10</sub>) per rolling, 12-month period</p> <p>There shall be no visible fugitive emissions from the material transfer points associated with this emissions unit.</p> <p>Visible fugitive emissions shall not exceed 10% opacity from the truck load-out operations.</p> <p><b>Stack Emissions:</b>  <u>Baghouse D-188.1 (LKD silo):</u>            0.01 grain (gr) PM<sub>10</sub>/dry standard cubic foot (dscf) &amp; 0.17 pound PM<sub>10</sub>/hour   <u>Baghouse D-188.2 (LKD silo):</u>            0.01 gr PM<sub>10</sub>/dscf &amp; 0.17 pound PM<sub>10</sub>/hour   <u>Baghouse D-189 (load-out):</u></p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.01 gr PM <sub>10</sub> /dscf & 0.10 pound PM <sub>10</sub> /hour  <u>Baghouses D-188.1, D-188.2, and D-189, combined:</u> 1.93 tons PM <sub>10</sub> per rolling, 12-month period  Visible PE shall not exceed 7% opacity from the stacks serving baghouses D-188.1, D-188.2, and D-189.
c.	OAC rule 3745-17-08(A)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-07(B).
d.	OAC rule 3745-17-07(B)	This emission unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
e.	OAC rule 3745-17-11(B)	The emission limitations specified by this rule is less stringent than the emission limitations established pursuant to OAC rules 3745-31-10 through -20.
f.	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitations established pursuant to OAC rules 3745-31-10 through -20.

(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-10 through -20.
- b. The permittee shall employ best available control technology (BACT) on this emissions unit for the control of particulate emissions. The BACT control requirements for this emissions unit have been identified, as follows:
  - i. The material transfer points shall be designed and operated in such a manner as to result in no visible particulate emissions during operation of this emissions unit.
  - ii. The lime kiln dust (LKD) silo and pneumatic material transfer system leading to the silo shall be equipped with baghouse control capable of



achieving 0.01 gr PM<sub>10</sub>/dscf. Baghouses D188.1 and D188.2 are currently operated in order to meet this requirement.

- iii. The box/dump truck load-out operation shall be equipped with a pug mill that sufficiently wets the LKD material prior to load-out.
- iv. The pneumatic/dry bulk tank truck load-out operation shall be equipped with baghouse control capable of achieving 0.01 gr PM<sub>10</sub>/dscf. Baghouse D189 is currently operated in order to meet this requirement.

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 baghouse discharges serving baghouses D-188.1, D-188.2, and D-189. 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from the following operations associated with this emissions unit:
  - a. material transfer operations;
  - b. box/dump truck load-out operation; and
  - c. pneumatic/dry bulk tank truck load-out operation.

A separate record shall be kept for each operation and the presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:

- d. the color of the emissions;
- e. the total duration of any visible emission incident; and



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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).
- (3) The permittee shall identify the following information in the report in accordance with the monitoring requirements for visible emissions in term d)(1) above:
  - a. all visible emissions checks during which any visible particulate emissions were observed from the stacks serving baghouses: D-188.1, D-188.2, and D-189 that are associated with this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

If there are no day(s) and/or corrective actions(s) to identify, as required above, the permittee shall indicate that no visible emissions were observed and/or that no corrective actions were taken.

- (4) The permittee shall identify the following information in the report in accordance with the monitoring requirements for visible fugitive emissions in term d)(2) above:
  - a. all visible fugitive emissions checks during which any fugitive emissions were observed from the transfer and/or loading operations associated with this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible fugitive emissions.

If there are no day(s) and/or corrective actions(s) to identify, as required above, the permittee shall indicate that no visible emissions were observed and/or that no corrective actions were taken.

- (5) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements



(1) 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. Emission Limitations

0.01 grain PM<sub>10</sub>/dscf per baghouse (D-188.1, D-188.2, and D-189))

Applicable Compliance Method

If required, compliance with the emission limitations shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

b. Emission Limitations

0.17 pound PM<sub>10</sub>/hour (D-188.1)

0.17 pound PM<sub>10</sub>/hour (D-188.2)

0.10 pound PM<sub>10</sub>/hour (D-189)

Applicable Compliance Method

Each hourly emission limitation represents the potential to emit of each baghouse serving the dried fines processing operation and can be calculated using the following equation:

0.01 gr PM <sub>10</sub> <sup>(1)</sup>	dscf <sup>(2)</sup>	1 pound <sup>(3)</sup>	60 minutes <sup>(3)</sup>
dscf	minute	7000 grains	hour

Where,

- (1) Maximum outlet grain loading of each baghouse, as supplied in the permit application.
- (2) Maximum outlet gas flow rate of each baghouse (D-188.1 = 2,000 dscfm; D-188.2 = 2,000 dscfm; and D-189 = 1,200 dscfm), as supplied in the permit application.
- (3) Conversion factors.

If required, compliance with this emission limitation shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

c. Emission Limitation



1.93 tons PM<sub>10</sub> per rolling, 12-month period, combined for baghouses D-188.1, D-188.2, and D-189

Applicable Compliance Method

The annual emission limitation was calculated using the following equation:

0.44 pound PM <sub>10</sub> <sup>(1)</sup> hour	8760 hours <sup>(2)</sup> year	1 ton <sup>(3)</sup> 2000 pounds
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Where,

- (1) Combined, hourly emission rate for the baghouses.
- (2) Maximum annual operating scheduled.
- (3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitations, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitations

4.01 tons PE per rolling, 12-month period

3.49 tons PM<sub>10</sub> per rolling, 12-month period

Applicable Compliance Method

Compliance with the fugitive emission limitations shall be determined using the following fugitive emission calculations for each material transfer/conveying operation associated with this emissions unit:

i. Material Transfer/Conveying Operations

tons LKD <sup>(1)</sup> year	0.1 lb PE <sup>(2)</sup> ton	1-CE <sup>(3)</sup>	1 ton <sup>(4)</sup> 2000 lbs	0.87 PM <sub>10</sub> <sup>(5)</sup> PE
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Where:

- (1) Maximum annual material throughput, as indicated in the permit application.
- (2) Emission factor for product transfer and conveying from RACM Section 2.3, pages 154-171 (9/80).
- (3) CE = control efficiency for the reduction of fugitive particulate emissions, as indicated in the permit application.
- (4) Conversion factor.



(5) To estimate fugitive PM<sub>10</sub> emissions, assume 87% of PE is PM<sub>10</sub>, from RACM Section 2.3, pages 154-171 (9/80).

ii. Load-out Operations

tons LKD <sup>(1)</sup>	0.25 lb PE <sup>(2)</sup>	1-CE <sup>(3)</sup>	1 ton <sup>(4)</sup>	0.87 PM <sub>10</sub> <sup>(5)</sup>
year	ton		2000 lbs	PE

Where:

- (1) Maximum annual material throughput, as indicated in the permit application.
- (2) Emission factor for packaging and shipping from RACM Section 2.3, pages 154-171 (9/80).
- (3) CE = control efficiency for the reduction of fugitive particulate emissions, as indicated in the permit application.
- (4) Conversion factor.
- (5) To estimate fugitive PM<sub>10</sub> emissions, assume 87% of PE is PM<sub>10</sub> [RACM Section 2.3, pages 154-171 (9/80)].

e. Emission Limitations

7% opacity, as a six-minute average, from the stacks serving D-188.1, D-188.2, and D-189

Applicable Compliance Method

If required, compliance 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").

f. Emission Limitations

10% opacity of fugitive dust, as a three-minute average, from the truck load-out operations

Applicable Compliance Method

If required, compliance 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") and the procedures specified in OAC rule 3745-17-03(B)(3).

g. Emission Limitation



No visible fugitive emissions from material transfer operations

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 22, as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

(2) Emission Testing Requirements

The permittee shall conduct, or have conducted, visible emission testing for the truck unloading operations associated with this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days following the issuance of this permit. The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the appropriate Ohio EPA District Office or local air agency.
- b. The emission testing shall be conducted to demonstrate compliance with the following visible emission rates for the truck unloading operations:

box/dump truck load-out operation	10% opacity of fugitive dust, as a three-minute average
pneumatic/dry bulk tank truck load-out operation	10% opacity of fugitive dust, as a three-minute average

- c. The following test method shall be employed to demonstrate compliance with the allowable visible emission rates:

Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating



parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.