



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

10/31/2016

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: Lafarge North America - Paulding Plant
Facility ID: 0363000002
Permit Type: Minor Permit Modification
Permit Number: P0120771

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 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". The signature is written in a cursive style.

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
Lafarge North America - Paulding Plant**

Facility ID:	0363000002
Permit Number:	P0120771
Permit Type:	Minor Permit Modification
Issued:	10/31/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Lafarge North America - Paulding Plant

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	25
1. F003, Roadways.....	26
2. F010, Screener (Ag Lime).....	32
3. F011, Storage Pile (Ag Lime).....	36
4. F012, Stacker to Storage Pile ("Class A" Clinker)	39
5. P013, Hammermill Crusher	42
6. P901, Raw Material Handling.....	44
7. P905, Mid Kiln Feed System for Uncalcined & Precalcined Materials	49
8. Emissions Unit Group - Cement Kiln Group: Kilns 1 and 2: P014, P015.....	59
9. Emissions Unit Group - Group 2: F001, F002.....	74



Proposed Title V Permit
Lafarge North America - Paulding Plant
Permit Number: P0120771
Facility ID: 0363000002
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0363000002
Facility Description: Cement, Hydraulic
Application Number(s): A0052946, A0055977
Permit Number: P0120771
Permit Description: Title V minor permit modification to add several new emissions units and additional requirements to emissions units P014 and P015.
Permit Type: Minor Permit Modification
Issue Date: 10/31/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0116498

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

Lafarge North America - Paulding Plant
11435 County Road 176
P.O. Box 160
Paulding, OH 45879-0226

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
Lafarge North America - Paulding Plant

Permit Number: P0120771

Facility ID: 0363000002

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
Lafarge North America - Paulding Plant
Permit Number: P0120771
Facility ID: 0363000002

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
Lafarge North America - Paulding Plant

Permit Number: P0120771

Facility ID: 0363000002

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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. The following rule is applicable to this facility: 40 CFR 63.1340 et seq. (MACT Subpart LLL)

The permittee shall comply with the applicable emission limitation in 40 CFR 63.1345 (10 percent opacity, as a 6-minute average)

The following is the list of the emissions units at this facility that are subject to Subpart LLL:

- a) each raw mill;
- b) each finish mill (including emissions units P007, P008, and P009);
- c) each raw material, clinker, or finished product storage bin (including emissions unit P901, P903, and P905);
- d) each conveying system transfer point including those associated with coal preparation used to convey coal from the mill to the kiln (including emissions units P025, P026, and P905, and F004 prior to the pug mill);
- e) each bagging and bulk loading and unloading system (including emissions units P001, P002, P003, P004, P005, P006, and P905);
- f) each open clinker storage pile; and
- g) the following specific emissions points or locations, as specified in the permittee's O & M plan:

Process 9: Auxiliary System - Clinker Transfer
EP 2-6: Clinker truck loadout chute
EP 2-7: Clinker reclaim chute, clinker storage fugitives misc.

Process 9: Auxiliary - CKD Transfer
EP 7-1: CKD Tank #1 Baghouse Outlet
EP 7-2: CKD Tank #2, and Truck Loading, Baghouse Outlet (F004)
EP 4-5: East Dust Scoop Conveyance System Baghouse Outlet (P025)
EP 4-6: West Dust Scoop Conveyance System Baghouse Outlet (P026)
EP 4-7: CKD Bin

Process 3: Burning - Clinker Cooler
EP 4-2: Clinker elevator #1
EP 4-3: Clinker elevator #2
EP 4-8: Drag Line #1
EP 4-9: Drag Line #2
EP 4-10: Drag Line #3

Process 4: Cement Grinding
EP 2-5: Gypsum Reclaim System



- EP 5-1: Transfer to Air Separator #1, Cement Cooler #1, Cement Pumps (P007)
- EP 5-2: Transfer to Air Separator #2, Cement Cooler #2, Cement Pumps (P008)
- EP 5-3: Transfer to Air Separator #3, Cement Cooler #3, Cement Pumps (P009)
- EP 5-4: Discharge from Finish Mill #1, Air Separator #1 (P007)
- EP 5-5: Discharge from Finish Mill #2, Air Separator #2 (P008)
- EP 5-6: Discharge from Finish Mill #3, Air Separator #3 (P009)

- Process 6: Fuels - Coal/Coke Handling
- EP 2-2: Coal/Coke Reclaim Conveyor System
- EP 2-2: Coal/Coke Storage Silo #1 and #2

- Process 5: Packing and Shipping
- EP 6-1: Packhouse #1 Cement Silos (P001)
- EP 6-2: Packhouse #1 Cement Silos (P001)
- EP 6-3: Packhouse #2 Cement Silos (P002)
- EP 6-4: Packhouse #2 Cement Silos (P002)
- EP 6-5: Cement Packing Machine #1 (P003)
- EP 6-6: Cement Packing Machine #2, Packhouse #1 Bulk Load-out (P004, P005)
- EP 6-7: Packhouse #2 Bulk Load-out (P006)

- Process 2: Raw Mix
- EP 2-8: Sand /Iron Truck Unloading Area (P901)
- EP 3-5: Other Raw Material Conveyor Belt Transfer - Partial Enc. (P901)
- EP 3-6: Other Raw Material Conveyor Belt Transfer - Partial Enc. (P901)
- EP 3-7: Rock Conveyor to Shuttle Conveyor Transfer - Total Enc. (P901)
- EP 3-8: Crossover Conveyor Transfer to ORM Day Bins (P903)
- EP 3-9: ORM /Limestone /Fly Ash /Clay Transfer to Raw Mill - Mill Building (P903)

(P905 - additions)
load-in, load-out, and wind erosion from uncalcined and precalcined material storage pile
hopper loading; and
material conveying.

[40 CFR 63.1340(b)]

3. On-site sources that are subject to (or potentially subject to by source category) standards for nonmetallic mineral processing plants in subpart 000, part 60 of this chapter are not subject to this subpart. Crushers are not covered by this subpart regardless of their location.
[40 CFR 63.1340(c)]
4. The compliance date for existing sources with the requirements for open clinker storage piles in 40 CFR 63.1343(c) is February 12, 2014.
[40 CFR 63.1351(e)]
5. If permittee has a different emissions limit or requirement for the same pollutant under another regulation in CFR Title 40, the permittee must comply with the most stringent emissions limit or requirement and is exempt from the less stringent requirement.
[40 CFR 63.1356]



- 6. This Title V permit recognizes the provisions for Affirmative Defense for Violation of Emission Standards During Malfunction, from 40 CFR 63.1344.
- 7. The permittee shall comply with the applicable operational restrictions required under 40 CFR 63 Subpart LLL, including the following sections:

63.1343(c)	must prepare, and operate in accordance with, fugitive dust control measures described in Operation and Maintenance Plan (see 40 CFR 63.1347) - O&M Plan must also include measures to minimize fugitive dust from e.g. accidental spillage
63.1343(c)(1), (2)	For open clinker storage piles, O&M Plan must specify one or more of the following: partial enclosure, water spray or fogging system, chemical dust suppression, wind barrier, compaction, tarpaulin, or vegetative cover. Plan must be specific for each pile; explain how the measure(s) are appropriate for site conditions; and revised as needed.
63.1343(c)(3)	Temporary piles of clinker that result from accidental spillage or clinker storage cleaning operations must be cleaned up within 3 days.
63.1347(a)	must prepare, for each affected source, a written operations and maintenance plan. The O&M Plan must be submitted to the Director for review and approval as part of the application for a 40 CFR 70 (Title V) permit
63.1347(a)(1), (2)	O&M Plan must include: Procedures for proper operation and maintenance of the affected sources and air pollution control devices (including fugitive dust control measures for open clinker piles, of 63.1343 through 63.1348); plans to address periods of startup and shutdown; and corrective actions to be taken when required by 63.1350(f)(3)
63.1347(b)	Failure to comply with any provision of the O&M Plan is a violation of this permit and Subpart LLL.
63.1348(b)(9)	Startup /Shutdown Compliance: all air pollution control devices must be operating.
63.1348(c)	requirements /provisions, If undertake change in operations that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value (including notification to the Director)
63.1348(d)	General duty to minimize emissions: must operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions.

- 8. The permittee shall comply with the applicable monitoring and/or record keeping requirements required under 40 CFR 63 Subpart LLL, including the following sections:

63.1350(f)	must conduct opacity monitoring in accordance with 63.1350(f) and the plan developed under 63.1350(p).
63.1350(f)(1)	monthly 10-minute opacity visible emissions observations for each source by Method 22 - provisions for reduced observation frequency - if 'positive', must do 30-minute Method 9 test within 1 hour - also provisions for exclusion /alternate monitoring for totally enclosed conveying system transfer point, and for emissions points located in buildings
63.1350(f)(2)	for finish mill, daily visible emissions observations of the mill sweep and air separator PM control devices - Method 22, 6 minutes. Within 24 hours of a



	'positive', must conduct follow up Method 22 - if this second one is 'positive', must do 30-minute Method 9 test within 1 hour
63.1350(f)(3)	If any 'positive' Method 22, must initiate within one-hour the corrective actions specified in O&M Plan.
63.1348(b)(1)	Continuous Monitoring Requirements (general)
63.1348(b)(3)	must demonstrate compliance according to 40 CFR 63.1350(f), based on the maximum 6-minute average opacity from performance test - must initiate corrective actions within one hour
63.1350(f)(4)	provisions for finish mills for alternates to visible emissions observations: continuous opacity monitoring system (COMS), or bag leak detection system (BLDS)
63.1350(m)(1), (2), (3), (4)	Parameter monitoring requirements (general) including: minimum of one cycle each 15-minute period; determine 1-hour block averages (if applicable); record the results of each inspection, calibration, and validation check.
63.1350(m)(10)	BLDS requirements (if applicable): each exhaust stack; consistent with the manufacturer's written specifications (and EPA-454/R-98-015, Sep 1997); <10 mg /cu m; relative or absolute PM loadings; continuously record; equipped with an alarm system; provisions for positive pressure systems; provisions for multiple BLDS
63.1350(m)(11)	BLDS (if applicable) - procedures to address cause of alarms (may include process shutdown)
63.1350(o), (p)	provisions for application /request to the Director for approval of alternate monitoring requirements - requirements for BLDS monitoring plan (if applicable): installation; initial /periodic adjustment, including alarm set-point; operation /quality assurance; maintenance, including maintenance schedule /spare parts inventory; BLDS output records /storage; records retention
63.1355(a), (b)	maintain files of all information (including all reports and notifications) readily available for inspection [63.10(b)(1)] - five years retention, two years minimum retained on-site. shall maintain records as required by 63.10(b)(2) and (b)(3); documentation for initial notifications /NOCs under 63.9; applicability determinations; information for recordkeeping /reporting wavier (if applicable)
63.1355(c)	records - continuous monitors (if applicable)
63.1355(g)	requirements: records for malfunctions
63.1355(h)	For each exceedance, must keep records of the date, duration and description of each exceedance; specific actions taken for each exceedance including inspections, corrective actions and repeat performance tests and the results of those actions.

9. The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart LLL, including the following sections:

63.1354(b)(9)	summary report semiannually - specifications in 63.10(e)(3)(vi). In addition, the summary report shall include all failures to comply with O&M Plan.
63.1353(a)	Notification requirements (General Provision applicability in Table 1 to Subpart LLL)
63.1353(b)	comply with the notification requirements in 40 CFR 63.9 as follows: initial notifications (including via Title V application); notification of performance tests,



	63.7 and 63.9(e); notification of opacity and visible emission observations, 63.6(h)(5) and 63.9(f); notification of compliance status, 63.9(h); requirements where an exceedance triggers retesting
63.1354(a)	Notification requirements (General Provision applicability in Table 1 to Subpart LLL)
63.1354(b)	comply with the reporting requirements in 40 CFR 63.10 as follows (if applicable): 63.10(d)(2), performance test results (as part of the NOC); 63.10(d)(3), opacity results from 63.1349; 63.10(d)(4), compliance extension progress; 63.10(e)(2), COMS reports
63.1354(c)	requirements: reporting a failure to meet a standard due to a malfunction

10. The permittee shall comply with the applicable testing /compliance requirements required under 40 CFR 63 Subpart LLL, including the following sections :

63.1349(b)(2), (d), (e)	Initial opacity tests were conducted in July /August 2002.
-------------------------	--

11. The permittee shall comply with all the applicable requirements of 40 CFR, Part 63, Subpart LLL (National Emission Standards for Hazardous Air Pollutants for Portland Cement Manufacturing) as well as with all the applicable requirements of Subpart A of Part 63 (General Provisions), as identified in Table 1 in the Appendix of Subpart LLL

12. The following insignificant emissions units are subject to 40 CFR 63.6580 et seq. (MACT Subpart ZZZZ): P030, P031, and P032. These units are existing emergency <500 HP diesel stationary reciprocating internal combustion engines (RICE) pursuant to 40 CFR 63.6585 and 63.6590(a)(1)(ii).

13. The permittee shall comply with the applicable requirements under 40 CFR 63 Subpart ZZZZ, including the following sections:

40 CFR 63.6595(a)(1)	The compliance date for Part 63 Subpart ZZZZ for existing CI RICE is 10/19/13.
Applicable Tables from Part 63, Subpart ZZZZ	Compliance requirements in Table 2c #1; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8.
40 CFR 63.6602	Maintain compliance with operational limitations in Table 2c #1 (inspection and maintenance requirements) to Part 63 Subpart ZZZZ.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the CI RICE, as identified in Table 8 to Subpart ZZZZ.

14. The permittee shall comply with the applicable operational restrictions required under 40 CFR 63 Subpart ZZZZ, including the following sections:

40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(e)	Operate & maintain RICE according to mfg. instructions and develop a facility maintenance plan for the RICE that meets the requirements of Subpart ZZZZ Table 2c #6.



40 CFR 63.6625(f)	Install a non-resettable hour meter by compliance date.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6640(f)	Requirements /restrictions for engine to be considered an emergency stationary RICE.

15. The permittee shall comply with the applicable monitoring /record keeping requirements under 40 CFR 63 Subpart ZZZZ, including the following sections:

40 CFR 63.6655(f)	Maintain records of the hours of operation in emergency operations, non-emergency operations, and in maintenance checks and readiness testing, as recorded through the non-resettable hour meter. If the RICE is used for demand response, records of the notification of the emergency and the time of operation, as part of the demand response, is to be maintained.
40 CFR 63.6640(a) and 40 CFR 63.6655(d)	Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6655(e)	Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2c and to demonstrate that the RICE was operated and maintained according to the facility's maintenance plan.
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).

16. The permittee shall comply with the applicable reporting requirements under 40 CFR 63 Subpart ZZZZ, including the following sections:

40 CFR 63.6640(b); and OAC rule 3745-15-03(B)(2) and (D)	Submit in the PER each instance in which the operational requirements in Table 2c of the NESHAP Subpart ZZZZ were not met.
40 CFR 63.6640(e) and OAC rule 3745-15-03(B)(2) and (D)	Submit in the PER each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.

17. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 **and/or 40 CFR Part 60 or 63.**

EU ID	Operations, Property and/or Equipment Description
B001	Clay Wash Mill Water Heater - 10 mmBtu/hr Natural Gas (PTI 03-(1)3107 issued December 21, 1998)
F004	Cement kiln dust (baghouse bottoms) - pneumatic conveying and storage
P001	Cement transfer from finish milling to Packhouse #1 silos
P002	Cement transfer from finish milling to Packhouse #2 silos



Proposed Title V Permit
Lafarge North America - Paulding Plant
Permit Number: P0120771
Facility ID: 0363000002

Effective Date: To be entered upon final issuance

EU ID	Operations, Property and/or Equipment Description
P003	Cement packaging in Packing Machine #1 at Packhouse #1
P004	Cement bulk load-out (truck & rail) in Packhouse #1
P005	Cement packaging in Packing Machine #2 at Packhouse #1
P006	Cement bulk load-out (truck) in Packhouse #2
P007	Finish ball mill - grinding for clinker and gypsum - 34 tons/hr
P008	Finish ball mill - grinding for clinker and gypsum - 34 tons/hr
P009	Finish ball mill - grinding for clinker and gypsum - 28 tons/hr
P028	Dry Absorbent Addition System - gravity/screw transfer to weigh hopper for kiln #1 - controlled by cartridge filter (PTI P0107001 issued March 9, 2011)
P029	Dry Absorbent Addition System - gravity/screw transfer to weigh hopper for kiln #2 - controlled by cartridge filter (PTI P0107001 issued March 9, 2011)
P030	Kiln Auxiliary Drive #1 - 140 hp, diesel fired engine (PBR11506)
P031	Kiln Auxiliary Drive #2 - 140 hp, diesel fired engine (PBR11507)
P032	Fire Pump Engine - 267 hp diesel fired (PBR11508)
P903	Fly Ash Raw Material Silo (PTI 03-7494 issued December 15, 1993)

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



Proposed Title V Permit
Lafarge North America - Paulding Plant

Permit Number: P0120771

Facility ID: 0363000002

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F003, Roadways

Operations, Property and/or Equipment Description:

Paved and 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 operations(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. 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 03-16227 issued December 7, 2004)	104 tons fugitive particulate emissions (PE) /yr 29.0 tons fugitive particulate matter less than 10 microns in size (PM ₁₀) /yr
b.	OAC rule 3745-17-07(B)(1)	none [See b)(2)j.]
c.	OAC rule 3745-17-08(B)(1)	none [See b)(2)k.]
d.	OAC rule 3745-31-05(A)(3) (PTI 03-16227 issued December 7, 2004) paved roadways and parking areas [see b)(2)a]	no visible PE, except for a period of time not to exceed one minute during any 60-minute observation period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [see b)(2)c, and b)(2)e through b)(2)i]
e.	OAC rule 3745-31-05(A)(3) (PTI 03-16227 issued December 7, 2004) unpaved roadways and parking areas [see b)(2)b]	no visible PE, except for a period of time not to exceed three minutes during any 60-minute observation period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [see b)(2)d through b)(2)i]

(2) Additional Terms and Conditions

a. The paved roadways that are subject to the terms and conditions of this permit are listed below:



paved roadways: all paved road segments

paved parking areas: all paved parking areas

- b. The unpaved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

unpaved roadways: all unpaved road segments

unpaved parking areas: all unpaved parking areas

- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas with watering and sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- d. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with watering or other suitable dust suppression chemicals, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- g. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such



material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
 - i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
 - j. 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).
 - k. The 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)(1), 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) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
 - paved roadways and parking areas: minimum inspection frequency:
All Once per day of operation
 - unpaved roadways and parking areas: minimum inspection frequency:
All Once per day of operation
[OAC 3745-77-07(C)(1) and PTI 03-16227]
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area 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 3745-77-07(C)(1) and PTI 03-16227]
 - (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
[OAC 3745-77-07(C)(1) and PTI 03-16227]
 - (4) The permittee shall maintain records of the following information:



- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- 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 and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (3)d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
[OAC 3745-77-07(C)(1) and PTI 03-16227]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify the following:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; 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 in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
[OAC 3745-77-07(C)(1) and PTI 03-16227]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
104 tons fugitive PE/year

Applicable Compliance Method:
The emission limitation was determined by summing the total emission rates from unpaved and paved roadways and parking areas, and then dividing by 2000 pounds/ton.

The emission rate was determined as follows:

- i. for paved areas, multiply the appropriate emission factor from AP-42 (Chapter 13.2.1, revised 12/03) of 5.95 pounds PE/vehicle mile traveled



(VMT) by the maximum VMT of 33,209 miles/year, and a control factor of $(1 - 0.95)^*$; and

- ii. for unpaved areas, multiply the appropriate emission factor from AP-42 (Chapter 13.2.2, revised 12/03) of 10.97 pounds PE/VMT by the maximum VMT of 71,924 miles/year, and a control factor of $(1 - 0.75)^*$.

* The control efficiency for dust suppression is assumed to be 95% for paved areas and 75% for unpaved areas.

Provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual PE limitation will be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- b. Emission Limitation:
29.0 tons fugitive PM₁₀/year

Applicable Compliance Method:

The emission limitation was determined by summing the total emission rates from unpaved and paved roadways and parking areas, and then dividing by 2000 pounds/ton.

The emission rate was determined as follows:

- i. for paved areas, multiply the appropriate emission factor from AP-42 (Chapter 13.2.1, revised 12/03) of 1.16 pounds PM₁₀/vehicle mile traveled (VMT) by the maximum VMT of 33,209 miles/year, and a control factor of $(1 - 0.95)^*$; and
- ii. for unpaved areas, multiply the appropriate emission factor from AP-42 (Chapter 13.2.2, revised 12/03) of 3.12 pounds PM₁₀/VMT by the maximum VMT of 71,924 miles/year, and a control factor of $(1 - 0.75)^*$.

* The control efficiency for dust suppression is assumed to be 95% for paved areas and 75% for unpaved areas.

Provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual PM₁₀ limitation will be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- c. Emission Limitation:
There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any 60-minute period.

Applicable Compliance Method:

Compliance with the visible emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in



40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(1) through (B)(4)(d) of OAC rule 3745-17-03. [OAC 3745-77-07(C)(1) and PTI 03-16227]

d. Emission Limitation:

There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(1) through (B)(4)(d) of OAC rule 3745-17-03. [OAC 3745-77-07(C)(1) and PTI 03-16227]

g) Miscellaneous Requirements

- (1) None.

2. F010, Screener (Ag Lime)

Operations, Property and/or Equipment Description:

Limestone screening/handling 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) b)(1)b. and b)(2)c.

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) June 30, 2008 (PTI P0118568 issued May 21, 2015)	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 (PTI P0118568 issued May 21, 2015)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)c.
c.	40 CFR Part 60, Subpart OOO	Fugitive Emission Limit – 7 percent opacity (see b)(2)d.)
d.	40 CFR Part 60.1 - 19	General Provisions

(2) Additional Terms and Conditions

a. The permittee shall 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. 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) [the less than 10 tons per year BAT exemption] in the Ohio State Implementation Plan (SIP).



- c. 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] in the Ohio SIP.
- d. The screening operation is an affected facility (as defined in section 60.670 and 60.671) that commenced construction after April 22, 2008 and must meet the fugitive emission limits and compliance requirements in Table 3 to Subpart 000 of Part 60 – 7 percent opacity.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring /record keeping requirements under 40 CFR 60 Subpart 000, including the following sections:

40 CFR 60.674(b)	Periodic inspections if wet suppression is used.
40 CFR 60.676(b)(1)	Maintain inspections records required by 40 CFR 60.674(b) in a logbook to demonstrate continuous compliance.

[OAC rule 3745-77-07(C)(1). 40 CFR Part 60 Subpart 000 and PTI P0118568]

- (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 screening/handling operation. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of components of the screening/handling operation for which the plan applies;
- b. A determination of the frequency that the screening/handling operation 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 screening/handling operation. This form/record should include, at a minimum, the following elements:
 - i. Components of the screening/handling operation 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 screening/handling operation or who can verify that the screening/cleaning operation was treated; and
 - viii. Method used to treat the screening/handling operation.
- 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 appropriate District Office or local air agency (DO/Laa) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/Laa has approved its use.
[OAC rule 3745-77-07(C)(1) and PTI P0118568]

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the components of the screening/handling operation 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 conditions. No inspection shall be necessary when 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 P0118568]

(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 P0118568]



e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR 60 Subpart OOO, including the following sections:

40 CFR 60.676(a)(2)	Equipment replacement.
40 CFR 60.676(f)	Reporting of test results.
40 CFR 60.676(j)	Alternative reporting requirements.

[OAC rule 3745-77-07(C)(1). 40 CFR Part 60 Subpart OOO and PTI P0118568]

- (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 P0118568]

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: fugitive emission limit of 7 percent opacity for screening operations.

Applicable Compliance Method: The permittee must demonstrate initial compliance by conducting a performance test according to 40 CFR Part 60.11 and 60.675, with subsequent testing as required by Table 3 of 40 CFR Part 60 Subpart OOO.

[OAC rule 3745-77-07(C)(1). 40 CFR Part 60 Subpart OOO and PTI P0118568]

g) Miscellaneous Requirements

- (1) The application and enforcement of the provisions of NSPS, as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements for 40 CFR Part 60 are also federally enforceable.



3. F011, Storage Pile (Ag Lime)

Operations, Property and/or Equipment Description:

Storage pile, including load-in, load-out (inclusive of truck loading) and wind erosion

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) b)(1)b. and b)(2)c.

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) June 30, 2008 (PTI P0118568 issued May 21, 2015)	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 (PTI P0118568 issued May 21, 2015)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee shall 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. 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) [the less than 10 tons per year BAT exemption] in the Ohio State Implementation Plan (SIP).

c. 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] in the Ohio SIP.



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 storage pile operations. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of components of the storage pile operation for which the plan applies;
- b. A determination of the frequency that storage pile operations 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 storage pile operations. This form/record should include, at a minimum, the following elements:
 - i. Components of storage pile operations 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 storage pile or who can verify that storage pile operations were treated; and
 - viii. Method used to treat the storage pile operations.
- 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 appropriate District Office or local air agency (DO/Laa) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/Laa has approved its use.

[OAC rule 3745-77-07(C)(1) and PTI P0118568]

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of storage pile operations 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 conditions. No inspection shall be necessary when the storage pile 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 P0118568]

(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 P0118568]

e) Reporting Requirements

- (1) 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 P0118568]

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



4. F012, Stacker to Storage Pile ("Class A" Clinker)

Operations, Property and/or Equipment Description:

"Class A" Clinker Storage Piles

- 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) June 30, 2008 (PTI P0118569 issued June 9, 2015)	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 (PTI P0118569 issued June 9, 2015)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)c.
c.	40 CFR, Part 63, Subpart LLL	See c)(1), d)(1), and e)(1).

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements for this emissions unit established under OAC rule 3745-31-05(A)(3), as effective June 30, 2008, have been determined to be the following:
 - i. for all "Class A Clinker" storage piles that meet the definition of an "open clinker storage pile", the BAT requirements are equivalent to the requirements established under in 40 CFR, Part 63, Subpart LLL.
 - ii. for all "Class A Clinker" storage piles that do not meet the definition of an "open clinker storage pile", the BAT requirement is maintaining a permanent enclosure for the storage pile [See c)(2)].



- b. The BAT requirements apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] in the Ohio State Implementation Plan (SIP).
- c. 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] in the Ohio SIP.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR, Part 63, Subpart LLL, including the following sections:

63.1343(c)	must prepare, and operate in accordance with, fugitive dust control measures described in Operation and Maintenance Plan (see 63.1347) - O&M Plan must also include measures to minimize fugitive dust from e.g. accidental spillage
63.1343(c)(1), (2)	For open clinker storage piles, O&M Plan must specify one or more of the following: partial enclosure, water spray or fogging system, chemical dust suppression, wind barrier, compaction, tarpaulin, or vegetative cover. Plan must be specific for each pile; explain how the measure(s) are appropriate for site conditions; and revised as needed.
63.1343(c)(3)	Temporary piles of clinker that result from accidental spillage or clinker storage cleaning operations must be cleaned up within 3 days.
63.1347(a)	must prepare, for each affected source, a written operations and maintenance plan. The O&M Plan must be submitted to the Director for review and approval as part of the application for a 40 CFR, Part 70 (Title V) permit
63.1347(a)(1), (2)	O&M Plan must include: Procedures for proper operation and maintenance of the affected sources and air pollution control devices (including fugitive dust control measures for open clinker piles, of 63.1343 through 63.1348); plans to address periods of startup and shutdown; and corrective actions to be taken when required by 63.1350(f)(3)
63.1347(b)	Failure to comply with any provision of the O&M Plan is a violation of this permit and Subpart LLL.
63.1348(c)	requirements /provisions, If undertake change in operations that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value (including notification to the Director)
63.1348(d)	General duty to minimize emissions: must operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[OAC rule 3745-77-07(A)(1), PTI P0118569 and 40 CFR Part 63 Subpart LLL]

- (2) All “Class A Clinker” storage piles that are not “open clinker storage piles” (as defined in 40 CFR, Part 63, Subpart LLL) shall be completely enclosed in a building or other structure.

[OAC rule 3745-77-07(A)(1), PTI P0118569 and 40 CFR Part 63 Subpart LLL]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and/or record keeping requirements required under 40 CFR, Part 63, Subpart LLL, including the following sections:

63.1355(a), (b)	maintain files of all information (including all reports and notifications) readily available for inspection [63.10(b)(1)] - five years retention, two years minimum retained on-site. shall maintain records as required by 63.10(b)(2) and (b)(3); documentation for initial notifications /NOCs under 40 CFR 63.9; applicability determinations; information for recordkeeping /reporting wavier (if applicable)
-----------------	---

[OAC rule 3745-77-07(C)(1), PTI P0118569 and 40 CFR Part 63 Subpart LLL]

- (2) The permittee shall maintain the following documentation on all “Class A Clinker” storage piles at the facility:
- a. the facility identification of each storage pile;
 - b. an identification as to if the storage pile is a “open clinker storage piles”;
 - c. for all storage piles that are not “open clinker storage piles” the permittee shall maintain documentation as to how the enclosure will be maintained.
 - d. If the status of any clinker storage pile changes, (i.e. changes from an “open clinker storage pile” to a completely enclosed clinker storage pile, or visa versa) the permittee shall document the date when this change occurred.

[OAC rule 3745-77-07(C)(1), PTI P0118569 and 40 CFR Part 63 Subpart LLL]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63, Subpart LLL, including the following sections:

63.1354(b)(9)	summary report semiannually - specifications in 63.10(e)(3)(vi). In addition, the summary report shall include all failures to comply with O&M Plan.
63.1353(a)	Notification requirements (General Provision applicability in Table 1 to Subpart LLL)
63.1353(b)	comply with the notification requirements in 40 CFR 63.9 where applicable
63.1354(a)	Notification requirements (General Provision applicability in Table 1 to Subpart LLL)
63.1354(b)	comply with the reporting requirements in 40 CFR 63.10 where applicable:

[OAC rule 3745-77-07(C)(1), PTI P0118569 and 40 CFR Part 63 Subpart LLL]

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



5. P013, Hammermill Crusher

Operations, Property and/or Equipment Description:

Hammermill crusher - (limestone) unloading trucks, crushing material, discharging to conveyors - with baghouse

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 operations(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. 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)	none [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Paulding County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



Proposed Title V Permit
Lafarge North America - Paulding Plant

Permit Number: P0120771

Facility ID: 0363000002

Effective Date: To be entered upon final issuance

- f) Testing Requirements
 - (1) None.

- g) Miscellaneous Requirements
 - (1) None.



6. P901, Raw Material Handling

Operations, Property and/or Equipment Description:

(Other) raw material storage, conveying, handling - (ORM day bin) with process baghouse

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 operations(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. 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 (PTI 03-8914 issued January 4, 1996)	4.7 lbs/day fugitive particulate emissions (PE) [from the conveyors and storage hall] 0.005 gr/dscf or no visible emissions (0% opacity) [from the process baghouse] Visible emissions shall not exceed 1 minute in any 60-minute observation period [from the storage hall egress points] See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-17-07(B)(1)	none [See b)(2)c.]
e.	OAC rule 3745-17-08(B)	none [See b)(2)d.]
f.	40 CFR Part 63, Subpart LLL (40 CFR 63.1340-1359) See b)(2)e.	10 percent opacity, as a six-minute average [40 CFR 63.1348] See d)(3), e)(3), f)(1)e, and f)(2).
g.	40 CFR 63.1-15 (40 CFR 63 Subpart LLL – Appendix)	Table 1 to Subpart LLL of 40 CFR Part 63 – Applicability of General Provisions to Subpart LLL shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	40 CFR Part 60, Subpart F	exempt, pursuant to 40 CFR 63.1356 (40 CFR Part 63, Subpart LLL)

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart LLL.
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- c. 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).
- d. The 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)(1).
- e. In accordance with 40 CFR 63.1340(b), this emissions unit is an existing raw material, clinker, or finished product storage bin / conveying system transfer point at a facility which is a major source subject to the emissions limitations / control measures specified in this section.

c) Operational Restrictions

- (1) The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the transfer of material into the conveyor hopper.
[OAC 3745-77-07(C)(1) and PTI 03-8914]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. 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 pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, 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.

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 range(s) 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.

The acceptable range for the pressure drop across the baghouse is 3 to 7 inches of water.

This range(s) is 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 range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.
 [OAC 3745-77-07(C)(1) and PTI 03-8914]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the baghouse and for any visible fugitive dust emissions from the conveyor transfer points, storage piles, and storage hall egress points associated with 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. the cause of the visible emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
 [OAC 3745-77-07(C)(1) and PTI 03-8914]
- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart LLL, including the following sections:

40 CFR 63.1350	monitoring requirements
40 CFR 63.1355	recordkeeping requirements

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart LLL]

e) Reporting Requirements

- (1) 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 baghouse(s) was outside the acceptable range(s);
- b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) 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 3745-77-07(C)(1) and PTI 03-8914]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from the baghouse and/or the conveyor transfer points, storage piles, and storage hall egress points associated with this emissions unit and (b) describe 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 3745-77-07(C)(1) and PTI 03-8914]
- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart LLL, including the following sections:

40 CFR 63.1353	notification requirements
40 CFR 63.1354	Reporting requirements

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart LLL]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
4.7 lbs/day fugitive PE [from the conveyors and storage hall]

Applicable Compliance Method:

Compliance with the daily allowable PE limitation above may be determined by multiplying the AP-42, Table 8.19-1.1 (as revised in a 9/85 version) emission factor of 13.2 lbs PE/acre/day by the maximum total area of the storage hall (0.25 acre).

[OAC 3745-77-07(C)(1) and PTI 03-8914]



- b. Emission Limitation:
no visible emissions (0% opacity), from the process baghouse

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.
[OAC 3745-77-07(C)(1) and PTI 03-8914]
- c. Emission Limitation:
Visible emissions shall not exceed 1 minute in any 60-minute observation period [from the storage hall egress points]

Applicable Compliance Method:
If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
[OAC 3745-77-07(C)(1) and PTI 03-8914]
- d. Emission Limitation:
0.005 gr/dscf [from the process baghouse]

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.
[OAC 3745-77-07(C)(1) and PTI 03-8914]
- e. Emission Limitation:
10 percent opacity, as a six-minute average

Applicable Compliance Method:
The permittee shall demonstrate compliance with this limitation in accordance with 40 CFR, Part 60, Appendix A, Method 9, and the compliance procedures and performance test methods specified in section f)(2) of the terms and conditions of this permit.
[OAC rule 3745-77-07(C)(1) and 40 CFR 63 Subpart LLL]

(2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart LLL, including the following sections:

40 CFR 63.1349	performance testing requirements
----------------	----------------------------------

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart LLL]

g) Miscellaneous Requirements

(1) None.



7. P905, Mid Kiln Feed System for Uncalcined & Precalcined Materials

Operations, Property and/or Equipment Description:

Uncalcined and precalcined materials mid-kiln feed system hoppers and transfer with baghouses

- 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 operations(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. 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 03-16227 issued December 7, 2004)	See b)(2)b and b)(2)c. <u>Fugitive Emissions:</u> 0.24 ton particulate emissions (PE) /year 0.12 ton particulate matter less than 10 microns in size (PM ₁₀) /year visible fugitive PE limitations [See b)(2)d.] best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)e through b)(2)g.] <u>Stack Emissions:</u> 0.01 grains PE /dscf 10.2 tons PE /year [See b)(2)i.] Visible particulate emissions from the baghouse stacks serving this emissions unit shall not exceed 5 percent opacity, as a six-minute average. See b)(2)h.
b.	OAC rule 3745-17-07(B)(1)	none [See b)(2)j.]
c.	OAC rule 3745-17-08(B)	none [See b)(2)k.]
d.	OAC rule 3745-17-11(B)	none [See b)(2)l.]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	none [See b)(2)m.]
f.	40 CFR Part 63, Subpart LLL (40 CFR 63.1340-1359) See b)(2)n.	10 percent opacity, as a six-minute average [40 CFR 63.1348] See d)(5), e)(4), f)(1)i, and f)(2).
g.	40 CFR 63.1-15 (40 CFR 63 Subpart LLL – Appendix)	Table 1 to Subpart LLL of 40 CFR Part 63 – Applicability of General Provisions to Subpart LLL shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The following mid-kiln feed system emission points are covered by this permit and subject to the above-mentioned requirements:
 - i. load-in, load-out, and wind erosion from uncalcined and precalcined material storage pile;
 - ii. hopper loading; and
 - iii. material conveying.
- b. The best available technology (BAT) control requirements for this emissions unit have been determined to be building enclosures and the use of four baghouses (306-DC-01, 306-DC-02, 306-DC-03, and 306-DC-04) which are capable of achieving maximum outlet concentrations of 0.01 gr/dscf.
- c. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart LLL.
- d. Visible fugitive particulate emissions (PE) associated with the mid-kiln feed system shall not exceed the following opacity restrictions:
 - i. There shall be no visible fugitive PE from the material transfer, conveying, and bin loading operations, including the enclosed operations, associated with the mid-kiln feed system, except from hopper loading which is subject to the requirements of 40 CFR 63 Subpart LLL.
 - ii. There shall be no visible fugitive PE from the load-in and load-out operations of the storage piles associated with the mid-kiln feed system, except for a period of time not to exceed one minute during any 60-minute observation period.

- iii. There shall be no visible fugitive PE from wind erosion of the storage piles associated with the mid-kiln feed system, except for a period of time not to exceed one minute during any 60-minute observation period.
- e. The permittee shall employ best available control measures for the load-in, load-out, and wind erosion emissions from the material storage pile associated with the mid-kiln feed system for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee maintains that the inherent moisture content and silt content of the materials processed/handled is at a level which is sufficient to comply with all applicable requirements. If at any time the moisture content and/or silt content is not sufficient to meet the above applicable requirements, the permittee has committed to watering, as needed. In addition, the permittee has committed to reduced drop heights and maintaining as low of a pile height as possible to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The control measure(s) specified in b)(2)e. shall be employed if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- g. Implementation of the above-mentioned control measures, in accordance with the terms and conditions of this permit, is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05 (A)(3).
- h. All particulate emissions from the baghouses are assumed to be particulate matter less than 10 μ m in size (PM₁₀).
- i. The total annual PE limitation is comprised of four emission points: baghouse 306-DC-01, baghouse 306-DC-02, baghouse 306-DC-03, and baghouse 306-DC-04. The emission limitation of 10.16 tons PE/year is a summation of the emissions from the four emission points.
- j. 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).
- k. The 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)(1).
- l. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Paulding County.



- m. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - n. In accordance with 40 CFR 63.1340(b), this emissions unit is an existing raw material, clinker, or finished product storage bin / conveying system transfer point / bulk loading or unloading system at a facility which is a major source subject to the emissions limitations / control measures specified in this section.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the fugitive dust operations/sources in accordance with the following frequencies:

<u>storage pile operations:</u>	<u>minimum inspection frequency:</u>
load-in operations	once during each day of operation
load-out operations	once during each day of operation
wind erosion from pile surface	once during each day of operation
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a fugitive dust operation/source 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 event shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.
[OAC 3745-77-07(C)(1) and PTI 03-16227]
 - (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
[OAC 3745-77-07(C)(1) and PTI 03-16227]
 - (4) The permittee shall maintain records of the following information:
 - 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 measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.



The information in d)(3)d shall be kept separately for each fugitive dust operation/source listed above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for (a) any visible fugitive emissions from transfer operations that are not contained within an enclosure and (b) any visible fugitive emissions from enclosures containing the transfer operations associated with the mid-kiln feed system. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:

- a. the color and location of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each of the baghouse stacks 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 baghouse stack identification number;
- b. the color of the emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- (7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart LLL, including the following sections:

40 CFR 63.1350	monitoring requirements
40 CFR 63.1355	recordkeeping requirements

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart LLL]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify the following:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; 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 in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 [OAC 3745-77-07(C)(1) and PTI 03-16227]

- (2) The permittee shall submit semiannual written reports which identify the following:
 - a. each day during which any visible fugitive emissions were observed from the transfer operations associated with the mid-kiln feed system that are not contained within an enclosure;
 - b. each day during which any visible fugitive emissions were observed from the enclosures containing the transfer operations associated with the mid-kiln feed system; and
 - c. describe any corrective actions taken to eliminate the visible fugitive 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 3745-77-07(C)(1) and PTI 03-16227]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any of the baghouse stacks serving this emissions unit and (b) describe 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 3745-77-07(C)(1) and PTI 03-16227]

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart LLL, including the following sections:

40 CFR 63.1353	notification requirements
40 CFR 63.1354	reporting requirements

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart LLL]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

Emission Limitation:
 Fugitive: 0.24 ton PE/year

Applicable Compliance Method:
 The emission limitation was determined by summing the total emission rates associated with the material storage pile and material handling operations, and then dividing by 2000 pounds/ton.

The emission rate was determined as follows:

- i. for load-in/load-out of storage piles, multiply the appropriate emission factor from AP-42 (Chapter 11.19.2, revised 8/04) of 0.00010 pound PM₁₀/ton of aggregate processed by the maximum capacity of 100 tons/hour, a maximum operating schedule of 8760 hours/year, and a particle size multiplier of 2.1;
- ii. for wind erosion from storage piles, multiply the appropriate emission factor from USEPA's Control of Open Fugitive Dust Sources (9/98) of 3.78 lbs PE/day/acre by 365 days/year, and 0.01 acres; and
- iii. for hopper loading, multiply the appropriate emission factor from AP-42 (Chapter 11.19.2, revised 8/04) of 0.00010 pound PM₁₀/ton of aggregate processed by the maximum capacity of 100 tons/hour, a maximum operating schedule of 8760 hours/year, and a particle size multiplier of 2.1.

Provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual PE limitation will be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- b. Emission Limitation:
Fugitive: 0.12 ton PM₁₀/year

Applicable Compliance Method:

The emission limitation was determined by summing the total emission rates associated with the material storage piles and material handling operations, and then dividing by 2000 pounds/ton.

The emission rate was determined as follows:

- i. for load-in/load-out of storage piles, multiply the appropriate emission factor from AP-42 (Chapter 11.19.2, revised 8/04) of 0.00010 pound PM₁₀/ton of aggregate processed by the maximum capacity of 100 tons/hour, and a maximum operating schedule of 8760 hours/year;
- ii. for wind erosion from storage piles, multiply the appropriate emission factor from USEPA's Control of Open Fugitive Dust Sources (9/98) of 3.78 lbs PE/day/acre by 365 days/year, and 0.01 acres; and
- iii. for hopper loading, multiply the appropriate emission factor from AP-42 (Chapter 11.19.2, revised 8/04) of 0.00010 pound PM₁₀/ton of aggregate processed by the maximum capacity of 100 tons/hour, and a maximum operating schedule of 8760 hours/year.

Provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual PE limitation will be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

- c. Emission Limitation:
Stack: 0.01 grains PE/dscf
- Applicable Compliance Method:
This limitation was established based on the manufacturer's guaranteed maximum outlet concentration. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A - Methods 1-5. [OAC 3745-77-07(C)(1) and PTI 03-16227]
- d. Emission Limitation:
Stack: 10.2 tons PE/year
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual limitation by summing the annual emission rates from the four baghouses (306-DC-01, 306-DC-02, 306-DC-03, and 306-DC-04) associated with this emissions unit and multiplying by 60 minutes/hour and 8760 hours/year, and then dividing by 7000 grains/pound and 2000 pounds/ton.
- The emission rate was determined as follows:
- i. for 306-DC-01, multiply the maximum outlet concentration from the baghouse of 0.01 grains PE/dscf by the maximum volumetric air flow of 1,500 dscf;
 - ii. for 306-DC-02, multiply the maximum outlet concentration from the baghouse of 0.01 grains PE/dscf by the maximum volumetric air flow of 12,000 dscf;
 - iii. for 306-DC-03, multiply the maximum outlet concentration from the baghouse of 0.01 grains PE/dscf by the maximum volumetric air flow of 12,000 dscf;
 - iv. for 306-DC-04, multiply the maximum outlet concentration from the baghouse of 0.01 grains PE/dscf by the maximum volumetric air flow of 1,500 dscf;
- Provided compliance is demonstrated with the maximum outlet concentrations, compliance with the annual emission limitation will be assumed. [OAC 3745-77-07(C)(1) and PTI 03-16227]
- e. Emission Limitation:
There shall be no visible fugitive PE from the load-in and load-out operations of the storage piles associated with the mid-kiln feed system, except for a period of time not to exceed one minute during any 60-minute observation period.
- Applicable Compliance Method:
If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on

Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

f. Emission Limitation:

There shall be no visible fugitive PE from wind erosion of the storage piles associated with the mid-kiln feed system, except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

g. Emission Limitation:

There shall be no visible fugitive PE from the material transfer, conveying, and bin loading operations, including the enclosed operations, associated with the mid-kiln feed system except from hopper loading.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

h. Emission Limitation:

Visible particulate emissions from the baghouse stacks serving this emissions unit shall not exceed 5 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI 03-16227]

i. Emission Limitation:

10 percent opacity, as a six-minute average

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation in accordance with 40 CFR, Part 60, Appendix A, Method 9, and the compliance procedures



Effective Date: To be entered upon final issuance

and performance test methods specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR 63 Subpart LLL]

- (2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart LLL, including the following sections:

40 CFR 63.1349	performance testing requirements
----------------	----------------------------------

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart LLL]

- g) Miscellaneous Requirements

- (1) None.



8. Emissions Unit Group -Cement Kiln Group: Kilns 1 and 2: P014, P015

EU ID	Operations, Property and/or Equipment Description
P014	Cement Kiln #1 -- cement clinker manufacture in rotary wet kiln #1 (North), waste-derived fuel and coal, with baghouse with dry absorbent addition, and selective non-catalytic reduction
P015	Cement Kiln #2 -- cement clinker manufacture in rotary wet kiln #2 (South), waste-derived fuel and coal, with baghouse with dry absorbent addition, and selective non-catalytic reduction

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 operations(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. 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)	75 pounds per hour (lbs/hr) of particulate emissions (PE)
b.	OAC rule 3745-17-07(A)	See b)(2)d.
c.	OAC rule 3745-18-69(B)	43.0 pounds sulfur dioxide (SO ₂) per ton of cement produced See b)(2)k .
d.	40 CFR Part 61, Subpart FF	Exempt, pursuant to 40 CFR 61.348(d)(4).
e.	40 CFR Part 63, Subpart EEE (40 CFR 63.1200-1221) See b)(2)b.	emissions standards and related requirements [40 CFR 63.1204 and 63.1220] See b)(2)a, b)(2)c, c)(1), d)(1), e)(1), and f)(2).
f.	40 CFR 63.1-15 (40 CFR Part 63, Subpart EEE – Appendix)	Table 1 to Subpart EEE of 40 CFR Part 63 – Applicability of General Provisions to Subpart EEE shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	OAC 3745-31-05(A)(3) (PTI P0120369 issued April 21, 2016)	See b)(2)e.
h.	OAC rule 3745-31-05(D)	See b)(2)g, b)(2)l, b)(2)m, b)(2)n, c)(2),



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(PTI P0120369 issued April 21, 2016)	c)(3), d)(6), d)(7), f)(1)c, f)(1)d, and g)(1).

(2) Additional Terms and Conditions

- a. The permittee shall comply with the emissions standards and related requirements of 40 CFR 63.1204, until the next Comprehensive Performance Test and associated requirements are completed and approved, at which time the emissions standards and related requirements of 40 CFR 63.1220 become effective.
- b. In accordance with 40 CFR 63.1200 and 63.1201, this emissions unit is a hazardous waste burning cement kiln subject to the emissions limitations /control measures specified in this section.
- c. The permittee shall comply with the applicable additional requirements required under 40 CFR 63 Subpart EEE, including the following sections:

40 CFR 63.1206	compliance procedures for the standards and operating requirements
40 CFR 63.1213	provisions for compliance date extension
40 CFR 63.1214	implementation and enforcement authority provisions
40 CFR 63.1215	provisions for health based compliance alternatives

- d. The opacity limitation specified by OAC rule 3745-17-07(A) is less stringent than the limitation established pursuant to 40 CFR, Part 63, Subpart EEE.
- e. A Best Available Technology (BAT) determination for these emissions units was originally established in PTI 03-976 and was determined to be compliance with all applicable State and Federal rules and compliance with the terms and conditions of the permit.
- f. The terms and conditions of PTI P01120369 include the determination of BAT for these emissions units made in PTI 03-976 issued November 17, 1980.
- g. PTI P01120369 establishes the following emission limitations and control requirements for the purpose of making these requirements federally enforceable:
 - i. P014: 6.01 lbs NO_x per ton of clinker, as a 30-day rolling average.
 - ii. P014: 5.52 lbs SO₂ per ton of clinker, as a 30-day rolling average.
 - iii. P015: 5.46 lbs NO_x per ton of clinker, as a 30-day rolling average.
 - iv. P015: 6.80 lbs SO₂ per ton of clinker, as a 30-day rolling average.

- v. Installation of selective non-catalytic reduction (SNCR) and dry absorbent addition (DAA) units for control of NO_x and SO₂ emissions.

- h. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO_x monitoring system, designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance /quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly Cylinder Gas Audits or Relative Accuracy Audits as required in 40 CFR Part 60; and to conduct Relative Accuracy Test Audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

- i. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO₂ monitoring system, designed to ensure continuous valid and representative readings of SO₂ emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance /quality control plan and a logbook dedicated to the continuous SO₂ monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly Cylinder Gas Audits or Relative Accuracy Audits as required in 40 CFR Part 60; and to conduct Relative Accuracy Test Audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

- j. The continuous emission monitoring system(s) consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

- k. The emission limitation specified by OAC rule 3745-18-69(B) is less stringent than the emission limitation established under OAC rule 3745-31-05(D).

- l. At least 30 days prior to any transfer of ownership or operation of this facility, the permittee shall provide a copy of this permit to the proposed transferee and shall simultaneously provide written notice of the prospective transfer, together with a copy of the proposed written agreement, to the Ohio EPA. No transfer of ownership or operation of this facility, whether in compliance with the procedures of this Paragraph or otherwise, shall relieve the permittee of its obligation to ensure that the terms of this permit under OAC rule 3745-31-05(D) are implemented, unless:
 - i. the transferee agrees, in writing, to undertake the obligations of this permit under OAC rule 3745-31-05(D) and further agrees in writing to be substituted for the current permittee under this permit and thus become bound by the terms thereof;



- ii. the Ohio EPA determines that the transferee has the financial and technical ability to assume the obligations of this permit under OAC rule 3745-31-05(D); and
iii. the Ohio EPA's consent, in writing, to relieve the permittee of its obligations of this permit under OAC rule 3745-31-05(D).

Any attempt to transfer ownership or operation of this facility, or any portion thereof, without complying with this Paragraph constitutes a violation of this permit.

- m. Emission reductions resulting from compliance with the requirements of this permit under OAC rule 3745-31-05(D) shall not be considered as a creditable contemporaneous emission decrease for the purpose of obtaining a netting credit under the Clean Air Act's Non-attainment NSR and PSD programs.

These limitations do not apply to emission reductions achieved by the permittee that are surplus to those required under the requirements of this permit under OAC rule 3745-31-05(D) ("surplus emission reductions"). For purposes of this Paragraph, surplus emission reductions are the reduction over and above those required under the requirements of this permit under OAC rule 3745-31-05(D) that result from the permittee's compliance with federally enforceable emissions limits that are more stringent than limits imposed under OAC rule 3745-31-05(D) or from the permittee's compliance with emissions limits otherwise required under applicable provisions of the Clean Air Act or with an applicable SIP that contains more stringent limits than those imposed under the requirements of this permit under OAC rule 3745-31-05(D).

- n. Whenever any violation of the requirements of this permit under OAC 3745-31-05(D), or any other event affecting the permittee's performance under such requirements, or the performance itself under such requirements, may pose an immediate threat to the public health or welfare or the environment, the permittee shall notify the Ohio EPA, orally or by electronic or facsimile transmission as soon as possible, but no later than 24 hours after the permittee first knew, or should have known, of the violation or event.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR 63 Subpart EEE, including the following sections:

Table with 2 columns: 40 CFR 63.1206 and compliance procedures for the standards and operating requirements

[OAC rule 3745-77-07(A)(1), PTI P0120369 and 40 CFR Part 63 Subpart EEE]

- (2) The permittee shall continuously operate the SNCR technology during all times of kiln operation, except during periods of SNCR technology malfunction. [OAC rule 3745-77-07(A)(1) and PTI P0120369]



- (3) The permittee shall continuously operate the DAA technology during all times of kiln operation, except during periods of DAA technology malfunction.
[OAC rule 3745-77-07(A)(1) and PTI P0120369]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring / record keeping requirements required under 40 CFR 63 Subpart EEE, including the following sections:

40 CFR 63.1209	monitoring requirements
40 CFR 63.1211	recordkeeping and reporting requirements

[OAC rule 3745-77-07(C)(1), PTI P0120369 and 40 CFR Part 63 Subpart EEE]

- (2) The permittee shall operate and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous NO_x monitoring system including, but not limited to:

- a. emissions of NO_x in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of NO_x in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(2)g and d)(2)h.

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

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

- (3) The permittee shall operate and maintain equipment to continuously monitor and record SO₂ emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous SO₂ monitoring system including, but not limited to:

- a. emissions of SO₂ in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of SO₂ in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous SO₂ monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO₂ monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO₂ monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(3)g and d)(3)h.

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

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

- (4) The permittee shall maintain on site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. The letter(s)/document(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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



- (5) The permittee shall maintain on site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. The letter(s)/document(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments, the CEMS shall be operated at all times during kiln operation. Each such CEMS shall be used at each kiln to demonstrate compliance with the NO_x and SO₂ emission limits established pursuant to OAC rule 3745-31-05(D).

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

- (6) Each NO_x and SO₂ CEMS required pursuant to Paragraph 45 shall monitor and record the applicable NO_x /SO₂ emission rate from each kiln stack in units of lbs of NO_x /SO₂ per ton of clinker produced at such kiln and shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

- (7) The permittee shall collect and record the following information each 'operating day' for each emissions unit:

- a. total pounds of NO_x /SO₂ emitted for the emissions unit
- b. the total tons of clinker produced by the emissions unit
- c. (beginning after 30 days of operation under this permit) the sum of the pounds of NO_x /SO₂ emitted for the day, and the previous twenty-nine (29) operating days
- d. (beginning after 30 days of operation under this permit) the sum of the tons of clinker produced for the day, and the previous twenty-nine (29) operating days
- e. (beginning after 30 days of operation under this permit) divide the total number of pounds of NO_x /SO₂ emitted during the thirty (30) operating days by the total tons of clinker produced during the same 30 operating days [i.e. d)(7)c / d)(7)d]

For any day which is not an 'operating day' for an emissions unit, a record stating such shall be made for that day for the unit.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

- (8) The monitoring and recordkeeping requirements in d)(3), d)(5), d)(6) and d)(7), are sufficient to show compliance with the SO₂ limitation established under OAC 3745-18-69.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart EEE, including the following sections:



40 CFR 63.1210	notification requirements
40 CFR 63.1211	recordkeeping and reporting requirements
40 CFR 63.1212	other requirements pertaining to the NIC
40 CFR 63.1207	performance testing requirements

[OAC rule 3745-77-07(C)(1), PTI P0120369 and 40 CFR Part 63 Subpart EEE]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14, 3745-18, and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous NO_x and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total NO_x emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;
 - viii. results and dates of quarterly cylinder gas audits;



- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitors out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring systems, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring systems and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(2)b.xi and e)(2)b.xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter. The permittee is directed to use data substitution procedures from 40 CFR 75 for showing compliance with the rolling 30-day limitation(s) in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit
[OAC rule 3745-77-07(C)(1) and PTI P0120369]

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO₂ monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO₂ emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14, 3745-18, and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;

- ii. the manufacturer and model number of the continuous SO₂ and other associated monitors;
- iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
- iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. the total SO₂ emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous SO₂ monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO₂ monitors out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous SO₂ monitoring systems, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous SO₂ monitoring systems and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(3)b.xi and e)(3)b.xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter. The permittee is directed to use data substitution procedures from 40 CFR 75 for showing compliance with the rolling 30-day limitation(s) in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit
[OAC rule 3745-77-07(C)(1) and PTI P0120369]

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:

43.0 pounds of sulfur dioxide per ton of cement produced

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with OAC rule 3745-17-03(B)(10).
[OAC rule 3745-77-07(C)(1) and PTI P0120369]

b. Emission Limitation:

75 lbs/hr of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5.
[OAC rule 3745-77-07(C)(1) and PTI P0120369]

c. Emission Limitations:

P014: 6.01 lbs NO_x per ton of clinker, as a 30-day rolling average

P015: 5.46 lbs NO_x per ton of clinker, as a 30-day rolling average

Applicable Compliance Method:

Compliance with the 30-day rolling average emission limit shall be determined in accordance with the following procedure, beginning on the 30th day after the issuance of this permit: first, sum the total pounds of NO_x emitted from the kiln during an operating day (i.e. any day on which kiln operation has occurred) and the previous twenty-nine (29) operating days as measured by the applicable NO_x CEMS, as applicable; second, sum the total tons of clinker produced by the kiln during the same operating day and previous 29 operating days; and third, divide the total number of pounds of NO_x emitted from the kiln or kilns during the thirty (30) operating days by the total tons of clinker produced by such kiln during the same 30 operating days. A new compliance determination of the 30-day rolling average emission limit shall be calculated for each new operating day. In calculating each 30-day rolling average emission rate, the total pounds of NO_x emitted from a kiln during a specified period (operating day or 30-day period) shall include all emissions of that pollutant from the subject kiln that occur during the specified period, including emissions during each start-up, shut-down, or malfunction.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

d. Emission Limitations:

P014: 5.52 lbs SO₂ per ton of clinker, as a 30-day rolling average

P015: 6.80 lbs SO₂ per ton of clinker, as a 30-day rolling average



Applicable Compliance Method:

Compliance with the 30-day rolling average emission limit shall be determined in accordance with the following procedure, beginning on the 30th day after the issuance of this permit: first, sum the total pounds of SO₂ emitted from the kiln during an operating day (i.e. any day on which kiln operation has occurred) and the previous twenty-nine (29) operating days as measured by the applicable SO₂ CEMS, as applicable; second, sum the total tons of clinker produced by the kiln during the same operating day and previous 29 operating days; and third, divide the total number of pounds of SO₂ emitted from the kiln or kilns during the thirty (30) operating days by the total tons of clinker produced by such kiln during the same 30 operating days. A new compliance determination of the 30-day rolling average emission limit shall be calculated for each new operating day. In calculating each 30-day rolling average emission rate, the total pounds of SO₂ emitted from a kiln during a specified period (operating day or 30-day period) shall include all emissions of that pollutant from the subject kiln that occur during the specified period, including emissions during each start-up, shut-down, or malfunction.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

- (2) The permittee shall comply with the applicable testing / compliance requirements as required under 40 CFR 63 Subpart EEE, including the following sections:

40 CFR 63.1207	performance testing requirements
40 CFR 63.1208	test methods

[OAC rule 3745-77-07(C)(1), PTI P0120369 and 40 CFR Part 63 Subpart EEE]

- (3) Ongoing compliance with the NO_x emission limitations contained in this permit, 40 CFR Part 60 and any other applicable standard(s) shall be demonstrated through the data collected as required in Sections d) and f)(1)c of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

- (4) Ongoing compliance with the SO₂ emission limitations contained in this permit, 40 CFR Part 60 and any other applicable standard(s) shall be demonstrated through the data collected as required in Sections d) and f)(1)d of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI P0120369]

g) Miscellaneous Requirements

(1) DEFINITIONS

Terms used in the requirements of this permit under OAC rule 3745-31-05(D) that are defined in the Clean Air Act or in regulations promulgated by U.S. EPA pursuant to the Act shall have the meanings assigned to them in the Act or such regulations, unless otherwise provided in this permit. Whenever the terms set forth below are used, the following definitions shall apply:

- a. "Business Day" means any Day, except for Saturday, Sunday, and federal holidays.
- b. "CEMS" or "Continuous Emission Monitoring System" shall mean, for obligations involving NO_x and SO₂ under OAC rule 3745-31-05(D), the devices defined, installed, calibrated, maintained, and operated in accordance with 40 C.F.R. 60.13 and 40 C.F.R. 60 Appendix B and Appendix F;
- c. "Continuously Operate" or "Continuous Operation" shall mean that when a Control Technology is used at a Kiln, except during a Malfunction of the Control Technology, it shall be operated at all times of Kiln Operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for such Control Technology and the Kiln;
- d. "Contractor" shall mean any person or entity hired by the permittee to perform services on its behalf necessary to comply with the provisions of this permit;
- e. "Control Efficiency" shall mean the extent of reduction in the emissions of a specific air pollutant;
- f. "Control Technology" shall mean Selective Non-Catalytic Reduction, Selective Catalytic Reduction, Dry Absorbent Addition, or Wet Flue Gas Desulphurization, or other alternative technology approved by U.S. EPA and the Affected State(s);
- g. "Day" shall mean a calendar day unless expressly stated to be a Business Day. In computing any period of time under this permit, where the last day would fall on a Saturday, Sunday, or federal holiday, the period shall run until the close of business of the next Business Day;
- h. "Dry Absorbent Addition" or "DAA" shall mean a pollution control system that combines a dry alkaline or semi-dry alkaline reagent directly with the Kiln gas stream to achieve the reduction of sulfur dioxide emissions;
- i. "Emission Limit" shall mean the maximum allowable Emission Rate of a specified air pollutant from any Kiln or Kilns and shall be expressed as pounds of such air pollutant emitted per Ton of clinker produced;
- j. "Emission Rate" for a specified air pollutant from any Kiln or Kilns shall mean the number of pounds of such air pollutant emitted per Ton of clinker measured in accordance with this permit;
- k. "Facilities" shall mean the following Portland cement manufacturing facility used for the production of Portland cement: Paulding Cement Plant, 11435 Road 176, Paulding, Ohio 45879 (hereinafter "Paulding" or "Paulding, Ohio");
- l. "Kiln" as used in this permit shall have the same meaning as defined at 40 C.F.R. 63.1341. The following are identified as the individual Kilns at the Facility: Paulding, Ohio: Paulding Kiln 1, Paulding Kiln 2;

- m. "Kiln Operation" shall mean any period when any raw materials are fed into the Kiln or any period when any combustion is occurring or fuel is being fired in the Kiln;
- n. "Malfunction" as used in this permit under OAC rule 3745-31-05(D) shall have the same meaning as defined at 40 C.F.R. § 60.2;
- o. "National Ambient Air Quality Standards" or "NAAQS" shall mean national ambient air quality standards that are promulgated pursuant to Section 109 of the Act, 42 U.S.C. § 7409;
- p. "NO_x" shall mean oxides of nitrogen, measured in accordance with the provisions of this permit;
- q. "Non-attainment NSR" shall mean the non-attainment area New Source Review (NSR) program within the meaning of Part D of Subchapter I of the Act, 42 U.S.C. §§7501-7515, 40 C.F.R. Part 51, and any applicable State Implementation Plan.
- r. "Operating Day" shall mean any Day on which Kiln Operation has occurred;
- s. "Operating Month" shall mean any calendar month in which Kiln Operation has occurred;
- t. "PSD" shall mean the Prevention of Significant Deterioration program within the meaning of Part C of Subchapter I of the Act, 42 U.S.C. §§ 7470-7492, 40 C.F.R. Part 52, and any applicable State Implementation Plan;
- u. "Retire" or "Retirement" shall mean, with respect to any Kiln: (1) to permanently Shut Down the Kiln; and (2) to file an application in accordance with Ohio's SIP to remove permanently any legal authorization for further operation of the Kiln.
- v. "Selective Non-Catalytic Reduction" or "SNCR" shall mean a pollution control system that injects an ammonia-based reagent into the gas stream without the use of a catalyst for the purpose of reducing NO_x emissions;
- w. "SO₂" means the pollutant sulfur dioxide, measured in accordance with the provisions of this permit;
- x. "Shut Down" shall mean the cessation of Kiln Operation;
- y. "Startup" shall mean the beginning of Kiln Operation;
- z. "Title V permit" shall mean a permit required by and issued in accordance with the requirements of 42 U.S.C. 7661 - 7661 f;
- aa. "Ton" or "Tons" shall mean short ton or short tons;
- bb. "Tonnage Limit" shall mean the total amount of NO_x or SO₂ emissions allowed under the permit, expressed as Tons.



Proposed Title V Permit
Lafarge North America - Paulding Plant

Permit Number: P0120771

Facility ID: 0363000002

Effective Date: To be entered upon final issuance

- cc. "United States" shall mean the United States of America, acting on behalf of U.S. EPA;
- dd. "U.S. EPA" shall mean the United States Environmental Protection Agency and any of its successor departments or agencies.



9. Emissions Unit Group - Group 2: F001, F002

EU ID	Operations, Property and/or Equipment Description
F001	Quarry extraction -- drilling, blasting, loading materials to trucks
F002	Storage Piles and Clinker & Gypsum Handling -- storage piles in quarry and cement plant, and handling of clinker and gypsum, with baghouses on drag lines)

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 operations(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. 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 3745-17-07(B)(1)	none [See b)(2)a.]
b.	OAC rule 3745-17-08(B)	none [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. The 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)(1), 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) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.



Proposed Title V Permit
Lafarge North America - Paulding Plant

Permit Number: P0120771

Facility ID: 0363000002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.