



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  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

1/9/2009

Lynn Radabaugh  
MGQ Aggregates  
P O Box 130  
Old Fort, OH 44861

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0374020222  
Permit Number: P0104315  
Permit Type: Renewal  
County: Seneca

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO 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

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 [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: Ohio EPA-NWDO

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
MGQ Aggregates**

Facility ID: 0374020222  
Permit Number: P0104315  
Permit Type: Renewal  
Issued: 1/9/2009  
Effective: 1/9/2009  
Expiration: 1/9/2019





**Air Pollution Permit-to-Install and Operate**  
for  
MGQ Aggregates

**Table of Contents**

- Authorization ..... 1
- A. Standard Terms and Conditions ..... 3
  - 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
  - 2. Who is responsible for complying with this permit? ..... 4
  - 3. What records must I keep under this permit? ..... 4
  - 4. What are my permit fees and when do I pay them?..... 4
  - 5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
  - 6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
  - 7. What reports must I submit under this permit? ..... 5
  - 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
  - 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5
  - 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
  - 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
  - 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
  - 13. Can I transfer this permit to a new owner or operator?..... 6
  - 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
  - 15. What happens if a portion of this permit is determined to be invalid? ..... 7
- B. Facility-Wide Terms and Conditions..... 8
- C. Emissions Unit Terms and Conditions ..... 10
  - 1. F004, Limestone Processing..... 11
  - 2. F005, Limestone Load Out..... 14
  - 3. P001, Product Load Out..... 17
  - 4. P901, Product Handling ..... 21





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104315  
**Facility ID:** 0374020222  
**Effective Date:** 1/9/2009

## Authorization

Facility ID: 0374020222  
Application Number(s): A0036724  
Permit Number: P0104315  
Permit Description: Raw material handling, (2) product load-out operations and product drying, transferring, conveying and storage  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/9/2009  
Effective Date: 1/9/2009  
Expiration Date: 1/9/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15  
This document constitutes issuance to:

MGQ Aggregates  
2000 W CR 42  
Tiffin, OH 44883

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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 this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104315  
Permit Description: Raw material handling, (2) product load-out operations and product drying, transferring, conveying and storage

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

- |                                   |                      |
|-----------------------------------|----------------------|
| <b>Emissions Unit ID:</b>         | <b>F004</b>          |
| Company Equipment ID:             | Limestone Processing |
| Superseded Permit Number:         | 03-17307             |
| General Permit Category and Type: | Not Applicable       |
| <b>Emissions Unit ID:</b>         | <b>F005</b>          |
| Company Equipment ID:             | Limestone Load Out   |
| Superseded Permit Number:         | 03-17307             |
| General Permit Category and Type: | Not Applicable       |
| <b>Emissions Unit ID:</b>         | <b>P001</b>          |
| Company Equipment ID:             | Product Load Out     |
| Superseded Permit Number:         | 03-17307             |
| General Permit Category and Type: | Not Applicable       |
| <b>Emissions Unit ID:</b>         | <b>P901</b>          |
| Company Equipment ID:             | Product Handling     |
| Superseded Permit Number:         | 03-17307             |
| General Permit Category and Type: | Not Applicable       |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104315

**Facility ID:** 0374020222

**Effective Date:** 1/9/2009

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104315

**Facility ID:** 0374020222

**Effective Date:** 1/9/2009

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104315

**Facility ID:** 0374020222

**Effective Date:** 1/9/2009

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104315

**Facility ID:** 0374020222

**Effective Date:** 1/9/2009

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104315

**Facility ID:** 0374020222

**Effective Date:** 1/9/2009

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



**1. F004, Limestone Processing**

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

raw material (limestone) handling.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	See b)(2)b.
b.	OAC rule 3745-17-08 (B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-07(B).
c.	OAC rule 3745-17-07 (B)	This emission unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

(2) Additional Terms and Conditions

a. The following material handling and processing equipment/operations are covered by this permit:

i. front-end loader;



- ii. feeder (F1);
  - iii. 10' x 24" conveyor (C1);
  - iv. 40' x 24" conveyor (C2);
  - v. 5 x 10 screen (S1);
  - vi. 50' x 24" conveyor (C3); and
  - vii. chute transfer.
- b. Permit to Install 03-17307 for this air contaminant source takes into account the use of aggregate with a high inherent moisture content (4% moisture) and a corresponding visible fugitive emission restriction of 20% opacity, as a three-minute average as voluntary restrictions proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3), to ensure potential particulate emissions (PE) and emissions of particulate matter 10 microns or less in size (PM10) are each less than 10.0 tons per year.
- c. If at any time the inherent moisture content of the aggregate is not sufficient to meet the above applicable requirement, the permittee shall employ control measures to ensure compliance.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform visible emission inspections of the material handling operations associated with this emissions unit in accordance with the following minimum frequencies:

<b>Material Handling Operation</b>	<b>Minimum Inspection Frequency</b>
loading	once during each day of operation
transfer points/conveying	once during each day of operation
screening	once during each day of operation

- (2) The purpose of the inspections is to determine the need for implementing additional control measures. The inspections shall be performed during representative, normal operating conditions.
- (3) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;



- b. the date of each inspection where it was determined by the permittee that it was necessary to implement control measure(s);
- c. the dates control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days control measure(s) was (were) implemented.

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

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible fugitive PE 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.

g) Miscellaneous Requirements

- (1) None.



**2. F005, Limestone Load Out**

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

product (dried limestone) load-out operation with telescopic chute.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	See b)(2)a.
b.	OAC rule 3745-17-08 (B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-07(B).
c.	OAC rule 3745-17-07 (B)	This emission unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

(2) Additional Terms and Conditions

a. Permit to Install 03-17307 for this air contaminant source takes into account the following voluntary restrictions proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3), to ensure controlled potential particulate emissions (PE) and



emissions of particulate matter 10 microns or less in size (PM10) are each less than 10.0 tons per year.

- i. use of a partial enclosure and telescopic chute and a corresponding visible fugitive emission restriction of 20% opacity, as a three-minute average;
- ii. loading of product (dried limestone) that has been sized to a specification of 4 mesh x 30 mesh

If at any time the proposed control measures are not sufficient to meet the above applicable requirement, the permittee shall employ additional control measures to ensure compliance.

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., enclosure openings) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee



shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible fugitive PE 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.

g) Miscellaneous Requirements

(1) None.



**3. P001, Product Load Out**

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

product (fines) load-out operation with pneumatic hose and baghouse.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	5.0 mg particulate emissions (PE)/dscm and 2.06 tons PE/year for emission units P001 and P901 combined [See b)(2)b. and b)(2)c.]  5.0 mg particulate matter 10 micron or less in size (PM10)/dscm and 2.06 tons PM10/year for emission units P001 and P901 combined [See b)(2)b. and b)(2)c.]  Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from the baghouse stack serving this emissions unit. See b)(2)a.
b.	OAC rule 3745-17-11 (B)	See b)(2)c.
c.	OAC rule 3745-17-07 (A)	See b)(2)d.



(2) Additional Terms and Conditions

- a. Permit to Install 03-17307 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. use of a baghouse achieving a maximum outlet concentration of 5.0 mg PE/dscm and 5.0 mg PM10/dscm and a corresponding visible emission restriction of 0% opacity, as a six-minute average

The potential to emit for this emissions unit and for the limestone dryer, the enclosed material handling operations, and product (fines) storage associated with this emissions unit P901 is 2.06 tons PE/year and 2.06 tons PM10/year and was determined by multiplying the maximum outlet concentrations of 5.0 mg/dscm, a maximum volumetric air flow rate of 25,000 dscfm, and a maximum operating schedule of 8760 hours/year, applying the appropriate conversion factors of 1 gram/1,000 milligrams, 1 pound/454 grams, 60 minutes/hour, 0.0283 m3/ft3, and 1 ton/2,000 pounds.

- b. The emission limitations of 5.0 mg PE/dscm and 2.06 tons PE/year and 5.0 mg PM10/dscm and 2.06 tons PM10/year represent the emissions from the baghouse serving this emissions unit (P001) and the limestone dryer, the enclosed material handling operations, and product (fines) storage associated with this emissions unit P901.
- c. All emissions of particulate matter are PM10.
- d. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (C).
- e. The visible emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (C).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.



\*Based on the current configuration of this emissions unit, this monitoring and recordkeeping requirement will be met by performing and recording the results of the daily Method 9 observations required for emissions unit P901.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation(s):

5.0 mg PE/dscm and 2.06 tons PE/year for emission units P001 and P901 combined

5.0 mg PM10/dscm and 2.06 tons PM10/year for emission units P001 and P901 combined

Applicable Compliance Method:

The mg/dscm emission limitations were established in accordance with the baghouse manufacturer's guaranteed maximum outlet concentration (and assumption that all emissions of particulate matter are PM10).

If required, compliance with the PE limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60 Appendix A, Methods 1 through 5.

If required, compliance with the mg PM10/dscm emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitations were established by multiplying the maximum outlet concentrations of 5.0 mg/dscm, a maximum volumetric air flow rate of 25,000 dscfm, and a maximum operating schedule of 8760 hours/year, applying the appropriate conversion factors of 1 gram/1,000 milligrams, 1 pound/454 grams, 60 minutes/hour, 0.0283 m<sup>3</sup>/ft<sup>3</sup>, and 1 ton/2,000 pounds. Therefore, provided compliance with the 5.0 mg PE/dscm and the 5.0 mg PM10/dscm limits are demonstrated, compliance with the annual limitations will be assumed.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104315

**Facility ID:** 0374020222

**Effective Date:** 1/9/2009

b. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from the baghouse stack serving this emissions unit.

Applicable Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

g) Miscellaneous Requirements

(1) None.



**4. P901, Product Handling**

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

product drying, transferring, conveying, and storage with baghouses.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)(b)	See b)(2)b.
b.	OAC rule 3745-31-05 (A)(3)	<p><u>product drying, transfer/conveying, screening, and product (fines) storage:</u></p> <p>5.0 mg particulate emissions (PE)/dscm and 2.06 tons PE/year for emission units P001 and P901 combined [See b)(2)c.and b)(2)d.]</p> <p>5.0 mg particulate matter 10 micron or less in size (PM10)/dscm and 2.06 tons PM10/year for emission units P001 and P901 combined [See b)(2)c. and b)(2)d.]</p> <p>Visible emissions shall not exceed 0% opacity, as a six-minute average from the baghouse stack serving the limestone dryer and enclosed material handling operations.</p> <p><u>product (dried limestone) storage silos:</u></p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.03 gr PE/dscf and 4.51 tons PE/year 0.03 gr PM10/dscf and 4.51 tons PM10/year [See b)(2)c. and b)(2)d.]</p> <p>Visible emissions shall not exceed 0% opacity, as a six-minute average from the baghouse stacks serving the silo bin vents.</p> <p><u>fugitive emissions:</u> There shall be no visible fugitive emissions from the building openings associated with the enclosed material handling operations [See b)(2)f.]</p>
c.	OAC rule 3745-17-11 (B)	See b)(2)g.
d.	OAC rule 3745-17-07 (A)	See b)(2)h.
e.	OAC rule 3745-17-08 (B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-07(B).
f.	OAC rule 3745-17-07 (B)	This emission unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
g.	OAC rule 3745-21-08(B)	See b)(2)j.
h.	40 CFR Part 60 (NSPS), Subpart UUU	See b)(2)i.

(2) Additional Terms and Conditions

- a. The following equipment/operations are covered by this permit:
  - i. natural gas-fired fluidized bed limestone dryer with baghouse;
  - ii. pneumatic screw conveyor (totally enclosed)
  - iii. 15 ton (500 barrel) fines silo with baghouse;
  - iv. 40' x 24" conveyor (C4) with building enclosure and baghouse;
  - v. 6 x 12 screen (S2) with building enclosure and baghouse;
  - vi. 40' x 24" conveyor (C5) with building enclosure and baghouse;
  - vii. bucket elevator with building enclosure and baghouse;



- viii. 300 ton product silo #1 with baghouse;
  - ix. 300 ton product silo #2 with baghouse;
  - x. 300 ton product silo #3 with baghouse; and
  - xi. 300 ton product silo #4 with baghouse.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the nitrogen oxide (NO<sub>x</sub>), and carbon monoxide (CO) emissions from natural gas combustion in the limestone dryer associated with this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than ten tons per year.
- c. Permit to Install 03-17307 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
- i. use of a baghouse to control emissions from the limestone dryer, the enclosed material handling operations, and product (fines) storage associated with this emissions unit. The baghouse shall achieve a maximum outlet concentration of 5.0 mg PE/dscm and 5.0 mg PM10/dscm and a corresponding visible emission restriction of 0% opacity, as a six-minute average
  - ii. use of a baghouse to control emissions from product (dried limestone) storage silos achieving a maximum outlet concentration of 0.03 gr PE/dscf and 0.03 gr PM10/dscf and a corresponding visible emission restriction of 0% opacity, as a six-minute average
  - iii. no visible fugitive emissions from the building openings associated with the enclosed material handling operations

The potential to emit for the limestone dryer, the enclosed material handling operations, and product (fines) storage associated with this emissions unit and emission unit P001 is 2.06 tons PE/year and 2.06 tons PM10/year and was determined by multiplying the maximum outlet concentrations of 5.0 mg/dscm, a maximum volumetric air flow rate of 25,000 dscfm, and a maximum operating schedule of 8760 hours/year, applying the appropriate conversion factors of 1 gram/1,000 milligrams, 1 pound/454 grams, 60 minutes/hour, 0.0283 m<sup>3</sup>/ft<sup>3</sup>, and 1 ton/2,000 pounds.

The potential to emit for the product (dried limestone) storage silos is 4.51 tons PE/year and 4.51 tons PM10/year and was determined by combining the annual emissions from the four identical bin vents. The annual emissions were calculated by multiplying the maximum baghouse outlet concentrations, the maximum volumetric air flow rates (1,000 acfm per bin vent), and the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds.

- d. All emissions of particulate matter are PM10.



- e. The emission limitations of 5.0 mg PE/dscm and 2.06 tons PE/year and 5.0 mg PM10/dscm and 2.06 tons PM10/year represent the emissions from the baghouse serving the limestone dryer, the enclosed material handling operations, and product (fines) storage associated with this emissions unit (P901) and the emissions from the product (fines) load-out operation associated with emissions unit P001.
- f. The material handling operations associated with this emissions unit (P901) are enclosed in a building that is vented to a baghouse. An estimated 99% of the emissions are captured by the baghouse. The resulting fugitive emissions are negligible, therefore, a fugitive PE/PM10 limitation will not be established in this permit.
- g. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- h. The visible emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- i. The requirements of this rule are equivalent to or less stringent than the emission limitations and monitoring and record keeping requirements established pursuant to OAC rule 3745-31-05 (A)(3).
- j. The "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (B) are satisfied by the design of the emissions unit.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, that rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however, until the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall have a certified visible emissions observer measure and record three 6-minute averages of the opacity of visible emissions to the atmosphere each day of operation from the limestone dryer 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") and the procedures in 40 CFR Part 60.11. These records shall be retained for at least two years.



- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving the dried product storage bins. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (4) 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.) associated with the enclosed material handling operations. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
  - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
  - (1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
    - a. Emission Limitation(s):  
baghouse serving dryer, enclosed material handling operations, and product (fines) storage  
  
5.0 mg PE/dscm and 2.06 tons PE/year  
  
5.0 mg PM10/dscm and 2.06 tons PM10/year  
  
Applicable Compliance Method:  
  
The mg PE/dscm emission limitation was established in accordance with the baghouse manufacturer's guaranteed maximum outlet concentration. If required, compliance with the particulate emission limitation shall be determined in



accordance with the test methods and procedures specified in 40 CFR Part 60 Appendix A, Methods 1 through 5.

All emissions of particulate matter are PM10 and have been established as equivalent to the PE limitation. If required, compliance with the mg PM10/dscm emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitations were determined by multiplying the maximum outlet concentrations of 5.0 mg/dscm, a maximum volumetric air flow rate of 25,000 dscfm, and a maximum operating schedule of 8760 hours/year, applying the appropriate conversion factors of 1 gram/1,000 milligrams, 1 pound/454 grams, 60 minutes/hour, 0.0283 m<sup>3</sup>/ft<sup>3</sup>, and 1 ton/2,000 pounds. Therefore, provided compliance with the 5.0 mgPE/dscm and the 5.0 mg PM10/dscm limits are demonstrated, compliance with the annual limitations will be assumed.

b. Emission Limitation(s):

baghouses serving product (dried limestone) storage silo bin vents

0.03 gr PE/dscf and 4.51 tons PE/year

0.03 gr PM10/dscf and 4.51 tons PM10/year

Applicable Compliance Method:

The gr PE/dscf emission limitation was established in accordance with the baghouse manufacturer's guaranteed maximum outlet grain loading concentration. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60 Appendix A, Methods 1 through 5.

All emissions of particulate matter are PM10 and have been established as equivalent to the PE limitation. If required, compliance with the mg PM10/dscm emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitations were established by combining the annual emissions from the four identical bin vents. The annual emissions were calculated by multiplying the maximum baghouse outlet concentrations, the maximum volumetric air flow rates (1,000 acfm per bin vent), and the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf and the 0.03 gr PM10/dscf limitations, compliance with the annual limitations will be assumed.



c. Emission Limitation:

0% opacity, as a six-minute average from the limestone dryer

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with requirements in Section d)(2).

d. Emission Limitation:

0% opacity, as a six-minute average from the storage bin vents

Applicable Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

e. Emission Limitation:

no visible fugitive emissions from building enclosure

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

(2) The permittee shall conduct, or have conducted, an initial performance test for the baghouse serving the limestone dryer that is associated with this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable maximum outlet concentrations for PE and PM10 and the opacity restriction.
- c. The following test methods shall be employed to demonstrate compliance with the above emissions: for PE, Methods 1-4 and 5 of 40 CFR Part 60, Appendix A; for PM10, Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M; and for opacity, Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Part 60.11. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The sampling time and volume for each test run shall be as least 2 hours and 1.70 dscm.



- 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).

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.

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.

g) Miscellaneous Requirements

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