Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

7/20/2010

Certified Mail

Facility ID: 0362000079
Permit Number: P0087399
County: Ottawa

Brian Mensinger
Graymont Dolime (OH), Inc.
965 East College Ave.
Pleasant Gap, PA 16823

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

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

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

# Response to Comments

Response to comments for: Title V Permit

| | |
|---|---|
| Facility ID: | 0362000079 |
| Facility Name: | Graymont Dolime (OH), Inc. |
| Facility Description: | Lime Manufacturing Plant |
| Facility Address: | 21880 West State Route 163<br>P.O. Box 158<br>Genoa, OH 43430-0158<br>Ottawa County |
| Permit #: | P0087399, Renewal |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the News Herald on 03/24/2010. The comment period ended on 04/23/2010. | |
| Hearing date (if held) | |
| Hearing Public Notice Date (if different from draft public notice) | |

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
    a. Comment: **None**
    b. Response: **None**
2. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Title V Permit
for
Graymont Dolime (OH), Inc.

| | |
|---|---|
| Facility ID: | 0362000079 |
| Permit Number: | P0087399 |
| Permit Type: | Renewal |
| Issued: | 7/20/2010 |
| Effective: | 8/10/2010 |
| Expiration: | 8/10/2015 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Graymont Dolime (OH), Inc.

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# Authorization

Facility ID: 0362000079
Facility Description: Lime Manufacturing Plant
Application Number(s): A0018370, A0036855, A0038457
Permit Number: P0087399
Permit Description: Renewal of Title V operating permit.
Permit Type: Renewal
Issue Date: 7/20/2010
Effective Date: 8/10/2010
Expiration Date: 8/10/2015
Superseded Permit Number: P0087398

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

Graymont Dolime (OH), Inc.
21880 West State Route 163
P.O. Box 158
Genoa, OH 43430-0158

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.
If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.
See A.29 below if no deviations occurred during the quarter.
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.
In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.
These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.
If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
*(Authority for term: OAC rule 3745-77-07(A)(5))*

## 6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
*(Authority for term: OAC rule 3745-77-07(A)(6))*

## 7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with,

or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by

law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.
After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.
No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

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

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) 4.

2. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P010, P014, and P015 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [Authority for term: 40 CFR Part 64]

3. The following insignificant emissions unit are located at this facility:

   a) P019 – #4 tube mill, classifier and conveying (permit to install 03-13117);
   b) P901 – hydrate silo, bucket, elevator and loadout (permit to install 03-13117).

   Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17-11, 3745-18, and/or 3745-21.

4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)), or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

   a) B001 – plant space heaters (each less than 0.3 mmBtu);
   b) F002 – kiln rock supply system (three silos and conveying systems);
   c) F004 – aggregate stockpiles;
   d) F005 – material handling equipment;
   e) F006 – limestone extraction;
   f) F009 – primary and secondary crushing and screening
   g) F011 – coal milling (three mills which grind coal/coke for the rotary kilns);
   h) F012 – coal/coke feed ;
   i) F013 – fines bin loading spout;
   j) L001 – main shop parts washer;
   k) P018 – cement/lime blending and bagging system;
   l) P024 – #1 tube mill;
   m) P025 – #2 tube mill;
   n) P026 – #3 tube mill;
   o) P904 – kiln dust collection system;
   p) P905 – lime bulk loader;
   q) P906 – bulk hydrate loading system;
   r) T001 – store room diesel tank (275 gallons);
   s) T002 – quarry diesel tank (750 gallons); and
   t) T003 – store room gasoline tank (300 gallons).

# C. Emissions Unit Terms and Conditions

## 1. P001, Quicklime Fines Screening System

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

This emission unit includes the glasshouse bin, the screen, the north cooler discharge conveyor and the Pebble elevator with associated dust collector.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B) | PE shall not exceed 6.01 pounds per hour (lbs/hr). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;
b. 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.

The permittee may reduce the frequency of visual observations from daily to weekly, if, for a full quarter, no abnormal emissions were observed from this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

e) Reporting Requirements

(1) The permittee shall identify the following information in the quarterly deviation reports in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

PE shall not exceed 6.01 lbs/hr.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. <u>Emission Limitation:</u>

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**2. P004, No. 1,2,3 Packers**

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

This emission unit includes all four spout packers (Packers #1, #2, and #3), packer supply bin, their spill systems and associated dust collection systems. Also includes the #4 bin hand packer.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B) | PE shall not exceed 20.16 pounds per hour (lbs/hr). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) 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.

The permittee may reduce the frequency of visual observations from daily to weekly, if, for a full quarter, no abnormal emissions were observed from this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

e) Reporting Requirements

(1) The permittee shall identify the following information in the quarterly deviation reports in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

PE shall not exceed 20.16 lbs/hr.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

(2) [Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**3. P005, Hydrate Lime Supply Silos**

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

This emission unit includes the three air separators and conveying systems to the Type N and Type S hydrate storage silos with their associated dust collection equipment. Also includes the supply bin to the atmospheric hydrators and the associated dust collector. Also includes the feeders, screw conveyors, and a crusher, which prepares quicklime for the hydrators,that were all formerly included in the RY2005 FER under F014.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B) | PE shall not exceed 9.88 pounds per hour (lbs/hr). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) 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.

The permittee may reduce the frequency of visual observations from daily to weekly, if, for a full quarter, no abnormal emissions were observed from this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

e) Reporting Requirements

(1) The permittee shall identify the following information in the quarterly deviation reports in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

PE shall not exceed 9.88 lbs/hr.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

(2) [Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**4. P006, Atmospheric Hydrators**

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

This emission unit includes the #1 and #2 hydrators and their associated wet scrubbers and the burner dust collector.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B) | PE shall not exceed 10.18 pounds per hour (lbs/hr). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) 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.

The permittee may reduce the frequency of visual observations from daily to weekly, if, for a full quarter, no abnormal emissions were observed from this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

e) Reporting Requirements

(1) The permittee shall identify the following information in the quarterly deviation reports in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

PE shall not exceed 10.18 lbs/hr.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

(2) [Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

## 5. P021, Pressure Hydrate Feed System

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

This emission unit includes the storage silo, screw conveyors, and elevators for the autoclave supply system with dust collector.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B) | PE shall not exceed 7.49 pounds per hour (lbs/hr). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;
b. 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.

The permittee may reduce the frequency of visual observations from daily to weekly, if, for a full quarter, no abnormal emissions were observed from this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

e) Reporting Requirements

(1) The permittee shall identify the following information in the quarterly deviation reports in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

PE shall not exceed 7.49 lbs/hr.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

(2) [Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

## 6. P903, Pebble Loading System

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

This emission unit includes the Pebble bin, a two deck screen, and a loading spout with a dust collector.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B) | PE shall not exceed 3.64 pounds per hour (lbs/hr). |
| c. | OAC rule 3745-17-07(B) | See b)(2)a. |
| d. | OAC rule 3745-17-08(B) | See b)(2)b. |

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in “Appendix A” of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in “Appendix A” of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;
b. 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.

The permittee may reduce the frequency of visual observations from daily to weekly, if, for a full quarter, no abnormal emissions were observed from this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

e) Reporting Requirements

(1) The permittee shall identify the following information in the quarterly deviation reports in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1),OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

PE shall not exceed 3.64 lbs/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

## 7. Emissions Unit Group - Roadways, Parking Areas, and Conveying,: F007, F008

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| F007 | Paved and unpaved plant roadways and parking areas |
| F008 | Post kiln conveying |
| | |

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(B) | See b)(2)a. |
| b. | OAC rule 3745-17-08(B) | See b)(2)b. |

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

## 8. Emissions Unit Group - Autoclave Pressure Hydrators: P007, P016, P020,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P007 | autoclave pressure hydrator #1, its aerator, and common wet scrubber |
| P016 | autoclave pressure hydrator #2, its aerator, and common wet scrubber |
| P020 | autoclave pressure hydrator #3, its aerator, and common wet scrubber |

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | See b)(2)a. |
| b. | OAC rule 3745-17-11(B) | See b)(2)b. |

(2) Additional Terms and Conditions

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

b. The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 pounds per hour (lbs/hr). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Ottawa County. (The scrubber is an integral part of these emissions units. The UMRE is based upon the total of the particulate emissions rates from the scrubbers.)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

## 9. Emissions Unit Group - Rotary Kilns: P010, P014, P015,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P010 | No. 1 Rotary Kiln and its associated wet scrubber system. |
| P014 | No. 2 Rotary Kiln and its associated wet scrubber system. |
| P015 | No. 3 Rotary Kiln and its associated wet scrubber system. |

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | See b)(2)a. |
| b. | OAC rule 3745-17-11(B) | Particulate emissions (PE) shall not exceed 100 pounds per hour (lbs/hr), for emissions units P010, P014 and P015, combined. [See b)(2)b.] |
| c. | OAC rule 3745-18-68(C) | Sulfur dioxide (SO2) emissions shall not exceed 14.9 lbs per ton of product, for emissions unit P010, P014 and P015, combined. [See b)(2)c.] |
| d. | OAC rule 3745-17-07(C) | See b)(2)a. |
| e. | 40 CFR Part 64 | See c)(1) and c)(2), d)(1) – d)(5) and d)(9), e)(1) and e)(4). |

(2) Additional Terms and Conditions

a. Pursuant to the provisions of OAC rule 3745-17-07(C), the permittee is hereby granted the following equivalent visible PE limitation for the stack(s) serving these emissions unit in lieu of the 20% visible PE limitation specified in OAC rules 3745-17-07(A)(1)(a) and (A)(1)(b):

Except as otherwise provided in OAC rules 3745-17-07(A)(2) and (A)(3), the permittee shall not cause or allow the discharge into the ambient air from the stack(s) serving these emissions unit any visible PE greater than 44% opacity, as a six-minute average.

b. In accordance with the provisions of OAC rule 3745-17-11(A)(3), the combined hourly PE from emissions unit P010, P014 and P015 shall not exceed 100 pounds.

c. OAC rule 3745-18-68(C) states that emissions unit P010 is subject to the 14.9 lbs SO2/ton of product limit. At the time that this rule was written, emissions units P010, P014 and P015 were all grouped under emissions unit P010. Therefore, all three of these emissions units (P010, P014 and P015), combined, are subject to the SO2 emission limitation of 14.9 lbs/ton of product.

c) Operational Restrictions

(1) The scrubber water supply pressure for each kiln shall be continuously maintained, when the emissions unit is in operation, at a value no less than which was established during the EVEL test conducted on August 21, 2003 that demonstrated the emissions unit was in compliance (P010: 22 pounds per square inch, P014: 50 pounds per square inch, P015: 28 pounds per square inch), or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3(a)(2)]

(2) The scrubber water flow rate for each kiln shall be continuously maintained, when the emissions unit is in operation, at a value no less than which was established during the EVEL test conducted on August 21, 2003 that demonstrated the emissions unit was in compliance (P010: 850 gallons per minute, P014: 904 gallons per minute, P015: 850 gallons per minute), or as established during the most recent performance test that demonstrated the emission unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3(a)(2)]

(3) The permittee shall burn only petroleum coke, natural gas and/or coal in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) The quality of petroleum coke and/or coal burned in this emissions unit shall meet, on as burned basis, a sulfur content (in lbs/mmBtu) that is no greater than the sulfur content (in lbs/mmBtu) measured during the most recent emission test that demonstrated the emissions unit was in compliance with the limitation of 14.9 lbs SO2/ton of product.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(b)]

(2) After approval of monitoring under this part, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or

the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(e)]

(3) The permittee shall properly operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

a. The water supply pressure, in psig, on a once/shift basis.

b. The water flow rate, in gpm, on a once/shift basis.

c. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3(a), and 40 CFR Part 64.9(b)]

(4) In addition to the parametric monitoring required in Section d)(3) of this permit, the permittee shall conduct visual inspections of the control equipments' spray nozzles. These inspections shall be conducted whenever the emissions unit has been down for at least 24 hours but not to exceed one inspection per quarter. The permittee is required to perform at least one inspection per year. The inspections shall include, at a minimum, the following:

a. look for wear, or clogging of each spray nozzle; and

b. determination of the directional output of the spray nozzle's (i.e. are the nozzle's spraying in a manner that ensures that the spray is covering the entire gas stream).

Records of these inspections shall be kept in accordance with the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(e)]

(5) The permittee shall maintain a supply of replacement nozzles, or any other parts necessary to ensure that the scrubbing system will operate properly. Any worn, or clogged nozzles should be replaced, or fixed during the inspection.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(e)]

(6) The permittee shall collect representative grab samples of the petroleum coke and/or coal that is burned in this emissions unit for each day when the emissions unit is in operation. The aforementioned grab samples shall be combined to create a monthly composite sample that is representative of the fuel burned in this emissions unit. Since a common supply bin feeds petroleum coke and/or coal to all three kilns, it is not necessary to sample each kiln. The daily grab petroleum coke and/or coal samples shall be collected from the blowpipe of each kiln, which is located between the coal mill and the burners.

The petroleum coke and/or coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal; or the sampling procedures similar to those outlined in ASTM method D197, Standard Test Method for Sampling and Fineness Test of Pulverized Coal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) Each monthly composite sample of petroleum coke and/or coal shall be analyzed for the following:

a. sulfur content, in lbs/mmBtu; and

b. heat content, in Btu/lb of petroleum coke and/or coal.

c. The methods for analysis of the petroleum coke and/or coal shall be as follows:

i. for sulfur content: ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke; or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High-Temperature Tube Furnace Combustion Methods; and

ii. for heat content: ASTM method D5865, Standard Test Method for Gross Calorific Value of Coal and Coke ; ASTM method D2015, Standard Test Method for Gross Calorific Value of Coal and Coke by the Adiabatic Bomb Calorimeter; ASTM method D3286; Standard Test Method for Gross Calorific Value of Coal and Coke by the Isoperibol Bomb Calorimeter; or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters.

Any alternative analytical methods for those mentioned above, may be used upon written approval from the Director (the appropriate District Office or local air agency)

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) For each day during which the permittee burns a fuel other than petroleum coke, natural gas and/or coal, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(9) The CAM plan for this emissions unit has been developed for particulates and sulfur dioxide emissions. The CAM performance indicators for the scrubber controlling this emissions unit are water pressure and water flow* which are based upon the results of site-specific particulates and SO2 emission testing, and scrubber parametric data collected during the emission testing. When the water pressure and water flow rates of the scrubber are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in section e)(4) below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. Scrubber operating parameters will be re-verified through periodic emission testing, or if the scrubber or emissions units operating conditions change. In addition to periodic monitoring of their scrubber operating parameters, the permittee also has an inspection and maintenance program for the scrubber. Based on the results of the monitoring and inspection program, repairs to the scrubber shall be made as needed. If the current CAM indicators and/or the scrubber inspection program is considered inadequate, the permittee will develop a Quality Improvement Plan.

*Monitoring of the pH to ensure compliance with the SO2 limit is not necessary since SO2 emissions are chemically bound to the lime dust in the kiln itself. In this respect, the SO2 acts more like a particulate than a gas, and is not influenced by pH.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-77-07(A)(3)(a), OAC rule 3745-77-07(A)(3)(b), 40 CFR Part 64.3(a), 40 CFR Part 64.6(c), 40 CFR Part 64.7(d), and 40 CFR Part 64.8]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director (the appropriate District Office or local air agency), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

a. The water supply pressure.

b. The scrubber water flow rate.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 64.9(a)]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than petroleum coke, natural gas and/or coal was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing a deviation of the operational restriction of 14.9 lbs SO2/tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) If the results of monitoring or record keeping data indicate that the particulates or sulfur dioxide emission limitations may have been exceeded, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The reports shall be submitted in accordance with the Standard Term and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(d) and 40 CFR Part 64.9(a)]

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

Visible PE shall not exceed 44% opacity, as a 6-minute average, except as provided by rule.

<u>Applicable Compliance Method:</u>

The permittee shall demonstrate compliance with the visible PE limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

b. <u>Emission Limitation:</u>

100 lbs PE/hr (for emissions units P010, P014, and P015, combined)

<u>Applicable Compliance Method:</u>

The permittee shall demonstrate compliance with the allowable emission limitation based on the results of emissions testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

SO2 emissions shall not exceed 14.9 lbs/ton of product

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable lbs/ton SO2 emission limitation based on the results of emission testing conducted in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rule 3745-18-04(A) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for emissions units P010, P014 and P015 in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the visible PE limitation and the allowable mass emission rates for PE and SO2.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

i. for visible PE, Method 9 of 40 CFR, Part 60, Appendix A;

ii. for PE, Methods 1 through 5 of 40 CFR, Part 60, Appendix A, and

iii. for SO2, Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while emissions units P010, P014 and P015 are operating at or near their maximum capacities (i.e. operating under conditions that cause the greatest emissions for those pollutants being tested), unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

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

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

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

[Authority for term: OAC rule 3745-17-03(B)(10), OAC rule 3745-18-04(A), and OAC rule 3745-77-07(C)(1)]

(3) During any emission testing for this emissions unit, the permittee shall record the following additional information:

a. the sulfur content of the petroleum coke and/or coal, in lbs/mmBtu;

b. the total quantities of the coke and coal burned, in tons;

c. the water supply pressure, in psig; and

d. the scrubber water flow rate, in gallons/minute.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.