State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

09/29/00

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-22-01-0062
Huron Lime Company
John Ray Suitlas
131 Whitebell Circle
Wellsburg, WV 26070-1248

Dear John Ray Suitlas:

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

The 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
Becky Castle, DAPC PMU

Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 09/29/00

FINAL ISSUANCE

Effective Date: 09/29/00

Expiration Date: 09/29/05

This document constitutes issuance to:

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

of a Title V permit for Facility ID: 03-22-01-0062

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
P901 (No. 1 Kiln)
Scrubber exhaust of a 27.8 TPH rotary kiln and fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

P902 (No. 2 Kiln)
Scrubber exhaust of a 27.8 TPH rotary kiln and fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

P903 (No. 3 Kiln)
Scrubber exhaust of a 27.8 TPH rotary kiln and a fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

Z001 (Product Handling)
BH-1 and fugitive emissions from the load out shed.

Z002 (Storage Piles)
Fugitive emissions from coal, limestone, and agricultural lime storage pile activities.

Z003 (Road/Parking Lot)
Fugitive emissions from plant truck/automobile traffic.

Z004 (Product conveying crushing screening)
BH-2 & BH-3, Baghouse and fugitive emissons from the load out shed.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. If a renewal permit is not issued prior to the

expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

   i. The date, place (as defined in the permit), and time of sampling or measurements.
   ii. The date(s) analyses were performed.
   iii. The company or entity that performed the analyses.
   iv. The analytical techniques or methods used.
   v. The results of such analyses.
   vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. 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. 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.

7. 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.

8. 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.

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. 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 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.

11. 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.

12. 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:

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

   i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
   ii. 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 appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

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

ii. 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.

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

13. 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.

14. 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).

15. 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.

16. 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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and

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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. 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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

3. Records Retention Requirements

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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

6. 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.

7. 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.

8. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility has one or more emissions units that emit more than 0.25 ton/day of criteria pollutants and is subject to the emergency action plan provisions in accordance with OAC rule 3745-25-03. The permittee shall comply with the emergency action plan provisions as detailed in Engineering Guide #64.

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 1 Kiln (P901)

Activity Description: Scrubber exhaust of a 27.8 TPH rotary kiln and fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
rotary lime kiln #1, with scrubber (37 TPH feed, including coal)	OAC rule 3745-17-11(B)	149.1 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
	OAC rule 3745-18-28(F)	4.0 pounds of sulfur dioxide (SO2)/ton of product (from emissions units P901, P902 and P903 combined)
	OAC rule 3745-17-08(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.c of the terms and conditions of this permit)

2. Additional Terms and Conditions

2.a In accordance with the provisions of OAC rule 3745-17-11(A)(3), the combined hourly PE from the scrubber exhaust stacks for Ohio EPA emissions units P901, P902, and P903 shall not exceed 149.1 pounds.

2.b This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.c Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 4 inches of water at all times while this emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value of not less than 1400 gallons per minute (a scrubber pump amperage of 23 or above) at all times while this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while this emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The scrubber water flow will be continuously measured by a pump amgerage gauge.

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

a. the pressure drop across the scrubber, in inches of water, on a once/day basis;

b. the scrubber water flow rate by taking a scrubber pump amperage reading, on a once/shift basis (the scrubber water flow rate is directly proportional to the scrubber pump amperage); and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and this emissions unit.

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

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

IV. Reporting Requirements

1. The permittee shall submit 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 static pressure drop across the scrubber; and

b. the scrubber pump amperage readings.

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

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

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

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

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

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

V. Testing Requirements

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

1.a the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal;

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

1.c the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5 of 40 CFR Part 60, Appendix A; for SO2, Method 6 of 40 CFR Part 60, Appendix A.

1.d the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency; and

1.e not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. 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 district office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

During the emission testing of this emissions unit, the following additional information should be recorded:

i. the scrubber pump amperage; and,

ii. the pressure drops across each scrubber.

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

2.a Emission Limitation:

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

Applicable Compliance Method:

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

2.b Emission Limitation:

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

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2.c Emission Limitation:

4.0 pounds SO2/ton product

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 2 Kiln (P902)

Activity Description: Scrubber exhaust of a 27.8 TPH rotary kiln and fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
rotary lime kiln #2, with scrubber (40.73 TPH feed, including coal)	OAC rule 3745-17-11(B)	149.1 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
	OAC rule 3745-18-28(F)	4.0 pounds of sulfur dioxide (SO2)/ton of product (from emissions units P901, P902 and P903 combined)
	OAC rule 3745-17-08(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.c of the terms and conditions of this permit)

2. Additional Terms and Conditions

2.a In accordance with the provisions of OAC rule 3745-17-11(A)(3), the combined hourly PE from the scrubber exhaust stacks for Ohio EPA emissions units P901, P902, and P903 shall not exceed 149.1 pounds.

2.b This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.c Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 4 inches of water at all times while this emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value of not less than 1400 gallons per minute (a scrubber pump amperage of 23 or above) at all times while this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while this emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The scrubber water flow will be continuously measured by a pump amgerage gauge.

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

a. the pressure drop across the scrubber, in inches of water, on a once/day basis;

b. the scrubber water flow rate by taking a scrubber pump amperage reading, on a once/shift basis (the scrubber water flow rate is directly proportional to the scrubber pump amperage); and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and this emissions unit.

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

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

IV. Reporting Requirements

1. The permittee shall submit 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 static pressure drop across the scrubber; and

b. the scrubber pump amperage readings.

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

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

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

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

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

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

V. Testing Requirements

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

1.a the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal;

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

1.c the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5 of 40 CFR Part 60, Appendix A; for SO2, Method 6 of 40 CFR Part 60, Appendix A.

1.d the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency; and

1.e not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. 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 district office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

During the emission testing of this emissions unit, the following additional information should be recorded:

i. the scrubber pump amperage; and,

ii. the pressure drops across each scrubber.

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

2.a Emission Limitation:

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

Applicable Compliance Method:

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

2.b Emission Limitation:

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

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2.c Emission Limitation:

4.0 pounds SO2/ton product

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Kiln (P903)

Activity Description: Scrubber exhaust of a 27.8 TPH rotary kiln and a fugitive emissions from the unloading of a settling chamber and from roof and wall openings in the control building.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
rotary lime kiln #3, with scrubber (40.73 TPH feed, including coal)	OAC rule 3745-17-11(B)	149.1 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provide by rule.
	OAC rule 3745-18-28(F)	4.0 pounds of sulfur dioxide (SO2)/ton of product (from emissions units P901, P902 and P903 combined)
	OAC rule 3745-17-08(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.c of the terms and conditions of this permit)

2. Additional Terms and Conditions

2.a In accordance with the provisions of OAC rule 3745-17-11(A)(3), the combined hourly PE from the scrubber exhaust stacks for Ohio EPA emissions units P901, P902, and P903 shall not exceed 149.1 pounds.

2.b This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.c Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 4 inches of water at all times while this emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value of not less than 1400 gallons per minute (a scrubber pump amperage of 23 or above) at all times while this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while this emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The scrubber water flow will be continuously measured by a pump amgerage gauge.

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

a. the pressure drop across the scrubber, in inches of water, on a once/day basis;

b. the scrubber water flow rate by taking a scrubber pump amperage reading, on a once/shift basis (the scrubber water flow rate is directly proportional to the scrubber pump amperage); and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and this emissions unit.

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

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

IV. Reporting Requirements

1. The permittee shall submit 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 static pressure drop across the scrubber; and

b. the scrubber pump amperage readings.

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

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

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

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

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

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

V. Testing Requirements

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

1.a the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal;

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

1.c the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5 of 40 CFR Part 60, Appendix A; for SO2, Method 6 of 40 CFR Part 60, Appendix A.

1.d the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency; and

1.e not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. 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 district office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

During the emission testing of this emissions unit, the following additional information should be recorded:

i. the scrubber pump amperage; and,

ii. the pressure drops across each scrubber.

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

2.a Emission Limitation:

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

Applicable Compliance Method:

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

2.b Emission Limitation:

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

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2.c Emission Limitation:

4.0 pounds SO2/ton product

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Product Handling (Z001)

Activity Description: BH-1 and fugitive emissions from the load out shed.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
final product storage bins, screening and truck loadout operations, with 2 baghouses (emissions unit P905)	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-08(A)	none (refer to section A.I.2.c of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.d of the terms and conditions of this permit)

2. Additional Terms and Conditions

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

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

2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.d Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Piles (Z002)

Activity Description: Fugitive emissions from coal, limestone, and agricultural lime storage pile activities.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
load-in or load-out of the storage piles (emissions unit F003) [refer to section A.I.2.a of the terms and conditions of this permit for identification of the storage piles]	OAC rule 3745-17-08(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.c of the terms and conditions of this permit)

2. Additional Terms and Conditions

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

i. coal storage pile;
ii. limestone storage pile;
iii. agricultural lime storage pile #1;
iv. agricultural lime storage pile #2; and
v. agricultural lime storage pile #3.

2.b This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.c Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Road/Parking Lot (Z003)

Activity Description: Fugitive emissions from plant truck/automobile traffic.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas (refer to section A.I.2.a of the terms and conditions of this permit for identification of the paved roadways and parking areas)	OAC rule 3745-17-08(A)	none (refer to section A.I.2.c of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.d of the terms and conditions of this permit)
unpaved roadways and parking areas (refer to section A.I.2.b of the terms and conditions of this permit for identification of the unpaved roadways and parking areas)	OAC rule 3745-17-08(A)	none (refer to section A.I.2.c of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.d of the terms and conditions of this permit)

2. Additional Terms and Conditions

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

i. main entrance; and

ii. employee parking area.

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

i. coal storage pile road;
ii. load shed road;
iii. sludge haul road;
iv. exit road parking lot; and
v parking lot.

2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.d Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Product conveying crushing screening (Z004)

Activity Description: BH-2 & BH-3, Baghouse and fugitive emissons from the load out shed.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
lime crushing, lime screening, lime re-screening and material handling operations, with baghouse (emissions unit P904)	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-08(A)	none (refer to section A.I.2.c of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.I.2.d of the terms and conditions of this permit)

2. Additional Terms and Conditions

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

2.b This operation is exempt from the visible PE 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.

2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Erie County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.d Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
lime crushing, lime screening, lime re-screening and material handling operations, with baghouse (emissions unit P904)	OAC rule 3745-31-05 (PTI No. 03-4890)	1.3 pounds PE/hour, from the baghouse stack (refer to section B.I.2.a of the terms and conditions of this permit)

2. Additional Terms and Conditions

2.a This emissions unit consists of multiple pieces of lime processing/conveying equipment and was previously improperly grouped under multiple emissions units. The 1.3 pounds PE/hour emission limitation was established in a PTI issued on June 13, 1990 and only addressed a portion of the lime processing equipment covered by this emissions unit.

2.b Particulate emissions from product transfer, conveying, and screening operations shall be captured and vented to a baghouse.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

a. the color of the emissions;
b. the cause of the visible emissions;
c. the total duration of any visible emission incident; and
d. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

V. Testing Requirements (continued)

Emission Limitation:

1.3 pounds PE/hour

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by multiplying the maximum process weight rate (200 tons/hour) by the appropriate emission factor from AP-42, Table 11.17-4, revised 1/95 (0.00061 pound PE/ton from screening and 0.000088 lb PE/ton from transfer - both emission factors take control efficiency into account). If required, the test method to be employed to demonstrate compliance with this emission limitation shall be Method 5, which is located in 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

None

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