State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
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MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

9/30/2008

Certified Mail
Facility ID: 0322010062
Permit Number: P0086935
County: Erie

Nancy Case
Huron Lime Company
100 Meeker St.
Huron, OH 44839-0451

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Title V Permit to Control Air Pollution
OAC Chapter 3745-77

Huron Lime Company

Facility ID: 0322010062
Permit Number: P0086935
Permit Type: Renewal
Issued: 9/30/2008
Effective: 10/21/2008
Expiration: 10/21/2013

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Title V Permit to Control Air Pollution
OAC Chapter 3745-77
Huron Lime Company

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Authorization

Facility ID: 0322010062
Facility Description: Lime manufacturing
Application Number(s): A0017808, A0017809, A0017810
Permit Number: P0086935
Permit Description: lime manufacturing
Permit Type: Renewal
Issue Date: 9/30/2008
Effective Date: 10/21/2008
Expiration Date: 10/21/2013
Superseded Permit Number:

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

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

Ohio 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 (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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

(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
(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 (i.e., postmarked) 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) constitutes a violation of an emission limitation (or control requirement) and, therefore, 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 scheduled maintenance, 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 promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written 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.

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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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) The permittee must comply with all terms and conditions of this permit. 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.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition 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 contaminent 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency) 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 (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(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 appropriate Ohio EPA District Office or local air agency 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 appropriate District Office of the Ohio EPA or local air agency 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 Fed. Reg. 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 has 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.

No emissions unit 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 opening 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 appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) 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

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 appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of 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 appropriate Ohio EPA District Office or local air agency 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 (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.

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 potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P901, P902, and P903 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   (Authority for term: 40 CFR Part 64)

C. Emissions Unit Terms and Conditions

1. F002, Road/Parking Lot

Operations, Property and/or Equipment Description:

Paved roadways and parking areas; unpaved roadways and parking areas.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-17-08(A)	none [See b)(2)c.]
b.	OAC rule 3745-17-07(B)	none [See b)(2)d.]

(2) Additional Terms and Conditions

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

i. the main entrance; and

ii. the employee parking area.

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

i. the coal storage pile road;

ii. the load shed road;

iii. the sludge haul road;

iv. the exit road parking lot; and

v. the parking lot.

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

d. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

2. F003, Storage Piles

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-17-08(A)	none [See b)(2)b.]
b.	OAC rule 3745-17-07(B)	none [See b)(2)c.]

(2) Additional Terms and Conditions

a. The storage piles that are covered by this permit are listed below:

i. the coal storage pile;

ii. the limestone storage pile;

iii. the agricultural lime storage pile #1;

iv. the agricultural lime storage pile #2; and

v. the agricultural lime storage pile #3.

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

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

3. P901, No. 1 Kiln

Operations, Property and/or Equipment Description:

Scrubber exhaust of a 15 TPH rotary kiln and fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

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(C) (PTI #03-17221, issued 09/04/2007)	0.057 lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P901 2.77 tons HCl per rolling, 12- month period for emission units P901 See b)(2)a. and c)(1)
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
d.	OAC rule 3745-18-28(F)	4.0 lbs SO2/ton of lime produced, from emissions units P901, P902, and P903, combined
e.	OAC rule 3745-17-08(A)	none [See b)(2)b.]
f.	OAC rule 3745-17-07(B)	none [See b)(2)c.]
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(6), d)(10) through d)(13), and e)(3) through e)(5)

(2) Additional Terms and Conditions

a. This permit establishes a federally enforceable emission limitation of 2.77 tons HCl per rolling, 12-month period for purposes of avoiding applicability of Maximum Achievable Control Technology (MACT) regulations. The federally enforceable emission limitation is based on the lbs HCl/ton emission limitation and a lime production restriction [See c)(1)].

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

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) The maximum amount of lime produced in emissions unit P901 (kiln #1) shall not exceed 97,236 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

(2) To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the lime production rates specified in the following table:

Month(s)	Lime Production (tons)
1-1	11,000
1-2	22,000
1-3	33,000
1-4	44,000
1-5	55,000
1-6	66,000
1-7	77,000
1-8	88,000
1-9	97,236
1-10	97,236
1-11	97,236
1-12	97,236

After the first 12 calendar months of operation following the issuance of PTI #03-17221, compliance with the annual lime production limitations shall be based upon a rolling, 12-month summation of the monthly lime production rates.

[OAC rule 3745-77-07(A)(1) and PTI #03-17221]

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

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI #03-17221].

d) Monitoring and/or Recordkeeping Requirements

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

a. the water flow rate, in gallons per minute, across the scrubber. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate;

b. the supplemental water flow rate to the ID fan, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

a. the pressure drop, in inches of water, across the scrubber;

b. the supplemental water flow rate to the quench unit, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:

a. the pressure drop, in inches of water, across the scrubber;

b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate), across the scrubber;

c. the water flow rate, in gallons per minute, to the ID fan; and

d. the water flow rate, in gallons per minute, to the quench unit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective

action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:

a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;

b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above);

c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute; and

d. the acceptable value for the supplemental scrubber water flow rate to the quench unit, is a minimum of 275 gallons of water per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(10) The permittee shall collect and record the following information on a monthly basis:

a. the amount of stone fed to emissions unit P901, in tons;

b. the amount of lime produced by emissions unit P901, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.] by a factor of 2);

c. for the first 12 months of operation, under the provisions of PTI #03-17221, the cumulative year-to-date amount of lime production for emissions unit P901, in tons;

d. beginning the first month after the first 12 calendar months of operation, under the provisions of PTI #03-17221, the rolling, 12-month lime production rates, in tons;

e. the HCl emission rate from lime produced for emissions unit P901, in tons per month, calculated by multiplying the lbs HCl/ton of lime produced emission limitation for this emissions unit by the amount of lime produced [d)(10)b.];

f. for the first 12 months of operation, under the provisions of PTI #03-17221, the cumulative year-to-date total HCl emissions, in tons; and

g. beginning the first month, after the first 12 months of operation, under the provisions of PTI #03-17221, the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

When the static pressure drop across the scrubber, scrubber water flow rate, supplemental scrubber water flow rate to the ID fan, and the supplemental scrubber

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

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

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

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the rolling, 12-month HCl emission limitation of 2.77 tons;

b. For the first 12 calendar months of operation, under the provisions of PTI #03-17221, all exceedances of the maximum allowable cumulative lime production rates specified in section c)(1); and

c. Beginning the first month after the first 12 calendar months of operation under the provisions of PTI #03-17221, all exceedances of the rolling, 12-month lime production restriction of 97,236 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. the total quantity of coal received each month from each supplier (tons);

b. the weighted* average sulfur content (percent) of the coal received during each calendar month;

c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and

d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;

d. each period of time when the supplemental water flow rate to the quench unit was less than the applicable limit contained in this permit;

e. an identification of each incident of deviation described in a., b., c. and d. above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in a., b., c. and d. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in a., b., c. and d. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

f) Testing Requirements

(1) Emissions Testing Requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted 6 months following permit issuance, and every 2.5 years thereafter unless otherwise specified or approved by the Ohio EPA, NWDO;

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO2, and HCl;

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A;

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;

iii. for SO2, Method 6 of 40 CFR Part 60, Appendix A; and

iv. for HCl, ASTM Method D6735.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee

may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

(2) Compliance Methods Requirements: Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit, section f)(1) of the terms and conditions of the permit for emissions unit P902, and section f)(1) of the terms and conditions of the permit for emissions unit P903.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

b. Emission Limitation:

4.0 pounds SO2/ton product

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

c. Emission Limitation:

0.057 lb HCl/ton lime produced for emissions unit P901

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated by the performance testing required in condition f)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

d. Emission Limitation:

2.77 tons HCl/rolling, 12-month period for emissions unit P901

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

e. Emission Limitation:

The maximum amount of lime produced in emissions unit P901 (kiln #1) shall not exceed 97,236 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

f. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

g) Miscellaneous Requirements

(1) None.

4. P902, No. 2 Kiln

Operations, Property and/or Equipment Description:

Scrubber exhaust of a 15 TPH rotary kiln and fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

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(C) (PTI #03-17221 issued on 09/04/2007)	0.051 lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P902 2.48 tons HCl per rolling, 12- month period for emission units P902 See b)(2)a. and c)(1)
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
d.	OAC rule 3745-18-28(F)	4.0 lbs SO2/ton of lime produced, from emissions units P901, P902, and P903, combined
e.	OAC rule 3745-17-08(A)	none [See b)(2)b.]
f.	OAC rule 3745-17-07(B)	none [See b)(2)c.]
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(6), d)(10) through d)(13), and e)(3) through e)(5)

(2) Additional Terms and Conditions

a. PTI #03-17221 establishes a federally enforceable emission limitation of 2.48 tons HCl per rolling, 12-month period for purposes of avoiding applicability of Maximum Achievable Control Technology (MACT) regulations. The federally enforceable emission limitation is based on the lbs HCl/ton emission limitation and a lime production restriction [See c)(1)].

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

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) The maximum amount of lime produced in emissions unit P902 (kiln #2) shall not exceed 97,236 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

(2) To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the lime production rates specified in the following table:

Month(s)	Lime Production (tons)
1-1	11,000
1-2	22,000
1-3	33,000
1-4	44,000
1-5	55,000
1-6	66,000
1-7	77,000
1-8	88,000
1-9	97,236
1-10	97,236
1-11	97,236
1-12	97,236

After the first 12 calendar months of operation following the issuance of PTI #03-17221, compliance with the annual lime production limitations shall be based upon a rolling, 12-month summation of the monthly lime production rates.

[OAC rule 3745-77-07(A)(1) and PTI #03-17221]

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

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI #03-17221]

d) Monitoring and/or Recordkeeping Requirements

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

a. the water flow rate, in gallons per minute, across the scrubber. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate; and

b. the supplemental water flow rate to the ID fan, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

a. the pressure drop, in inches of water, across the scrubber; and

b. the supplemental water flow rate to the quench unit, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:

a. the pressure drop, in inches of water, across the scrubber;

b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate), across the scrubber;

c. the water flow rate, in gallons per minute, to the ID fan; and

d. the water flow rate, in gallons per minute, to the quench unit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective

action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1), 40 CFR,Part 64, and PTI #03-17221]

(6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:

a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;

b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above);

c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute; and

d. the acceptable value for the supplemental scrubber water flow rate to the quench unit, is a minimum of 275 gallons of water per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(10) The permittee shall collect and record the following information on a monthly basis:

a. the amount of stone fed to emissions unit P902, in tons;

b. the amount of lime produced by emissions unit P902, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.] by a factor of 2);

c. for the first 12 months of operation, under the provisions of PTI #03-17221, the cumulative year-to-date amount of lime production for emissions unit P902, in tons;

d. beginning the first month after the first 12 calendar months of operation, under the provisions of PTI #03-17221, the rolling, 12-month lime production rates, in tons;

e. the HCl emission rate from lime produced for emissions unit P902, in tons per month, calculated by multiplying the lbs HCl/ton of lime produced emission limitation for this emissions unit by the amount of lime produced [d)(10)b.];

f. for the first 12 months of operation, under the provisions of PTI #03-17221, the cumulative year-to-date total HCl emissions, in tons; and

g. beginning the first month, after the first 12 months of operation, under the provisions of PTI #03-17221, the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

When the static pressure drop across the scrubber, scrubber water flow rate, supplemental scrubber water flow rate to the ID fan, and the supplemental scrubber

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

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

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

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the rolling, 12-month HCl emission limitation of 2.48 tons;

b. For the first 12 calendar months of operation, under the provisions of PTI #03-17221, all exceedances of the maximum allowable cumulative lime production rates specified in section b)(1); and

c. Beginning the first month after the first 12 calendar months of operation under the provisions of PTI #03-17221, all exceedances of the rolling, 12-month lime production restriction of 97,236 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. the total quantity of coal received each month from each supplier (tons);

b. the weighted* average sulfur content (percent) of the coal received during each calendar month;

c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and

d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;

d. each period of time when the supplemental water flow rate to the quench unit was less than the applicable limit contained in this permit;

e. an identification of each incident of deviation described in a., b., c. and d. above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in a., b., c. and d. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in a., b., c. and d. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

f) Testing Requirements

(1) Emissions Testing Requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted 6 months following permit issuance, and every 2.5 years thereafter unless otherwise approved by the Ohio EPA, NWDO;

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO2 and HCl;

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A;

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;

iii. for SO2, Method 6 of 40 CFR Part 60, Appendix A; and

iv. for HCl, ASTM Method D6735.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the

Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

(2) Compliance Methods Requirements: Compliance with the emission limitation(s) in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit, section f)(1) of the terms and conditions of the permit for emissions unit P902, and section f)(1) of the terms and conditions of the permit for emissions unit P903.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

b. Emission Limitation:

4.0 pounds SO2/ton product

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

c. Emission Limitation:

0.051 lb HCl/ton lime produced, for emissions unit P902

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

d. Emission Limitation:

2.48 tons HCl/rolling, 12-month period for emissions unit P902

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

e. Emission Limitation:

The maximum amount of lime produced in emissions unit P902 (kiln #2) shall not exceed 97,236 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

f. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

g) Miscellaneous Requirements

(1) None.

5. P903, No. 3 Kiln

Operations, Property and/or Equipment Description:

Scrubber exhaust of a 15 TPH rotary kiln and a fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

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(C) (PTI #03-17221 issued on 09/04/2007)	0.093 lb hydrogen chloride (HCl)/ton lime produced, for emissions unit P903 4.22 tons HCl per rolling, 12- month period for emission units P903 See b)(2)a. and c)(1)
b.	OAC rule 3745-17-11(B)	100 lbs particulate emissions (PE)/hour, for emissions units P901, P902, and P903, combined
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
	OAC rule 3745-18-28(F)	4.0 lbs SO2/ton of lime produced, from emissions units P901, P902, and P903, combined
	OAC rule 3745-17-08(A)	none [See b)(2)b.]
	OAC rule 3745-17-07(B)	none [See b)(2)c.]
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See c)(2), d)(1) through d)(6), d)(10) through d)(13), and e)(3) through e)(5)

(2) Additional Terms and Conditions

a. PTI #03-17221 establishes a federally enforceable emission limitation of 4.22 tons HCl per rolling, 12-month period for purposes of avoiding applicability of Maximum Achievable Control Technology (MACT) regulations. The federally enforceable emission limitation is based on the lbs HCl/ton emission limitation and a lime production restriction [See c)(1)].

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

c. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

(1) The maximum amount of lime produced in emissions unit P903 (kiln #3) shall not exceed 90,666 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

(2) To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the lime production rates specified in the following table:

Month(s)	Lime Production (tons)
1-1	11,000
1-2	22,000
1-3	33,000
1-4	44,000
1-5	55,000
1-6	66,000
1-7	77,000
1-8	88,000
1-9	90,666
1-10	90,666
1-11	90,666
1-12	90,666

After the first 12 calendar months of operation following the issuance of PTI #03-17221, compliance with the annual lime production limitations shall be based upon a rolling, 12-month summation of the monthly lime production rates.

[OAC rule 3745-77-07(A)(1) and PTI #03-17221]

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

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64, and PTI #03-17221]

d) Monitoring and/or Recordkeeping Requirements

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

a. the water flow rate, in gallons per minute, across the scrubber. For this emissions unit, the scrubber water flow rate will be continuously measured by a pump amperage gauge, which is directly proportional to water flow rate; and

b. the supplemental water flow rate to the ID fan, in gallons per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

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

a. the pressure drop, in inches of water, across the scrubber.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

(3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record following on a daily basis:

a. the pressure drop, in inches of water, across the scrubber;

b. the water flow rate, in terms of pump amperage (which is proportional to water flow rate), across the scrubber; and

c. the water flow rate, in gallons per minute, to the ID fan.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

(4) Whenever a monitored value for any of the parameters specified in d)(3) above deviates from (falls below) the acceptable value specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64, and PTI #03-17221]

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the

need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

(6) The acceptable values for parameters specified in d)(3) are as follows for all times while the emissions unit is in operation:

a. the acceptable value for the pressure drop across the scrubber is a minimum of 16 inches of water;

b. the acceptable value for the scrubber water flow rate is a minimum of 1400 gallons per minute (a scrubber pump amperage of 23 or above); and

c. the acceptable value for the supplemental scrubber water flow rate to the ID fan, is a minimum of 4 gallons of water per minute.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

(7) The values above are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value(s) based upon information obtained during future particulate emission and HCl tests that demonstrate compliance with the allowable particulate emission rate and HCl emission rate for this emissions unit. In addition, approved revisions to the value(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

(8) The permittee shall collect or require the coal supplier to collect a minimum of one representative grab sample per month of the coal supplied for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989 Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(9) For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for sulfur content and heat content.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(10) The permittee shall collect and record the following information on a monthly basis:

a. the amount of stone fed to emissions unit P903, in tons;

b. the amount of lime produced by emissions unit P903, in tons (the tons of lime produced shall be calculated by dividing the stone feed [d)(10)a.] by a factor of 2);

c. for the first 12 months of operation, under the provisions of PTI #03-17221, the cumulative year-to-date amount of lime production for emissions unit P903, in tons;

d. beginning the first month after the first 12 calendar months of operation, under the provisions of PTI #03-17221, the rolling, 12-month lime production rates, in tons;

e. the HCl emission rate from lime produced for emissions unit P903, in tons per month, calculated by multiplying the lbs HCl/ton of lime produced emission limitation for this emissions unit by the amount of lime produced [d)(10)b.];

f. for the first 12 months of operation, under the provisions of PTI #03-17221, the cumulative year-to-date total HCl emissions, in tons; and

g. beginning the first month, after the first 12 months of operation, under the provisions of PTI #03-17221, the rolling, 12-month HCl emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(11) The permittee shall maintain daily records that document any time periods when the water utilized in the scrubber was obtained from a settling pond undergoing excavation.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

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

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

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

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

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the rolling, 12-month HCl emission limitation of 4.22 tons;

b. For the first 12 calendar months of operation, under the provisions of PTI #03-17221, all exceedances of the maximum allowable cumulative lime production rates specified in section b)(1); and

c. Beginning the first month after the first 12 calendar months of operation under the provisions of PTI #03-17221, all exceedances of the rolling, 12-month lime production restriction of 90,666 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(2) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document sulfur content (percent) and heat content (BTU/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. the total quantity of coal received each month from each supplier (tons);

b. the weighted* average sulfur content (percent) of the coal received during each calendar month;

c. the weighted* average heat content (BTU/pound) of the coal received during each calendar month; and

d. the calculated (based on the ratio of the past measured stack sulfur dioxide emissions to the sulfur content of the fired coal) weighted* average sulfur dioxide emission rate in tons/year based on the coal received each calendar month.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

(3) The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the scrubber utilized water from a settling pond undergoing excavation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

(4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. each period of time when the supplemental water flow rate to the ID fan was less than the applicable limit contained in this permit;

d. an identification of each incident of deviation described in a., b., and c. above where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in a., b., and c. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in a., b., and c. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17221]

f) Testing Requirements

(1) Emissions Testing Requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted 6 months following permit issuance, and every 2.5 years thereafter unless otherwise approved by the Ohio EPA, NWDO;

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, SO2 and HCl;

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A;

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A;

iii. for SO2, Method 6 of 40 CFR Part 60, Appendix A; and

iv. for HCl, ASTM Method D6735.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

(2) Compliance Methods Requirements: Compliance with the emission limitation(s) in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit, section f)(1) of the terms and conditions of the permit for emissions

unit P902, and section f)(1) of the terms and conditions of the permit for emissions unit P903.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

b. Emission Limitation:

4.0 lbs SO2/ton of lime produced

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

c. Emission Limitation:

0.093 lb HCl/ton lime produced, for emissions unit P903

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

d. Emission Limitation:

4.22 tons HCl/rolling, 12-month period for emissions unit P903

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

e. Emission Limitation:

The maximum amount of lime produced in emissions unit P903 (kiln #3) shall not exceed 90,666 tons of lime per year, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

f. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17221]

g) Miscellaneous Requirements

(1) None.

6. P904, Product conveying crushing screening

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 #03-4890, issued June 13, 1990)	1.3 lbs particulate emissions (PE)/hour; and 5.7 tons PE/year from the baghouse stack See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	none [See b)(2)c.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)d.]
d.	OAC rule 3745-17-07(B)	none [See b)(2)e.]
e.	OAC rule 3745-17-08(B)	none [See b)(2)f.]

(2) Additional Terms and Conditions

a. The best available technology (BAT) control requirement for this emissions unit has been determined to be the following:

i. use of a baghouse (BH-1); and

ii. use of a building enclosure.

b. The emission limitations/control measures in section b)(1) were established in accordance with the best available technology (BAT) requirements in OAC rule 3745-31-05(A)(3) and apply only to the equipment installed under PTI #03-4890. The other equipment and operations associated with emissions unit P904 are existing operations installed prior in January 1974 and are not subject to the BAT requirements in OAC rule 3745-31-05(A)(3).

c. The 1.3 lbs PE/hour emission limitation associated with the equipment permitted under PTI #03-4890, was established by using an emissions factor of 1.8 lbs

PE/ton, applying a control efficiency for the baghouse, and establishing a limit of 120% of actuals.

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

e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

f. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

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

(2) 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.

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

e) Reporting Requirements

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

a. identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and

b. describe any corrective actions taken to minimize or eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted 6 months prior to or following the issuance of this permit, and within 6 months prior to the expiration of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

b. The emission testing shall be conducted on baghouse BH-1 to demonstrate compliance with the allowable emissions limit of 1.3 lbs PE/hour.

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. Methods 1-4 of 40 CFR Part 60, Appendix A; and

ii. for PE, Method 5 of 40 CFR Part 60, Appendix A.

d. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

f. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Ohio EPA, NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review

and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emissions tests.

g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

(2) Compliance Methods Requirements: Compliance with the emission limitation(s) in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

1.3 lbs of PM/hour (emissions from baghouse BH-1); 5.7 tons PM/year

Applicable Compliance Method:

Compliance with the lbs/hour emissions limitation shall be determined by emissions testing performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

The ton per year emission limitation was developed by multiplying the emission limitation of 1.3 lbs PM/hour by the maximum operating schedule of 8760 hours/year and applying the conversion factor of 2000 lbs/ton. Therefore, provided compliance is shown with the emission limitation of 1.3 lbs PM/hour, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-4890]

g) Miscellaneous Requirements

(1) None.

7. P905, Product Handling

Operations, Property and/or Equipment Description:

Final product storage bins (7), screening (1) and truck loadout operations (2), with 2 baghouses (BH-2 and BH-3).

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 #03-17107, issued 08/01/2006)	See b)(2)a. and b)(2)b. Fugitive Emissions: 2.00 tons fugitive particulate emissions (PE)/year Visible particulate fugitive emissions shall not exceed 20% opacity as a 3-minute average. Emissions from Recovery Baghouse (BH-2): 0.44 ton particulate matter emissions 10 microns or less in size (PM10)/year 0.02 grains PM10/dry standard cubic foot (dscf) [See b)(2)c.] Visible particulate emissions shall not exceed 5% opacity as a six-minute average
b.	OAC rule 3745-17-11(B)	none [See b)(2)d.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)e.]
d.	OAC rule 3745-17-07(B)	none [See b)(2)f.]
e.	OAC rule 3745-17-08(B)	none [See b)(2)g.]

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirement for this emissions unit has been determined to be the following:

i. totally enclosed design for the new overhead storage bin (bin no. 7) and the new conveyor (C-5).

ii. use of a recovery baghouse (BH-2) for the new loadout spout (West Loadout) that achieves a maximum outlet concentration of 0.02 grains PM10/dscf.

b. The emission limitations/control measures in section b)(1) were established in accordance with the best available technology (BAT) requirements in OAC rule 3745-31-05(A)(3) and apply only to the new loadout spout (West Loadout), the new overhead storage bin (bin no. 7), and the new conveyor (C-5). The other equipment and operations associated with emissions unit P905 are existing operations installed prior in January 1974 and are not subject to the BAT requirements in OAC rule 3745-31-05(A)(3).

c. It should also be noted that the recovery baghouse (BH-2) currently serves some of the existing equipment and operations associated with emissions unit P905. The 2.00 tons PM10/year emission limitation associated with the new loadout spout (West Loadout) was established by using the volumetric air flow from the recovery baghouse (BH-2) dedicated to the new loadout spout operation [see f)(2)c. for details].

d. All PE from baghouse stack is PM10.

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

f. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

g. This emissions unit is exempt from the visible PE emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across recovery baghouse BH-2 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 recovery baghouse BH-2 on daily basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(2) 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(3) 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 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 reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(4) The acceptable range for the pressure drop across recovery baghouse BH-2 shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(5) This range 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 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 ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an

operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the General Terms and Conditions of this permit 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 recovery baghouse BH-2 field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. 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, 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

(3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted 6 months prior to or following the issuance of this permit, and within 6 months prior to the expiration of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

b. The emission testing shall be conducted on recovery baghouse (BH-2) to demonstrate compliance with the allowable maximum outlet concentration for PM10.

c. The following test methods shall be employed to demonstrate compliance with the above emission limitations: for PM10, Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

f. Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The

permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

(2) Compliance with the emission limitations specified in section b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

2.00 tons of PE/year (fugitive)

Applicable Compliance Method:

Compliance with the tons of fugitive PE limitation shall be demonstrated by multiplying the AP-42 emission factor from Table 11.17-4 (revised 2/98) of 0.61 lb PE/ton, the maximum hourly throughput rate of 75 tons/hr, the capture efficiency of 99% (1-0.99) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

b. Emission Limitation:

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

Applicable Compliance Method:

The 0.02 gr/dscf limitation is the established BAT maximum outlet concentration for recovery baghouse BH-2. The permittee shall demonstrate compliance with the mass emission limitation by testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency [See f)(1)].

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

d. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

e. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17107]

g) Miscellaneous Requirements

(1) None.