



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

7/7/2009

Certified Mail

Bradley Belden  
The Belden Brick Company  
P.O. Box 430  
Sugarcreek, OH 44681-0430

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0679000118  
Permit Number: 06-06301  
Permit Type: Administrative Modification  
County: Tuscarawas

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

Dear Permit Holder:

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

The issuance of this PTI 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, Southeast 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, Manager  
Permit Issuance and Data Management Section, DAPC

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

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  
for  
The Belden Brick Company**

Facility ID: 0679000118  
Permit Number: 06-06301  
Permit Type: Administrative Modification  
Issued: 7/7/2009  
Effective: 7/7/2009





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 The Belden Brick Company

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**Final Permit-to-Install**  
**Permit Number:** 06-06301  
**Facility ID:** 0679000118  
**Effective Date:** 7/7/2009

## Authorization

Facility ID: 0679000118  
Facility Description: The Belden Brick Company Plants 2, 3, 4, 6, 8, and 9.  
Application Number(s): A0007073  
Permit Number: 06-06301  
Permit Description: Administrative modification of PTI No. 06-06301 to establish federally enforceable netting requirements; increases in SO2 emissions from P201 at Plant 2 and P301 at Plant 3 are being offset by the installation of control equipment and reduction in allowable SO2 emissions from P801-P803 at Plant 8 for the purpose of avoiding PSD review.  
Permit Type: Administrative Modification  
Permit Fee: \$2,700.00  
Issue Date: 7/7/2009  
Effective Date: 7/7/2009

This document constitutes issuance to:

The Belden Brick Company  
475 Dover Road  
Sugarcreek, OH 44681-0430

Of a Permit-to-Install 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, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: 06-06301  
 Permit Description: Administrative modification of PTI No. 06-06301 to establish federally enforceable netting requirements; increases in SO2 emissions from P201 at Plant 2 and P301 at Plant 3 are being offset by the installation of control equipment and reduction in allowable SO2 emissions from P801-P803 at Plant 8 for the purpose of avoiding PSD review.

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>F252</b>
Company Equipment ID:	Plt 2 Clay/Shale Crushers
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F253</b>
Company Equipment ID:	Plt 2 material Handling Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F254</b>
Company Equipment ID:	Plt 2 Crushed Material Storage Bins
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F255</b>
Company Equipment ID:	Plt 2 Clay/Shale Grinders
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F256</b>
Company Equipment ID:	Plt 2 Screening Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F257</b>
Company Equipment ID:	Plt 2 Ground Material Storage Bins
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P201</b>
Company Equipment ID:	Plt 2 Gas-Fired Tunnel Kiln #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P301</b>
Company Equipment ID:	Plt 3 Tunnel Kiln #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P801</b>
Company Equipment ID:	Plt 8 Tunnel Kiln #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P802</b>
Company Equipment ID:	Plt 8 Tunnel Kiln #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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**Final Permit-to-Install**  
**Permit Number:** 06-06301  
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**Effective Date:** 7/7/2009

<b>Emissions Unit ID:</b>	<b>P803</b>
Company Equipment ID:	Plt 8 Tunnel Kiln #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
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**Final Permit-to-Install**  
**Permit Number:** 06-06301  
**Facility ID:** 0679000118  
**Effective Date:** 7/7/2009

## **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. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. 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 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.

#### **4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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 ORC section 3704.08.
  - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District



Office. 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.)

## 10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted



for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## **15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. Fees**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.



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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 06-06301  
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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.



State of Ohio Environmental Protection Agency  
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## **C. Emissions Unit Terms and Conditions**



**1. F252, One clay crusher and one shale crusher (Plant 2 Grinding Plant)**

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

One clay crusher and one shale crusher at the Plant 2 Grinding Plant vented to a fabric filter; administrative modification

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).
b.	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The enclosure of the grinding plant is equipped with wall fans which are defined as vents in 40 CFR 60.671. These vents have been disabled in order to avoid the initial performance test requirement in 40 CFR 60.8. Any subsequent activation of vents in the grinding plant enclosure is a violation of this permit to install and would result in the immediate applicability of the particulate emissions limits in 40 CFR 60.672(a) of 0.05 g/dscm and 7 percent opacity and the stack test requirements of 40 CFR 60.8.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from all openings in the grinding plant building. The presence or absence of any visible emissions from any opening in the grinding plant building 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any opening in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Southeast District Office) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
- (2) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).  
  
Applicable Compliance Method:  
Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.  
  
Total grinding plant (F252-F257, combined): (8.5 lbs/ton)(350,000tons/yr)(95% efficiency of dust suppressants and fabric filters)(98% efficiency of total enclosure)(0.0005 ton/lb) = 1.5 tons/yr.
  - b. Emission Limitation:  
No visible fugitive emissions from the building.  
  
Applicable Compliance Method:  
In determining compliance with 40 CFR 60.672(e), and while performing the daily visible fugitive emissions checks, the owner or operator shall use Method 22 to determine fugitive emissions. The initial performance test shall be conducted



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while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

- g) Miscellaneous Requirements
  - (1) None.



**2. F253, Material handling operations (Plant 2 Grinding Plant)**

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

Material handling operations at the Plant 2 Grinding Plant vented to a fabric filter; administrative modification

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).
b.	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The enclosure of the grinding plant is equipped with wall fans which are defined as vents in 40 CFR 60.671. These vents have been disabled in order to avoid the initial performance test requirement in 40 CFR 60.8. Any subsequent activation of vents in the grinding plant enclosure is a violation of this permit to install and would result in the immediate applicability of the particulate emissions limits in 40 CFR 60.672(a) of 0.05 g/dscm and 7 percent% opacity and the stack test requirements of 40 CFR 60.8.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from all openings in the grinding plant building. The presence or absence of any visible emissions from any opening in the grinding plant building 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any opening in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Southeast District Office) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
- (2) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).  
  
Applicable Compliance Method:  
Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.  
  
Total grinding plant (F252-F257, combined): (8.5 lbs/ton)(350,000ton/yr)(95% efficiency of dust suppressants and fabric filters)(98% efficiency of total enclosure)(0.0005 ton/lb) = 1.5 tons/yr.
  - b. Emission Limitation:  
No visible fugitive emissions from the building.  
  
Applicable Compliance Method:  
In determining compliance with 40 CFR 60.672(e), and while performing the daily visible fugitive emissions checks, the owner or operator shall use Method 22 to determine fugitive emissions. The initial performance test shall be conducted



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while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

- g) Miscellaneous Requirements
  - (1) None.



**3. F254, Eight crushed material storage bins (Plant 2 Grinding Plant)**

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

Eight crushed material storage bins at the Plant 2 Grinding Plant vented to a fabric filter; administrative modification

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).
b.	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The enclosure of the grinding plant is equipped with wall fans which are defined as vents in 40 CFR 60.671. These vents have been disabled in order to avoid the initial performance test requirement in 40 CFR 60.8. Any subsequent activation of vents in the grinding plant enclosure is a violation of this permit to install and would result in the immediate applicability of the particulate emissions limits in 40 CFR 60.672(a) of 0.05 g/dscm and 7 percent opacity and the stack test requirements of 40 CFR 60.8.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from all openings in the grinding plant building. The presence or absence of any visible emissions from any opening in the grinding plant building 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any opening in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Southeast District Office) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
- (2) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).  
  
Applicable Compliance Method:  
Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.  
  
Total grinding plant (F252-F257, combined): (8.5 lbs/ton)(350,000ton/yr)(95% efficiency of dust suppressants and fabric filters)(98% efficiency of total enclosure)(0.0005 ton/lb) = 1.5 tons/yr.
  - b. Emission Limitation:  
No visible fugitive emissions from the building.  
  
Applicable Compliance Method:  
In determining compliance with 40 CFR 60.672(e), and while performing the daily visible fugitive emissions checks, the owner or operator shall use Method 22 to determine fugitive emissions. The initial performance test shall be conducted



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while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

- g) Miscellaneous Requirements
  - (1) None.



**4. F255, Two clay grinders and two shale grinders (Plant 2 Grinding Plant)**

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

Two clay grinders and two shale grinders at the Plant 2 Grinding Plant vented to a fabric filter; administrative modification to add one clay grinder and one shale grinder with no increase in allowable emissions

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).
b.	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The enclosure of the grinding plant is equipped with wall fans which are defined as vents in 40 CFR 60.671. These vents have been disabled in order to avoid the initial performance test requirement in 40 CFR 60.8. Any subsequent activation of vents in the grinding plant enclosure is a violation of this permit to install and would result in the immediate applicability of the particulate emissions limits in 40 CFR 60.672(a) of 0.05 g/dscm and 7 percent opacity and the stack test requirements of 40 CFR 60.8.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from all openings in the grinding plant building. The presence or absence of any visible emissions from any opening in the grinding plant building 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any opening in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Southeast District Office) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
- (2) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).  
  
Applicable Compliance Method:  
Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.  
  
Total grinding plant (F252-F257, combined): (8.5 lbs/ton)(350,000ton/yr)(95% efficiency of dust suppressants and fabric filters)(98% efficiency of total enclosure)(0.0005 ton/lb) = 1.5 tons/yr.
  - b. Emissions Limitation:  
No visible fugitive emissions from the building.  
  
Applicable Compliance Method:  
In determining compliance with 40 CFR 60.672(e), and while performing the daily visible fugitive emissions checks, the owner or operator shall use Method 22 to determine fugitive emissions. The initial performance test shall be conducted



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while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

- g) Miscellaneous Requirements
  - (1) None.



**5. F256, Ten screening operations (Plant 2 Grinding Plant)**

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

Ten screening operations at the Plant 2 Grinding Plant vented to a fabric filter; administrative modification to add six new screening operations with no increase in allowable emissions

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).
b.	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The enclosure of the grinding plant is equipped with wall fans which are defined as vents in 40 CFR 60.671. These vents have been disabled in order to avoid the initial performance test requirement in 40 CFR 60.8. Any subsequent activation of vents in the grinding plant enclosure is a violation of this permit to install and would result in the immediate applicability of the particulate emissions limits in 40 CFR 60.672(a) of 0.05 g/dscm and 7 percent opacity and the stack test requirements of 40 CFR 60.8.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from all openings in the grinding plant building. The presence or absence of any visible emissions from any opening in the grinding plant building 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any opening in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Southeast District Office) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
- (2) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).  
  
Applicable Compliance Method:  
Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.  
  
Total grinding plant (F252-F257, combined): (8.5 lbs/ton)(350,000ton/yr)(95% efficiency of dust suppressants and fabric filters)(98% efficiency of total enclosure)(0.0005 ton/lb) = 1.5 tons/yr.
  - b. Emissions Limitation:  
No visible fugitive emissions from the building.  
  
Applicable Compliance Method:  
In determining compliance with 40 CFR 60.672(e), and while performing the daily visible fugitive emissions checks, the owner or operator shall use Method 22 to determine fugitive emissions. The initial performance test shall be conducted



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while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

- g) Miscellaneous Requirements
  - (1) None.



**6. F257, Twelve ground material storage bins (Plant 2 Grinding Plant)**

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

Twelve ground material storage bins at the Plant 2 Grinding Plant vented to a fabric filter; administrative modification

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).
b.	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The enclosure of the grinding plant is equipped with wall fans which are defined as vents in 40 CFR 60.671. These vents have been disabled in order to avoid the initial performance test requirement in 40 CFR 60.8. Any subsequent activation of vents in the grinding plant enclosure is a violation of this permit to install and would result in the immediate applicability of the particulate emissions limits in 40 CFR 60.672(a) of 0.05 g/dscm and 7 percent opacity and the stack test requirements of 40 CFR 60.8.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from all openings in the grinding plant building. The presence or absence of any visible emissions from any opening in the grinding plant building 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any opening in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Southeast District Office) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
- (2) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Particulate emissions shall not exceed 1.5 tons per year from the grinding plant (F252 - F257, combined).  
  
Applicable Compliance Method:  
Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.  
  
Total grinding plant (F252-F257, combined): (8.5 lbs/ton)(350,000ton/yr)(95% efficiency of dust suppressants and fabric filters)(98% efficiency of total enclosure)(0.0005 ton/lb) = 1.5 tons/yr.
  - b. Emission Limitation:  
No visible fugitive emissions from the building.  
  
Applicable Compliance Method:  
In determining compliance with 40 CFR 60.672(e), and while performing the daily visible fugitive emissions checks, the owner or operator shall use Method 22 to determine fugitive emissions. The initial performance test shall be conducted



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while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

- g) Miscellaneous Requirements
  - (1) None.



**7. P201, Plant 2 Natural Gas-Fired Tunnel Kiln #1**

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

Plant 2 Natural Gas-Fired Tunnel Kiln #1 - administrative modification of natural gas-fired tunnel kiln vented to a dry scrubber and fabric filter; terms and conditions in this permit supersede those identified in PTI # 06-5543 issued on 4/23/99.

- 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) d)(6) – (9) and e)(6)
- b) Applicable Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Emissions of particulate matter shall not exceed 1.9 pounds per hour nor 8.2 tons per year.</p> <p>Emissions of sulfur dioxide (SO<sub>2</sub>) shall not exceed 20.2 pounds per hour nor 88.5 tons per year.</p> <p>Emissions of nitrogen oxides shall not exceed 5.4 pounds per hour nor 23.7 tons per year.</p> <p>Emissions of carbon monoxide shall not exceed 17.0 pounds per hour nor 74.5 tons per year.</p> <p>Emissions of hydrogen fluoride (HF) shall not exceed 1.4 pounds per hour nor 6.2 tons per year.</p> <p>Emissions of hydrogen chloride (HCl) shall not exceed 0.9 pound per hour nor 4.0 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any



	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
		stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-08(B)	See b)(2)b.
f.	OAC rule 3745-23-06(B)	See b)(2)c.
g.	40 CFR 63.52(a)(2)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The Belden Brick Company (Belden) operates a brick making facility in Sugarcreek, Ohio consisting of several adjacent brick plants. Belden shall install control equipment on the three tunnel kilns at Plant 8 (P801 - P803) in order to reduce existing source SO2 emissions to net out of PSD review for Plant 2's kiln (P201) and Plant 3's kiln (P301). Belden shall install a continuous emissions monitoring system (CEMS) on the exhaust from the three kilns at Plant 8 to ensure compliance with the combined Plant 8 SO2 emission limitations. Belden shall not violate the combined Plant 8 SO2 emission limitations or the SO2 emissions from P201 and P301 will be subject to PSD review. The table below summarizes the net increase in SO2 emission rates, in tons per year, based on subtraction of the Plant 8 uncontrolled baseline SO2 emissions for years 1998 and 1999 from the new allowable controlled SO2 emission rates for P201, P301, and P801-P803 combined.

POLLUTANT	PLANT 2 EMISSIONS INCREASE	1998/1999 BASELINE PLANT 8 EMISSIONS (UNCONTROLLED)	PLANT 8 NEW ALLOWABLE LIMITATION	PLANT 3 EMISSIONS INCREASE	NET INCREASE
Sulfur Dioxide	88.5	720.8	518.9	153.3	39.9

- b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-06301.

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. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to



Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and 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. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-06301.
- d. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the March 13, 2007 D.C. Circuit Court of Appeals decision to vacate the Brick and Structural Clay Products Manufacturing MACT (40 CFR Part 63, Subpart JJJJJ).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to the Title V permit for this facility that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) During any period of CEMS downtime which exceeds three hours, all scrubber reagent feed rates shall be set to the maximum rates which were recorded for the same product during its most recent run.

d) Monitoring and/or Recordkeeping Requirements

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).



With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(2) For sulfur dioxide and exhaust gas flow:

- a. The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> and exhaust gas flow data from this emissions unit in units of the applicable standards (pounds per hour and tons per year for SO<sub>2</sub>). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6, and be operated in accordance with 40 CFR 60.13 unless otherwise specified in d)(2)b. below.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> and exhaust gas flow monitoring system including, but not limited to, minute-by-minute concentration data for SO<sub>2</sub>; minute-by-minute flow data in ACFM; SO<sub>2</sub> data in pounds per hour; the results of all daily, weekly, and quarterly calibration checks; and the magnitude of any calibration adjustments.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data recorded by the CEMS shall be used to determine compliance with the applicable emission limitations on an ongoing basis.

- b. Within 90 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub> and exhaust gas flow monitoring system designed to meet all requirements as listed in 40 CFR Part 60, Appendix F and ensure continuous valid and representative readings of SO<sub>2</sub> and flow. The plan shall describe in detail, complete, step-by-step procedures and operations for each of the following activities:
- i. calibration of CEMS;
  - ii. CD determination and adjustment of CEMS;
  - iii. preventive maintenance of CEMS (including spare parts inventory);
  - iv. data recording, calculations, and reporting;
  - v. accuracy audit procedures including sampling and analysis methods; and
  - vi. program of corrective action for malfunctioning CEMS.

Each continuous SO<sub>2</sub> and exhaust gas flow monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. The continuous SO<sub>2</sub> and exhaust gas flow monitoring systems



are considered to be certified if they have passed their initial certification test(s), received an initial certification letter from Ohio EPA, Central Office, and continue to comply with all requirements as listed in 40 CFR Part 60, Appendix F, unless otherwise specified in the applicable permit terms and conditions.

The permittee shall be required to complete a CEMS certification relative accuracy test audit (RATA), in accordance with the procedures specified in 40 CFR Part 60, Appendix F, within 12 months after permit issuance. From the date of CEMS certification forward, the permittee may forego annual RATA requirements as listed in 40 CFR Part 60, Appendix F, by completing a quarterly cylinder gas or relative accuracy audit, in accordance with 40 CFR Part 60, Appendix F, for each quarter of the year. Should any CEMS not pass a cylinder gas or relative accuracy audit on the first attempt for two consecutive quarters (even though a recalibration or repair allows the second attempted cylinder gas or relative accuracy audit to pass), the permittee shall complete a RATA within 60 days of the second quarter's failed cylinder gas or relative accuracy audit. The permittee shall also complete a RATA for the CEMS within six months prior to the expiration of this permit. RATA testing may also be required if the CEMS as listed on the CEMS certification letter from Ohio EPA, Central Office, or any CEMS associated equipment, are changed or modified.

Beginning on the effective date of this permit, the permittee shall perform daily zero/span calibration drift checks on each SO<sub>2</sub> and flow CEMS for 60 consecutive operating days in accordance with the requirements specified in 40 CFR Part 60, Appendix F, section 4 and 40 CFR Part 60, Appendix B, Performance Specification 6. If, on the first attempt, the results of each daily zero/span calibration drift check are less than the criteria for excessive calibration drift specified in 40 CFR Part 60, Appendix F, section 4.3 (as determined by the Ohio EPA, Southeast District Office), the permittee shall begin performing zero/span calibration drift checks on a weekly basis. If any CEMS should fail a weekly zero/span calibration drift check for two consecutive weeks (based on the criteria of being two times over the limit as stated in Appendix F, section 4.3), the permittee shall perform daily zero/span calibration drift checks until such time as 60 consecutive daily zero/span calibration drift checks have been successfully completed within the criteria specified in Appendix F, section 4.3.

The quality assurance/quality control plan and a logbook dedicated to the SO<sub>2</sub> and flow CEMS must be kept on site and available for inspection during regular office hours.

- (3) For HF and HCl:
  - a. The permittee shall operate and maintain equipment to continuously monitor and record HF and HCl from this emissions unit in units of the applicable standards (pounds per hour and tons per year for both HF and HCl). The permittee shall maintain records of all data obtained by the HF and HCl CEMS including, but not limited to minute-by-minute concentration data for HF and HCl; HF and HCl data in pounds per hour.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning



hardware, analyzers, and data recording/processing hardware and software. The permittee shall maintain a written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of HF and HCl. The plan shall follow all manufacturer's recommendations regarding maintaining the CEMS, and assuring accurate data measurements. The quality assurance/quality control plan and a logbook dedicated to the HF and HCl CEMS must be kept on site and available for inspection during regular office hours.

Whenever the monitored value for HF or HCl exceeds the applicable emission limitations established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- i. the date and time the deviation began;
- ii. the magnitude of the deviation at that time;
- iii. the date the investigation was conducted;
- iv. the name(s) of the personnel who conducted the investigation; and
- v. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to ensure the operation of the control equipment to achieve the applicable emission limitations specified in this permit, 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:

- vi. a description of the corrective action;
- vii. the date the corrective action was completed;
- viii. the date and time the deviation ended;
- ix. the total period of time (in minutes) during which there was a deviation;
- x. the HF and/or HCl readings immediately after the corrective action; and
- xi. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) 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, if a strip-chart



recorder is employed for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

- (5) The permittee shall maintain daily records of all scrubber reagent feed rates (maximum actual rates or set points) and the associated product in the kiln at the time.
- (6) The permit to install modification application for this emissions unit, P201, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The Ohio Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
  - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
  - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: hydrogen fluoride

TLV (mg/m<sup>3</sup>): 2,600

Maximum Hourly Emission Rate (lbs/hr): 1.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 20.89

MAGLC (ug/m<sup>3</sup>): 61.90

The permittee, has demonstrated that emissions of hydrogen fluoride from emissions unit P201 is calculated to be less than 80 percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration calculation, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit to install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute<sup>2</sup>, ORC 3704.03(F):
    - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
    - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute<sup>2</sup>, ORC 3704.03(F);
    - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute<sup>2</sup>, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
    - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute<sup>2</sup>, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
  - (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous six-month period.
  - (2) The permittee shall submit deviation (excursion) reports that identify all periods of CEMS downtime which exceeds three hours in duration during which the scrubber reagent feed rates were less than the maximum actual feed rate or set point which was previously associated with the product being run.
  - (3) Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limits specified in this permit.



The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub> and exhaust gas flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarter.

Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

- (4) The permittee shall submit the results of the daily zero/span calibration drift checks required in d)(2)b to the Ohio EPA, Southeast District Office within 14 days after the drift checks are completed.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the HF and HCl emissions exceed the applicable emission limitations;
  - b. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
  - c. each incident of deviation described in Aa@ where prompt corrective action, that would bring the emissions unit into compliance with the applicable emission limitations, was determined to be necessary and was not taken; and
  - d. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (6) The permittee shall submit annual reports to the Ohio EPA, Southeast District Office, documenting any changes made to a parameter or value used in the dispersion model,



that was used to demonstrate compliance with the <sup>A</sup>Toxic Air Contaminant Statute<sup>@</sup>, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

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

a. Emission Limitations:

Emissions of particulate matter shall not exceed 1.9 pounds per hour nor 8.2 tons per year.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

b. Emission Limitations:

Emissions of SO<sub>2</sub> shall not exceed 20.2 pounds per hour nor 88.5 tons per year.

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitations shall be based upon the records and report data specified in sections d)(2). If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

c. Emission Limitations:

Emissions of HF shall not exceed 1.4 pounds per hour nor 6.2 tons per year. Emissions of HCl shall not exceed 0.9 pound per hour nor 4.0 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for hydrogen fluoride and hydrogen chloride in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4 and 26 or 26A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

- d. Emission Limitations:  
Emissions of nitrogen oxides shall not exceed 5.4 pounds per hour nor 23.7 tons per year.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

- e. Emission Limitations:  
Emissions of carbon monoxide shall not exceed 17.0 pounds per hour nor 74.5 tons per year.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

- f. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.

**Applicable Compliance Method:**

Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g) Miscellaneous Requirements

- (1) None.



**8. P301 - Plant 3 Natural Gas-Fired Tunnel Kiln #1**

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

Plant 3 Natural Gas-Fired Tunnel Kiln #1 - Chapter 31 modification of a natural gas-fired tunnel kiln vented to a dry scrubber and fabric filter; terms and conditions in this permit supersede those identified in PTI # 06-695 issued on 4/29/81.

- 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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions shall not exceed 4.2 pounds per hour nor 18.4 tons per year.</p> <p>Emissions of sulfur dioxide (SO<sub>2</sub>) shall not exceed 35.0 pounds per hour nor 153.3 tons per year.</p> <p>Emissions of nitrogen oxides shall not exceed 6.0 pounds per hour nor 26.3 tons per year.</p> <p>Emissions of carbon monoxide shall not exceed 22.1 pounds per hour nor 99.0 tons per year.</p> <p>Emissions of hydrogen fluoride (HF) shall not exceed 1.9 pounds per hour nor 8.3 tons per year.</p> <p>Emissions of hydrogen chloride (HCl) shall not exceed 1.2 pounds per hour nor 5.4 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B).</p>



	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-08(B)	See b)(2)b.
f.	OAC rule 3745-23-06(B)	See b)(2)c.
g.	40 CFR 63.52(a)(2)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The Belden Brick Company (Belden) operates a brick making facility in Sugarcreek, Ohio consisting of several adjacent brick plants. Belden shall install control equipment on the three tunnel kilns at Plant 8 (P801 - P803) in order to reduce existing source SO<sub>2</sub> emissions to net out of PSD review for Plant 2's kiln (P201) and Plant 3's kiln (P301). Belden shall install a continuous emissions monitoring system (CEMS) on the exhaust from the three kilns at Plant 8 to ensure compliance with the combined Plant 8 SO<sub>2</sub> emission limitations. Belden shall not violate the combined Plant 8 SO<sub>2</sub> emission limitations or the SO<sub>2</sub> emissions from P201 and P301 will be subject to PSD review. The table below summarizes the net increase in SO<sub>2</sub> emission rates, in tons per year, based on subtraction of the Plant 8 uncontrolled baseline SO<sub>2</sub> emissions for years 1998 and 1999 from the new allowable controlled SO<sub>2</sub> emission rates for P201, P301, and P801-P803 combined.

POLLUTANT	PLANT 2 EMISSIONS INCREASE	1998/1999 BASELINE PLANT 8 EMISSIONS (UNCONTROLLED)	PLANT 8 NEW ALLOWABLE LIMITATION	PLANT 3 EMISSIONS INCREASE	NET INCREASE
Sulfur Dioxide	88.5	720.8	518.9	153.3	39.9

- b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-06301.



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. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and 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. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-06301.
- d. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the March 13, 2007 D.C. Circuit Court of Appeals decision to vacate the Brick and Structural Clay Products Manufacturing MACT (40 CFR Part 63, Subpart JJJJJ).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to the Title V permit for this facility that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) During any period of CEMS downtime which exceeds three hours, all scrubber reagent feed rates shall be set to the maximum rates which were recorded for the same product during its most recent run.

d) Monitoring and/or Recordkeeping Requirements

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission



incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(2) For SO<sub>2</sub> and exhaust gas flow:

- a. The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> and exhaust gas flow data from this emissions unit in units of the applicable standards (pounds per hour and tons per year for SO<sub>2</sub>). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6, and be operated in accordance with 40 CFR 60.13 unless otherwise specified in d)(2)b below.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> and exhaust gas flow monitoring system including, but not limited to, minute-by-minute concentration data for SO<sub>2</sub>; minute-by-minute flow data in ACFM; SO<sub>2</sub> data in pounds per hour; the results of all daily, weekly, and quarterly calibration checks; and the magnitude of any calibration adjustments.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data recorded by the CEMS shall be used to determine compliance with the applicable emission limitations on an ongoing basis.

- b. Within 90 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub> and exhaust gas flow monitoring system designed to meet all requirements as listed in 40 CFR Part 60, Appendix F and ensure continuous valid and representative readings of SO<sub>2</sub> and flow. The plan shall describe in detail, complete, step-by-step procedures and operations for each of the following activities:
- i. calibration of CEMS;
  - ii. CD determination and adjustment of CEMS;
  - iii. preventive maintenance of CEMS (including spare parts inventory);
  - iv. data recording, calculations, and reporting;
  - v. accuracy audit procedures including sampling and analysis methods; and
  - vi. program of corrective action for malfunctioning CEMS.



Each continuous SO<sub>2</sub> and exhaust gas flow monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. The continuous SO<sub>2</sub> and exhaust gas flow monitoring systems are considered to be certified if they have passed their initial certification test(s), received an initial certification letter from Ohio EPA, Central Office, and continue to comply with all requirements as listed in 40 CFR Part 60, Appendix F, unless otherwise specified in the applicable permit terms and conditions.

The permittee shall be required to complete a CEMS certification relative accuracy test audit (RATA), in accordance with the procedures specified in 40 CFR Part 60, Appendix F, within 12 months after permit issuance. From the date of CEMS certification forward, the permittee may forego annual RATA requirements as listed in 40 CFR Part 60, Appendix F, by completing a quarterly cylinder gas or relative accuracy audit, in accordance with 40 CFR Part 60, Appendix F, for each quarter of the year. Should any CEMS not pass a cylinder gas or relative accuracy audit on the first attempt for two consecutive quarters (even though a recalibration or repair allows the second attempted cylinder gas or relative accuracy audit to pass), the permittee shall complete a RATA within 60 days of the second quarter's failed cylinder gas or relative accuracy audit. The permittee shall also complete a RATA for the CEMS within six months prior to the expiration of this permit. RATA testing may also be required if the CEMS as listed on the CEMS certification letter from Ohio EPA, Central Office, or any CEMS associated equipment, are changed or modified.

Beginning on the effective date of this permit, the permittee shall perform daily zero/span calibration drift checks on each SO<sub>2</sub> and flow CEMS for 60 consecutive operating days in accordance with the requirements specified in 40 CFR Part 60, Appendix F, section 4 and 40 CFR Part 60, Appendix B, Performance Specification 6. If, on the first attempt, the results of each daily zero/span calibration drift check are less than the criteria for excessive calibration drift specified in 40 CFR Part 60, Appendix F, section 4.3 (as determined by the Ohio EPA, Southeast District Office), the permittee shall begin performing zero/span calibration drift checks on a weekly basis. If any CEMS should fail a weekly zero/span calibration drift check for two consecutive weeks (based on the criteria of being two times over the limit as stated in Appendix F, section 4.3), the permittee shall perform daily zero/span calibration drift checks until such time as 60 consecutive daily zero/span calibration drift checks have been successfully completed within the criteria specified in Appendix F, section 4.3.

The quality assurance/quality control plan and a logbook dedicated to the SO<sub>2</sub> and flow CEMS must be kept on site and available for inspection during regular office hours.

- (3) For HF and HCl:
  - a. The permittee shall operate and maintain equipment to continuously monitor and record HF and HCl from this emissions unit in units of the applicable standards (pounds per hour and tons per year for both HF and HCl). The permittee shall maintain records of all data obtained by the HF and HCl CEMS including, but not



limited to minute-by-minute concentration data for HF and HCl; HF and HCl data in pounds per hour.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. The permittee shall maintain a written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of HF and HCl. The plan shall follow all manufacturer's recommendations regarding maintaining the CEMS, and assuring accurate data measurements. The quality assurance/quality control plan and a logbook dedicated to the HF and HCl CEMS must be kept on site and available for inspection during regular office hours.

Whenever the monitored value for HF or HCl exceeds the applicable emission limitations established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- i. the date and time the deviation began;
- ii. the magnitude of the deviation at that time;
- iii. the date the investigation was conducted;
- iv. the name(s) of the personnel who conducted the investigation; and
- v. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to ensure the operation of the control equipment to achieve the applicable emission limitations specified in this permit, 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:

- vi. a description of the corrective action;
- vii. the date the corrective action was completed;
- viii. the date and time the deviation ended;
- ix. the total period of time (in minutes) during which there was a deviation;
- x. the HF and/or HCl readings immediately after the corrective action; and
- xi. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



- (4) 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, if a strip-chart recorder is employed for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.
- (5) The permittee shall maintain daily records of all scrubber reagent feed rates (maximum actual rates or set points) and the associated product in the kiln at the time.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous six-month period.
- (2) The permittee shall submit deviation (excursion) reports that identify all periods of CEMS downtime which exceeds three hours in duration during which the scrubber reagent feed rates were less than the maximum actual feed rate or set point which was previously associated with the product being run.
- (3) Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limits specified in this permit.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub> and exhaust gas flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarter.



Pursuant to OAC rule 3745-15-04 and ORC 3704.03(l) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

- (4) The permittee shall submit the results of the daily zero/span calibration drift checks required in d)(2)b to the Ohio EPA, Southeast District Office within 14 days after the drift checks are completed.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the HF and HCl emissions exceed the applicable emission limitations;
  - b. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
  - c. each incident of deviation described in Aa@ where prompt corrective action, that would bring the emissions unit into compliance with the applicable emission limitations, was determined to be necessary and was not taken; and
  - d. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
Particulate emissions shall not exceed 4.2 pounds per hour nor 18.4 tons per year.  
  
Applicable Compliance Method:  
If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.  
  
The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.
  - b. Emission Limitations:  
Emissions of SO<sub>2</sub> shall not exceed 35.0 pounds per hour nor 153.3 tons per year.



**Applicable Compliance Method:**

Compliance with the SO<sub>2</sub> emission limitations shall be based upon the records and report data specified in d)(2). If required, the permittee shall demonstrate compliance with the allowable mass emission rate for sulfur dioxide in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

**c. Emission Limitations:**

Emissions of HF shall not exceed 1.9 pounds per hour nor 8.3 tons per year. Emissions of HCl shall not exceed 1.2 pounds per hour nor 5.4 tons per year.

**Applicable Compliance Method:**

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for hydrogen fluoride and hydrogen chloride in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4 and 26 or 26A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

**d. Emission Limitations:**

Emissions of nitrogen oxides shall not exceed 6.0 pounds per hour nor 26.3 tons per year.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

**e. Emission Limitations:**

Emissions of carbon monoxide shall not exceed 22.1 pounds per hour nor 99.0 tons per year.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.



The allowable ton per year limit was determined by multiplying the allowable emission rate, in pounds per hour, by 8760 hours per year, then dividing by 2000 pounds per ton. Therefore, compliance with the pound per hour limit will result in compliance with the ton per year limit.

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

g) Miscellaneous Requirements

(1) None.



**9. P801, Plant 8 Natural Gas-Fired Tunnel Kiln #1**

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

Plant 8 Natural Gas-Fired Tunnel Kiln #1, administrative modification of a natural gas-fired tunnel kiln controlled with a lime slurry spray tower and an electrostatic precipitator to establish federally enforceable netting requirements to offset increased emissions from P201 and P301.

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic minor to establish federally enforceable netting requirements to offset increased emissions from P201 and P301	Emissions of sulfur dioxide (SO <sub>2</sub> ) from emissions units P801, P802 and P803, combined, shall exceed neither 200 lbs/hr nor 518.9 tons per rolling, 12-month period.
b.	OAC rule 3745-18-06(E)(2)	Emissions of SO <sub>2</sub> shall not exceed 118.5 lbs/hr.
c.	OAC rule 3745-17-11(A)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour as determined by an emissions test conducted in May, 2001. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

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

c) Operational Restrictions

(1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the SO<sub>2</sub>



emissions, upon issuance of this permit. The emissions of SO<sub>2</sub> from emissions units P801, P802, and P803, combined shall not exceed 518.9 tons per year, based upon a rolling, 12-month summation of the SO<sub>2</sub> emissions.

(2) The permittee shall burn only natural gas as a fuel 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) For SO<sub>2</sub> and exhaust gas flow:

a. The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> and exhaust gas flow data from this emissions unit in units of the applicable standard (pounds per hour for SO<sub>2</sub>). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6, and be operated in accordance with 40 CFR 60.13 unless otherwise specified in d)(2)b below.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> and exhaust gas flow monitoring system including, but not limited to, minute-by-minute concentration data for SO<sub>2</sub>; minute-by-minute flow data in ACFM; SO<sub>2</sub> data in pounds per hour; the results of all daily, weekly, and quarterly calibration checks; and the magnitude of any calibration adjustments.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data recorded by the CEMS shall be used to determine compliance with the applicable emission limitations on an ongoing basis.

b. Within 90 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub> and exhaust gas flow monitoring system designed to meet all requirements as listed in 40 CFR Part 60, Appendix F and ensure continuous valid and representative readings of SO<sub>2</sub> and flow. The plan shall describe in detail, complete, step-by-step procedures and operations for each of the following activities:

- i. calibration of CEMS;
- ii. CD determination and adjustment of CEMS;
- iii. preventive maintenance of CEMS (including spare parts inventory);
- iv. data recording, calculations, and reporting;
- v. accuracy audit procedures including sampling and analysis methods; and
- vi. program of corrective action for malfunctioning CEMS.



Each continuous SO<sub>2</sub> and exhaust gas flow monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. The continuous SO<sub>2</sub> and exhaust gas flow monitoring systems are considered to be certified if they have passed their initial certification test(s), received an initial certification letter from Ohio EPA, Central Office, and continue to comply with all requirements as listed in 40 CFR Part 60, Appendix F, unless otherwise specified in the applicable permit terms and conditions.

The permittee shall be required to complete a CEMS certification relative accuracy test audit (RATA), in accordance with the procedures specified in 40 CFR Part 60, Appendix F, within 12 months after permit issuance. From the date of CEMS certification forward, the permittee may forego annual RATA requirements as listed in 40 CFR Part 60, Appendix F, by completing a quarterly cylinder gas or relative accuracy audit, in accordance with 40 CFR Part 60, Appendix F, for each quarter of the year. Should any CEMS not pass a cylinder gas or relative accuracy audit on the first attempt for two consecutive quarters (even though a recalibration or repair allows the second attempted cylinder gas or relative accuracy audit to pass), the permittee shall complete a RATA within 60 days of the second quarter's failed cylinder gas or relative accuracy audit. The permittee shall also complete a RATA for the CEMS within six months prior to the expiration of this permit. RATA testing may also be required if the CEMS as listed on the CEMS certification letter from Ohio EPA, Central Office, or any CEMS associated equipment, are changed or modified.

Beginning on the effective date of this permit, the permittee shall perform daily zero/span calibration drift checks on the SO<sub>2</sub> and flow CEMS for 60 consecutive operating days in accordance with the requirements specified in 40 CFR Part 60, Appendix F, section 4 and 40 CFR Part 60, Appendix B, Performance Specification 6. If, on the first attempt, the results of each daily zero/span calibration drift check are less than the criteria for excessive calibration drift specified in 40 CFR Part 60, Appendix F, section 4.3 (as determined by the Ohio EPA, Southeast District Office), the permittee shall begin performing zero/span calibration drift checks on a weekly basis. If any CEMS should fail a weekly zero/span calibration drift check for two consecutive weeks (based on the criteria of being two times over the limit as stated in Appendix F, section 4.3), the permittee shall perform daily zero/span calibration drift checks until such time as 60 consecutive daily zero/span calibration drift checks have been successfully completed within the criteria specified in Appendix F, section 4.3.

The quality assurance/quality control plan and a logbook dedicated to the SO<sub>2</sub> and flow CEMS must be kept on site and available for inspection during regular office hours.

- (3) 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, if a strip-chart recorder is employed for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.



- (4) For P801-P803, the permittee shall maintain the following monthly records for each emissions unit and the combined total for all three emissions units:
  - a. total SO<sub>2</sub> emissions for the month, including any emissions that occur during the bypassing of the control equipment and/or the continuous emission monitor; and
  - b. total SO<sub>2</sub> emissions for the previous 12 months.

e) Reporting Requirements

- (1) The permittee shall submit the results of the daily zero/span calibration draft checks required in d)(2)b to the Ohio EPA, Southeast District Office within 14 days after the drift checks are completed.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limit specified in this permit.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub> and exhaust gas flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1 and November 1 of each year and shall address the data obtained during the previous calendar quarter.

Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month SO<sub>2</sub> emissions limitation for P801, P802, and P803 was exceeded. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

- a. Emission Limitations:

Emissions of SO<sub>2</sub> from emissions units P801, P802 and P803, combined, shall exceed neither 200 lbs/hr nor 518.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitation shall be based upon the records and report data specified in d)(2). If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

- b. Emission Limitation:

Emissions of SO<sub>2</sub> shall not exceed 118.5 lbs/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

g) Miscellaneous Requirements

- (1) None.



**10. P802, Plant 8 Natural Gas-Fired Tunnel Kiln # 2**

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

Plant 8 Natural Gas-Fired Tunnel Kiln #2; administrative modification of a natural gas-fired tunnel kiln controlled with a lime slurry spray tower and an electrostatic precipitator to establish federally enforceable netting requirements to offset increased emissions from P201 and P301.

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic minor to establish federally enforceable netting requirements to offset increased emissions from P201 and P301	Emissions of sulfur dioxide (SO <sub>2</sub> ) from emissions units P801, P802 and P803, combined, shall exceed neither 200 lbs/hr nor 518.9 tons per rolling, 12-month period.
b.	OAC rule 3745-18-06(E)(2)	Emissions of SO <sub>2</sub> shall not exceed 118.5 lbs/hr.
c.	OAC rule 3745-17-11(A)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour as determined by an emissions test conducted in May, 2001. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

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

c) Operational Restrictions

(1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the



emissions, upon issuance of this permit. The emissions of SO<sub>2</sub> from emissions units P801, P802, and P803, combined shall not exceed 518.9 tons per year, based upon a rolling, 12-month summation of the SO<sub>2</sub> emissions.

- (2) The permittee shall burn only natural gas as fuel 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) For SO<sub>2</sub> and exhaust gas flow:

- a. The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> and exhaust gas flow data from this emissions unit in units of the applicable standard (pounds per hour for SO<sub>2</sub>). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6, and be operated in accordance with 40 CFR 60.13 unless otherwise specified in d)(2)b below.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> and exhaust gas flow monitoring system including, but not limited to, minute-by-minute concentration data for SO<sub>2</sub>; minute-by-minute flow data in ACFM; SO<sub>2</sub> data in pounds per hour; the results of all daily, weekly, and quarterly calibration checks; and the magnitude of any calibration adjustments.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data recorded by the CEMS shall be used to determine compliance with the applicable emission limitations on an ongoing basis.

- b. Within 90 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub> and exhaust gas flow monitoring system designed to meet all requirements as listed in 40 CFR Part 60, Appendix F and ensure continuous valid and representative readings of SO<sub>2</sub> and flow. The plan shall describe in detail, complete, step-by-step procedures and operations for each of the following activities:

- i. calibration of CEMS;
- ii. CD determination and adjustment of CEMS;
- iii. preventive maintenance of CEMS (including spare parts inventory);
- iv. data recording, calculations, and reporting;
- v. accuracy audit procedures including sampling and analysis methods; and
- vi. program of corrective action for malfunctioning CEMS.



Each continuous SO<sub>2</sub> and exhaust gas flow monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. The continuous SO<sub>2</sub> and exhaust gas flow monitoring systems are considered to be certified if they have passed their initial certification test(s), received an initial certification letter from Ohio EPA, Central Office, and continue to comply with all requirements as listed in 40 CFR Part 60, Appendix F, unless otherwise specified in the applicable permit terms and conditions.

The permittee shall be required to complete a CEMS certification relative accuracy test audit (RATA), in accordance with the procedures specified in 40 CFR Part 60, Appendix F, within 12 months after permit issuance. From the date of the CEMS certification forward, the permittee may forego annual RATA requirements as listed in 40 CFR Part 60, Appendix F, by completing a quarterly cylinder gas or relative accuracy audit, in accordance with 40 CFR Part 60, Appendix F, for each quarter of the year. Should any CEMS not pass a cylinder gas or relative accuracy audit on the first attempt for two consecutive quarters (even though a recalibration or repair allows the second attempted cylinder gas or relative accuracy audit to pass), the permittee shall complete a RATA within 60 days of the second quarter's failed cylinder gas or relative accuracy audit. The permittee shall also complete a RATA for the CEMS within six months prior to the expiration of this permit. RATA testing may also be required if the CEMS as listed on the CEMS certification letter from Ohio EPA, Central Office, or any CEMS associated equipment, are changed or modified.

Beginning on the effective date of this permit, the permittee shall perform daily zero/span calibration drift checks on the SO<sub>2</sub> and flow CEMS for 60 consecutive operating days in accordance with the requirements specified in 40 CFR Part 60, Appendix F, section 4 and 40 CFR Part 60, Appendix B, Performance Specification 6. If, on the first attempt, the results of each daily zero/span calibration drift check are less than the criteria for excessive calibration drift specified in 40 CFR Part 60, Appendix F, section 4.3 (as determined by the Ohio EPA, Southeast District Office), the permittee shall begin performing zero/span calibration drift checks on a weekly basis. If any CEMS should fail a weekly zero/span calibration drift check for two consecutive weeks (based on the criteria of being two times over the limit as stated in Appendix F, section 4.3), the permittee shall perform daily zero/span calibration drift checks until such time as 60 consecutive daily zero/span calibration drift checks have been successfully completed within the criteria specified in Appendix F, section 4.3.

The quality assurance/quality control plan and a logbook dedicated to the SO<sub>2</sub> and flow CEMS must be kept on site and available for inspection during regular office hours.

- (3) 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, if a strip-chart recorder is employed for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.



- (4) For P801-P803, the permittee shall maintain the following monthly records for each emissions unit and the combined total for all three emissions units:
  - a. total SO<sub>2</sub> emissions for the month, including any emissions that occur during the bypassing of the control equipment and/or the continuous emission monitor; and
  - b. total SO<sub>2</sub> emissions for the previous 12 months.

e) Reporting Requirements

- (1) The permittee shall submit the results of the daily zero/span calibration draft checks required in d)(2)b. to the Ohio EPA, Southeast District Office within 14 days after the drift checks are completed.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limit specified in this permit.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub> and exhaust gas flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarter.

Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month SO<sub>2</sub> emissions limitation for P801, P802, and P803 was exceeded. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

- a. Emission Limitations:

Emissions of SO<sub>2</sub> from emissions units P801, P802 and P803, combined, shall exceed neither 200 lbs/hr nor 518.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitation shall be based upon the records and report data specified in d)(2). If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

- b. Emission Limitation:

Emissions of SO<sub>2</sub> shall not exceed 118.5 lbs/hr of SO<sub>2</sub>.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

g) Miscellaneous Requirements

- (1) None.



**11. P803, Plant 8 Natural Gas-Fired Tunnel Kiln # 3**

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

Plant 8 Natural Gas-Fired Tunnel Kiln #3; administrative modification of a natural gas-fired tunnel kiln controlled with a lime slurry spray tower and an electrostatic precipitator to establish federally enforceable netting requirements to offset increased emissions from P201 and P301.

- 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(D) Synthetic minor to establish federally enforceable netting requirements to offset increased emissions from P201 and P301	Emissions of sulfur dioxide (SO <sub>2</sub> ) from emissions units P801, P802 and P803, combined, shall exceed neither 200 lbs/hr nor 518.9 tons per rolling, 12-month period.
b.	OAC rule 3745-18-06(E)(2)	Emissions of SO <sub>2</sub> shall not exceed 118.5 lbs/hr.
c.	OAC rule 3745-17-11(A)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)b.

- (2) Additional Terms and Conditions
  - a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour as determined by an emissions test conducted in May, 2001. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).
  - b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c) Operational Restrictions
  - (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the



emissions, upon issuance of this permit. The emissions of SO2 from emissions units P801, P802, and P803, combined shall not exceed 518.9 tons per year, based upon a rolling, 12-month summation of the SO2 emissions.

- (2) The permittee shall burn only natural gas as fuel 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) For SO2 and exhaust gas flow:

- a. The permittee shall operate and maintain equipment to continuously monitor and record SO2 and exhaust gas flow data from this emissions unit in units of the applicable standard (pounds per hour for SO2). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6, and be operated in accordance with 40 CFR Part 60.13 unless otherwise specified in d)(2)b below.

The permittee shall maintain records of all data obtained by the continuous SO2 and exhaust gas flow monitoring system including, but not limited to, minute-by-minute concentration data for SO2; minute-by-minute flow data in ACFM; SO2 data in pounds per hour; the results of all daily, weekly, and quarterly calibration checks; and the magnitude of any calibration adjustments.

Each CEMS consists of all the equipment used to acquire and record data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data recorded by the CEMS shall be used to determine compliance with the applicable emission limitations on an ongoing basis.

- b. Within 90 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO2 and exhaust gas flow monitoring system designed to meet all requirements as listed in 40 CFR Part 60, Appendix F and ensure continuous valid and representative readings of SO2 and flow. The plan shall describe in detail, complete, step-by-step procedures and operations for each of the following activities:

- i. calibration of CEMS;
- ii. CD determination and adjustment of CEMS;
- iii. preventive maintenance of CEMS (including spare parts inventory);
- iv. data recording, calculations, and reporting;
- v. accuracy audit procedures including sampling and analysis methods; and
- vi. program of corrective action for malfunctioning CEMS.



Each continuous SO<sub>2</sub> and exhaust gas flow monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. The continuous SO<sub>2</sub> and exhaust gas flow monitoring systems are considered to be certified if they have passed their initial certification test(s), received an initial certification letter from Ohio EPA, Central Office, and continue to comply with all requirements as listed in 40 CFR Part 60, Appendix F, unless otherwise specified in the applicable permit terms and conditions.

The permittee shall be required to complete a CEMS certification relative accuracy test audit (RATA), in accordance with the procedures specified in 40 CFR Part 60, Appendix F, within 12 months after permit issuance. From the date of CEMS certification forward, the permittee may forego annual RATA requirements as listed in 40 CFR Part 60, Appendix F, by completing a quarterly cylinder gas or relative accuracy audit, in accordance with 40 CFR Part 60, Appendix F, for each quarter of the year. Should any CEMS not pass a cylinder gas or relative accuracy audit on the first attempt for two consecutive quarters (even though a recalibration or repair allows the second attempted cylinder gas or relative accuracy audit to pass), the permittee shall complete a RATA within 60 days of the second quarter's failed cylinder gas or relative accuracy audit. The permittee shall also complete a RATA for the CEMS within six months prior to the expiration of this permit. RATA testing may also be required if the CEMS as listed on the CEMS certification letter from Ohio EPA, Central Office, or any CEMS associated equipment, are changed or modified.

Beginning on the effective date of this permit, the permittee shall perform daily zero/span calibration drift checks on the SO<sub>2</sub> and flow CEMS for 60 consecutive operating days in accordance with the requirements specified in 40 CFR Part 60, Appendix F, section 4 and 40 CFR Part 60, Appendix B, Performance Specification 6. If, on the first attempt, the results of each daily zero/span calibration drift check are less than the criteria for excessive calibration drift specified in 40 CFR Part 60, Appendix F, section 4.3 (as determined by the Ohio EPA, Southeast District Office), the permittee shall begin performing zero/span calibration drift checks on a weekly basis. If any CEMS should fail a weekly zero/span calibration drift check for two consecutive weeks (based on the criteria of being two times over the limit as stated in Appendix F, section 4.3), the permittee shall perform daily zero/span calibration drift checks until such time as 60 consecutive daily zero/span calibration drift checks have been successfully completed within the criteria specified in Appendix F, section 4.3.

The quality assurance/quality control plan and a logbook dedicated to the SO<sub>2</sub> and flow CEMS must be kept on site and available for inspection during regular office hours.

- (3) 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, if a strip-chart recorder is employed for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.



- (4) For P801-P803, the permittee shall maintain the following monthly records for each emissions unit and the combined total for all three emissions units:
  - a. total SO<sub>2</sub> emissions for the month, including any emissions that occur during the bypassing of the control equipment and/or the continuous emission monitor; and
  - b. total SO<sub>2</sub> emissions for the previous 12 months.

e) Reporting Requirements

- (1) The permittee shall submit the results of the daily zero/span calibration draft checks required in d)(2)b to the Ohio EPA, Southeast District Office within 14 days after the drift checks are completed.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limit specified in this permit.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub> and exhaust gas flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarter.

Pursuant to OAC rule 3745-15-04 and ORC 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month SO<sub>2</sub> emissions limitation for P801, P802, and P803 was exceeded. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

- a. Emission Limitations:

Emissions of SO<sub>2</sub> from emissions units P801, P802 and P803, combined, shall exceed neither 200 lbs/hr nor 518.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitation shall be based upon the records and report data specified in d)(2). If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

- b. Emission Limitation:

Emissions of sulfur dioxide shall not exceed 118.5 lbs/hr of SO<sub>2</sub>.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub> in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

g) Miscellaneous Requirements

- (1) None.