



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

10/12/2016

Genevieve Damico *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: Mississippi Lime Company - Huron Plant  
Facility ID: 0322010062  
Permit Type: Minor Permit Modification  
Permit Number: P0120467

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office





## **PROPOSED**

### **Division of Air Pollution Control Title V Permit**

for

Mississippi Lime Company - Huron Plant

Facility ID:	0322010062
Permit Number:	P0120467
Permit Type:	Minor Permit Modification
Issued:	10/12/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Mississippi Lime Company - Huron Plant

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**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant  
**Permit Number:** P0120467  
**Facility ID:** 0322010062  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0322010062  
Facility Description: Lime manufacturing  
Application Number(s): A0054366, M0004050  
Permit Number: P0120467  
Permit Description: Title V permit modification to include two new PTIs, a modification to emissions unit F003 (storage piles) and an administrative modification to the lime kilns.  
Permit Type: Minor Permit Modification  
Issue Date: 10/12/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0119257

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

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

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

Craig W. Butler  
Director



**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant

**Permit Number:** P0120467

**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. 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 recordings for 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 submitted scheduled 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 permit except 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 intermittent consistent 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 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 (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 Requirements Under 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.



**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant  
**Permit Number:** P0120467  
**Facility ID:** 0322010062

**Effective Date:** To be entered upon final issuance

**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 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 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.



**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant

**Permit Number:** P0120467

**Facility ID:** 0322010062

**Effective Date:** To be entered upon final issuance

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



**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant  
**Permit Number:** P0120467  
**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.
2. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions units P901 through P903 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR Part 64]



**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant

**Permit Number:** P0120467

**Facility ID:** 0322010062

**Effective Date:** To be entered upon final issuance

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



**1. F002, Road/Parking Lot**

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

Paved roadways and parking areas; unpaved roadways and parking areas

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 3745-17-08(A)	See b)(2)c.
b.	OAC rule 3745-17-07(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit are listed below:

- i. the main entrance; and
- ii. the employee parking area.

b. The unpaved roadways and parking areas that are covered by this permit are listed below:

- i. the coal storage pile road;
- ii. the load shed road;
- iii. the sludge haul road;
- iv. the exit road parking lot; and
- v. the parking lot.

c. 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.



- d. 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) None.
  
- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
  
- e) Reporting Requirements
  - (1) None.
  
- 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. None.
  
- g) Miscellaneous Requirements
  - (1) None.



**2. F003, Storage Piles**

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

Storage piles; load-in and load-out operations.

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.	ORC 3704.03(T) PTI #P0118593, issued 3/30/15)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as defined in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittee's storage piles. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each storage pile for which the plan applies.
- b. A determination of the frequency that each storage pile will be inspected to determine if additional control measures are needed.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the storage piles. This form/record should include, at a minimum, the following elements:
  - i. Storage pile inspected;
  - ii. Date inspected;
  - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
  - iv. Result of the inspection (needs treated or does not need treated);
  - v. A description of why no treatment was needed;
  - vi. Date treated;
  - vii. Name of employee who either treated the segment or who can verify that the segment was treated; and
  - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Northwest District Office for review and approval. The permittee can begin using the revised Work Practice Plan once the Northwest District Office has approved its use.

[OAC rule 3745-77-07(C)(1) and PTI #P0118593]

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the aggregate storage piles at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for an aggregate storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.



[OAC rule 3745-77-07(C)(1) and PTI #P0118593]

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0118593]

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit the proposed Work Practice Plan to Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI #P0118593]

- (2) The permittee shall submit semi-annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the semi-annual monitoring, recordkeeping and reporting requirements deviation reports required in the Standard Terms and Conditions section of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0118593]

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. None.

g) Miscellaneous Requirements

- (1) None.



**3. P904, Product conveying crushing screening**

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

Lime crushing, lime screening, lime re-screening and material handling operations with 1 baghouse (BH-1).

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 3745-17-11(B)	18.33 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)	See b)(2)a.
d.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)e.

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-45-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



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:

18.33 lbs of PE/hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with OAC rule 3745-17-03(B)(10).

[OAC 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**4. P905, Product Handling and Loadout**

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

Product Handling and Loadout Operations [includes three baghouses (BH-2, BH-3, BH-4) and two loadouts (west loadout and east loadout)]

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0116433, issued 03/20/2014)	See b)(2)a. and b)(2)b.  <u>Fugitive Emissions:</u> 2.04 tons fugitive particulate emissions (PE)/ year  Visible particulate fugitive emissions shall not exceed 20% opacity, as a 3-minute average.  <u>Emissions from Recovery Baghouse (BH-2):</u>  0.44 ton particulate matter emissions 10 microns or less in size (PM10)/year  0.02 grain PM10/dry standard cubic foot (dscf) [See b)(2)c.]  Visible PE shall not exceed 5% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	See b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)e.
d.	OAC rule 3745-17-07(B)	See b)(2)f.
e.	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) control requirement for this emissions unit has been determined to be the following:
  - i. totally enclosed design for overhead storage bin (bin no. 7), conveyor (C-5), and Deister Screen.
  - ii. use of a recovery baghouse (BH-2) for Loadout spout (West Loadout) that achieves a maximum outlet concentration of 0.02 grains PM10/dscf.
- b. The emission limitations/control measures in section b)(2)a. were established in accordance with the best available technology (BAT) requirements in OAC rule 3745-31-05(A)(3) and apply only to the Loadout spout (West Loadout), overhead storage bin (bin no. 7), conveyor (C-5), and the Deister Screen. The other equipment and operations associated with emissions unit P905 are existing operations installed prior in January 1974 and are not subject to the BAT requirements in OAC rule 3745-31-05(A)(3).

It should also be noted that the recovery baghouse (BH-2) currently serves some of the existing equipment and operations associated with emissions unit P905. The 0.44 ton PM10/year emission limitation associated with the West Loadout was established by using the volumetric air flow from the recovery baghouse (BH-2) dedicated to the loadout spout operation [see f)(1)c. for details].

- c. All PE from baghouse stack is PM10.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also Table 1 does not apply since the facility is located in Erie County.
- e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. 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).
- g. 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) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. 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 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 abnormal 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)(2)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.

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

(2) The permittee shall submit semiannual written reports that identify:

- c. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

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:  
2.04 tons of PE/year (fugitive)

Applicable Compliance Method:

Compliance with the tons of fugitive PE limitation shall be demonstrated by adding the west loadout fugitive emissions to the screening operation fugitive emissions.



The west load out fugitive emissions were calculated in the following manner:

75 tons <sup>(1)</sup>	0.61 lb PE <sup>(2)</sup>	(1-0.99) <sup>(3)</sup>	8760 hrs <sup>(4)</sup>	1 ton <sup>(5)</sup>
hour	ton		year	2000 lbs

**= 2.00 tons PE/year**

Where:

- (1) Maximum hourly throughput rate, as supplied in the permit application.
- (2) Emission factor taken from AP-42, Table 11.17-4 (revised 2/98)] for loaded uncontrolled.
- (3) Capture efficiency of baghouse (99%), as supplied in the permit application.
- (4) Maximum annual operating schedule.
- (5) Conversion factor.

The screening fugitive emissions were calculated in the following manner:

Controlled screening emissions:

110 tons <sup>(1)</sup>	0.00031 lb PE <sup>(2)</sup>	8760 hrs <sup>(3)</sup>	1 ton <sup>(4)</sup>
hour	ton	year	2000 lbs

= 0.06 ton PE/year

Where:

- (1) Maximum hourly throughput rate, as supplied in the permit application.
- (2) Emission factor taken from AP-42, Table 11.17-4 (revised 2/98)] for screening controlled.
- (3) Maximum annual operating schedule.
- (4) Conversion factor.

Fugitive screening emissions:

0.06 ton <sup>(1)</sup>	0.99 <sup>(2)</sup>	(1-0.995) <sup>(3)</sup>	(1-0.99) <sup>(4)</sup>	(1-0.70) <sup>(5)</sup>
year				

**= 0.04 ton PE/year**

Where:



- (1) Controlled screening emissions [from calculation above].
- (2) Capture efficiency of baghouse (99%).
- (3) Control efficiency of baghouse (99.5%).
- (4) Capture efficiency of baghouse (99%), as supplied in the permit application.
- (5) Building enclosure efficiency (70%).

West Loadout Fugitive Emissions: 2.00 tons PE/yr  
Screening Fugitive Emissions: 0.04 ton PE/yr  
2.04 tons PE/yr  
[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

b. Emission Limitation:

0.02 gr PM10/dscf (emissions from recovery baghouse BH-2)

Applicable Compliance Method:

The 0.02 gr/dscf limitation is the established BAT maximum outlet concentration for recovery baghouse BH-2. The permittee demonstrated compliance with the gr/dscf limitation through testing conducted on October 15-16, 2013. If required, the permittee shall demonstrate compliance with the gr/dscf limitation through emissions testing conducted in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

c. Emission Limitation:

0.44 ton of PM10/year (emissions from recovery baghouse BH-2)

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the emission limitation of 0.02 gr PM10/dscf by the maximum volumetric air flow from the recovery baghouse BH-2 dedicated to the new Loadout spout operation (584 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.02 gr PM10/dscf, compliance with the annual limitation shall also be demonstrated.\

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]



d. Emission Limitation:

Visible particulate fugitive emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six-minute average (from recovery baghouse BH-2).

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI #P0116433]

g) Miscellaneous Requirements

- (1) None.



**5. P906**

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

60 TPH aglime drying plant

- 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(F) (PTI #P0118595, issued 4/29/15)	<u>Aglime drying:</u> 0.01 grain particulate matter 10 microns or less in size (PM <sub>10</sub> ) per dry standard cubic foot (dscf), 9.39 tons PM <sub>10</sub> /yr  0.0065 grain particulate matter 2.5 microns or less in size (PM <sub>2.5</sub> ) per dscf, 6.10 tons PM <sub>2.5</sub> /yr  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six minute average from the baghouse stack.  No visible emissions of fugitive dust from the dryer  <u>Material handling emissions:</u> 0.26 ton fugitive PM <sub>10</sub> /yr  0.08 ton fugitive PM <sub>2.5</sub> /yr  Visible emissions of fugitive dust from material handling operations shall not exceed 20% opacity, as a 3-minute average.  Best available control measures that are sufficient to minimize and eliminate visible emissions of fugitive dust [See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and b)(2)d.]  See b)(2)a. and c)(1)
b.	ORC 3704.03(T)	<u>Emissions from natural gas combustion:</u> Nitrogen oxides (NOx) emissions shall not exceed 2.56 tons/month averaged over a twelve-month, rolling period.  Carbon monoxide (CO) emissions shall not exceed 2.15 tons/month averaged over a twelve-month, rolling period.  PM <sub>10</sub> /PM <sub>2.5</sub> emissions shall not exceed 0.05 ton/month averaged over a twelve-month, rolling period.
c.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	Volatile organic compounds (VOC) emissions shall not exceed 0.14 tons/month averaged over a twelve-month, rolling period.  See b)(2)b. and b)(2)e.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)f.
e.	OAC rule 3745-17-07(A)	See b)(2)g.
f.	OAC rule 3745-17-07(B)	See b)(2)h.
g.	OAC rule 3745-17-08(B)	See b)(2)i.
h.	OAC rule 3745-17-11(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. The PTI for this emissions unit establishes the following legally and practically enforceable emission limitations. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which requires the use of a baghouse:
  - i. 0.01 gr PM<sub>10</sub>/dscf; 9.39 tons PM<sub>10</sub>/year;
  - ii. 0.0065 gr PM<sub>2.5</sub>/dscf; 6.10 tons PM<sub>2.5</sub>/year;



**Effective Date:** To be entered upon final issuance

- iii. Visible PE shall not exceed 5% opacity, as a six-minute average;
  - iv. No visible emission of fugitive dust from the dryer
  - v. 0.26 ton fugitive PM<sub>10</sub>/yr
  - vi. 0.08 ton fugitive PM<sub>2.5</sub>/yr; and
  - vii. Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
- b. Emissions of sulfur dioxide (SO<sub>2</sub>) from natural gas combustion are insignificant, and therefore, are not included in this permit.
- c. The permittee has committed to employ the following control measures for this emissions unit for purposes of ensuring compliance with the above-mentioned applicable requirements:

<b>Material Processing and Handling Operation:</b>	<b>Control Measure(s)*</b>
hopper/truck loading	maintain a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust
conveyor transfer points	maintain a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust

\*If at any time the moisture content is not sufficient to meet the above applicable requirements, the permittee shall apply water to the area before conducting operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. For each material processing and handling operation, the above-identified control measure(s) shall be implemented in the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the material processing and handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- e. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).



- f. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- g. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(F).
- h. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- i. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements: [See b)(2)a.]
  - a. Use of a baghouse with a maximum outlet concentration of 0.01 gr/dscf for PM<sub>10</sub>.
  - b. Use of a baghouse with a maximum outlet concentration of 0.0065 gr/dscf for PM<sub>2.5</sub>.

[OAC rule 3745-77-07(A)(1) and PTI #P0118595]

- (2) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0118595]

d) Monitoring and/or Recordkeeping Requirements

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



[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

- (2) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
All Operations	Once During Each Day of Operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

- (3) The permittee shall maintain records of the following information for the material processing and handling operations:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in “d)(3)d.” shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.



These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

- (2) The permittee shall submit semiannual written reports that identify:
- a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

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:

0.01 grain PM<sub>10</sub>/dscf, 9.39 tons PM<sub>10</sub>/yr

Applicable Compliance Method:

The established maximum outlet concentration for the baghouse serving this emissions unit has been determined to be 0.01 gr PM<sub>10</sub>/dscf and compliance with the limitation was demonstrated through previous emission testing on 1/28/16. If required, the permittee shall demonstrate compliance with this limitation through emission testing using Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the emission limitation of 0.01 gr PM<sub>10</sub>/dscf by a maximum volumetric flow rate, the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.01gr PM<sub>10</sub>/dscf, compliance with the annual limitation shall also be demonstrated.



[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

b. Emission Limitation:

0.0065 grain PM<sub>2.5</sub>/per dscf, 6.10 tons PM<sub>2.5</sub>/yr

Applicable Compliance Method:

The established maximum outlet concentration for the baghouse serving this emissions unit has been determined to be 0.0065 grain PM<sub>2.5</sub>/dscf and compliance with the limitation was demonstrated through previous emission testing on 1/28/16. If required, the permittee shall demonstrate compliance with this limitation through emission testing using Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the emission limitation of 0.0065 gr PM<sub>2.5</sub>/dscf by a maximum volumetric flow rate, the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.00658 gr PM<sub>2.5</sub>/dscf, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

d. Emission Limitation:

No visible emissions of fugitive dust from the dryer

Applicable Compliance Method:

If required, compliance with the visible emissions limitation for fugitive dust from material handling operations shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]



e. Emission Limitation:

0.26 ton fugitive PM<sub>10</sub>/yr

Applicable Compliance Method:

The annual fugitive PM<sub>10</sub> limitation was developed by applying the appropriate emission factor from AP-42 13.2.4 (revised 11/06) of 0.00081 lb PM<sub>10</sub>/ton for feed hopper loading and AP-42 Table 11.19.2-2 (revised 8/04) of 0.00010 lb PM<sub>10</sub>/ton for truck loading and 0.00005 lb PM<sub>10</sub>/ton for all conveyor transfer points to a maximum hourly throughput rate, multiplying by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton.

\*Controlled emission factors were used for aggregate transfer due to high moisture content of material.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

f. Emission Limitation:

0.08 ton fugitive PM<sub>2.5</sub>/yr

Applicable Compliance Method:

The annual fugitive PM<sub>2.5</sub> limitation was developed by applying the appropriate emission factor from AP-42 13.2.4 (revised 11/06) of 0.00012 lb PM<sub>2.5</sub>/ton for feed hopper loading and AP-42 Table 11.19.2-2 (revised 8/04) of 0.00010 lb PM<sub>2.5</sub>/ton for truck loading and 0.00001 lb PM<sub>2.5</sub>/ton for all conveyor transfer points to a maximum hourly throughput rate, multiplying by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton.

\*Controlled emission factors were used for aggregate transfer due to high moisture content of material.

\*\*If no PM<sub>2.5</sub> emission factor was available (truck loading) it was assumed all PM<sub>10</sub> = PM<sub>2.5</sub>.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

g. Emission Limitation:

Visible emissions of fugitive dust from material handling operations shall not exceed 20 percent opacity as a three-minute average.



Applicable Compliance Method:

If required, compliance with the visible emissions limitation for fugitive dust from material handling operations shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

h. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 2.56 tons/month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The emission limitation was developed by multiplying the maximum heat input from the dryer by the emission factor 100 lbs NO<sub>x</sub>/mm scf, dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98), multiplying by the maximum operating schedule of 8760 hrs/year, dividing by 2000 lbs/ton and then dividing by 1 year/12 months.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

i. Emission Limitation:

CO emissions shall not exceed 2.15 tons/month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The emission limitation was developed by multiplying the maximum heat input from the dryer by the emission factor 84 lbs CO/mm scf, dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98), multiplying by the maximum operating schedule of 8760 hrs/year, dividing by 2000 lbs/ton and then dividing by 1 year/12 months.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

j. Emission Limitation:

PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall not exceed 0.05 ton/month averaged over a twelve-month, rolling period.

The emission limitation was developed by multiplying the maximum heat input from the dryer by the emission factor 1.9 lbs PM<sub>10</sub>/PM<sub>2.5</sub>/mm scf, dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98), multiplying by the maximum operating schedule of 8760 hrs/year, dividing by 2000 lbs/ton and then dividing by 1 year/12 months.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]



k. Emission Limitation:

VOC emissions shall not exceed 0.14 tons/month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The emission limitation was developed by multiplying the maximum heat input from the dryer by the emission factor 5.5 lbs VOC/mm scf, dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98), multiplying by the maximum operating schedule of 8760 hrs/year, dividing by 2000 lbs/ton and then dividing by 1 year/12 months.

[OAC rule 3745-77-07(C)(1) and PTI #P0118595]

g) Miscellaneous Requirements

(1) None.



**6. Emissions Unit Group -Kiln Auxiliary Motors: P006,P007,P008,**

EU ID	Operations, Property and/or Equipment Description
P006	Kiln 1 Auxiliary Motor
P007	Kiln 2 Auxiliary Motor
P008	Kiln 3 Auxiliary Motor

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0119822, issued 12/23/15)	Nitrogen oxide (NOx) emissions shall not exceed 1.00 lb/hr and 4.40 tons/year  Carbon monoxide (CO) emissions shall not exceed 1.65 lbs/hr and 7.21 tons/year  See b)(2)a. and b)(2)h.
b.	OAC rule 3745-17-07(A)(1)	Visible emissions of particulate emissions (PE) shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
c.	OAC rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.310 pound per mmBtu of actual heat input.
d.	OAC rule 3745-18-06(G)	See b)(2)b.
e.	OAC rule 3745-110-03(F)	See b)(2)c.
f.	40 CFR Part 63, Subpart ZZZZ (40 CFR Part 63.6580 – 63.6675)  [In accordance with NESHAP/MACT 40 CFR Part 63.6590(a)(1)(iii), this affected source includes an existing RICE located at an area source of HAP emissions which commenced construction of before June 12, 2006.]	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63.1-15 (40 CFR 63.6665)	Table 8 to Subpart ZZZZ of 40 CFR 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with OAC rules 3745-17-07(A)(1), 17-11(B)(5)(a), and 40 CFR Part 63, Subpart ZZZZ.
- b. This emissions unit is exempt from OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
- c. This emissions unit is exempt from OAC rule 3745-110-03(F) pursuant to OAC rule 3745-110-03(J)(3).
- d. In accordance with 40 CFR 63.6603, the permittee must comply with the following requirements of Table 2d:
  - i. Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
  - ii. Inspect spark plugs every 1, 440 hours of operation or annually, whichever comes first, and replace as necessary; and
  - iii. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
- e. Emissions of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) are negligible and therefore, are not included in this permit.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0119822]

- (2) In accordance with 40 CFR 63.6225(h), the permittee must minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #P0119822]

- (2) In accordance with 40 CFR 63.6625(e), the permittee must operate and maintain the emission unit according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (3) In accordance with 40 CFR 63.6225(j), the permittee may utilize an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (4) Per 40 CFR 63.6640, the permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c and Table 2d to this subpart that apply according to methods specified in Table 6 to this subpart.

- a. The permittee must comply with the work or management practices identified in #9 of Table 6 to this subpart.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (5) In accordance with 40 CFR 63.6655(d) the permittee must keep records required in Table 6 of this subpart to show continuous compliance with each applicable emission or operating limit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (6) Per 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate the stationary RICE was operated and maintained according to the permittee's own maintenance plan.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (7) Per § 63.6660, the permittee must maintain applicable records required by Part 63, Subpart ZZZZ, in the form and time duration, as specified below:

- a. Records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).



- b. As specified in §63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- c. Each record must be readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0119822]

- (2) Per 63.6640(b), the permittee must report each instance when each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that are applicable were not met. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in 63.6650.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (3) Per 63.6640(e), the permittee must report each instance the requirements in Table 8 to this subpart that apply were not met.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (4) Per 63.6645(a)(5), the requirements of 63.6645(a) do not apply if you own or operate an existing stationary RICE less than 100 HP that is not subject to any numerical emission standards.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0119822]

- (5) 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 3745-77-07(C)(1) and PTI #P0119822]

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:

NOx emissions shall not exceed 1.00 lb/hr and 4.40 tons/year

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*Potential to emit for this emissions unit was established by multiplying the maximum fuel input rate (as indicated in the permittee's application) by an emission factor from AP-42 Chapter 3.

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0119822]

b. Emission Limitation:

CO emissions shall not exceed 1.65 lbs/hr and 7.21 tons/year

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*Potential to emit for this emissions unit was established by multiplying the maximum fuel input rate (as indicated in the permittee's application) by an emission factor from AP-42 Chapter 3.

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0119822]



c. Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0119822]

d. Emission Limitation:

PE shall not exceed 0.310 pound per mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #P0119822]

g) Miscellaneous Requirements

- (1) None.



**2. 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) (PTI #P0121000, issued 8/4/16)	0.07 lb hydrogen chloride (HCl)/ton lime produced, for emission units P901, P902, and P903, separately  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 <sub>2</sub> /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.
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(6), d)(10) through d)(13), e)(3) and e)(4).



(2) Additional Terms and Conditions

- a. The PTI for these emissions units establish 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 lbs HCl/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.

[OAC rule 3745-77-07(A)(1) and PTI #P0121000]

- (2) Water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI #P0121000]

- (3) The quality of coal burned in these emissions units shall meet, on an as-received basis, a sulfur content (in percent, by weight) which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.0 lbs SO<sub>2</sub>/ton lime produced, based upon the weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month.

[OAC rule 3745-77-07(A)(1) and PTI #P0121000]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the following parameters daily, during operation of this emissions unit:

- a. the water flow rate, in gallons per minute, across the scrubber. The scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate;
- b. the pressure drop, in inches of water, across the scrubber; and
- c. the supplemental water flow rate to the quench unit, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (2) 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 the 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; and
  - c. the water flow rate, in gallons per minute, to the quench unit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (3) Whenever a monitored value for any of the parameters specified in d)(2) above deviates from (falls below) the acceptable value specified in d)(5), 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (4) 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (5) The acceptable values for parameters specified in d)(2) 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); and
  - c. 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (6) 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (7) 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).

The analytical methods for sulfur 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. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

- (8) The permittee shall maintain the following monthly records:
- a. the total quantity of coal received from each supplier;
  - b. the permittee or coal supplier's analyses for each shipment of coal received; and
  - c. the weighted\* average sulfur content (in percent, by weight) of the coal received during each calendar month.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

- (9) 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)(9)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 lbs HCl/ton of lime produced emission limitation by the amount of lime produced [d)(9)b.]; and
- e. the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

- (10) 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (11) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the quench unit and wet scrubber in series, controlling this emissions unit are the static pressure drop across the scrubber, scrubber water flow rate and the supplemental scrubber water flow rate to the quench unit which was established during emissions testing which showed compliance with the particulate emissions limit. An operational restriction was also established as a result of emissions testing, that water utilized in the scrubber shall only be obtained from settling ponds that are not undergoing excavation operations.

When the static pressure drop across the scrubber, scrubber water flow rate and the supplemental scrubber water flow rate to the quench unit show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (12) At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (13) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

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.

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows the sulfur content (in percent, by weight) of the coal received exceeded a sulfur content (in percent, by weight) that demonstrates compliance with the emission limitation of 4.0 lbs SO<sub>2</sub>/ton of lime produced, based upon the weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

- (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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

- (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 quench unit was less than the applicable limit contained in this permit;
  - d. 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;
  - e. 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

- f. 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #P0121000]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted at the following time frames:
    - i. For SO<sub>2</sub>, HCl, and PE in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO<sub>2</sub>, and HCl;
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. Methods 1-4 of 40 CFR Part 60, Appendix A;
    - ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;
    - iii. for SO<sub>2</sub>, Method 6 of 40 CFR Part 60, Appendix A; and
    - iv. for HCl, ASTM Method D6735 or USEPA Method 321 (FTIR).
  - d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).
  - e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.
  - f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.



- g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

[OAC rule 3745-77-07(C)(1)]

- (2) 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.]

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

4.0 pounds SO<sub>2</sub>/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.]

[OAC rule 3745-77-07(C)(1)]



c. Emission Limitation:

0.07 lb HCl/ton lime produced for emission units P901, P902, and P903, separately

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.]

[OAC rule 3745-77-07(C)(1)]

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).

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

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).

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

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.



**Proposed Title V Permit**  
Mississippi Lime Company - Huron Plant

**Permit Number:** P0120467

**Facility ID:** 0322010062

**Effective Date:** To be entered upon final issuance

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0121000]

g) Miscellaneous Requirements

(1) None.