



Environmental  
Protection Agency

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

12/15/2010

Certified Mail

Jason Trausch  
Church & Dwight Co.  
2501 East County Road 34  
Old Fort, OH 44861

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0374000022  
Permit Number: P0106426  
Permit Type: Initial Installation  
County: Seneca

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Advertiser Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
Ohio EPA-NWDO; Michigan; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Church and Dwight is an Arm and Hammer Baking Soda production facility. The company also manufactures several different product lines from this location. P0106426 serves as an initial permit to install for the limestone receiving and transfer operation that is associated with their cat litter manufacturing line (P039) and was installed in 2001. P039 was permitted under PTI #03-13515, issued 1/23/01 (last modified 3/13/08). This permit will correct the company's current permit deficiency for this line.

3. Facility Emissions and Attainment Status:

Church and Dwight is requesting federally enforceable restrictions and limitations to restrict the potential emissions of particulate matter of less than or equal to ten microns in size (PM<sub>10</sub>) emitted from the proposed operation. It is the facility's intent to maintain facility emissions below PSD thresholds. Seneca County is classified as attainment for all criteria pollutants.

4. Source Emissions:

Church and Dwight is requesting federally enforceable restrictions and limitations associated with the use of a dust collection and control system. This PTI establishes mass emission limitations of 1.23 pound PM<sub>10</sub>/hour and 5.39 tons PM<sub>10</sub>/year based on an operational restriction to employ a dust collection and control system that is capable of achieving 0.02 gr/dscf of PM<sub>10</sub>.

5. Conclusion:

The federally enforceable limitations on the potential to emit from this operation will maintain the facility's current emission levels below PSD applicability.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM <sub>10</sub>	5.39



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
Church & Dwight Co.

Issue Date: 12/15/2010

Permit Number: P0106426

Permit Type: Initial Installation

Permit Description: limestone receiving, storage, and transfer system for the cat litter manufacturing line

Facility ID: 0374000022

Facility Location: Church & Dwight Co.  
2501 East County Road 34,  
Old Fort, OH 44861

Facility Description: Alkalies and Chlorine Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Church & Dwight Co.**

Facility ID: 0374000022  
Permit Number: P0106426  
Permit Type: Initial Installation  
Issued: 12/15/2010  
Effective: To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install
for
Church & Dwight Co.

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. Federally Enforceable Standard Terms and Conditions ..... 4
2. Severability Clause ..... 4
3. General Requirements ..... 4
4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5
5. Scheduled Maintenance/Malfunction Reporting ..... 6
6. Compliance Requirements ..... 6
7. Best Available Technology ..... 7
8. Air Pollution Nuisance ..... 7
9. Reporting Requirements ..... 7
10. Applicability ..... 8
11. Construction of New Sources(s) and Authorization to Install ..... 8
12. Permit-To-Operate Application ..... 9
13. Construction Compliance Certification ..... 9
14. Public Disclosure ..... 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 10
16. Fees ..... 10
17. Permit Transfers ..... 10
18. Risk Management Plans ..... 10
19. Title IV Provisions ..... 10
B. Facility-Wide Terms and Conditions ..... 11
C. Emissions Unit Terms and Conditions ..... 13
1. P902, limestone receiving, storage, and transfer ..... 14



## Authorization

Facility ID: 0374000022  
Facility Description: Sodium bicarbonate manufacturing.  
Application Number(s): A0039578  
Permit Number: P0106426  
Permit Description: Limestone receiving, storage, and transfer system for the cat litter manufacturing line  
Permit Type: Initial Installation  
Permit Fee: \$1,200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 12/15/2010  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Church & Dwight Co.  
2501 East County Road 34  
Old Fort, OH 44861

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

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## **Authorization (continued)**

Permit Number: P0106426

Permit Description: limestone receiving, storage, and transfer system for the cat litter manufacturing line

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID:**

**P902**

Company Equipment ID:

Limestone Receiving, storage, and transfer

Superseded Permit Number:

General Permit Category and Type:

Not Applicable



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



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

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

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

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

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

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

## **10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

## 12. Permit-To-Operate Application

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

## 13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

**Effective Date:** To be entered upon final issuance

- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

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

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

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

**16. Fees**

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

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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

**Effective Date:** To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

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



1. P902, limestone receiving, storage, and transfer

Operations, Property and/or Equipment Description:

limestone receiving, storage, and transfer system for the cat litter manufacturing line (P039)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	2.74 tons fugitive particulate emissions (PE)/year; 1.21 tons fugitive PM10/year  Visible fugitive PE from the material transfer points shall not exceed ten percent (10%) opacity, as a six-minute average.  See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(D)	1.23 pounds particulate matter less than or equal to 10 microns (PM <sub>10</sub> )/hour and 5.39 tons PM <sub>10</sub> /year from the limestone receiving baghouse  Visible fugitive PE from the egress points associated with the building enclosing the limestone receiving operation shall not exceed ten percent (10%) opacity, as a six-minute average.  Visible PE from the baghouse vent shall not exceed ten percent (10%) opacity, as a six-minute average.  See b)(2)d. and b)(2)e.
c.	OAC rule 3745-17-11(B)	See b)(2)f.
d.	OAC rule 3745-17-07(A)	See b)(2)g.
e.	OAC rule 3745-17-08(B)	The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08.
f.	OAC rule 3745-17-07(B)	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

(2) Additional Terms and Conditions

- a. The operations covered by this permit and subject to the above-mentioned requirements are listed below:
  - i. Limestone receiving;
  - ii. (2) Limestone storage silos; and
  - iii. (6) Limestone transfer points.
- b. The “Best Available Technology” (BAT) control requirements for this emissions unit have been determined to be the following:
  - i. Limestone receiving shall be equipped with a building enclosure vented to a baghouse capable of achieving 0.02 grains PM<sub>10</sub>/dscf.
  - ii. The limestone conveyors shall be equipped with 3-sided enclosures.

BAT requirements also include compliance with the terms and conditions of this permit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-31-05(D).
- d. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD). The federally enforceable emission limitations are based on the operational restriction contained in c)(1):
  - i. 1.23 pound PM<sub>10</sub>/hour and 5.39 tons PM<sub>10</sub>/year;
  - ii. Visible fugitive PE from the egress points associated with the building enclosing the limestone receiving operation shall not exceed ten percent (10%) opacity, as a six-minute average.
  - iii. Visible PE from the baghouse vent shall not exceed ten percent (10%) opacity, as a six-minute average.

All emissions of particulate matter from the dust collector stack are PM<sub>10</sub>.

- e. The limestone receiving baghouse vents inside the building enclosure; therefore the visible fugitive emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a) and the corresponding monitoring, recordkeeping, and reporting requirements effectively restrict and monitor the visible emissions from the limestone receiving operation. No additional monitoring, recordkeeping, or reporting requirements were established to verify compliance with the visible emission limitation established for the baghouse.
  - f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
  - g. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).
- c) Operational Restrictions
- (1) The following operational restriction is being established for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)d.]:
    - a. The enclosed limestone receiving operation shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.02 grain particulate matter less than or equal to 10 microns (PM<sub>10</sub>)/dscf
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log and shall be kept separately for:
    - a. the egress points (i.e., building windows, doors, roof monitors, etc.) serving the building enclosure for the limestone receiving operation; and
    - b. the limestone transferring and conveying operation.
- If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.
- If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)f. above or continue the daily check until the incident has ended.

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points serving the building enclosure for the limestone receiving operation and from the limestone transferring and conveying emissions points and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive 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.

f) Testing Requirements

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

a. Emission Limitations:

2.74 tons fugitive PE/year; 1.21 tons fugitive PM<sub>10</sub>/year

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by multiplying the emission factor provided in Section 11.9 of Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (7/1998) for bottom dump truck unloading (0.0066 pound PE/ton) by the maximum annual limestone throughput of 190,000 tons and then dividing by 2,000 pounds/ton. A control efficiency of 70% was applied for the use of a building enclosure vented to a baghouse. PM<sub>10</sub> emissions were estimated using a PE to PM<sub>10</sub> relative ratio of 2.1:1, derived from AP-42 Section 13.2.4 (1/1995). Should further updates in AP-42 occur, the most current emission factors shall be used.

b. Emission Limitation:

0.02 gr PM<sub>10</sub>/dscf

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the dust collector. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

c. Emission Limitation:

1.23 pounds PM<sub>10</sub>/hour

Applicable Compliance Method:

The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.02 gr PM<sub>10</sub>/dscf and the maximum volumetric air flow rate (7,200 cfm) from this emissions unit to the baghouse, and using the following conversion factors in order to covert to pounds per hour: 1 pound/7000 grains and 60 minutes/hour. Therefore, provided compliance is demonstrated with the 0.02 gr PM<sub>10</sub>/dscf limitation, compliance with the hourly limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. Emission Limitation:

5.39 tons PM<sub>10</sub>/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is maintained with the 0.02 gr PM<sub>10</sub>/dscf limitation, compliance with the annual limitation shall also be demonstrated.

e. Emission Limitation

Visible PE associated with the limestone receiving baghouse shall not exceed 10 percent (10%) opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined though visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.



**Effective Date:** To be entered upon final issuance

f. Emission Limitation:

Visible fugitive PE from the egress points associated with the building enclosing the limestone receiving operation and from the material transfer points shall not exceed 10 percent (10%) opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.