



11/14/2014

Ms. Kimberly Bauman
Mississippi Lime Company - Huron Plant
16147 US Hwy 61
Ste Genevieve, MO 63670

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0322010062
Permit Number: P0117626
Permit Type: OAC Chapter 3745-31 Modification
County: Erie

Certified Mail

Table with 2 columns: Status (No) and Category (TOXIC REVIEW, PSD, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MAJOR NON-ATTAINMENT, MODELING SUBMITTED, MAJOR GHG, SYNTHETIC MINOR TO AVOID MAJOR GHG)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Sandusky Register. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

[Handwritten signature of Erica R. Engel-Ishida]

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Mississippi Lime Company - Huron Plant

Issue Date: 11/14/2014
Permit Number: P0117626
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 permit modification to update synthetic minor restriction for HCl emissions to allow operational flexibility.
Facility ID: 0322010062
Facility Location: Mississippi Lime Company - Huron Plant
100 Meeker Street,
Huron, OH 44839-0451
Facility Description: Lime Manufacturing

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility is located in Huron, Ohio (Erie County). Mississippi Lime Company operates three lime kilns (P901, P902, and P903).

3. Facility Emissions and Attainment Status:

The facility is a major source for Title V. Erie County is in attainment or unclassifiable for criteria pollutants.

4. Source Emissions:

This permit action affects emission units P901, P902, and P903 which are currently permitted under PTI No. P0108309, issued August 16, 2011. The company would like to maximize usage of each kiln by establishing the lbHCl/ton limit as the same value (proposing 0.07 lbHCl/ton) for each kiln and by establishing a production limit of 284,286 tons lime/rolling, 12-month period from all three kilns combined (removing the need for a "per kiln" production limit).

Individual kiln limits in the past were established because each kiln had a different emission factor per testing. The 0.07 lbHCl/ton would be based on the worst-case kiln test in 2013 (kiln #3 at 0.056 lbHCl/ton) increased by 25%. Each kiln has tested below 0.07 lb/ton in the last round of testing and with the improvements on kilns 2 and 3 (addition of a quench on kiln 3, trefoil on kiln 2), further emission reductions are expected. This current permit modification would allow the company (1) operational flexibility to use the kiln that is performing the best more often and (2) to use the other kilns more while they are bringing down kilns 2 and 3 to make the improvements without worrying about a production cap.

The facility's proposed changes will result in an increase in kiln's 1 short term limit, an increase in the overall production limit of all three kilns combined, and an increase in the overall HCl limit for all three kilns combined.

5. Conclusion:

With the proposed enforceable restrictions on its HCl emission limitations for each kiln and a combined lime production rate limit for P901, P902, and P903, the facility's potential to emit for HCl will still stay under 10 tons/year; therefore, avoiding being subject to the MACT, Subpart AAAAA, Lime Manufacturing Plant.

6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>HCl</u>	<u>9.95</u>



DRAFT

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

for

Mississippi Lime Company - Huron Plant

Facility ID:	0322010062
Permit Number:	P0117626
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/14/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Mississippi Lime Company - Huron Plant

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Draft Permit-to-Install
Mississippi Lime Company - Huron Plant
Permit Number: P0117626
Facility ID: 0322010062
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0322010062
Facility Description: Lime manufacturing
Application Number(s): A0051536
Permit Number: P0117626
Permit Description: Chapter 31 permit modification to update synthetic minor restriction for HCl emissions to allow operational flexibility.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$3,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/14/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Mississippi Lime Company - Huron Plant
100 Meeker Street
Huron, OH 44839-0451

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117626
 Permit Description: Chapter 31 permit modification to update synthetic minor restriction for HCl emissions to allow operational flexibility.

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

Group Name: Kilns

Emissions Unit ID:	P901
Company Equipment ID:	No. 1 Kiln
Superseded Permit Number:	P0108309
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P902
Company Equipment ID:	No. 2 Kiln
Superseded Permit Number:	P0108309
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P903
Company Equipment ID:	No. 3 Kiln
Superseded Permit Number:	P0108309
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Mississippi Lime Company - Huron Plant
Permit Number: P0117626
Facility ID: 0322010062
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 of an 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 appropriate Ohio EPA District Office or contracted



local air agency, 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- 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 ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- 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.

7. Best Available Technology

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



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual



obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions



Draft Permit-to-Install

Mississippi Lime Company - Huron Plant

Permit Number: P0117626

Facility ID: 0322010062

Effective Date: To be entered upon final issuance

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.

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Mississippi Lime Company - Huron Plant

Permit Number: P0117626

Facility ID: 0322010062

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Draft Permit-to-Install
Mississippi Lime Company - Huron Plant
Permit Number: P0117626
Facility ID: 0322010062
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Kilns: P901,P902,P903,

EU ID	Operations, Property and/or Equipment Description
P901	Rotary Lime Kiln No. 1 with quench unit and wet scrubber in series
P902	Rotary Lime Kiln No. 2 with quench unit and wet scrubber in series
P903	Rotary Lime Kiln No. 3 with wet scrubber

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.07 lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P901 9.95 tons HCl per rolling, 12-month period for emission units P901, P902, and P903, combined See b)(2)a., c)(1), and c)(2).
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
d.	OAC rule 3745-18-28(F)	4.0 lbs SO ₂ /ton of lime produced, from emissions units P901, P902, and P903, combined
e.	OAC rule 3745-17-08(A)	See b)(2)b.
f.	OAC rule 3745-17-07(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. This permit establishes a federally enforceable emission limitation of 9.95 tons HCl per rolling, 12-month period for P901, P902, and P903, combined for purposes of avoiding applicability of Maximum Achievable Control Technology



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

- b. This facility is not located within an Appendix A area, as identified in OAC rule 3745-17-08(B). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.
- c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) The maximum amount of lime produced in emission units P901 (kiln #1), P902 (kiln #2), and P903 (kiln #3), combined, shall not exceed 284,286 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.
- (2) Water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the following parameters during operation of this emissions unit:
 - a. the water flow rate, in gallons per minute, across the scrubber. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate; and
 - b. the supplemental water flow rate to the ID fan, in gallons per minute.
- (2) The permittee shall properly install, operate, and maintain equipment to monitor the following parameters daily, during operation of this emissions unit:
 - a. the pressure drop, in inches of water, across the scrubber; and
 - b. the supplemental water flow rate to the quench unit, in gallons per minute.
- (3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:
 - a. the pressure drop, in inches of water, across the scrubber;
 - b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate), across the scrubber;
 - c. the water flow rate, in gallons per minute, to the ID fan; and
 - d. the water flow rate, in gallons per minute, to the quench unit.



- (4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.
- (5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- (6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:
 - a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;
 - b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above);
 - c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute; and
 - d. the acceptable value for the supplemental scrubber water flow rate to the quench unit, is a minimum of 275 gallons of water per minute, for emissions units P901 and P902; and a minimum 200 gallons of water per minute, for emissions unit P903.
- (7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in



accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D5865, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

- (9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.
- (10) The permittee shall collect and record the following information on a monthly basis:
 - a. the amount of stone fed to each emissions unit, in tons;
 - b. the amount of lime produced by each emissions unit, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.] by a factor of 2);
 - c. the rolling, 12-month lime production rates, in tons;
 - d. the HCl emission rate from lime produced for each emissions unit, in tons per month, calculated by multiplying the lbsHCl/ton of lime produced emission limitation by the amount of lime produced [d)(10)b.]; and
 - e. the rolling, 12-month HCl emission rates, in tons.
- (11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month HCl emission limitation of 9.95 tons; and
 - b. all exceedances of the rolling, 12-month lime production restriction of 284,286 tons.

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

- (2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur



content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

- a. the total quantity of coal received each month from each supplier (tons);
- b. the weighted* average sulfur content (percent) of the coal received during each calendar month;
- c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and
- d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

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

- (3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.
- (4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;
 - b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;
 - c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;
 - d. each period of time when the supplemental water flow rate to the quench unit was less than the applicable limit contained in this permit;
 - e. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. above where a prompt investigation was not conducted;
 - f. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - g. an identification of each incident of deviation described in e)(4)a., e)(4)b., e)(4)c. and e)(4)d. where proper records were not maintained for the investigation and/or the corrective action.



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

f) Testing Requirements

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

a. Emission Limitation:

100 pounds PE/hour, from emissions units P901, P902, and P903, combined

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lbs/hour limitation through emissions testing conducted in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A; Method 5 of 40 CFR Part 60, Appendix A.

[The permittee demonstrated compliance with the lbs/hour limitation through testing conducted on October 8, 2013.]

b. Emission Limitation:

4.0 pounds SO₂/ton of lime produced, from emission units P901, P902 and P903, combined

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lbs/ton of lime produced limitation through emissions testing conducted in accordance with Methods 1-4 of 40 CFR Part 60; and Method 6 of 40 CFR Part 60, Appendix A.

[The permittee demonstrated compliance with the lbs/ton of lime produced limitation through testing conducted on June 4, 2013.]

c. Emission Limitation:

0.07 lbHCl/ton lime produced for emissions unit P901

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lbs/ton of lime produced limitation through emissions testing conducted in accordance with Methods 1-4 of 40 CFR Part 60; and ASTM Method D6735 or USEPA Method 321 (FTIR).

[The permittee demonstrated compliance with the lbs/ton of lime produced limitation through testing conducted on October 8, 2013.]



d. Emission Limitation:

9.95 tons HCl/rolling, 12-month period for emissions units P901, P902, and P903, combined

Applicable Compliance Method:

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

e. Emission Limitation:

The maximum amount of lime produced in emissions units P901, P902, and P903, combined, shall not exceed 284,286 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:

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

f. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.