

Facility ID: 1677110000 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677110000 Emissions Unit ID: P040 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P040 - 1.6 MM Btu/hr natural gas-fired Kiln 1 - Harrop 8 cf Gas Fired Asset 06001.	OAC rule 3745-31-05(A)(3) (PTI 16-02444)	2.47 pounds of carbon monoxide (CO) per hour
		10.82 tons of CO per year
		0.55 pound of nitrogen oxides (NOx) per hour
		2.41 tons of NOx per year
		0.31 pound of volatile organic compounds (VOC) per hour
		1.36 tons of VOC per year
		0.01 pound of sulfur dioxide (SO2) per hour
		0.04 ton of SO2 per year
		2.41 tons of particulate emissions (PE) per year
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11.	
	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	OAC rule 3745-17-07(A)	0.551 pound of PE per hour
	OAC rule 3745-17-11	

2. **Additional Terms and Conditions**
 - (a) The hourly and annual PE, VOC, CO, NOx, and SO2 emission limitations were established for Permit to Install (PTI) purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting is required to demonstrate compliance with these limitations.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- 2. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. Reporting Requirements

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

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

2.47 pounds of CO per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 10 of 40 CFR Part 60, Appendix A.

Emission Limitation

0.55 pound of NOx per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 7 of 40 CFR Part 60, Appendix A.

Emission Limitation

0.31 pound of VOC per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 25 or 25A of 40 CFR Part 60, Appendix A.

Emission Limitation

0.01 pound of SO2 per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 6 of 40 CFR Part 60, Appendix A.

Emission Limitation

0.551 pound of PE per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in OAC rule 3745-17-03(B)(10).

Emission Limitations

10.82 tons of CO per year

2.41 tons of NOx per year

1.36 tons of VOC per year

0.04 ton of SO2 per year

2.41 tons of PE per year

Applicable Compliance Method

Compliance shall be based on multiplying the allowable hourly emissions limitation by 8760 hours per year, and

then dividing by 2000 pounds per ton.
Emission Limitation

Visible particulate emissions from any stack shall not exceed ten percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1) and through the record keeping requirement established in section C.1 of these terms and conditions.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

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Facility ID: 1677110000 Emissions Unit ID: P041 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P041 - 1.0 MM Btu/hr natural gas-fired Kiln 5 - Unique/Pereny 8 cf Gas Fired Asset 06005.	OAC rule 3745-31-05(A)(3) (PTI 16-02444)	1.54 pounds of carbon monoxide (CO) per hour
		6.75 tons of CO per year
		0.35 pound of nitrogen oxides (NOx) per hour
		1.53 tons of NOx per year
		0.20 pound of volatile organic compounds (VOC) per hour
		0.88 ton of VOC per year
		0.01 pound of sulfur dioxide (SO2) per hour
		0.04 ton of SO2 per year
		0.33 pound of particulate emissions (PE) per hour
		1.45 tons of PE per year
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed ten percent opacity as a six-minute average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- (a) The hourly and annual PE, VOC, CO, NOx, and SO2 emission limitations were established for Permit to Install (PTI) purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting is required to demonstrate compliance with these limitations.

B. **Operational Restrictions**

1. None

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

2. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. **Reporting Requirements**

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

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

1.54 pounds of CO per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 10 of 40 CFR Part 60, Appendix A.

Emission Limitation

0.35 pound of NOx per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 7 of 40 CFR Part 60, Appendix A.

Emission Limitation

0.20 pound of VOC per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 25 or 25A of 40 CFR Part 60, Appendix A.

Emission Limitation

0.01 pound of SO2 per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in Method 6 of 40 CFR Part 60, Appendix A.

Emission Limitation

0.33 pound of PE per hour

Applicable Compliance Method

If required, compliance shall be based on emission testing conducted in accordance with the procedures and methods specified in OAC rule 3745-17-03(B)(10).

Emission Limitations

6.75 tons of CO per year
1.53 tons of NOx per year
0.88 ton of VOC per year
0.04 ton of SO₂ per year
1.45 tons of PE per year

Applicable Compliance Method

Compliance shall be based on multiplying the allowable hourly emissions limitation by 8760 hours per year, and then dividing by 2000 pounds per ton.

Emission Limitation

Visible particulate emissions from any stack shall not exceed ten percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1) and through the record keeping requirement established in section C.1 of these terms and conditions.

F. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.