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

12/16/2013

Certified Mail

Jeff Hunyor
Systech Environmental Corporation
11435 County Road 176
P.O. Box 160
Paulding, OH 45879

Facility ID: 0363000046
Permit Number: P0115152
County: Paulding

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 10/30/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0363000046
Facility Name:	Systech Environmental Corporation
Facility Description:	Waste-derived Fuel Supplier
Facility Address:	11435 County Road 176 P.O. Box 160 Paulding, OH 45879 Paulding County
Permit:	P0115152, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Paulding Progress on 11/06/2013. The comment period ended on 12/06/2013.	
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: Ownership

a. Comment: In the Statement of Basis, it states that Systech is located on the same property as Lafarge. This is not a correct legal statement since Systech, not Lafarge, owns the property on which the facility is located. However, in the context of the Title V program and the Clean Air Act, if the two parcels are considered one 'property', then this is not an issue.

   Response: With that last sentence, yes, the company is touching upon the relevant point. Legal considerations, e.g. that Systech is a subsidiary of Lafarge, etc. and non-legal considerations, e.g. 'contiguous /adjoining' properties, etc. are all included in considerations that make Systech a Title V facility under the Clean Air Act. This is not an issue.

2. Topic: Emissions units not yet constructed

a. Comment: In Condition B.2.a), does it need to be noted that Tanks T012 and T013 have not yet been constructed?

   Response: No, no such explicit note is needed in the permit. At any future point of compliance determination for the Title V permit, there will be no compliance concerns for any tanks which are awaiting their installation under the terms of the Permit to Install(s) that was issued.

3. Topic: Compliance responsibility

a. Comment: Conditions B.2.e)(4) and B.3.m) refer to Lafarge and what it has to do. This provision should be made clear that Lafarge would be responsible for compliance since Lafarge has control over the device(s).

Response: As is stated in B.2.e)(4), Lafarge's compliance with "Lafarge emissions units P014 and P015" will serve as compliance for Systech with Systech's (applicable) Title V permit requirements. The language of the permit will be unchanged; however, this agency response recognizes agreement with the company comment. If Lafarge has noncompliance issues with their (applicable) requirements for P014 and P015 cement kilns, the issues will be dealt with primarily, possibly exclusively, with Lafarge and Lafarge's permit; but Systech would likely be expected to at least be available for any contact which may be needed to resolve any issues that involve Systech's permit.

4. Topic: Typographical error

a. Comment: In the first line of Condition B.10.b)(1) the word "condition" appears to be missing.

Response: The correction will be made as specified.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Systech Environmental Corporation

Facility ID:	0363000046
Permit Number:	P0115152
Permit Type:	Renewal
Issued:	12/16/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Systech Environmental Corporation

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Authorization

Facility ID: 0363000046
Facility Description: Waste-derived Fuel Supplier
Application Number(s): A0048098
Permit Number: P0115152
Permit Description: Title V permit renewal for Systech which is the 'support facility' for the Lafarge Portland cement plant in Paulding. Systech receives, handles/blends and feeds various liquid/solvent waste-derived fuels to the cement kilns.
Permit Type: Renewal
Issue Date: 12/16/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0109068

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

Systech Environmental Corporation
11435 County Road 176
P.O. Box 160
Paulding, OH 45879

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 and no later than 6 months 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 For State-Only Requirements

(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

(5) Standard Term and Condition A. 30.

(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 recordingsfor 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 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 submittedscheduled maintenancerequests, 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 submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted 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 to the Ohio EPA DAPC, Northwest District Office 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." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

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

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From 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) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with 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 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.

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 Ohio EPA DAPC, Northwest District Office) 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 on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms

and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 Federal Register 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 is subject to 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.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified 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 operating 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 theOhio 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 (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 Ohio EPA DAPC, Northwest District Office. 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 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 For State-Only Requirements

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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 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 potential to emit; or

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

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following regulation shall apply to this facility: 40 CFR 61.340 et seq. (NESHAP Subpart FF - Benzene Waste Operations). The permittee shall comply with the following Subpart FF applicable emission limitations/control measures at this facility:

   a) Standards for Tanks:

      The permittee shall comply with the following standards for each tank (i.e., emissions units T008, T009, T010, T011, T012, T013, T026, T027, T028, T029, and T030) employed at this facility:

      (1) The permittee shall install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. The fixed roof shall comply with the requirements of (2) and (3) as follows:

      (2) 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 parts per million by volume (ppmv) above background, as determined at least once per year by the methods specified in B.5.

      (3) Each opening 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 tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

      (4) The closed-vent system and control devices shall be designed and operated in accordance with the requirements in B.2.e).

      [40 CFR 61.343(a)(1) and OAC rule 3745-77-07(A)(1)]

   b) Standards for Containers:

      The permittee shall comply with the following standards for each container in which waste is placed:

      (1) The cover and all openings (e.g., bungs, hatches, and sampling ports) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined at least once per year by the methods specified in B.5.*

      (2) Each opening 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 the container except when it is necessary to use the opening for waste loading, removal, inspection, or sampling.

      (3) When a waste is transferred into a container by pumping, the permittee shall perform the transfer using a submerged fill pipe. The submerged fill pipe outlet shall extend to within two fill pipe diameters of the bottom of the container while the container is being loaded. During loading of the waste, the cover shall remain in place and all openings shall be

maintained in a closed, sealed position except for those openings required for the submerged fill pipe and those openings required for venting of the container to prevent physical damage or permanent deformation of the container or cover.

(4) Treatment of a waste in a container, including aeration, thermal or other treatment, must be performed by the owner or operator in a manner such that, while the waste is being treated, the covered or closed container is vented directly through a closed-vent system to a control device. The closed-vent system and control device** must be designed and operated in accordance with the requirements of 40 CFR 61.349. For a container cover, the cover and all openings (e.g., doors, hatches) must be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, initially and thereafter at least once per year by the methods specified in B.5.a) Safety devices, as defined in Subpart FF, may be installed and operated as necessary on any container, enclosure, closed-vent system, or control device used to comply with this subsection. Fuel blending is considered to be part of the treatment process under this subsection.

* Containers having a volume of less than 111 gallons, and meeting the US DOT specifications and testing requirements under 49 CFR 178, are exempt from the monitoring requirement of B.2.b)(2), provided such containers are covered and not vented to the atmosphere. (considering US EPA letter - June 27, 1995 - Region VI to Dow Chemical Co.)

** See B.2.e)(4).
[40 CFR 61.345(a) and OAC rule 3745-77-07(A)(1)]

c) Standards for Individual Drain Systems:

The permittee shall comply with the following standards for each individual drain system in which waste is placed:

(1) The permittee shall install, operate, and maintain on each drain system opening a cover and closed-vent system that routes all organic vapors vented from the drain system to the control device. The cover on each individual drain system shall comply with the requirements of (2) and (3) as follows:

(2) The cover and all openings (e.g., doors, hatches) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined at least once per year by the methods specified in B.5.

(3) Each opening 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 the drain system except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

[40 CFR 61.346(a)(1)(i)(A) and (B), and OAC rule 3745-77-07(A)(1)]

d) Standards for Treatment Processes:

The permittee shall treat the waste stream in accordance with the following requirements:

(1) The permittee shall design, install, operate, and maintain a treatment process that destroys benzene in the waste stream by incinerating the waste in a combustion unit that achieves a destruction efficiency of 99 percent or greater for benzene.

(2) The permittee may aggregate or mix together individual waste streams to create a combined waste stream for the purpose of facilitating treatment of waste to comply with the above requirements.

(3) If the treatment process has any openings (e.g., access doors, hatches, etc.), all such openings shall be sealed (e.g., gasketed, latched, etc.) and kept closed at all times when waste is being treated, except during inspection and maintenance.

[40 CFR 61.348(a)(1)(iii), (a)(4), (e), and OAC rule 3745-77-07(A)(1)]

e) Standards for Closed-vent Systems:

The permittee shall properly design, install, operate, and maintain the closed-vent system and control device in accordance with the following requirements:

(1) The closed-vent system shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined at least once per year by the methods specified in B.5.

(2) All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

(3) For the closed-vent system(s), one or more devices which vent directly to the atmosphere may be used on the closed-vent system 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 resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

(4) The control device for the closed-vent system shall be designed and operated to reduce the organic emissions vented to it by 95 weight percent or greater. Note: Systech (the permittee) currently complies with requirements for the closed-vent system control device through more stringent requirements, i.e. 40 CFR 1200 et seq. - MACT Subpart EEE (Lafarge emissions units P014 and P015) - i.e. the closed-vent organic vapors are destroyed in the cement kiln(s) combustion zone. Carbon canisters are used as back-up when both cement kilns are off-line.

(5) The closed-vent system and control device shall be operated at all times when waste is placed in the tanks (or other waste management units) except when maintenance or repair of the control device cannot be completed without a shutdown of the control device.

[40 CFR 61.349(a)(1)(i), (iii), and (iv), (a)(2)(i)(A), and (b), and OAC rule 3745-77-07(A)(1)]

f) Standards - Miscellaneous

Delay of repair of equipment 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.
[40 CFR 61.350 and OAC rule 3745-77-07(A)(1)]

3. The permittee shall comply with the following Subpart FF monitoring and/or record keeping requirements:

a) Tanks:

(1) Each fixed-roof, seal, access door, and all other openings shall be checked by visual inspection quarterly 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 B.2.f), when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 45 calendar days after identification.
[40 CFR 61.343(c) and (d) and OAC rule 3745-77-07(C)(1)]

b) Containers:

(1) Each cover and all openings shall be visually inspected quarterly to ensure that they are closed and gasketed properly.

(2) Except as provided in B.2.f), when a broken seal or gasket or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.
[40 CFR 61.345(b) and (c) and OAC rule 3745-77-07(C)(1)]

c) Individual Drain Systems:

(1) Each cover seal, access hatch, and all other openings shall be checked by visual inspection quarterly to ensure that no cracks or gaps occur and that access hatches and other openings are closed and gasketed properly.

(2) Except as provided in B.2.f), when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.
[40 CFR 61.346(a)(2) and (3) and OAC rule 3745-77-07(C)(1)]

d) Treatment Process:

(1) Each seal, access door, and all other openings shall be checked by visual inspections quarterly to ensure that no cracks or gaps occur and that openings are closed and gasketed properly.

(2) Except as provided in B.2.f), when a broken seal or gasket or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

[40 CFR 61.348(e)(1) and (2) and OAC rule 3745-77-07(C)(1)]

e) Closed-vent System:

(1) Each closed-vent system and control device shall be visually inspected quarterly. 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.

(2) Except as provided in B.2.f), if visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the closed-vent system 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.

[40 CFR 61.349(f) and (g) and OAC rule 3745-77-07(C)(1)]

f) The permittee shall maintain engineering design documentation for all control equipment that is installed on tanks, containers, individual drain systems, or other waste management units as defined in 40 CFR 61.341. The documentation shall be retained for the life of the control equipment.

[40 CFR 61.356(d) and OAC rule 3745-77-07(C)(1)]

g) The permittee shall retain the following documentation for the life of the control device:

(1) A statement signed and dated by the permittee certifying that the closed-vent system and control device are designed to operate at the documented performance level when the waste management unit vented to the control device is or would be operating at the highest load or capacity expected to occur.

(2) The permittee shall maintain a record for each visual inspection required in B.3 that identifies a problem (such as a broken seal, gap or other problem) which could result in benzene emissions. The record shall include the date of the inspection, waste management unit and control equipment location where the problem is identified, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

[40 CFR 61.356(f)(1), (g) and OAC rule 3745-77-07(C)(1)]

h) The permittee shall maintain a record for each test of no detectable emissions required by B.2. The record shall include the following information: date the test is performed, background level measured during test, and maximum concentration indicated by the instrument reading measured for each potential leak interface. If detectable emissions are measured at a leak interface, then the record shall also include the waste management unit, control equipment, and leak interface location where detectable emissions were measured, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

[40 CFR 61.356(h) and OAC rule 3745-77-07(C)(1)]

i) Regarding parametric monitoring requirement for the closed-vent system control device under 40 CFR 61.354(c), refer to Lafarge Title V permit - Fac. ID 03 63 00 0002 (P0107002), or renewal, as applicable - emissions units P014 and P015.

j) Regarding daily inspection requirement for the closed-vent system control device under 40 CFR 61.354(c), refer to Lafarge Title V permit - Fac. ID 03 63 00 0002 (P0107002), or renewal, as applicable - emissions units P014 and P015.

k) Regarding combustion efficiency parametric monitoring requirement for the closed-vent system control device under 40 CFR 61.356(j)(4), refer to Lafarge Title V permit - Fac. ID 03 63 00 0002 (P0107002), or renewal, as applicable - emissions units P014 and P015.

l) Regarding engineering design requirement for the closed-vent system control device under 40 CFR 61.349(c)(1), refer to Lafarge Title V permit - Fac. ID 03 63 00 0002 (P0107002), or renewal, as applicable - emissions units P014 and P015.

m) The permittee shall maintain documentation that includes the following information regarding the closed-vent system /control device operation:

(1) Dates of startup and shutdown of the closed-vent system.

(2) Periods when the closed-vent system is not operated as designed.

Regarding control device performance records requirement under 40 CFR 61.356(j)(1), (3), and (4), refer to Lafarge Title V permit (Facility ID 03 63 00 0002 -P0107002), or renewal, as applicable - emissions units P014 and P015. Note: even at times of Lafarge cement kiln operation when not firing waste-derived fuel (and therefore not under MACT Subpart EEE standards), process standards for proper cement production still require a combustion temperature of approximately 2200 deg F, easily surpassing temperatures commonly associated with 95 percent organic destruction efficiency [See B.2.e)(4)]. Systech has records showing that the carbon canisters, although used only as back-up for times when neither kiln is operating (i.e. rarely), have been designed in accordance with standards such as in 40 CFR 61.356(f)(2)(i)(G).

4. The permittee shall comply with the following Subpart FF reporting requirements:

a) The permittee shall submit to the Director (Ohio EPA, Northwest District) annual reports that summarize the following information (if the information in the annual report is not changed in the following year, the permittee may submit a statement to that effect):

(1) Whether or not the water content of the waste stream is greater than 10 percent.
(2) Whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate.
(3) Annual waste quantity for the waste stream.
(4) Range of benzene concentrations for the waste stream.
(5) Annual average flow-weighted benzene concentration for the waste stream.
(6) Annual benzene quantity for the waste stream.

The annual reports shall be submitted by April 7 of each year, and shall cover the previous calendar year.

[40 CFR 61.357(a) and OAC rule 3745-77-07(C)(1)]

b) The permittee shall submit quarterly to the Director (Ohio EPA District Office or local air agency) a certification that all of the required inspections have been carried out in accordance with the requirements of B.3. The certification shall be submitted within 30 days following the end of the calendar quarter.
[40 CFR 61.357(d)(6) and OAC rule 3745-77-07(C)(1)]

c) The permittee shall submit annually to the Director (Ohio EPA District Office or local air agency) a report that summarizes all inspections required during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about the repairs or corrective action taken. The certification shall be submitted within 30 days following the end of the calendar quarter.
[40 CFR 61.357(d)(8) and OAC rule 3745-77-07(C)(1)]

d) Regarding operational excursion reporting requirement for the closed-vent system control device under 40 CFR 61.357(d)(7)(iv)(A), refer to Lafarge Title V permit - Fac. ID 03 63 00 0002 (P0107002), or renewal, as applicable - emissions units P014 and P015 (e.g. for any time periods where neither kiln is in operation).

5. The permittee shall comply with the following Subpart FF testing requirements:

a) The permittee shall annually test equipment for compliance with no detectable emissions in accordance with the following requirements:

(1) Monitoring shall comply with Method 21 from Appendix A of 40 CFR Part 60.

(2) The detection instrument shall meet the performance criteria of Method 21.

(3) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.

(4) Calibration gases shall be: zero air (less than 10 ppm of hydrocarbons in air); and, a mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.*

(5) The background level shall be determined as set forth in Method 21.

(6) The instrument probe shall be traversed around all potential leak interfaces as close as possible to the interface as described in Method 21.

(7) The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared to 500 ppm for determining compliance.

* The permittee may, at its option, elect to use the more stringent 'action level' classification for leak detection of 500 ppm (absolute) for all equipment, regardless of the piece of equipment or applicable regulation that applies. If this option is used, the permittee is instructed to use a corresponding calibration gas concentration of approximately 500 ppm methane or n-hexane.
[40 CFR 61.355(h) and OAC rule 3745-77-07(C)(1)]

b) The permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream. If test data are used, then the owner or operator shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When the permittee and Ohio EPA do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under 40 CFR 61.355(c)(3) shall be used to resolve the disagreement.
[40 CFR 61.355(c)(2) and OAC rule 3745-77-07(C)(1)]

c) The facility has been determined to be exempt from compliance demonstration for B.2.d)(1) under 40 CFR 61.348(d)(2). That is, the facility must instead be in compliance with 40 CFR 266.100 et seq. (Subpart H) or 40 CFR 63.1200 et seq. (Subpart EEE) for the cement kilns (emissions units P014 and P105) located at the Lafarge cement plant, which is permitted under the same premise number as this facility.
[OAC rule 3745-77-07(C)(1)]

6. Waste subject to processing (i.e., receipt, handling, and treatment), pursuant to 40 CFR, Part 61, Subpart FF standards for the highest total annual benzene (TAB) category of greater than 10 mega grams per year [40 CFR 61.342(c)], is not considered 'off-site material' under 40 CFR 63.680(b)(2)(vi), and is therefore explicitly excluded from 40 CFR, Part 63 Subpart DD applicability.

All of the fuel quality waste that the permittee processes is currently processed under Subpart FF requirements as described above, but this is chosen and voluntary, i.e., not all of the fuel quality waste actually falls under Subpart FF applicability. This Title V permit recognizes that, pursuant to this permit, the permittee has committed to continue to process all the fuel quality waste under the Subpart FF requirements as described above. The exclusion from Subpart DD applicability as described above is therefore extended to all the fuel quality waste, under authority of this Title V permit.
[OAC rule 3745-77-07(C)(1)]

7. The following equipment at the facility, intended /used to operate in volatile hazardous air pollutant (VHAP) service as defined in 40 CFR 61.241, is subject to the requirements of 40 CFR 61.240 et seq. (Subpart V - Equipment Leaks) under this permit: pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, and connectors.
[40 CFR 61.240(a)]

a) Each piece of equipment to which Subpart V under this permit applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.
[40 CFR 61.242-1(d) and OAC rule 3745-77-07(C)(1)]

b) Equipment that is in vacuum service is excluded from the requirements of B.8 through B.16 if it is identified in the log as required in B.17.c)(5).
40 CFR 61.242-1(e) and OAC rule 3745-77-07(C)(1)]

8. STANDARDS: PUMPS

a) Standards for pumps

(1) Each pump shall be monitored monthly to detect leaks by the methods specified in B.19.a) through B.19.f), except as provided in B.8.c) through B.8.l). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

(2) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.

[40 CFR 61.242-2(a), (b) and OAC rule 3745-77-07(C)(1)]

b) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in B.16.

A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
[40 CFR 61.242-2(c) and OAC rule 3745-77-07(C)(1)]

c) Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of B.8.a) and B.8.i), provided the requirements of B.8.d) through B.8.g) are met.
[40 CFR 61.242-2(d) and OAC rule 3745-77-07(A)(1)]

d) As provided in B.8.c), if applicable, each dual mechanical seal system must be:

(1) operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure;

(2) equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system; or

(3) equipped with a system that purges the barrier fluid into a process stream with zero VHAP emissions to atmosphere.

[40 CFR 61.242-2(d)(1) and OAC rule 3745-77-07(A)(1)]

e) As provided in B.8.c), if applicable, the barrier fluid must not be in VHAP service and, if the pump is covered by standards under 40 CFR part 60, is not in VOC service.
[40 CFR 61.242-2(d)(2) and OAC rule 3745-77-07(A)(1)]

f) As provided in B.8.c), if applicable, each barrier fluid system must be equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
[40 CFR 61.242-2(d)(3) and OAC rule 3745-77-07(A)(1)]

g) As provided in B.8.c), if applicable, each pump must be checked by visual inspections each calendar week for indications of liquids dripping from the pump seal.

(1) If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, the pump shall be monitored as specified in B.19 to determine the presence of VOC and VHAP in the barrier fluid.

(2) If the monitor reading (taking into account any background readings) indicates the presence of VHAP, a leak is detected. For the purpose of this paragraph, the monitor may be calibrated with VHAP, or may employ a gas chromatography column to limit the response of the monitor to VHAP, at the option of the permittee.

(3) If an instrument reading of 10,000 ppm or greater (total VOC) is measured, a leak is detected.

[40 CFR 61.242-2(d)(4) and OAC rule 3745-77-07(C)(1)]

h) As provided in B.8.c), if applicable, each sensor as described in B.8.f) must be checked daily or must be equipped with an audible alarm.
[40 CFR 61.242-2(d)(5) and OAC rule 3745-77-07(C)(1)]

i) As provided in B.8.c), if applicable, the permittee must determine, based on design considerations and operating experience, criteria applicable to the presence and frequency of drips and to the sensor that indicates failure of the seal system, the barrier fluid system, or both.

(1) If indications of liquids dripping from the pump seal exceed the criteria established above, or if, based on the criteria established above, the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

(2) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after it is detected, except as provided in B.16.

(3) A first attempt at repair shall be made no later than five calendar days after each leak is detected.

[40 CFR 61.242-2(d)(6) and OAC rule 3745-77-07(C)(1)]

j) Any pump that is designated, as described in j)(2) below, for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of B.8.a) through B.8.i) if the pump:

(1) has no externally actuated shaft penetrating the pump housing;

(2) is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in B.19.g; and

(3) is tested for compliance with j)(2) above initially upon designation, annually, and at other times requested by the Administrator.

[40 CFR 61.242-2(e) and OAC rule 3745-77-07(C)(1)]

k) If any pump is equipped with a closed-vent system capable of capturing and transporting any leakage from the seal or seals to a process or fuel gas system, it is exempt from the requirements of B.8.a) through B.8.j).
[40 CFR 61.242-2(f) and OAC rule 3745-77-07(A)(1)]

l) Any pump that is designated, as described in B.17.d)(1), as an unsafe-to-monitor pump, is exempt from the monitoring and inspection requirements of B.8.a) and B.8.g) through B.8.i) if:

(1) the permittee demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with B.8.a); and

(2) the permittee has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but no more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in B.8.b) if a leak is detected.

[40 CFR 61.242-2(g) and OAC rule 3745-77-07(C)(1)]

9. [RESERVED]

10. STANDARDS: PRESSURE RELIEF DEVICES

a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in B.19.g).
[40 CFR 61.242-4(a) and OAC rule 3745-77-07(A)(1)]

b) Pressure Relief Devices:

(1) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in B.16.

(2) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in B.19.g).

[40 CFR 61.242-4(b) and OAC rule 3745-77-07(C)(1)]

c) Any pressure relief device that is routed to a process or fuel gas system is exempt from the requirements of B.10.a and B.10.b above.
[40 CFR 61.242-4(c) and OAC rule 3745-77-07(A)(1)]

d) Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of B.10.a) and B.10.b), provided the permittee complies with the following:

After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in B.16.
[40 CFR 61.242-4(d) and OAC rule 3745-77-07(C)(1)]

11. STANDARDS: SAMPLING CONNECTION SYSTEMS

Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed vent system. Gases displaced during filling of the sample container are not required to be collected or captured.

In-situ sampling systems and sampling systems without purges are exempt from the above requirements.
[40 CFR 61.242-5(a), (c) and OAC rule 3745-77-07(A)(1)]

12. STANDARDS: OPEN-ENDED VALVES OR LINES

a) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve.

The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
[40 CFR 61.242-6(a) and OAC rule 3745-77-07(A)(1)]

b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
[40 CFR 61.242-6(b) and OAC rule 3745-77-07(A)(1)]

c) When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with a) at all other times.
[40 CFR 61.242-6(c) and OAC rule 3745-77-07(A)(1)]

d) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of a), b), and c).
[40 CFR 61.242-6(d) and OAC rule 3745-77-07(A)(1)]

e) Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in a), b), and c), are exempt from the requirements of those .

[40 CFR 61.242-6(e) and OAC rule 3745-77-07(A)(1)]

13. STANDARDS: VALVES

a) Each valve shall be monitored monthly to detect leaks by the method specified in B.19.a) through B.19.f) and shall comply with B.13.b) through B.13.d), except as provided in B.13.e) through B.13.j). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
[40 CFR 61.242-7(a), (b) and OAC rule 3745-77-07(C)(1)]

b) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.
[40 CFR 61.242-7(c) and OAC rule 3745-77-07(C)(1)]

c) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in B.16.

A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
[40 CFR 61.242-7(d) and OAC rule 3745-77-07(C)(1)]

d) First attempts at repair include, but are not limited to, the following best practices where practicable:

(1) tightening of bonnet bolts;

(2) replacement of bonnet bolts;

(3) tightening of packing gland nuts; and

(4) injection of lubricant into lubricated packing.
[40 CFR 61.242-7(e) and OAC rule 3745-77-07(C)(1)]

e) Any valve that is designated, as described in B.17.c)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of B.13.a) if the valve:

(1) Has no external actuating mechanism in contact with the process fluid;

(2) Is operated with emissions less than 500 ppm above background, as measured by the method specified in B.19.g); and

(3) Is tested for compliance with e)(2) above initially upon designation, annually, and at other times requested by the Director.
[40 CFR 61.242-7(f) and OAC rule 3745-77-07(C)(1)]

f) Any valve that is designated, as described in B.17.d)(1), as an unsafe-to-monitor valve is exempt from the requirements of B.13.a) if:

(1) the permittee demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with B.13.a); and

(2) thepermittee has a written plan that requires monitoring of the valve as frequent as practicable during safe-to-monitor times.
[40 CFR 61.242-7(g) and OAC rule 3745-77-07(C)(1)]

g) Any valve that is designated, as described in B.17.d)(2), as a difficult-to-monitor valve is exempt from the requirements of B.13.a) if:

(1) the permittee demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;

(2) the process unit within which the valve is located is an existing process unit; and

(3) thepermittee follows a written plan that requires monitoring of the valve at least once per calendar year.
[40 CFR 61.242-7(h) and OAC rule 3745-77-07(C)(1)]

h) The permittee may elect for all valves within a process unit to comply with one of the alternative work practices specified in B.13.i)(2) and B.13.i)(3) below.

The permittee must notify the Director (Ohio EPA, Northwest District) before implementing one of the alternative work practices: The permittee shall notify the Director (Ohio EPA, Northwest District) of the alternative standard selected 90 days before implementing either of the provisions.
[40 CFR 61.243-2(a), 40 CFR 61-247(d), and OAC rule 3745-77-07(C)(1)]

i) As provided in B.13.h) if applicable,

(1) The permittee shall comply initially with the requirements for valves, as described in B.13.a) through B.13.g) above.

(2) After 2 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, the permittee may begin to skip one of the quarterly leak detection periods for the valves in VHAP service.

(3) After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, the permittee may begin to skip three of the quarterly leak detection periods for the valves in VHAP service.

(4) If the percentage of valves leaking is greater than 2.0, the permittee shall comply with the requirements as described in B.13.a) through B.13.g), but may again elect to use this provision.

[40 CFR 61.243-2(b) and OAC rule 3745-77-07(C)(1)]

j) The permittee may comply with the alternative valve standard provisions of 40 CFR 61.243-1 in accordance with that provision, and upon notification to the Ohio EPA Director (Ohio EPA, Northwest District) and the US EPA Administrator under that provision.
[OAC rule 3745-77-07(C)(1)]

14. STANDARDS: PRESSURE RELIEF SERVICES IN LIQUID SERVICE AND CONNECTORS

a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pressure relief devices in liquid service and connectors, the permittee shall follow either one of the following procedures:

(1) The permittee shall eliminate the visual, audible, olfactory, or other indication of a potential leak.

(2) The permittee shall monitor the equipment within 5 days by the method specified in B.19.a) through B.19.f) and shall comply with the requirements of B.14.b). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

[40 CFR 61.242-8(a), (b) and OAC rule 3745-77-07(C)(1)]

b) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in B.16.

The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the following best practices

where practicable: Tightening of bonnet bolts; Replacement of bonnet bolts; Tightening of packing gland nuts; and Injection of lubricant into lubricated packing.
[40 CFR 61.242-8(c), (d) and OAC rule 3745-77-07(C)(1)]

15. [RESERVED]

16. STANDARDS: DELAY OF REPAIR

a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

b) [40 CFR 61.242-10(a) and OAC rule 3745-77-07(C)(1)]

c) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process and that does not remain in VHAP service.
[40 CFR 61.242-10(b) and OAC rule 3745-77-07(C)(1)]

d) Delay of repair for valves will be allowed if:

(1) the permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair; and

(2) when repair procedures are effected, the purged material is collected and destroyed in a control device complying with 40 CFR 61.242-11, i.e., achieving a destruction efficiency of 95 percent, by weight.
[40 CFR 61.242-10(c) and OAC rule 3745-77-07(C)(1)]

e) Delay of repair for pumps will be allowed if:

(1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and

(2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
[40 CFR 61.242-10(d) and OAC rule 3745-77-07(C)(1)]

f) Delay of repair beyond a process unit shutdown will be allowed for a valve if the valve assembly replacement is necessary during the process unit shutdown, the valve assembly supplies have been depleted, and the valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
[40 CFR 61.242-10(e) and OAC rule 3745-77-07(C)(1)]

17. Additional Subpart V Monitoring and Recordkeeping Requirements

a) When each leak is detected as specified in B.8, B.13, and B.14, the following requirements shall apply:

(1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.

(2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in B.13.b) and no leak has been detected during those 2 months.

(3) The identification on equipment, except on a valve, may be removed after it has been repaired.

[40 CFR 61.246(b) and OAC rule 3745-77-07(C)(1)]

b) When each leak is detected as specified in B.8, B.13, and B.14, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:

(1) the instrument and operator identification numbers and the equipment identification number;

(2) the date the leak was detected and the dates of each attempt to repair the leak;

(3) repair methods applied in each attempt to repair the leak;

(4) "above 10,000 ppm" if the maximum instrument reading measured by the methods specified in B.19 after each repair attempt is equal to or greater than 10,000 ppm;

(5) "repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;

(6) the signature of the permittee representative (or designate) whose decision it was that repair could not be effected without a process shutdown;

(7) the expected date of successful repair of the leak if a leak is not repaired within 15 calendar days;

(8) dates of process unit shutdowns that occur while the equipment is unrepaired; and

(9) the date of successful repair of the leak.

[40 CFR 61.246(c) and OAC rule 3745-77-07(C)(1)]

c) The following information pertaining to all equipment to which the standard applies shall be recorded in a log that is kept in a readily accessible location:

(1) a list of identification numbers for equipment (except welded fittings) subject to the requirements of Subpart V under this permit.

(2) a list of identification numbers for equipment that the permittee elects to designate for no detectable emissions as indicated by an instrument reading of less than 500 ppm above background (the designation of this equipment for no detectable emissions shall be signed by the permittee representative);

(3) a list of equipment identification numbers for pressure relief devices required to comply with B.10.a);

(4) the dates of each compliance test required in B.10 and B.8.j) and B.13.e), the background level measured during each test, and the maximum instrument reading measured at the equipment during each test; and

(5) a list of identification numbers for equipment in vacuum service.
[40 CFR 61.246(e) and OAC rule 3745-77-07(C)(1)]

d) The following information pertaining to all valves subject to the requirements of B.13.f) and B.13.g) and to all pumps subject to the requirements of B.8.l shall be recorded in a log that is kept in a readily accessible location:

(1) a list of identification numbers for valves and pumps that are designated as unsafe to monitor, an explanation for each valve or pump stating why the valve or pump is unsafe to monitor, and the plan for monitoring each valve or pump; and

(2) a list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.
[40 CFR 61.246(f) and OAC rule 3745-77-07(C)(1)]

e) If applicable, the following information shall be recorded for valves complying with B.13.h) and B.13.i):

(1) a schedule for monitoring; and

(2) the percent of valves found leaking during each monitoring period.
[40 CFR 60.246(g) and OAC rule 3745-77-07(C)(1)]

f) The following information shall be recorded in a log that is kept in a readily accessible location:

(1) design criterion required in B.8.h) and an explanation of the design criterion; and

(2) any changes to this criterion and the reasons for the changes.
[40 CFR 60.246(h) and OAC rule 3745-77-07(C)(1)]

18. Subpart V Reporting Requirements

a) A report shall be submitted to the Ohio EPA, Northwest District by January 31 and July 31 of each year that includes the following information as set forth in B.18.b) through B.18.f):

b) The process unit identification.

c) For each month during the semiannual reporting period:

(1) The number of valves for which leaks were detected as described in B.13.a), or under B.13.h) if applicable.

(2) The number of valves for which leaks were not repaired as required in B.13.c).

(3) The number of pumps for which leaks were detected as described in B.8.a) and B.8.i).

(4) The number of pumps for which leaks were not repaired as required in B.8.b) and B.8.i).

(5) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible.

d) Dates of process unit shutdowns which occurred within the semiannual reporting period.

e) Revisions to items reported according to 40 CFR 61.247(a) if changes have occurred since the initial report or subsequent revisions to the initial report.

f) The results of all performance tests and monitoring to determine compliance with no detectable emissions and, if applicable, with B.13.h), B.13.i), and/or B.13.j), conducted within the semiannual reporting period.
[40 CFR 61.247(b) and OAC rule 3745-77-07(C)(1): B.18.a - f]

Note: Compliance with the requirements of 40 CFR 61.10(c) is not required for revisions documented under B.18.b) through B.18.f).

g) An application for approval of construction or modification under 40 CFR 61.05(a) and 61.07, will not be required if --

(1) the new source complies with the 40 CFR 61.242 Subpart V standards under this permit;

(2) the new source is not part of the construction of a process unit; and

(3) in the next semiannual report required by B.18.a), the information in 40 CFR 61.247(a)(5) is reported.
[40 CFR 61.247(e) and OAC rule 3745-77-07(C)(1)]

19. Subpart V Test Methods and Procedures

a) Subpart V monitoring, as required under this permit, shall comply with the following requirements set forth in B.19.b) through B.19.f):

b) Monitoring shall comply with Method 21 of Appendix A of 40 CFR Part 60.

c) The detection instrument shall meet the performance criteria of Method 21.

d) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.

e) Calibration gases shall be:

(1) zero air (less than 10 ppm of hydrocarbon in air); and

(2) a mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.*

* The permittee may, at its option, elect to use the more stringent 'action level' classification for leak detection of 500 ppm (absolute) for all equipment, regardless of the piece of equipment or

applicable regulation that applies. If this option is used, the permittee is instructed to use a corresponding calibration gas concentration of approximately 500 ppm methane or n-hexane.

f) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21.
[40 CFR 61.245(b) and OAC rule 3745-77-07(C)(1): B.19.a - f]

g) When equipment is tested for compliance with or monitored for no detectable emissions, the permittee shall comply with the following requirements:

(1) The requirements of b) through e) shall apply.

(2) The background level shall be determined, as set forth in Method 21.

(3) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21.

(4) The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.

[40 CFR 61.245(c) and OAC rule 3745-77-07(C)(1)]

h) Each piece of equipment within a process unit that can conceivably contain equipment in VHAP service is presumed to be in VHAP service unless the permittee demonstrates that the piece of equipment is not in VHAP service. For a piece of equipment to be considered not in VHAP service, it must be determined that the percent VHAP content can be reasonably expected never to exceed 10 percent, by weight. For purposes of determining the percent VHAP content of the process fluid that is contained in or contacts equipment, procedures that conform to the methods described in ASTM Method D-2267 (incorporated by the reference as specified in 40 CFR 61.18) shall be used.
[40 CFR 61.245(d)(1) and OAC rule 3745-77-07(C)(1)]

i) The permittee may use engineering judgment rather than the procedures in h) to demonstrate that the percent VHAP content does not exceed 10 percent by weight, provided that the engineering judgment demonstrates that the VHAP content clearly does not exceed 10 percent, by weight. When the permittee and the Director do not agree on whether a piece of equipment is not in VHAP service, however, the procedures in h) shall be used to resolve the disagreement.

If the permittee determines that a piece of equipment is in VHAP service, the determination can be revised only after following the procedures in h).
[40 CFR 61.245(d)(2) and OAC rule 3745-77-07(C)(1)]

j) With regard to h) and i) above, samples used in determining the percent VHAP content shall be representative of the process fluid or gas that is contained in or contacts the equipment.
[40 CFR 61.245(d)(3) and OAC rule 3745-77-07(C)(1)]

20. Miscellaneous Requirements and Provisions

    Upon prior written approval of the US EPA administrator, and upon modification of the Title V permit as approved by Ohio EPA, the permittee may otherwise comply with certain requirements of Subpart V, under a 'determination of alternative means of emission limitation' as provided in 40 CFR 60.242-1(c).
    [OAC rule 3745-77-07(C)(1)]

21. 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.
    [OAC rule 3745-77-03(A)]

22. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and/or 40 CFR Part 61, Subparts V and FF .

    P018 - Mixer 1 (PTI 03-5052)
    P019 - Mixer 2 (PTI 03-5052)
    T008 - Tank 8 (PTI 03-10007)
    T009 - Tank 9 (PTI 03-10007)
    T010 - Tank 10 (PTI 03-13006)
    T011 - Tank 11 (PTI 03-13006)
    T026 - Tank 1 (PTI P0108233)
    T027 - Tank 2 (PTI P0108233)
    T028 - Tank 3 (PTI P0108233)
    T029 - Tank 4 (PTI P0108233)
    T030 - Tank 7 (PTI P0112535)

    (Authority for term: OAC rule 3745-77-07(A)(13))

C. Emissions Unit Terms and Conditions

1. There are no significant emissions units at this facility. See Part B.2 Above.