



State of Ohio Environmental Protection Agency

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Harr-  
Bowerston  
F002

Street Address:

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50 West Town Street, Suite 700  
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P.O. Box 1049  
Columbus, OH 43216-1049

04/09/07

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate  
F002 (Grinding Building)Grinding Building

Bowerston Shale Company (06-34-00-0012)  
Edward Milliken  
515 E. Main St.  
PO Box 199  
Bowerston, OH 44695

Dear Edward Milliken:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (800) 329-7518. For more information related to air pollution control in Ohio, visit [www.epa.state.oh/dapc](http://www.epa.state.oh/dapc).

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

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Southeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Southeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 04/09/07

Expiration Date: 04/09/12

This document constitutes issuance to:

Facility ID: 06-34-00-0012  
Bowerston Shale Company  
515 E. Main St.  
Bowerston, OH 44695

of a permit to operate for:

F002 (Grinding Building)  
Grinding Building

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in cursive script that reads "Chris Korleski".

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Chris Korleski  
Director

## Part I: General Terms and Conditions

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. 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.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. Records Retention Requirements

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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

**6. Scheduled Maintenance/Malfunction Reporting**

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

**7. Permit Transfers**

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

**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. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - 60 tph Grinding Building (including milling, screens, 3 bulk additive feeders and 19 enclosed conveyor transfer points, TP5 - TP23) all enclosed	OAC rule 3745-31-05(A)(3) (PTI# 06-07933 issued 1/17/06)	<p>No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.</p> <p>Total fugitive particulate emissions (PE) shall not exceed 22 tons per year.</p>
	40 CFR Part 60, Subpart OOO 60.672(e)(1)	<p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.c)</p> <p>The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.</p>
4 enclosed conveyor transfer points (in existing building, TP24 - TP27) vented to a baghouse	OAC rule 3745-31-05(A)(3)	<p>PE emissions from the stack shall not exceed 0.05g/dscm (0.022 gr/dscf) (3.0 lbs/hr)(13 TPY)</p> <p>Visible emissions from the stack shall not exceed 7 % opacity.</p>
	40 CFR Part 60, Subpart OOO 60.672(a)	<p>The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.</p>

**2. Additional Terms and Conditions**

**2.a** The Grinding Plant operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

Grinding processes:  
Mills,  
Screens, and  
Bulk additive addition

Transfer points:

In new building:

- TP5 - CB-01 discharge to CB-02 - enclosed
- TP6 - CB-02 discharge to box hoppers - enclosed headboxes
- TP7 - box feeders discharge to CB-03 - enclosed
- TP8 - CB-03 discharge to CB-04 - enclosed
- TP9 - CB-04 discharge to CB-05 - enclosed
- TP10 - CB-05 discharge to existing hammer mill crusher - contained
- TP11 - Hammer mill crusher feeder discharge to CB-06 - enclosed
- TP12 - CB-06 discharge to CB-07 - enclosed
- TP13 - CB-07 discharge to diverter chute work - enclosed
- TP14 - diverter chute work to customer screens - enclosed/rubber sealed
- TP15 - screen discharges to CB-08 and CB-09 - enclosed/rubber sealed
- TP16 - screen discharges to CB-08 and CB-09 - enclosed/rubber sealed
- TP17 - CB-08 discharge to CB-05 - enclosed
- TP18 - CB-09 discharge to CB-10 - enclosed
- TP19 - CB-10 discharge to CB-11 - enclosed
- TP20 - CB-11 discharge to CB-12 - enclosed
- TP21 - CB-12 discharge to box hoppers - enclosed headboxes
- TP22 - box feeders discharge to CB-13 and CB-14 - enclosed
- TP23 - CB-13 and CB-14 discharge to CB-15 - enclosed

In existing building:

- TP24 - CB-15 discharge to CB-16 - enclosed and vented to a baghouse
- TP25 - CB-16 discharge to existing pug mill - contained and vented to a baghouse
- TP26 - CB-16 discharge to CB-17 - enclosed and vented to a baghouse
- TP27 - CB-17 discharge to existing pug mill - contained and vented to a baghouse

**2.b** The permittee shall employ best available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:

material handling operation(s)	control measure(s)
grinding process and transfer points	maintain covers and sufficient moisture content

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.c** For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.

**2.d** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

**2.e** The throughput of this emission unit is limited by the maximum capacity of the kiln (plus waste and product loss on firing) - an inherent physical limitation.

## 2. Additional Terms and Conditions (continued)

- 2.f This emission unit is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

### B. Operational Restrictions

None

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks of the 4 enclosed conveyor transfer points in the existing building (TP-24 - TP-27), when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

2. The permittee shall perform daily checks of the new grinding plant building, when the emissions unit is in operation, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

1. The permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

### E. Testing Requirements

1. Compliance with the limitations contained in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

**E. Testing Requirements (continued)**

**1.a Emission Limitation:**

No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

Compliance Method: If required, compliance with the visible emission limitation for the operation(s) identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

**1.b Emission Limitation:**

Total fugitive particulate emissions (PE) shall not exceed 22 tons per year.

Compliance Method: Compliance with the annual limitations shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 06-07933, received August 31, 2005.

**1.c Emission Limitation:** The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

Compliance Method: Compliance shall be demonstrated by the monitoring and recordkeeping in Section C.1. of this permit.

**1.d Emission Limitation:** PE emissions from the stack shall not exceed 0.05g/dscm (0.022 gr/dscf) (3.0 lbs/hr)

Compliance Method: If required, compliance with the particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

**1.e Emission Limitation:** Visible emissions from the stack shall not exceed 7 % opacity.

Compliance Method: If required, compliance with the visible emission limitation for the operation(s) identified above shall be determined in accordance with the provisions of 40 CFR Part 60, Subpart A, Section 60.8 and 40 CFR Part 60, Subpart OOO, Section 60.675.

**F. Miscellaneous Requirements**

None