



State of Ohio Environmental Protection Agency

RECEIVED

NOV 02 1998

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

OHIO E.P.A.
N.W.D.O.

MAILING ADDRESS:

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

Re: Permit to Install
Paulding County
Application No: 03-3006
NSPS
NESHAP

CERTIFIED MAIL

T010
T011
T012
T013

October 28, 1998

LAFARGE/SYSTech ENVIRONMENTAL
TIM WEIBLE
P O BOX 160
PAULDING, OH 45879-0226

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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

Very truly yours,

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

cc: US EPA
NORTHWEST DISTRICT OFFICE, DAPC
TAMMY HILKENS, OHIO EPA, ENGINEERING

George V. Volinovich, Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 03-3006
APS Premise No. 0363000002
Permit Fee: \$2000.00

Name of Facility: LAFARGE/SYSTech ENVIRONMENTAL

Person to Contact: TIM WEIBLE

Address: P O BOX 160
PAULDING, OH 45879-0226

Location of proposed source(s): 11435 CR 76
PAULDING, OHIO

Description of proposed source(s):
4 WASTE DERIVED FUEL STORAGE TANKS - 150,000 GAL EACH.

Date of Issuance: October 28, 1998

Effective Date: October 28, 1998

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(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 source(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

Donald R. Schreyer

Director

2 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**

Application Number: **03-3006**

Date: **October 28, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's

3 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**

Application Number: **03-3006**

Date: **October 28, 1998**

approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

4 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

5 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**

Application Number: **03-3006**

Date: **October 28, 1998**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Lafarge/Systech Environmental** located in **Paulding** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T010	Waste derived fuel storage tank	Compliance with the Terms and Conditions of this permit	3745-31-05 40 CFR 61 Subpart FF (NESHAPs - benzene waste operations)	280 pounds/year OC 99 percent OC destruction efficiency during kiln operation Operational Restrictions (See Additional Special Terms and Conditions)
			40 CFR 60 Subpart Kb (NSPS - storage tanks for VOL)	(See Terms and Conditions - NSPS Requirements)
T011	Waste derived fuel storage tank	Compliance with the Terms and Conditions of this permit	3745-31-05 40 CFR 61 Subpart FF (NESHAPs - benzene waste	280 pounds/year OC 99 percent OC destruction efficiency during kiln

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T011 Cont'd			operations)	operation Operational Restrictions (See Additional Special Terms and Conditions)
			40 CFR 60 Subpart Kb (NSPS - storage tanks for VOL)	(See Terms and Conditions - NSPS Requirements)
T012	Waste derived fuel storage tank	Compliance with the Terms and Conditions of this permit	3745-31-05	280 pounds/year OC
			40 CFR 61 Subpart FF (NESHAPs - benzene waste operations)	99 percent OC destruction efficiency during kiln operation
				Operational Restrictions (See Additional Special Terms and Conditions)
			40 CFR 60 Subpart Kb (NSPS - storage tanks for VOL)	(See Terms and Conditions - NSPS Requirements)
T013	Waste derived fuel storage tank	Compliance with the Terms and Conditions of this permit	3745-31-05	280 pounds/year OC

7 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**
Application Number: **03-3006**
Date: **October 28, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T013 Cont'd			40 CFR 61 Subpart FF (NESHAPs - benzene waste operations)	99 percent OC destruction efficiency during kiln operation Operational Restrictions (See Additional Special Terms and Conditions)
			40 CFR 60 Subpart Kb (NSPS - storage tanks for VOL)	(See Terms and Conditions - NSPS Requirements)

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	0.56

8 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T010, T011, T012 and T013	Storage tanks	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

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

9 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**

Application Number: **03-3006**

Date: **October 28, 1998**

NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source Number</u>	<u>Source Description</u>	<u>NESHAP Regulation (Subpart)</u>
T010, T011, T012 and T013	Storage tanks	FF

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

- a. date of commencement of construction (no later than 30 days after such date);
- b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
- c. actual date of initial start-up (within 15 days after such date); and
- d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

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

10 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

11 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

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

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>Source Number(s)</u>	<u>Tank Size</u>
T010, T011, T012 and T013	150,000 gallons

In addition,

- A. In accordance with 40 CFR 60.116b(a) and (d), the owner and operator of the following storage vessel(s) shall notify the local field office within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. Records shall be retained for a minimum of two years.

<u>Source Number(s)</u>	<u>Tank Size</u>
T010, T011, T012 and T013	150,000 gallons

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

12 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction:

The company is adding four 150,000 gallon waste derived fuel storage tanks (emissions units T010, T011, T012, and T013). This Permit to Install (PTI) allows for the installation of these four new tanks.

This facility is subject to 40 CFR 61 Subpart FF (benzene waste operations). These tanks specifically are subject to 40 CFR 60 Subpart Kb (storage tanks for VOL). Compliance with the organic emissions destruction requirements of Subpart FF for the closed-vent system(s) is being accomplished with the operation of the cement kilns (emissions units P014 and P015) under 40 CFR 266 Subpart H (RCRA hazardous waste requirements). By complying with the requirements of Subpart FF for these tanks, compliance with the applicable requirements of Subpart Kb is also achieved. Facility-wide compliance with Subpart FF and Subpart H also accomplishes compliance with 40 CFR 63 Subpart DD (off-site waste and recovery), as provided in 40 CFR 63.683(c)(1), as it may otherwise have applied to these tanks.

Additional notes: The primary requirement of Subpart FF for the facility is the 99 percent destruction efficiency requirement for benzene in the waste derived fuel. This and other facility requirements from Subpart FF (not applying specifically to the tanks) will be addressed further in the Title V permit process.

A. Applicable Emission Limitations and/or Control Requirements

1. The permittee shall operate, and maintain a control device that reduces organic emissions in the closed-vent system(s) by 99 percent by weight.

B. Operational Restrictions

1. The permittee shall install, operate, and maintain, fixed-roof(s), and closed-vent system(s) that routes all organic vapors vented from emissions units T010, T011, T012, and T013 to a control device.
2. The closed-vent system(s), and the cover and all openings on the fixed roofs (e.g., access hatches, sampling ports, and gauge wells), shall be designed to operate with no

13 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**

Application Number: **03-3006**

Date: **October 28, 1998**

detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).

3. Each opening on the fixed-roofs shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in emissions units T010, T011, T012, and T013 except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.
4. All gauging and sampling devices in the closed-vent system(s) shall be gas-tight except when gauging or sampling is taking place.
5. One or more devices which vent directly to the atmosphere may be used on the closed-vent system(s) provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system(s) resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.
6. The closed-vent system(s) and control device shall be operated at all times when waste is placed in emissions units T010, T011, T012, and T013 except when maintenance or repair of the control device cannot be completed without a shutdown of the control device.

C. Monitoring and Recordkeeping Requirements

1. Each fixed-roof, seal, access door, and all other openings referenced in conditions (B)(3) shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly.
2. Except as provided in condition (C)(6), when a broken seal or gasket or other problem is identified from inspection according to condition (C)(1), or when detectable emissions from locations other than for the closed-vent system(s) are measured according to condition (B)(2), first efforts at repair shall be made as soon as

14 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

practicable but not later than 45 calendar days after identification.

3. The closed-vent system(s) and control device shall be visually inspected initially and quarterly thereafter. The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.
4. Except as provided in condition (C)(6), if visible defects are observed during an inspection under condition (C)(3), or if other problems are identified, or if detectable emissions are measured, a first effort to repair the closed-vent system(s) and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed.
5. The permittee shall demonstrate with either engineering calculations or performance tests that the reduction efficiency specified in condition (A)(1) is achieved. Engineering calculations shall be performed in accordance with requirements specified in 40 CFR 61.356(f), and performance tests shall be performed in accordance with 40 CFR 61.355..
6. Delay of repair under conditions (C)(2) and (C)(4) will be allowed if the repair is technically impossible without a complete or partial facility or unit shutdown. Repair of such equipment shall occur before the end of the next facility or unit shutdown.
7. Facility-wide compliance with applicable emissions monitoring requirements of 40 CFR 266 shall constitute compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.
8. Facility-wide compliance with applicable recordkeeping requirements of 40 CFR 61.356 shall constitute compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.
9. The permittee shall record the date, time, and duration, of all periods of control device downtime.

15 of 16 Pages

Facility Name: **Lafarge/Systech Environmental**

Application Number: **03-3006**

Date: **October 28, 1998**

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

D. Reporting Requirements

1. Quarterly written reports of 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, the probable cause of such deviations, and any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, 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 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).
2. The permittee shall submit annual reports which specify the total OC emissions for emissions units T010, T011, T012, and T013 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
4. Facility-wide compliance with applicable reporting requirements of 40 CFR 61.357 shall constitute further reporting compliance for emissions units T010, T011, T012, and T013 for this Permit to Install.

16 of 16 Pages

Facility Name: Lafarge/Systech Environmental

Application Number: 03-3006

Date: October 28, 1998

E. Testing Requirements/ Compliance Method Determinations

1. Emissions Limitation

Emissions Units T010, T011, T012, and T013; 280 pounds
OC/year each

Applicable Compliance Method

USEPA Tanks 3.0 computer program, with representative
waste-derived fuel composition and maximum throughputs

2. Emissions Limitation

99 percent destruction efficiency during kiln operation

Applicable Compliance Method

Facility-wide compliance with applicable test methods,
procedures, and compliance provisions of 40 CFR 61.355
shall constitute compliance for emissions units T010,
T011, T012, and T013 for this Permit to Install.

F. Miscellaneous Requirements

1. None.

