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

05/23/03

RE: Proposed Title V Chapter 3745-77 Permit
03-63-00-0002
Lafarge/Systech Environmental Corp.

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Lafarge/Systech Environmental Corp., has been created in Ohio EPA's State Air Resources System (STARS) on 05/23/03, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 05/23/03	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-63-00-0002 to:
Lafarge/Systech Environmental Corp.
11435 County Road 176
P.O. Box 160
Paulding, OH 45879

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Clay Wash Mill Hot Water Heater)
Clay Wash Mill Water Heater 10 MMBtu/hr Natural Gas

F001 (Quarry - Extraction)
Drilling, blasting, loading materials to trucks

F002 (Storage Piles)
Storage piles in quarry and cement plant

F003 (Roadways)
Paved and unpaved roadways

P001 (Packhouse #1 Silos)
Cement transfer from finish milling to Packhouse #1 silos

P002 (Packhouse #2 Silos)
Cement transfer from finish milling to Packhouse #2 silos

P003 (Packhouse #1 Packing Machine #1)
Cement packaging in Packing Machine #1 at Packhouse #1

P004 (Packhouse #1 Bulk Loadout (truck & rail))
Cement bulk loadout (truck & rail) in Packhouse #1

P005 (Packhouse #1 Packing Machine #2)
Cement packaging in Packing Machine #2 at Packhouse #1

P006 (Packhouse #2 Bulk Loadout (truck))
Cement bulk loadout (truck) in Packhouse #2

P007 (Finish Mill #1)
34 tph ball-grinding finish mill

P008 (Finish Mill #2)
34 tph ball-grinding finish mill

P009 (Finish Mill #3)
28 tph ball-grinding finish mill

P013 (Hammermill Crusher)
Unloading trucks, crushing material, discharging to conveyors

P014 (Cement Kiln #1)
Cement clinker manufacture in rotary kiln #1

P015 (Cement Kiln #2)
Cement clinker manufacture in rotary kiln #2

P901 (New RM Handling)
Other raw material storage, conveying and handling

P902 (CKD Unloading)
CKD storage, slurry and loading operations

P903 (Raw Material Handling)
Other raw material handling

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 3745-77-08(E) 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 current 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 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:

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

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-

07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, record keeping, 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.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

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

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

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

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

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.
(Authority for term: OAC rule 3745-77-07(A)(5))

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

(Authority for term: OAC rule 3745-77-07(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

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.

(Authority for term: OAC rule 3745-77-07(A)(9))

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.

(Authority for term: OAC rule 3745-77-07(A)(10))

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 (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

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

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

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

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

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.

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

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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

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.

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

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.

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

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).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

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.
(Authority for term: OAC rule 3745-77-07(G))

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 of the U.S. EPA, 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.

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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.) *(Authority for term: OAC rule 3745-77-07(I))*

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.
(This term is provided for informational purposes only.)

18. Insignificant Activities

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

19. Permit to Install Requirement

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

20. Air Pollution Nuisance

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

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable 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. The following rule is applicable to this facility: 40 CFR 63.1340 et seq. (Subpart LLL)

The permittee shall comply with the applicable emission limitation in 40 CFR 63.1347 and 63.1348 (10 percent opacity, as a 6-minute average)

The following is the list of the emissions units at this facility that are subject to 40 CFR 63.1340 et seq. (Subpart LLL):

a. each raw mill;

b. each finish mill (including emissions units P007, P008, and P009);

c. each raw material, clinker, or finished product storage bin (including emissions unit P901 and P903);

d. each conveying system transfer point including those associated with coal preparation used to convey coal from the mill to the kiln (including emissions units P025 and P026, and P902 prior to the pug mill);

e. each bagging and bulk loading and unloading system (including emissions units P001, P002, P003, P004, P005, and P006); and

f. the following specific emissions points or locations, as specified in the permittee's O & M plan:

Process 9: Auxiliary System - Clinker Transfer
EP2-6: Clinker truck loadout chute
EP2-7: Clinker reclaim chute

Process 9: Auxiliary - CKD Transfer
EP7-1: CKD Tank #1 Baghouse Outlet
EP7-2: CKD Tank #2, and Truck Loading, Baghouse Outlet (P902)
EP4-5: East Dust Scoop Conveyance System Baghouse Outlet (P025)
EP4-6: West Dust Scoop Conveyance System Baghouse Outlet (P026)
EP 4-7: CKD Bin

Process 3: Burning - Clinker Cooler
E-P 4-2: Clinker elevator #1
E-P 4-3: Clinker elevator #2
E-P 4-8: Drag Line #1
E-P 4-9: Drag Line #2
E-P 4-10: Drag Line #3

A. State and Federally Enforcable Section (continued)

Process 4: Cement Grinding
EP2-5: Gypsum Reclaim System
EP5-1: Transfer to Air Separator #1, Cement Cooler #1, Cement Pumps (P007)
EP5-2: Transfer to Air Separator #2, Cement Cooler #2, Cement Pumps (P008)
EP5-3: Transfer to Air Separator #3, Cement Cooler #3, Cement Pumps (P009)
EP5-4: Discharge from Finish Mill #1, Air Separator #1 (P007)
EP5-5: Discharge from Finish Mill #2, Air Separator #2 (P008)
EP5-6: Discharge from Finish Mill #3, Air Separator #3 (P009)

Process 6: Fuels - Coal/Coke Handling
E-P 2-2: Coal/Coke Reclaim Conveyor System
E-P 2-2: Coal/Coke Storage Silo #1 and #2

Process 5: Packing and Shipping
EP6-1: Packhouse #1 Cement Silos (P001)
EP6-2: Packhouse #1 Cement Silos (P001)
EP6-3: Packhouse #2 Cement Silos (P002)
EP6-4: Packhouse #2 Cement Silos (P002)
EP6-5: Cement Packing Machine #1 (P003)
EP6-6: Cement Packing Machine #2, Packhouse #1 Bulk Loadout (P004, P005)
EP6-7: Packhouse #2 Bulk Loadout (P006)

Process 2: Raw Mix
EP2-8: Sand /Iron Truck Unloading Area (P901)
EP3-5: Other Raw Material Conveyor Belt Transfer - Partial Enc. (P901)
EP3-6: Other Raw Material Conveyor Belt Transfer - Partial Enc. (P901)
EP3-7: Rock Conveyor to Shuttle Conveyor Transfer - Total Enc. (P901)
EP3-8: Crossover Conveyor Transfer to ORM Day Bins (P903)
EP3-9: ORM /Limestone /Fly Ash /Clay Transfer to Raw Mill - Mill Building (P903)

40 CFR 63.1340(b)

2. The first affected source in the sequence of materials handling operations subject to Subpart LLL is the raw material storage, which is just prior to the raw mill. Any equipment of the on-site nonmetallic mineral processing plant which precedes the raw material storage is not subject to Subpart LLL. In addition, the primary and secondary crushers of the on-site nonmetallic mineral processing plant, regardless of whether they precede the raw material storage, are not subject to Subpart LLL. Furthermore, the first conveyor transfer point subject to Subpart LLL is the transfer point associated with the conveyor transferring material from the raw material storage to the raw mill.
40 CFR 63.1340(c)

3. In conjunction with sections A.1 and A.2 above, the permittee shall comply with the following monitoring and/or record keeping requirements:

A. State and Federally Enforcable Section (continued)

3.a The permittee shall monitor opacity in accordance with the operation and maintenance (O & M) plan developed in accordance with the requirements below.

The written O & M plan shall be developed and submitted as required in section A.4.a below, and shall include the following information:

i. procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limit specified in section A.1 above;

ii. corrective actions to be taken when required by section A.3.c below; and

iii. procedures to be used to periodically monitor the affected sources listed in section A.2 above. Such procedures must include the provisions specified in section A.3.b below.
40 CFR 63.1350(a), (j)

3.b The permittee shall perform the following:

i. Conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A of 40 CFR Part 60. The test shall be conducted while the affected source is in operation.

ii. If no visible emissions are observed in six consecutive monthly tests for any affected source, the permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

iii. If no visible emissions are observed during the semi-annual test for any affected source, the permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

iv. If visible emissions are observed during any Method 22 test, the permittee shall conduct a 6-minute test of opacity in accordance with Method 9, Appendix A of 40 CFR Part 60. The Method 9 test shall begin within one hour of any observation of visible emissions.

A. State and Federally Enforcable Section (continued)

v. The requirement to conduct Method 22 visible emissions monitoring pursuant to sections A.3.a and A.3.b shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. [``Totally enclosed conveying system transfer point'' shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom.] The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.

vi. If any partially enclosed or unenclosed conveying system transfer point is located in a building, the permittee shall have the option to conduct a Method 22 visible emissions monitoring according to the requirements in sections A.3.b.i through A.3.b.iv above for each such conveying system transfer point located within the building, or for the building itself (according to section A.3.b.vii). *

vii. If visible emissions from the building are monitored, the requirements of sections A.3.b.i through A.3.b.iv above shall apply to the monitoring of the building, and the permittee shall also test for visible emissions from each side, roof and vent of the building for at least 1 minute. The test shall be conducted under normal operating conditions.
40 CFR 63.1350(a)

* The raw mill is a 'wet' process at this facility, and as such was never previously designated as an emissions unit. The raw mill and other associated affected sources (e.g. conveying system transfer points) are in a building. Pursuant to 40 CFR 63.1350(a)(4)(vii), the permittee may monitor this raw mill building in accordance with sections A.3.b.vi and vii above.

3.c The permittee shall monitor the raw mills and finish mills for opacity by conducting daily visual emissions observations of the mill sweep and air separator baghouses of these affected sources in accordance with the procedures of Method 22, Appendix A of 40 CFR Part 60. The Method 22 test shall be conducted while the affected source is operating at the representative performance conditions. The duration of the Method 22 test shall be 6 minutes. If visible emissions are observed during any Method 22 visible emissions test, the permittee shall:

i. initiate, within one-hour, the corrective actions specified in the O & M plan; and

ii. within 24 hours of the end of the Method 22 test in which visible emissions were observed, conduct a follow-up Method 22 test of each stack from which visible emissions were observed during the previous Method 22 test. If visible emissions are observed during the follow-up Method 22 test from any stack from which visible emissions were observed during the previous Method 22 test, conduct a visual opacity test of each stack from which emissions were observed during the follow up Method 22 test in accordance with Method 9, Appendix A of 40 CFR Part 60. The duration of the Method 9 test shall be 30 minutes.
40 CFR 63.1350(e)

3.d The permittee may submit an application to the Director for approval of alternate monitoring requirements to demonstrate compliance with the emission standards of Subpart LLL provided that the alternate monitoring complies with the requirements of sections A.3.e through A.3.i below.

If the application to use alternate monitoring requirements is approved, the permittee shall continue to use the original monitoring requirements until approval is received to use the alternate monitoring requirements.
40 CFR 63.1350(l)

3.e The Director will not approve averaging periods other than those specified in section A.3, unless the permittee documents, using data or information, that the longer averaging period will ensure that emissions do not exceed levels achieved during the performance test over any increment of time equivalent to the time required to conduct three runs of the performance test.
40 CFR 63.1350(l)(1)

A. State and Federally Enforcable Section (continued)

3.f The permittee shall submit the application for approval of alternate monitoring requirements no later than date of the notification of the performance test. The application shall contain the following information:

i. data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;

ii. a description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, the averaging period for the limit, and how the limit is to be calculated; and

iii. data or information documenting that the alternative monitoring requirements would provide equivalent or better assurance of compliance with the relevant emission standard.
40 CFR 63.1350(l)(3)

3.g The Director will notify the permittee of the approval or denial of the application within 90 calendar days after receipt of the original request, or within 60 calendar days of the receipt of any supplementary information, whichever is later. The Director will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard. Before disapproving any alternate monitoring application, the Director will provide:

i. notice of the information and findings upon which the intended disapproval is based; and

ii. notice of opportunity for the permittee to present additional supporting information before final action is taken on the application. This notice will specify how much additional time is allowed for the permittee to provide additional supporting information.
40 CFR 63.1350(l)(4)

3.h The permittee is responsible for submitting any supporting information in a timely manner to enable the Director to consider the application prior to the performance test. Neither the submittal of an application, nor the Director's failure to approve or disapprove the application shall relieve the permittee of the responsibility to comply with any provision of Subpart LLL.
40 CFR 63.1350(l)(5)

3.i The Director may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits are necessary to demonstrate compliance with the emission standards of Subpart LLL.
40 CFR 63.1350(l)(6)

3.j The requirements in section A.3.c to conduct daily Method 22 testing shall not apply to any specific raw mill or finish mill equipped with a continuous opacity monitor (COM) or a bag leak detection system (BLDS). If the permittee chooses to install a COM in lieu of conducting the daily visual emissions testing as required pursuant to section A.3.c, then the permittee shall install a COM at the outlet of the PM control device of the raw mill or finish mill. The COM shall be installed, maintained, calibrated, and operated as required by the general provisions of 40 CFR, Part 60, Subpart A and performance specification 1, Appendix B of 40 CFR, Part 60. To remain in compliance, the opacity shall be maintained such that the 6-minute average for any 6-minute block period does not exceed 10 percent. If the average opacity for any 6-minute block period exceeds 10 percent, this shall constitute a violation of the opacity limitation. If the permittee chooses to install a BLDS in lieu of conducting the daily visual emissions testing as required pursuant to section A.3.c, the permittee shall then comply with the requirements specified in sections A.3.k through A.3.s below.
40 CFR 63.1350(m)

3.k The BLDS must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grain per actual cubic foot) or less. "Certify" shall mean that the instrument manufacturer has tested the instrument on gas streams having a range of particle size distributions and confirmed by means of valid filterable PM tests that the minimum detectable concentration limit is at or below 10 milligrams per actual cubic meter (0.0044 grain per actual cubic foot) or less.
40 CFR 63.1350(m)(1)

A. State and Federally Enforcable Section (continued)

3.l The sensor on the BLDS shall provide output of relative PM emissions.
40 CFR 63.1350(m)(2)

3.m The BLDS shall have an alarm that will activate automatically when it detects a significant increase in relative PM emissions greater than a preset level.
40 CFR 63.1350(m)(3)

3.n The presence of an alarm condition should be clearly apparent to facility operating personnel.
40 CFR 63.1350(m)(4)

3.o For a positive-pressure fabric filter, each compartment or cell shall have a bag leak detector. For a negative-pressure or induced-air fabric filter, the bag leak detector must be installed downstream of the fabric filter. If multiple bag leak detectors are required (for either type of fabric filter), detectors may share the system instrumentation and alarm.
40 CFR 63.1350(m)(5)

3.p All BLDS shall be installed, operated, adjusted, and maintained so that they are based on the manufacturer's written specifications and recommendations. The USEPA recommends, where appropriate, that the standard operating procedures manual for each bag leak detection system include concepts from EPA's ``Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015, September 1997).
40 CFR 63.1350(m)(6)

3.q The baseline output of the BLDS system must be established as follows:

i. adjust the range and the averaging period of the device; and

ii. establish the alarm set points and the alarm delay time.
40 CFR 63.1350(m)(7)

3.r After initial adjustment, the range, averaging period, alarm set points, or alarm delay time may not be adjusted except as specified in the O & M plan. In no event may the range be increased by more than 100 percent or decreased by more than 50 percent over a 1 calendar year period unless a responsible official, as defined in 40 CFR 63.2, certifies in writing to the Director that the fabric filter has been inspected and found to be in good operating condition.
40 CFR 63.1350(m)(8)

3.s The permittee shall maintain and operate the fabric filter such that the bag leak detector alarm is not activated and an alarm condition does not exist for more than 5 percent of the total operating time in a 6-month block period. Each time the alarm activates, alarm time will be counted as the actual amount of time taken by the permittee to initiate corrective actions. If inspection of the fabric filter demonstrates that no corrective actions are necessary, no alarm time will be counted. The permittee shall continuously record the output from the BLDS during periods of normal operation. Normal operation does not include periods when the BLDS is being maintained or during startup, shutdown or malfunction.
40 CFR 63.1350(m)(9)

A. State and Federally Enforcable Section (continued)

3.t The permittee shall maintain files of all the information (including all reports and notifications) required by Subpart LLL. The files shall be recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.

The permittee shall maintain the following records for each affected emissions unit, as required by 40 CFR 63.10(b)(2) and (b)(3):

i. all documentation supporting initial notifications and notifications of compliance status pursuant to 40 CFR 63.9;

ii. all records of applicability determination, including supporting analyses; and

iii. if the permittee has been granted a waiver pursuant to 40 CFR 63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements.

In addition, regarding any continuous monitoring system, all records shall be maintained as required by 40 CFR 63.10(c).
40 CFR 63.1355

4. In conjunction with sections A.1 and A.2 above, the permittee shall comply with the following reporting requirements:

4.a The permittee shall prepare, for each Subpart LLL affected emissions unit, a written operations and maintenance (O & M) plan (this has been completed). The O & M plan shall be submitted to the Director for review and approval (this has been completed), and shall meet the requirements specified in section A.3.a above.

Failure to comply with, or implement procedures consistent with, any provision of the operations and maintenance plan shall be considered a violation of the limitation and this permit.
40 CFR 63.1350(a), (b) and 64 FR 31903

4.b The permittee shall comply with the notification requirements specified in 40 CFR 63.9 as follows:

i. submit notification of performance tests, as required by 40 CFR 63.7 and 63.9(e).

ii. submit notification of opacity and visible emission observations required by section A.3 above in accordance with 40 CFR 63.6(h)(5) and 63.9(f).

iii. submit notification, as required by 40 CFR 63.9(g), of the date that the continuous emission monitor performance evaluation required by 40 CFR 63.8(e) is scheduled to begin.

iv. submit notification of compliance status, as required by 40 CFR 63.9(h).
40 CFR 63.1353

A. State and Federally Enforcable Section (continued)

4.c The permittee shall comply with the reporting requirements specified in 40 CFR 63.10 of the general provisions of 40 CFR, Part 63, Subpart A as follows:

i. as required by 40 CFR 63.10(d)(2), the permittee shall report the results of performance tests as part of the notification of compliance status;

ii. as required by 40 CFR 63.10(d)(3), the permittee shall report the opacity results from tests required by A.5.c below;

iii. as required by 40 CFR 63.10(d)(4), if the permittee is required to submit progress reports as a condition of receiving an extension of compliance under 40 CFR 63.6(i), the permittee shall submit such reports by the dates specified in the written extension of compliance.
40 CFR 63.1354(b)(1) - (3)

4.d As required by 40 CFR 63.10(d)(5), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the emissions unit's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the permittee shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports, if applicable.
40 CFR 63.1354(b)(4)

4.e Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall make an immediate report of the actions taken for that event within 2 working days, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, certified by the permittee or other responsible official, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
40 CFR 63.1354(b)(5)

4.f The permittee shall submit a summary report semiannually that contains the information specified in 40 CFR 63.10(e)(3)(vi). In addition, the summary report shall include: All failures to comply with any provision of the O & M plan developed in accordance with section A.4.a above.
40 CFR 63.1354(b)(9)(v)

5. In conjunction with sections A.1 and A.2 above, the permittee shall comply with the following testing/ compliance demonstration requirements:

A. State and Federally Enforcable Section (continued)

5.a The permittee shall demonstrate initial compliance with the opacity standards using the test methods and procedures specified in section A.5.b and in 40 CFR 63.7. Performance test results shall be documented in complete test reports that contain the information required by items i through x below, as well as all other relevant information. The plan to be followed during testing shall be made available to the Director prior to testing, if requested:

i. brief description of the process and the air pollution control system;

ii. sampling location description(s);

iii. a description of sampling and analytical procedures and any modifications to standard procedures;

iv. test results;

v. quality assurance procedures and results;

vi. records of operating conditions during the test, preparation of standards, and calibration procedures;

vii. raw data sheets for field sampling and field and laboratory analyses;

viii. documentation of calculations;

ix. all data recorded and used to establish parameters for compliance monitoring; and

x. any other information required by the test method.
40 CFR 63.1349(a)

5.b The permittee shall demonstrate initial compliance with the opacity limitation of the affected emissions unit by conducting a test in accordance with Method 9, Appendix A of 40 CFR, Part 60. The performance test shall be conducted under the conditions that exist when the affected emissions unit is operating at the representative performance conditions in accordance with 40 CFR 63.7(e). The maximum 6-minute average opacity exhibited during the test period shall be used to determine whether the affected emissions unit is in initial compliance with the opacity limitation. The duration of the Method 9 performance test shall be 3 hours (30 6-minute averages), except that the duration of the Method 9 performance test may be reduced to 1 hour if the following conditions apply:

i. there are no individual readings greater than 10 percent opacity; and

ii. there are no more than three readings of 10 percent for the first 1-hour period.
40 CFR 63.1349(b)(2)

A. State and Federally Enforcable Section (continued)

5.c The permittee shall conduct, or have conducted, emission testing for all the Subpart LLL affected emissions units in accordance with the following requirements:

i. The emission testing shall be conducted by December 14, 2002 [in accordance with 40 CFR 63.7(a)(2)(ix)] [completed].

ii. The emission testing shall be conducted to demonstrate compliance with the allowable opacity limit(s).

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable opacity limitation: Method 9, 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the US EPA and Ohio EPA.

iv. The test(s) shall be conducted while each emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

v. The test(s) shall be conducted in accordance with sections A.5.a and A.5.b above.

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

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

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

6. In conjunction with sections A.1 and A.2 above, the permittee shall comply with the following miscellaneous requirements:

The permittee shall comply with all the applicable requirements of 40 CFR, Part 63, Subpart LLL (National Emission Standards for Hazardous Air Pollutants for Portland Cement Manufacturing) as well as with all the applicable requirements of Subpart A of Part 63 (General Provisions), as identified in Table 1 in the Appendix of Subpart LLL.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Mill Building, Ohio EPA emissions unit Z001;
Slurry Tanks, Ohio EPA emissions unit Z002;
Kiln Building, Ohio EPA emissions unit Z003; and
cement kiln dust handling system, Ohio EPA emissions unit Z004.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Clay Wash Mill Hot Water Heater (B001)

Activity Description: Clay Wash Mill Water Heater 10 MMBtu/hr Natural Gas

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
hot water heater - 10 mmBtu/hr - natural gas (washmill water heater)	OAC rule 3745-31-05 (A)(3) (PTI 03-13107)	1.0 lb nitrogen oxides (NOx)/hr, 4.38 tons NOx/yr 2.83 lbs carbon monoxide (CO)/hr, 12.40 tons CO/yr 8.15 lbs organic compounds (OC)/hr, 35.70 tons OC/yr 0.008 lb particulate emissions (PE)/hr, 0.04 ton PE/yr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-17-07(A), 3745-23-06(B) and 3745-21-08(B) and 40 CFR, Part 60, Subpart Dc.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	40 CFR 60.48c (g) NSPS Subpart Dc	See sections A.I.II.1 and A.III.2.
	OAC rule 3745-23-06(B) OAC rule 3745-21-08(B)	See A.I.2.b.

2. Additional Terms and Conditions

2.a OAC rule 3745-18-06 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel for burning.

2. Additional Terms and Conditions (continued)

2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 03-13107.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type of fuel burned in this emissions unit.

IV. Reporting Requirements

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

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
1.0 lb NOx/hr

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 1.4-1 (revised 7/98) emission factor for natural gas (100 lbs NOx/mm cu. ft).

If required, the permittee shall demonstrate compliance with the limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 7.

1.b Emission Limitation:
1.5 lbs of CO/hr

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft./hour) by the equipment manufacturer's-supplied emission factor for natural gas (150 lbs CO/mm cu. ft).

If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Methods 1- 4 and 10 of 40 CFR Part 60, Appendix A.

1.c Emission Limitation:
0.11 lb OC/hr

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (5.5 lbs OC/mm cu. ft).

If required, the permittee shall demonstrate compliance with the limitation above in accordance with 40 CFR, Part 60, Appendix A, Method 25.

V. Testing Requirements (continued)

1.d Emission Limitations:
0.08 lbs PE/hr
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 1.9 lbs PE/mm cu. ft.

Compliance with the lb/mmBtu allowable PE limitation may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 1.9 lbs PE/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly and lb/mmBtu allowable PE limitations in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.e Emission Limitations:
4.38 ton NOx /yr
6.57 ton CO /yr
0.48 ton OC /yr
0.35 ton PE /yr

Applicable Compliance Method:
Compliance with the annual emission limitations above shall be assumed as long as compliance with each hourly emission limitation is maintained (each annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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: Quarry - Extraction (F001)

Activity Description: Drilling, blasting, loading materials to trucks

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
quarry - mineral extraction	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a This facility is located in Paulding County, which is not an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A)(1), it is exempt from the requirements of OAC rule 3745-17-08(B).

2.b This emissions unit is exempt from the visible particulate emission limitation in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(7)(e).

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 (F002)

Activity Description: Storage piles in quarry and cement plant

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
aggregate (limestone) storage piles	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a This facility is located in Paulding County, which is not an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A)(1), it is exempt from the requirements of OAC rule 3745-17-08(B).

2.b This emissions unit is exempt from the visible particulate emission limitation in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(7)(e).

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: Roadways (F003)

Activity Description: Paved and unpaved roadways

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
plant roadways and parking areas	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a This facility is located in Paulding County, which is not an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A)(1), it is exempt from the requirements of OAC rule 3745-17-08(B).

2.b This emissions unit is exempt from the visible particulate emission limitation in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(7)(e).

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: Packhouse #1 Silos (P001)

Activity Description: Cement transfer from finish milling to Packhouse #1 silos

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
cement storage, with baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Packhouse #2 Silos (P002)

Activity Description: Cement transfer from finish milling to Packhouse #2 silos

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
cement storage and truck bulk loadout, equipped with a baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Packhouse #1 Packing Machine #1 (P003)

Activity Description: Cement packaging in Packing Machine #1 at Packhouse #1

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
cement packaging machine, equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Packhouse #1 Bulk Loadout (truck & rail) (P004)

Activity Description: Cement bulk loadout (truck & rail) in Packhouse #1

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
truck and rail product loading, equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Packhouse #1 Packing Machine #2 (P005)

Activity Description: Cement packaging in Packing Machine #2 at Packhouse #1

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
cement packaging machine, equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Packhouse #2 Bulk Loadout (truck) (P006)

Activity Description: Cement bulk loadout (truck) in Packhouse #2

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
cement truck loading, equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Finish Mill #1 (P007)

Activity Description: 34 tph ball-grinding finish mill

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
grinding ball mill for clinker and gypsum - 34 tons/hr - equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Finish Mill #2 (P008)

Activity Description: 34 tph ball-grinding finish mill

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
grinding ball mill for clinker and gypsum - 34 tons/hr - equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Finish Mill #3 (P009)

Activity Description: 28 tph ball-grinding finish mill

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
grinding ball mill for clinker and gypsum - 28 tons/hr - equipped with a process baghouse	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Hammermill Crusher (P013)

Activity Description: Unloading trucks, crushing material, discharging to conveyors

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
limestone hammermill crusher - 1000 tons/hr - equipped with a baghouse	OAC rule 3745-17-11(A)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 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: Cement Kiln #1 (P014)

Activity Description: Cement clinker manufacture in rotary kiln #1

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
cement kiln 1 (north), equipped with a baghouse	OAC rule 3745-17-11(A)	75 pounds per hour (lbs/hr) of particulate emissions (PE)
	OAC rule 3745-17-07(A)	See A.II.2.h.
	OAC rule 3745-18-69(B)	43.0 pounds sulfur dioxide per ton of cement produced
	40 CFR 61.348	Exempt, pursuant to 40 CFR 61.348(d)(4).
	OAC rule 3745-31-05 (PTI #03-976)	See A.I.2.a below.
	OAC rule 3745-77-07(A)	See Sections A.II.2 and 3 below.
	40 CFR 63.1204(a)(1) 40 CFR, Part 63, Subpart EEE	dioxins and furans: 0.40 ng TEQ/dscm, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(2) 40 CFR, Part 63, Subpart EEE	mercury: 120 ug/dscm, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(3) 40 CFR, Part 63, Subpart EEE	lead and cadmium: 330 ug/dscm, combined emissions, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(4) 40 CFR, Part 63, Subpart EEE	arsenic, beryllium, and chromium: 56 ug/dscm, combined emissions, corrected to 7 percent oxygen *

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.1204(a)(5)(i)(A) 40 CFR, Part 63, Subpart EEE	carbon monoxide (midkiln): 100 ppmv, hourly rolling average, dry basis, and corrected to 7 percent oxygen, and * hydrocarbons (midkiln): 10 ppmv, hourly rolling average, dry basis, corrected to 7 percent oxygen, and reported as propane, at any time during the DRE test runs or their equivalent as provided by 40 CFR 63.1206(b)(7)
	40 CFR 63.1204(a)(6) 40 CFR, Part 63, Subpart EEE	hydrochloric acid and chlorine gas: 130 ppmv, combined emissions, expressed as hydrochloric acid equivalents, dry basis, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(7) 40 CFR, Part 63, Subpart EEE	particulate matter; 0.15 kg/Mg dry raw material feed *
	40 CFR 63.1204(a)(7) 40 CFR, Part 63, Subpart EEE	Visible emissions shall not exceed 20 percent opacity. *
	40 CFR 63.1204(c) 40 CFR, Part 63, Subpart EEE	destruction and removal efficiency (DRE) of 99.99% for each principle organic hazardous constituent (POHC), as designated in accordance with A.I.2.b. * See section A.VI.1 and 2

2. Additional Terms and Conditions

2.a The terms and conditions of the permit to install for this emissions unit, which was issued on November 17, 1980, were made obsolete by the promulgation of Title 40, Parts 260, 261, 264, 265, 266, 270, and 271 on February 21, 1991, and later by the promulgation of Part 63 (Subpart EEE) on September 30, 1999.

2.b POHCs: The permittee must specify one or more POHCs from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1), excluding caprolactam (CAS number 105602) as provided by 40 CFR 63.60, for each waste to be burned. The permittee must base this specification on the degree of difficulty of incineration of the organic constituents in the waste and on their concentration or mass in the waste feed, considering the results of waste analyses or other data and information.
40 CFR 63.1204(c)(3)

2.c Significant figures: The emission limits (40 CFR 63.1204(a) and (b)) are presented with two significant figures. Although the permittee must perform intermediate calculations using at least three significant figures, the permittee may round the resultant emission levels to two significant figures to document compliance.
40 CFR 63.1204(f)

2. Additional Terms and Conditions (continued)

2.d The Subpart EEE emission standards and operating requirements included in this permit shall apply at all times, except:

i. during startup, shutdown, and malfunction; and

ii. when hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cut off for a period of time not less than the hazardous waste residence time) and the permittee has documented in the operating record that the permittee is complying with all otherwise applicable requirements and standards promulgated under authority of sections 112 (e.g., 40 CFR 60 Subpart LLL for cement kilns) or 129 of the Clean Air Act in lieu of the Subpart EEE emission standards specified in section A.I.1; the Subpart EEE monitoring and compliance standards of this permit; and the Subpart EEE notification, reporting, and record keeping requirements of this permit.

The permittee has committed to achieving compliance with section A.I.2.d.ii above through the startup, shutdown, and malfunction plan requirements of section A.II.5 of this permit.
40 CFR 63.1206(b)(1)

2.e Even if the permittee follows the startup and shutdown procedures and the corrective measures upon a malfunction that are prescribed in the Startup, Shutdown, and Malfunction Plan, the Subpart EEE emission standards and operating requirements of this permit shall apply if hazardous waste is in the combustion chamber (i.e., if the permittee is feeding hazardous waste or if startup, shutdown, or a malfunction occurs before the hazardous waste residence time has transpired after hazardous waste cutoff).
40 CFR 63.1206(c)(2)(ii)

2.f If the permittee plans to change* the design, operation, or maintenance practices of the emissions unit in a manner that may adversely affect compliance with any emission standard that is not monitored with a CEMS, the following shall take place:

i. The permittee must notify the Director at least 60 days prior to the change, unless the permittee documents circumstances that dictate that such prior notice is not reasonably feasible. The notification must include:

a. a description of the changes and which emission standards may be affected; and

b. a comprehensive performance test schedule and test plan under the requirements of 40 CFR 63.1207(f) that will document compliance with the affected emission standard(s).

ii. The permittee shall conduct a comprehensive performance test under the requirements of 40 CFR 63.1207(f)(1) and (g)(1) to document compliance with the affected emission standard(s) and establish operating parameter limits as required under 40 CFR 63.1209, and submit to the Administrator a Notification of Compliance (NOC) under 40 CFR 63.1207(j) and 63.1210(d).

2. Additional Terms and Conditions (continued)

iii. Except as provided by paragraph A.I.2.f.iv, after the change and prior to submitting the notification of compliance, the permittee must not burn hazardous waste for more than a total of 720 hours (renewable at the discretion of the Director) and only for the purposes of pre-testing or comprehensive performance testing. Pre-testing is defined in 40 CFR 63.1207(h)(2)(i) and (ii).

iv. The permittee may petition the Director to obtain written approval to burn hazardous waste in the interim prior to submitting a NOC for purposes other than testing or pre-testing. The permittee must specify operating requirements, including limits on operating parameters, that will ensure compliance with the emission standards of this subpart based on available information. The Director will review, modify as necessary, and approve, if warranted, the interim operating requirements.

* For purposes of section A.I.2.f, "change" means any change in design, operation, or maintenance practices that were documented in the comprehensive performance test plan, NOC, or startup, shutdown, and malfunction plan.

If the permittee determines that a change will not adversely affect compliance with the emission standards or operating requirements, the permittee must document the change in the operating record upon making such change. The permittee must revise as necessary the NOC, and the performance test plan and Documentation of Compliance as may be applicable, and start-up, shutdown, and malfunction plan to reflect these changes.
40 CFR 63.1206(b)(5)

2.g The permittee shall provide the hazardous waste residence time in the NOC.
40 CFR 63.1206(b)(11)

2.h The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 63.1204(a)(7) (40 CFR, Part 63, Subpart EEE).

2.i The permittee shall comply with all the applicable requirements of 40 CFR, Part 63, Subpart EEE (National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors - interim standards rule) as well as with all the applicable requirements of 40 CFR, Part 63, Subpart A (General Provisions), as identified in Table 1 in the appendix for Subpart EEE.

2.j Considering US EPA's proposed clarification regarding delegation of authority in 67 FR 2311 [proposed 40 CFR 63.1214], the Director has permit authority to act on petitions from the permittee for alternative standards and/or parameters under 40 CFR 63.1206(b)(10), (b)(15); 63.1209(g), (l), (n); and 63.1211(d).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 6 to 15 inches of water while the emissions unit is in operation.

The permittee may petition to the Ohio EPA, Northwest District Office for reestablishment of the pressure drop range provided the permittee can demonstrate to the Ohio EPA, Northwest District Office's satisfaction that the new pressure drop range will ensure ongoing compliance and the operating conditions upon which the pressure drop range was previously established are no longer applicable.

II. Operational Restrictions (continued)

2. Waste-derived fuel that is to be burned in the kiln shall conform to the specifications listed in Schedule A (Specifications of Blended Waste-Derived Fuel) below:

SCHEDULE A:

SPECIFICATIONS OF BLENDED WASTE-DERIVED FUEL

Sulfur	3% sulfur
Halogens	5% maximum
Inorganic Acids and Bases	extractable pH between 4.0 and 11.0
Water	1% maximum as separated phase
PCB	<50 PPM

3. The permittee shall comply with all State and federal laws and regulations including, but not limited to, the Toxic Substances Control Act of 1979. No registered herbicides, pesticides, rodenticides, insecticides, or radioactive wastes as defined by ASTM Method D5928, or other materials shall be combusted in this emissions unit in violation of State and federal laws and regulations.

4. The combustion gas temperature at the inlet to the initial dry particulate matter control device must be 400 degrees Fahrenheit or lower, based on the average of the test run average temperatures.
40 CFR 63.1204

5. The permittee shall be subject to the startup, shutdown, and malfunction plan requirements of 40 CFR 63.6(e)(3) as follows:

a. The permittee must identify in the plan a projected oxygen correction factor based on normal operations to use during periods of startup and shutdown.

b. The permittee must record the plan in the operating record.

c. In conjunction with sections A.I.2.d and A.II.4, the permittee has committed to the inclusion of a requirement for a three-hour (180-minute) rolling average compliance time for the temperature requirement of section A.II.4 during times when hazardous waste is not in the combustion chamber (reflective of 40 CFR 63.1342 requirements).
40 CFR 63.1206(c)(2)(i), (iii), (iv)

6. During malfunctions, the automatic waste feed cutoff requirements specified in section A.II.8 shall continue to apply, except as provided in paragraphs A.II.8.e and f. If the permittee exceeds a Subpart EEE emission standard specified in section A.I.1 and is monitored by a CEMS or COMs, or a Subpart EEE operating limit specified under section A.III, the automatic waste feed cutoff system must immediately and automatically cutoff the hazardous waste feed, except as provided in section A.II.8.h. If the malfunction itself prevents immediate and automatic cutoff of the hazardous waste feed, however, the permittee shall cease feeding hazardous waste as quickly as possible.

Although the automatic waste feed cutoff requirements shall continue to apply during a malfunction, an exceedance of an emission standard monitored by a CEMS or COMS or operating limit (as mentioned above) is not a violation of this permit if the permittee takes the corrective measures prescribed in the startup, shutdown, and malfunction plan.

II. Operational Restrictions (continued)

For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, the permittee shall:

a. within 45 days of the 10th exceedance, complete an investigation of the cause of each exceedance and evaluation of approaches to minimize the frequency, duration, and severity of each exceedance, and revise the startup, shutdown, and malfunction plan as warranted by the evaluation to minimize the frequency, duration, and severity of each exceedance; and

b. record the results of the investigation and evaluation in the operating record, and include a summary of the investigation and evaluation, and any changes to the startup, shutdown, and malfunction plan, in the excess emissions report required pursuant to 40 CFR 63.10(e)(3).
40 CFR 63.1206(c)(2)(v)

7. If the permittee feeds hazardous waste during startup or shutdown, the permittee must include waste feed restrictions (e.g., type and quantity), and other appropriate operating conditions and limits in the startup, shutdown, and malfunction plan. The permittee must interlock these established operating limits with the automatic waste feed cutoff system required pursuant to section A.II.8, except as provided in paragraphs A.II.8.e and f.

When feeding hazardous waste during startup or shutdown, the automatic waste feed cutoff system must immediately and automatically cutoff the hazardous waste feed if the permittee exceeds the established operating limits, except as provided in paragraph A.II.8.h.

Although these automatic waste feed cutoff requirements shall apply during startup and shutdown, an exceedance of an emission standard or operating limit is not a violation of this permit if the permittee complies with the operating procedures prescribed in the startup, shutdown, and malfunction plan.
40 CFR 63.1206(c)(2)(v)

8. The permittee shall comply with the following:

a. Upon the compliance date, the permittee shall operate the hazardous waste combustor with a functioning system that immediately and automatically cuts off the hazardous waste feed, except as provided in paragraph A.II.8.h, as follows:

i. when any of the following are exceeded: Subpart EEE operating parameter limits specified under section A.III; an emission standard monitored by a CEMS; and the allowable combustion chamber pressure;

ii. when the span value of any CMS detector, except a CEMS, is met or exceeded;

iii. upon malfunction of a CMS monitoring Subpart EEE operating parameter limits specified under section A.III; or an emission level; or

iv. when any component of the automatic waste feed cutoff system fails.

b. During an automatic waste feed cutoff (AWFCO), the permittee shall continue to duct combustion gasses to the air pollution control system while hazardous waste remains in the combustion chamber (i.e., if the hazardous waste residence time has not transpired since the hazardous waste feed cutoff system was activated).

c. The permittee shall continue to monitor during the cutoff the Subpart EEE operating parameters for which limits are established under section A.III and the emissions required under that section to be monitored by a CEMS, and the permittee shall not restart the hazardous waste feed until the operating parameters and emission levels are within the specified limits.

II. Operational Restrictions (continued)

d. If the AWFCO system fails to automatically and immediately cutoff the flow of hazardous waste upon exceedance of a parameter required to be interlocked with the AWFCO system pursuant to paragraph A.III.8.a , the permittee has failed to comply with the AWFCO requirements of A.II.8.

e. If, after any AWFCO, there is an exceedance of an emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the combustion chamber (i.e., whether the hazardous waste residence time has transpired since the hazardous waste feed cutoff system was activated), the permittee shall investigate the cause of the AWFCO, take appropriate corrective measures to minimize future AWFCOs, and record the findings and corrective measures in the operating record.

f. The permittee shall perform the following:

i. For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, the permittee shall submit to the Director a written report within 5 calendar days of the 10th exceedance documenting the exceedances and results of the investigation and corrective measures taken.

ii. On a case-by-case basis, the Director may require excessive exceedance reporting when fewer than 10 exceedances occur during a 60-day block period.

g. The AWFCO system and associated alarms shall be tested at least weekly to verify operability, unless the permittee documents in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspection will be adequate. At a minimum, the permittee shall conduct operability testing monthly. The permittee shall document and record in the operating record AWFCO operability test procedures and results.

h. The permittee may ramp down the waste feedrate of pumpable hazardous waste over a period not to exceed one minute, except as indicated in paragraph A.II.8.i. If the permittee elects to ramp down the waste feed, the permittee shall document ramp down procedures in the operating and maintenance plan. The procedures shall specify that the ramp down begins immediately upon initiation of automatic waste feed cutoff and the procedures shall prescribe a bona fide ramping down. If an emission standard or operating limit is exceeded during the ramp down, the permittee has failed to comply with the emission standards or operating requirements of Subpart LLL.

i. If the automatic waste feed cutoff is triggered by an exceedance of any of the operating limits (i.e., minimum combustion chamber temperature, maximum hazardous waste feedrate, or any hazardous waste firing system operating limits that may be established for the combustor), the permittee may not ramp down the waste feed cutoff.
40 CFR 63.1206(c)(3)

II. Operational Restrictions (continued)

9. Combustion system leaks of hazardous air pollutants shall be controlled as follows:

a. by keeping the combustion zone sealed to prevent combustion system leaks;

b. by maintaining the maximum combustion zone pressure lower than ambient pressure using an instantaneous monitor;

c. upon prior written approval of the USEPA Administrator, an alternative means of control to provide control of combustion system leaks equivalent to maintenance of combustion zone pressure lower than ambient pressure; or

d. upon prior written approval of the US EPA Administrator, other technique(s) which can be demonstrated to prevent fugitive emissions without use of instantaneous pressure limits.

The permittee shall specify in the operating record the method used for control of combustion system leaks.
40 CFR 63.1206(c)(5)

10. The permittee shall establish training programs for all categories of personnel whose activities may reasonably be expected to directly affect emissions of hazardous air pollutants from the emissions unit. Such persons include, but are not limited to, chief facility operators, control room operators, continuous monitoring system operators, persons that sample and analyze feed streams, persons that manage and charge feed streams to the combustor, persons that operate emission control devices, and ash and waste handlers. Each training program shall be of a technical level commensurate with the person's job duties specified in the training manual. Each commensurate training program shall require an examination to be administered by the instructor at the end of the training course. Passing of this test shall be deemed the "certification" for personnel, except that, for control room operators, the training and certification program shall be as specified in sections A.II.11 and 12.

The permittee shall ensure that the source is operated and maintained at all times by persons who are trained and certified to perform these and any other duties that may affect emissions of hazardous air pollutants. A certified control room operator shall be on duty at the site at all times the source is in operation.
40 CFR 63.1206(c)(6)

II. Operational Restrictions (continued)

11. Site-specific, permittee-developed and implemented training programs for control room operators shall include the following elements:

a. training on the following subjects:

i. environmental concerns, including types of emissions;

ii. basic combustion principles, including products of combustion;

iii. operation of the specific type of combustor used by the operator, including proper startup, waste firing, and shutdown procedures;

iv. combustion controls and continuous monitoring systems;

v. operation of air pollution control equipment and factors affecting performance;

vi. inspection and maintenance of the combustor, continuous monitoring systems, and air pollution control devices;

vii. actions to correct malfunctions or conditions that may lead to malfunction;

viii. residue characteristics and handling procedures; and

ix. applicable federal, State, and local regulations, including Occupational Safety and Health Administration workplace standards.

b. an examination designed and administered by the instructor; and

c. written material covering the training course topics that may serve as reference material following completion of the course.
40 CFR 63.1206(c)(6)(v)

12. To maintain control room operator qualification under a site-specific, permittee-developed and implemented training program as provided by section A.II.11, control room operators shall complete an annual review or refresher course covering, at a minimum, the following topics:

a. update of regulations;

b. combustor operation, including startup and shutdown procedures, waste firing, and residue handling;

c. inspection and maintenance;

d. responses to malfunctions or conditions that may lead to malfunction; and

e. operating problems encountered by the operator.

The permittee shall record the operator training and certification program in the operating record.
40 CFR 63.1206(c)(6)(vi), (vii)

II. Operational Restrictions (continued)

13. The permittee shall prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants. The plan shall prescribe how you will operate and maintain the combustor in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels achieved during the comprehensive performance test.

This plan shall ensure compliance with the operation and maintenance requirements of 40 CFR 63.6(e) and minimize emissions of pollutants, automatic waste feed cutoffs, and malfunctions.

The permittee shall record the plan in the operating record.
40 CFR 63.1206(c)(7)

14. The permittee has demonstrated that hydrocarbon emissions during the comprehensive performance test do not exceed the hydrocarbon emissions standard (Trial Burn, August, 1998). The limits established on the destruction and removal efficiency (DRE) operating parameters also ensure that compliance with the hydrocarbon emission standard is maintained.
40 CFR 63.1209(a)(7)

The permittee shall document compliance with the Destruction and Removal Efficiency (DRE) standard under 40 CFR 63.1203 through 63.1205 only once provided that the permittee does not modify the source after the DRE test in a manner that could affect the ability of the source to achieve the DRE standard.
40 CFR 63.1206(b)(7)(i)(A)

15. Paragraphs (j) through (p) of 40 CFR 63.1206 require that the permittee establish limits for operating parameters based on comprehensive performance testing to ensure that the permittee maintain compliance with the emission standards of 40 CFR 63 Subpart EEE. For several parameters, the permittee shall establish a limit for the parameter to ensure compliance with more than one emission standard. An example is a limit on minimum combustion chamber temperature to ensure compliance with both the DRE standard of paragraph (j) and the dioxin/furan standard of paragraph (k) of 40 CFR, 63.1206. If the performance tests for such standards are not performed, simultaneously, the most stringent limit for a parameter derived from independent performance tests shall apply.
40 CFR 63.1207(i)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis.

2. The permittee shall collect or require the coal/coke supplier to collect a representative grab sample of each shipment of coal/coke that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal/coke sampling in accordance with ASTM method D2234, and analyze the coal sample for sulfur content (percent by weight).

The analytical methods for sulfur content determination shall be: ASTM method D3177 or ASTM method D4239. Alternative, equivalent methods may be used upon written approval by Ohio EPA Northwest District Office.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect or require the blended waste derived fuel supplier to collect a representative grab sample of each batch of blended waste derived fuel to be burned in this emissions unit. All the samples collected each calendar month shall be combined into a composite sample. Each composite sample shall be analyzed for sulfur content (percent by weight). Alternately, a separate analysis may be performed for each batch grab sample, and a monthly arithmetic average of all the analyses computed.

The analysis for sulfur content shall be performed in accordance with ASTM method D4294, ASTM method D240, or ASTM method 6010. Alternative equivalent methods may be used upon written approval by Ohio EPA Northwest District Office.

4. The permittee shall collect or require to be collected on a daily basis, a representative grab sample of raw material slurry, clinker, and cement kiln dust produced from or fed into this emissions unit. All the samples collected each calendar month shall be combined into a composite sample. Each composite sample shall be analyzed for sulfur content (percent by weight). Alternately, an analysis may be performed for each daily grab sample, and the analytical results for all the daily grab samples may be used to calculate a monthly arithmetic average.

The analysis for sulfur content shall be perfomed in accordance with ASTM method C114. Alternative equivalent methods may be used opon written approval by Ohio EPA Northwest District Office.

5. In addition to fuel analysis information, the permittee shall calculate and record each month the following information for this emissions unit:

a. the amount of each coal/coke shipment, in pounds, and the total blended waste derived fuel, in gallons and pounds per batch, burned;

b. the amount of raw material slurry, clinker, and cement kiln dust, in pounds, used in or produced;

c. the total number of pounds of sulfur dioxide emitted, calculated as follows:

i. multiply the sulfur content of coal by the number of pounds of coal that were burned;

ii. multiply the sulfur content of the blended waste-derived fuel by the number of pounds of blended waste derived fuel that were burned;

iii. multiply the sulfur content of the raw material slurry by the number of pounds of raw material slurry processed;

iv. multiply the sulfur content of the clinker by the number of pounds of clinker produced;

v. multiply the sulfur content of the cement kiln dust by the number of pounds of cement kiln dust produced; and

vi. calculate the SO2 emissions, in pounds, as follows:

SO2 emissions (lbs/month) = 2* x [(i + ii + iii) - (iv + v)]

d. the total number of tons of cement made from clinker produced during each calendar month; and

e. the sulfur dioxide emitted from this emissions unit for each ton of cement (made from clinker produced) produced, i.e., the total pounds of sulfur dioxide emitted from this emissions unit during each calendar month divided by the number of tons of cement made from clinker produced during each calendar month.

* This factor (64/32) is required to convert sulfur to SO2 since 1 lb-mole (32 lbs) of sulfur will yield 1 lb-mole (64 lbs) of SO2 (S + O2 ----> SO2).

III. Monitoring and/or Record Keeping Requirements (continued)

6. Chemical analyses of the blended waste-derived fuel fed to the kiln shall be conducted daily. The analyses shall be performed in accordance with the test methods specified in OAC rule 3745-54-13 and/or 40 CFR Part 264.13, as applicable, and, at a minimum, shall include the analyses of the following:

a. halogen content and sulfur content, in weight percent (wt %);
b. polychlorinated biphenols (PCB) concentration, in ppm; and
c. pH.

If no materials have been added to the blended waste-derived fuel being fed to the kiln, the chemical analyses from the previous day will be sufficient to demonstrate compliance with this condition.

7. A minimum sample of 100 milliliters (ml) shall be taken from each batch of blended-waste derived fuel. Each sample shall be saved for a period of at least 90 days.

Any sample or measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods, SW-846, November 1986, and additional supplements or editions thereof; or any equivalent methods as specified in the approved waste analyses plan or as such term is defined and used in the Ohio hazardous waste rules. Alternative applicable methods, as included in the permittee's feedstream analysis plan under section A.III.19, may be used with prior approval from the Ohio EPA.

8. The records of sampling and monitoring information required in sections A.III. 6 and 7 above shall specify the following:

a. the date(s), source of sample, time(s) and method(s) of sampling or measurement;

b. the individual(s) who collected the sample or performed the measurements;

c. the date(s) analyses were performed;

d. the individual(s) who performed the analyses;

e. the analytical technique(s) or method(s) used; and

f. the results of such analyses.

9. For quality assurance purposes, the Director may at his discretion, require that the permittee submit samples to an independent laboratory, other than Systech, for detailed chemical analyses for any or all of the constituents listed in Schedule A. The samples may include any materials retained as a requirement of condition A.III.2 or any sample taken at the point of generation. The frequency for these independent analyses, which shall be conducted at the permittee's expense, shall not exceed four (4) per year under normal operating conditions.

[The permittee has committed to annual submittals to an independent laboratory in its Plan submitted on August 2, 1996.]

10. The permittee shall use a carbon monoxide continuous emissions monitoring system (CEMS) to demonstrate and monitor compliance with the carbon monoxide emissions limitation of 100 ppmv. The permittee shall also use an oxygen CEMS to continuously correct the carbon monoxide level to 7 percent oxygen.
40 CFR 63.1209(a)(1)(i)

The permittee shall install, calibrate, maintain, and continuously operate the CEMS in compliance with the quality assurance procedures provided in the appendix to 40 CFR , Part 63 Subpart EEE, and Performance Specifications 4B in Appendix B of 40 CFR, Part 60.
40 CFR 63.1209(a)(2)

III. Monitoring and/or Record Keeping Requirements (continued)

11. The permittee shall use a continuous opacity monitoring system(s) (COMS) to demonstrate and monitor compliance with the 20% opacity standard.

The permittee shall install, calibrate, maintain, and continuously operate the COMS in compliance with the quality assurance procedures provided in the appendix to 40 CFR 63 Subpart EEE, and Performance Specification 1 in appendix B of 40 CFR 60.
40 CFR 63.1209(a)(2)

The permittee shall maintain and operate the COMS in accordance with the requirements of 40 CFR 63.8(c) except for the requirements under 40 CFR 63.8(c)(3). The requirements of 40 CFR 63.1211(d) shall be complied with instead of 40 CFR 63.8(c)(3).
40 CFR 63.1209(a)(1)(ii)

12. The permittee shall install, calibrate, maintain, and operate a particulate matter CEMS to demonstrate and monitor compliance with the particulate matter standard of 0.15 kg/Mg dry raw material feed. However, compliance with the requirements in this section to install, calibrate, maintain and operate the PM CEMS is not required until such time that the USEPA promulgates all performance specifications and operational requirements applicable to PM CEMS.
40 CFR 63.1209(a)(1)(iii)

13. Except as provided by section A.III.14, if a carbon monoxide CEMS detects a response that results in a one-minute average at or above the 3,000 ppmv span level required by Performance Specification 4B in Appendix B of 40 CFR, Part 60, the one-minute average shall be recorded as 10,000 ppmv. The one-minute 10,000 ppmv value shall be used for calculating the hourly rolling average carbon monoxide emissions.
40 CFR 63.1209(a)(3)(i)

14. Carbon monoxide CEMS that use a span value of 10,000 ppmv when one-minute carbon monoxide levels are equal to or exceed 3,000 ppmv are not subject to section A.III.13. Carbon monoxide CEMS that use a span value of 10,000 are subject to the same CEMS performance and equipment specifications when operating in the range of 3,000 ppmv to 10,000 ppmv that are provided by Performance Specification 4B for other carbon monoxide CEMS, except:

i. calibration drift shall be less than 300 ppmv; and
ii. calibration error shall be less than 500 ppmv.
40 CFR 63.1209(a)(3)(ii)

Note: The permittee is currently employing an interlock between the AWFCO system and a carbon monoxide CEMS span of 3000 ppmv.

15. The permittee shall ignore periods of time when one-minute values are not available for calculating the hourly rolling averages for CEMS or CMS. When one-minute values become available again, the first one-minute value is added to the previous 59 values to calculate the hourly rolling average.
40 CFR 63.1209(a)(6)(ii), (b)(5)(ii)

16. The permittee shall continue monitoring carbon monoxide and CMS parameters when the hazardous waste feed is cutoff if the emissions unit is operating. The permittee shall not resume feeding hazardous waste if the emission levels exceed the standard or the operating parameter limit.

The permittee is not, however, subject to the CEMS or CMS requirements for this emissions unit during periods of time the requirements of section A.I.2.d.ii (compliance with emissions standards for non-hazardous waste burning sources when not burning hazardous waste) are met.
40 CFR 63.1209(a)(6)(iii), (b)(5)(iii)

III. Monitoring and/or Record Keeping Requirements (continued)

17. The permittee shall use continuous monitoring systems (CMS, e.g., thermocouples, pressure transducers, flow meters) to document compliance with the Subpart EEE operating parameter limits.

The permittee shall install and operate continuous monitoring systems other than CEMS in conformance with 40 CFR 63.8(c)(3) that requires the permittee, at a minimum, to comply with the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system: The calibration of thermocouples shall be verified at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than once per year. The permittee shall operate and maintain optical pyrometers in accordance with the manufacturer specifications unless otherwise approved by the Director. The permittee shall calibrate optical pyrometers in accordance with the frequency and procedures recommended by the manufacturer, but no less frequent than once per year, unless otherwise approved by the Director.
40 CFR 63.1209(b)(2)

18. The CMS shall sample the regulated parameter without interruption, and evaluate the detector response at least once every 15 seconds, and compute and record the average values at least once every 60 seconds.

The span of the non-CEMS CMS detector shall not be exceeded. The permittee shall interlock the span limits into the automatic waste feed cutoff system required by A.II.8.
40 CFR 63.1209(b)(3), (4)

19. Prior to feeding the material, the permittee shall obtain an analysis of each feed stream that is sufficient to document compliance with the applicable feedrate limits determined in the Notification of Compliance (NOC). The permittee shall develop and implement a feed stream analysis plan and record it in the operating record. The plan shall specify at a minimum:

a. the parameters for which each feed stream will be analyzed to ensure compliance with the applicable feedrate limits;

b. whether the analysis will be obtained by performing sampling and analysis or by other methods, such as using analytical information obtained from others or using other published or documented data or information;

c. how the analysis will be used to document compliance with applicable feedrate limits (e.g., if hazardous wastes are blended and analyses of the wastes are obtained only prior to blending, the plan shall describe how the pertinent parameters of the blended waste will be determined);

d. the test methods which will be used to obtain the analyses;

e. the sampling method which will be used to obtain a representative sample of each feed stream to be analyzed using sampling methods described in Appendix I of 40 CFR 26, or an equivalent method; and

f. the frequency with which the permittee will review or repeat the initial analysis of the feed stream to ensure that the analysis is accurate and up-to-date.

[Pursuant to Section A.IV.5, the permittee has committed to submit the feed stream analysis plan in the NOC.]
40 CFR 63.1209(c)(1) - (3)

III. Monitoring and/or Record Keeping Requirements (continued)

20. To comply with the applicable feedrate limits under the NOC, the permittee must monitor and record feedrates as follows:

a. determine and record the value of the parameter for each feed stream by sampling and analysis or other method;

b. determine and record the mass or volume flow rate of each feed stream by a CMS. If the permittee determines flow rate of a feed stream by volume, the permittee must determine and record the density of the feed stream by sampling and analysis (unless the permittee reports the constituent concentration in units of weight per unit volume (e.g., mg/l)); and

c. calculate and record the mass feedrate of the parameter per unit time.
40 CFR 63.1209(c)(4)

The permittee is not required to monitor levels of metals or chlorine in the following feed streams to document compliance with the applicable feedrate limits, provided that the permittee document in the NOC that expected levels of the constituent in the feed stream were documented, and those assumed feedrate levels accounted for, in documenting compliance with feedrate limits for the August 1998 Trial Burn (see section A.V.4): natural gas, process air, and feed streams from vapor recovery systems.
40 CFR 63.1209(c)(5)

21. The requirements of 40 CFR 63.8(d) (Quality control program) and (e) (Performance evaluation of continuous monitoring systems) shall apply, except that the permittee must conduct performance evaluations of the components of the CMS under the frequency and procedures (for example, submittal of performance evaluation test plan for review and approval) applicable to performance tests as provided by 40 CFR 63.1207.

The permittee must comply with the quality assurance procedures for CEMS prescribed in the appendix to 40 CFR 63 Subpart EEE.
40 CFR 63.1209(d)

22. The provisions of 40 CFR 63.8(b) shall apply to monitoring.

The provisions of 40 CFR 63.8(c) shall apply to operation and maintenance, except:

a. the requirements of 40 CFR 63.1211(c) [that requires CMSs to be installed, calibrated, and operational on the compliance date] shall be complied with instead of section 63.8(c)(3);

b. the performance specifications for carbon monoxide and oxygen CEMSs in Subpart B of 40 CFR, Part 60 [that requires detectors to measure the sample concentration at least once every 15 seconds for calculating an average emission rate once every 60 seconds] shall be complied with instead of 40 CFR 63.8(c)(4)(ii); and

c. 40 CFR 63.8(c)(4)(i), (c)(5), and (c)(7)(i)(C) pertaining to COMS shall apply to this permit.

The provisions of 40 CFR 63.8(g) shall apply to reduction of monitoring data.
40 CFR 63.1209(e), (f), (h)

III. Monitoring and/or Record Keeping Requirements (continued)

23. To remain in compliance with the destruction and removal efficiency (DRE) standard, the permittee shall establish operating limits during the comprehensive performance test (or during a previous DRE test under provisions of 40 CFR 63.1206(b)(7)) for the following parameters, unless the limits are based on manufacturer specifications, and comply with those limits at all times that hazardous waste remains in the combustion chamber (i.e., the hazardous waste residence time has not transpired since the hazardous waste feed cutoff system was activated):

a. The permittee shall measure the temperature of the combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee shall document the temperature measurement location in the NOC.

[The permittee shall establish a minimum hourly rolling average temperature limit as the average of the test run averages.]

b. As an indicator of gas residence time in the control device, the permittee shall establish and comply with a limit on the maximum flue gas flow rate, the maximum production rate, or another parameter that can be documented in the site-specific test plan as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run.

The permittee shall comply with this limit on an hourly rolling average basis.

c. The permittee shall establish limits on the maximum pumpable and total (i.e., pumpable and non-pumpable) hazardous waste feedrate for each location where hazardous waste is fed as follows:

i. the permittee shall establish the limits as the average of the maximum hourly rolling averages for each run; an

ii. the permittee shall comply with the feedrate limit(s) on an hourly rolling average basis.

d. The permittee shall specify operating parameters and limits to ensure that good operation of each hazardous waste firing system is maintained.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(j)

III. Monitoring and/or Record Keeping Requirements (continued)

24. The permittee shall comply with the dioxin and furans emission standard by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test, unless the limits are based on he manufacturer specifications.]

a. The permittee shall establish a limit on the maximum temperature of the gas at the inlet to the baghouse on an hourly rolling average basis. The permittee shall establish the hourly rolling average limit as the average of the test run averages.

b. The permittee shall measure the temperature of the combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee shall document the temperature measurement location in the NOC.

[The permittee shall establish a minimum hourly rolling average temperature limit as the average of the test run averages.]

c. As an indicator of gas residence time in the baghouse, the permittee shall establish and comply with a limit on the maximum flue gas flow rate, the maximum production rate, or another parameter that is documented in the site-specific NOC as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run. The permittee shall comply with this limit on a hourly rolling average basis.

d. The permittee shall establish limits on the maximum pumpable and total (pumpable and non-pumpable) waste feedrate for each location where waste is fed as follows:

i. the permittee shall establish the limits as the average of the maximum hourly rolling averages for each run; an

ii. the permittee shall comply with the feedrate limit(s) on a hourly rolling average basis.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(k) * 40 CFR 63.1209(k), (m), (n), (o)

25. The permittee shall comply with the mercury emission standard by establishing and complying with the following operating parameter limits. The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications. The permittee shall establish a 12-hour rolling average limit for the total feedrate of mercury in all feed streams as the average of the test run averages.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.

The permittee may request to have mercury feedrate limits extrapolated from performance test feedrate levels under the provisions of 40 CFR 63.1209(l)(1). (see also A.I.2.j).
40 CFR 63.1209(l)

26. The permittee shall comply with the particulate matter emission standard by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications.]

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(m)

III. Monitoring and/or Record Keeping Requirements (continued)

27. The permittee shall comply with the semi-volatile metal (cadmium and lead) and low-volatile metal (arsenic, beryllium, and chromium) emission standards by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications.]

a. The permittee shall establish a limit for the maximum inlet temperature to the baghouse on an hourly, rolling average basis as the average of the test run averages.

b. The permittee shall establish feed rate limits for the semi-volatile metals (cadmium and lead) and the low-volatile metals (arsenic, beryllium, and chromium) as follows, except as provided by paragraph A.III.27.b.ii of this section:

i. the permittee shall establish a 12-hour, rolling average limit for the feedrate of cadmium and lead, combined, in all feed streams as the average of the test run averages;

ii. the permittee shall establish a 12-hour, rolling average limit for the feed rate of arsenic, beryllium, and chromium, combined, in all the feed streams as the average of the test run averages; and

iii. the permittee shall establish a 12-hour, rolling average limit for the feed rate of arsenic, beryllium, and chromium, combined, in all he pumpable feed streams as the average of the test run averages. Dual feed rate limits for both pumpable and total feed streams are not required, however, if the total feed rate limit is based solely on the feed rate of pumpable feed streams.

c. The permittee shall establish a 12-hour, rolling average limit for the feed rate of the total chlorine and chloride in all the feed streams as the average of the test run averages.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.

The permittee may request to have semi-volatile metal and low volatile metal feed rate limits extrapolated from performance test feed rate levels under the provisions of 40 CFR 63.1209(n)(2)(ii) (see also A.I.2.j).
40 CFR 63.1209(n)

28. The permittee shall comply with the hydrogen chloride and chlorine gas emission standards by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications.]

The permittee shall establish a 12-hour, rolling average limit for the total feed rate of chlorine (organic and inorganic) in all the feed streams as the average of the test run averages.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(o)

29. If the permittee complies with the requirements for combustion system leaks pursuant to section A.II.9 by maintaining the maximum combustion chamber zone pressure lower than ambient pressure, the permittee shall monitor the pressure instantaneously* and the automatic waste feed cutoff system shall be engaged when negative pressure is not maintained at any time.

* See also Federal Register, February 13, 14, 2002.
40 CFR 63.1209(p)

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the range specified in Section A.II.1 of the terms and conditions of this permit. The deviation reports shall be submitted in accordance with the General Terms and Condition of this permit, paragraph A.I.c.

IV. Reporting Requirements (continued)

2. The permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Northwest District Office documenting all instances of stack opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any COMS downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit quarterly reports that summarize the results of the monthly information compiled in accordance with Section A.III.6 of this permit. These reports shall be submitted to Ohio EPA, Northwest District Office by February 15, May 15, August 15 and November 15 of each year, and shall present the data collected during the previous calendar quarter.

4. The permittee shall submit quarterly deviation (excursions) reports that identify all exceedances of the limitations/restrictions specified in section A.II.2 of this permit. The deviation reports shall be submitted in accordance with the General Terms and Condition of this permit, paragraph A.I.c.

IV. Reporting Requirements (continued)

5. The Notification of Compliance (NOC) status requirements of 40 CFR 63.9(h) shall apply, except that:

a. the notification is a NOC, rather than compliance status;

b. the notification is required for the initial comprehensive performance test and each subsequent comprehensive and confirmatory performance test; and

c. the permittee shall postmark the notification before the close of business on the 90th day following completion of relevant compliance demonstration activity rather than the 60th day as required by 40 CFR 63.9(h)(2)(ii).

Upon postmark of the NOC, the operating parameter limits identified in the NOC, as applicable, shall be complied with (the limits identified in the Documentation of Compliance or a previous NOC are no longer applicable).

The NOC requirements of 40 CFR 63.1207(j) shall also apply.

By the compliance date, the permittee shall develop and include in the operating record a Documentation of Compliance. The permittee is not subject to this requirement, however, if a NOC is submitted under 40 CFR 63.1207(j) prior to the compliance date.

As a data in lieu facility, and in consideration of 40 CFR 63.1206(a)(1), the permittee has committed to the submittal of the NOC before the Subpart EEE compliance date of September 30, 2003.
40 CFR 63.1210(b), 40 CFR 63.1211(c)(1)

In consideration of 64 FR 52982 et seq. and 40 CFR 270.66, this Title V permit recognizes that the CAA authority for Subpart EEE is effective with the postmark of the Notification of Compliance (NOC). This permit further recognizes that the NOC shall meet all applicable requirements as specified in this permit.

6. In accordance with 40 CFR 63.1206(c)(1)(v), upon postmark of the NOC, the permittee shall arrange to submit an application to reopen this permit in accordance with paragraph A.10.a. of Part I - General Terms and Conditions of this permit, except that the permittee shall be required to submit the application within two months of the postmark of the NOC.

7. In consideration of 40 CFR 63.1207(c)(1) and (e)(1)(i), the permittee has submitted a performance evaluation plan for the non-CEMS continuous monitoring system. The plan shall meet the requirements of this permit or as otherwise specified in 40 CFR 63.1209.

V. Testing Requirements

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

1.a Emission Limitation:
43 pounds of sulfur dioxide per ton of cement produced

Applicable Compliance Method:
The permittee shall demonstrate compliance with the sulfur dioxide emission limitation above based on the record keeping requirements in section A.III and the results of emission testing conducted in accordance with USEPA Methods 1 - 4 and 6, 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

1.b Emission Limitation:
75 lbs/hr of PE

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

1.c Emission Limitation:
dioxins and furans:
0.40 ng TEQ/dscm, corrected to 7 percent oxygen *

Applicable Compliance Method:
The permittee shall use Method 0023A, Sampling Method for Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans emissions from Stationary Sources, EPA Publication SW-846 to determine compliance with the emission standard for dioxins and furans.

The permittee shall sample for a minimum of three hours, and must collect a minimum sample volume of 2.5 dscm.

The permittee may assume that nondetects are present at zero concentration.

1.d Emission Limitation:
mercury: 120 ug/dscm, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Method 29 to demonstrate compliance with emission standard for mercury.

1.e Emission Limitation:
lead and cadmium (combined): 330 ug/dscm, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Method 29 to determine compliance with the emission standard for cadmium and lead (combined).

1.f Emission Limitation:
arsenic, beryllium, and chromium (combined): 56 ug/dscm, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Method 29 to determine compliance with the emission standard for arsenic, beryllium, and chromium (combined).

V. Testing Requirements (continued)

1.g Emission Limitation:
carbon monoxide (midkiln): 100 ppmv, based on an hourly rolling average, dry basis, corrected to 7 percent oxygen,

hydrocarbons (midkiln): 10 ppmv, based on an hourly rolling average, dry basis, corrected to 7 percent oxygen, and reported as propane, at any time during the DRE test runs or their equivalent as provided by 40 CFR 63.1206(b)(7)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the CO emission limitation above based on the record keeping requirements in section A.III .10 of this permit.

If required, the permittee shall demonstrate compliance with the CO emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 - 4 and 10.

If required, the permittee shall demonstrate compliance with the hydrocarbons emission limitation in accordance with 40 CFR 60, Appendix A, Method 25A.

1.h Emission Limitation:
hydrochloric acid and chlorine gas (combined): 130 ppmv, expressed as hydrochloric acid equivalents, dry basis, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Methods 26A, 320, or 321 to determine compliance with the emission standard for hydrochloric acid and chlorine gas (combined).

1.i Emission Limitation:
particulate matter: 0.15 kg/Mg dry raw material feed

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Methods 1 - 5 to demonstrate compliance with the particulate matter emission limitation above.

In accordance with 40 CFR 63.1204(A)(7), the permittee shall use suitable methods to determine the kiln raw material feedrate.

The permittee shall compute the particulate matter emission rate, E, from the following equation:

$E = (Cs \times Qsd) / P$

Where:

E = emission rate of particulate matter, kg/Mg of kiln raw material feed;

Cs = concentration of particulate matter, kg/dscm;

Qsd = volumetric flow rate of effluent gas, dscm/hr; and

P = total kiln raw material feed (dry basis), Mg/hr.

V. Testing Requirements (continued)

1.j Emission Limitation:
Visible emissions shall not exceed 20 percent opacity

Applicable Compliance Method:
The permittee shall demonstrate compliance with the visible emissions limitation in accordance with the record keeping requirements established in section A.III.11 of the terms and conditions of this permit.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.

c. The test method which shall be employed to demonstrate compliance with the allowable mass emission rate for PE is Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity.

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

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

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

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

a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for sulfur dioxide.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): OAC rule 3745-18-04(A). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity.

V. Testing Requirements (continued)

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

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

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

4. Through the Ohio EPA correspondence of June 5, 2001 to the permittee, this permit recognizes the approval of the data in lieu request for emissions unit P014 (Kiln 1), for the August 1998 RCRA Trial Burn (40 CFR 266 Subpart H - 'BIF'), under 40 CFR 63.1207(c)(2). In conjunction with this, the permittee has committed to specify in the NOC how the conditions of 40 CFR 63.1206(b)(6), (7), and (12), and 40 CFR 63.1207(g)(1) have been satisfied.

5. In consideration of US EPA's correspondence of October 20, 2000 to the permittee of, and in consideration of the RCRA testing (40 CFR 266 Subpart H - 'BIF') conducted on emissions unit P015 (Kiln 2) [Certification of Compliance test in 1992, and the Re-certification of Compliance test in 1995], and in conjunction with the data in lieu resolution of A.V.4 above, the Director approves the extension of data in lieu approval under A.V.4 to the 'similar unit', emissions unit P015, with the contingency that the first Comprehensive Performance test and the first Confirmatory Performance test under the re-promulgated standards (anticipated approximately 2007 and beyond) will be performed on emissions unit P015.

This data in lieu provision is intended to be extended to subsequent future testing, under alternated 'staggered' testing between these two emissions units.

V. Testing Requirements (continued)

6. An Absolute Calibration Audit (ACA) shall be conducted quarterly, and a Relative Accuracy Test Audit (RATA) (if applicable, see sections A.V.6.a and b) shall be conducted annually. An Interference Response Tests shall be performed whenever an ACA or a RATA is conducted. When a performance test is also required under 40 CFR 63.1207 to document compliance with emission standards, the RATA shall coincide with the performance test. The audits shall be conducted as follows:

a. This requirement applies to O2 and CO CEMS. The RATA shall be conducted at least annually. Conduct the RATA as described in the relative accuracy (RA) test procedure (or alternate procedures section) described in the applicable Performance Specifications. In addition, analyze the appropriate performance audit samples received from the EPA as described in the applicable sampling methods.

b. The ACA shall be conducted at least quarterly except in a quarter when a RATA (if applicable, see 'a' above) is conducted instead. Conduct an ACA as described in the calibration error (CE) test procedure described in the applicable Performance Specifications.

c. The interference response test shall be conducted whenever an ACA or RATA is conducted. Conduct an interference response test as described in the applicable Performance Specifications.

d. If the RA from the RATA or the CE from the ACA exceeds the criteria in the applicable Performance Specifications, hazardous waste burning shall cease immediately. Hazardous waste burning cannot resume until the permittee takes corrective measures and audit the CEMS with a RATA to document that the CEMS is operating within the specifications.

To provide continuation of the quality assurance currently being conducted for the permittee's RCRA requirements, the first RATA under this permit shall be required in January to March (1st quarter) 2004.

40 CFR 63 Subpart EEE, Appendix, Section 5

7. The permittee shall comply with any applicable performance testing and other requirements under the replacement standards for Subpart EEE, as may be applicable, before the expiration of this permit.

VI. Miscellaneous Requirements

1. The permittee shall comply with the Subpart EEE standards no later than the compliance date, September 30, 2003, unless the Director grants an extension of time under 40 CFR 63.6(i) or 40 CFR 63.1213.
40 CFR 63.1206(a)(1)

If the permittee chooses to comply with the emission standards of Subpart EEE prior to September 30, 2003, the compliance date is the date the Notification of Compliance under 40 CFR 63.1207(j)(1) is postmarked.
40 CFR 63.1206(a)(3)

2. The Director will determine compliance with the emission standards of this permit as provided by 40 CFR 63.6(f)(2). Conducting performance testing under operating conditions representative of the extreme range of normal conditions is consistent with the requirements of 40 CFR 63.6(f)(2)(iii)(B) and 63.7(e)(1) to conduct performance testing under representative operating conditions.

The Director will make a finding concerning compliance with the emission standards and other requirements of this permit as provided by 40 CFR 63.6(f)(3).

The Director may grant an extension of compliance with the emission standards of this permit as provided by 40 CFR 63.6(i) and 63.1213.
40 CFR 63.1206(b)(2) - (4)

VI. Miscellaneous Requirements (continued)

3. The permittee may submit a written request to the Administrator for approval to use data compression techniques to record data from CMS, including CEMS, on a frequency less than required by 40 CFR 63.1209 as specified in section A.III. The permittee shall submit the request for review and approval as part of the comprehensive performance test plan as follows:

a. The permittee shall record a data value at least once each ten minutes.

b. For each CEMS or operating parameter for which the permittee requests to use data compression techniques, the permittee shall recommend:

i. a fluctuation limit that defines the maximum permissible deviation of a new data value from a previously generated value without requiring the permittee to revert to recording each one-minute value. If the permittee exceeds a fluctuation limit, the permittee shall record each one-minute value for a period of time not less than ten minutes. If neither the fluctuation limit nor the data compression limit are exceeded during that period of time, the permittee may reinitiate recording data values on a frequency of at least once each ten minutes; and

ii. a data compression limit defined as the closest level to an operating parameter limit or emission standard at which reduced data recording is allowed. Within this level and the operating parameter limit or emission standard, the permittee shall record each one-minute average. The data compression limit should reflect a level at which the permittee is unlikely to exceed the specific operating parameter limit or emission standard, considering its averaging period, with the addition of a new one-minute average.
40 CFR 63.1211(d)

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: Cement Kiln #2 (P015)

Activity Description: Cement clinker manufacture in rotary kiln #2

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
cement kiln 2 (south), equipped with a baghouse	OAC rule 3745-17-11(A)	75 pounds per hour (lbs/hr) of particulate emissions (PE)
	OAC rule 3745-17-07(A)	See A.II.2.h.
	OAC rule 3745-18-69(B)	43.0 pounds sulfur dioxide per ton of cement produced
	40 CFR 61.348	Exempt, pursuant to 40 CFR 61.348(d)(4).
	OAC rule 3745-31-05 (PTI #03-976)	See A.I.2.a below.
	OAC rule 3745-77-07(A)	See Sections A.II.2 and 3 below.
	40 CFR 63.1204(a)(1) 40 CFR, Part 63, Subpart EEE	dioxins and furans: 0.40 ng TEQ/dscm, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(2) 40 CFR, Part 63, Subpart EEE	mercury: 120 ug/dscm, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(3) 40 CFR, Part 63, Subpart EEE	lead and cadmium: 330 ug/dscm, combined emissions, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(4) 40 CFR, Part 63, Subpart EEE	arsenic, beryllium, and chromium: 56 ug/dscm, combined emissions, corrected to 7 percent oxygen *

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.1204(a)(5)(i)(A) 40 CFR, Part 63, Subpart EEE	carbon monoxide (midkiln): 100 ppmv, hourly rolling average, dry basis, and corrected to 7 percent oxygen, and * hydrocarbons (midkiln): 10 ppmv, hourly rolling average, dry basis, corrected to 7 percent oxygen, and reported as propane, at any time during the DRE test runs or their equivalent as provided by 40 CFR 63.1206(b)(7)
	40 CFR 63.1204(a)(6) 40 CFR, Part 63, Subpart EEE	hydrochloric acid and chlorine gas: 130 ppmv, combined emissions, expressed as hydrochloric acid equivalents, dry basis, corrected to 7 percent oxygen *
	40 CFR 63.1204(a)(7) 40 CFR, Part 63, Subpart EEE	particulate matter; 0.15 kg/Mg dry raw material feed *
	40 CFR 63.1204(a)(7) 40 CFR, Part 63, Subpart EEE	Visible emissions shall not exceed 20 percent opacity. *
	40 CFR 63.1204(c) 40 CFR, Part 63, Subpart EEE	destruction and removal efficiency (DRE) of 99.99% for each principle organic hazardous constituent (POHC), as designated in accordance with A.I.2.b. * See section A.VI.1 and 2

2. Additional Terms and Conditions

2.a The terms and conditions of the permit to install for this emissions unit, which was issued on November 17, 1980, were made obsolete by the promulgation of Title 40, Parts 260, 261, 264, 265, 266, 270, and 271 on February 21, 1991, and later by the promulgation of Part 63 (Subpart EEE) on September 30, 1999.

2.b POHCs: The permittee must specify one or more POHCs from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1), excluding caprolactam (CAS number 105602) as provided by 40 CFR 63.60, for each waste to be burned. The permittee must base this specification on the degree of difficulty of incineration of the organic constituents in the waste and on their concentration or mass in the waste feed, considering the results of waste analyses or other data and information.
40 CFR 63.1204(c)(3)

2.c Significant figures: The emission limits (40 CFR 63.1204(a) and (b)) are presented with two significant figures. Although the permittee must perform intermediate calculations using at least three significant figures, the permittee may round the resultant emission levels to two significant figures to document compliance.
40 CFR 63.1204(f)

2. Additional Terms and Conditions (continued)

2.d The Subpart EEE emission standards and operating requirements included in this permit shall apply at all times, except:

i. during startup, shutdown, and malfunction; and

ii. when hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cut off for a period of time not less than the hazardous waste residence time) and the permittee has documented in the operating record that the permittee is complying with all otherwise applicable requirements and standards promulgated under authority of sections 112 (e.g., 40 CFR 60 Subpart LLL for cement kilns) or 129 of the Clean Air Act in lieu of the Subpart EEE emission standards specified in section A.I.1; the Subpart EEE monitoring and compliance standards of this permit; and the Subpart EEE notification, reporting, and record keeping requirements of this permit.

The permittee has committed to achieving compliance with section A.I.2.d.ii above through the startup, shutdown, and malfunction plan requirements of section A.II.5 of this permit.
40 CFR 63.1206(b)(1)

2.e Even if the permittee follows the startup and shutdown procedures and the corrective measures upon a malfunction that are prescribed in the Startup, Shutdown, and Malfunction Plan, the Subpart EEE emission standards and operating requirements of this permit shall apply if hazardous waste is in the combustion chamber (i.e., if the permittee is feeding hazardous waste or if startup, shutdown, or a malfunction occurs before the hazardous waste residence time has transpired after hazardous waste cutoff).
40 CFR 63.1206(c)(2)(ii)

2.f If the permittee plans to change* the design, operation, or maintenance practices of the emissions unit in a manner that may adversely affect compliance with any emission standard that is not monitored with a CEMS, the following shall take place:

i. The permittee must notify the Director at least 60 days prior to the change, unless the permittee documents circumstances that dictate that such prior notice is not reasonably feasible. The notification must include:

a. a description of the changes and which emission standards may be affected; and

b. a comprehensive performance test schedule and test plan under the requirements of 40 CFR 63.1207(f) that will document compliance with the affected emission standard(s).

ii. The permittee shall conduct a comprehensive performance test under the requirements of 40 CFR 63.1207(f)(1) and (g)(1) to document compliance with the affected emission standard(s) and establish operating parameter limits as required under 40 CFR 63.1209, and submit to the Administrator a Notification of Compliance (NOC) under 40 CFR 63.1207(j) and 63.1210(d).

2. Additional Terms and Conditions (continued)

iii. Except as provided by paragraph A.I.2.f.iv, after the change and prior to submitting the notification of compliance, the permittee must not burn hazardous waste for more than a total of 720 hours (renewable at the discretion of the Director) and only for the purposes of pre-testing or comprehensive performance testing. Pre-testing is defined in 40 CFR 63.1207(h)(2)(i) and (ii).

iv. The permittee may petition the Director to obtain written approval to burn hazardous waste in the interim prior to submitting a NOC for purposes other than testing or pre-testing. The permittee must specify operating requirements, including limits on operating parameters, that will ensure compliance with the emission standards of this subpart based on available information. The Director will review, modify as necessary, and approve, if warranted, the interim operating requirements.

* For purposes of section A.I.2.f, "change" means any change in design, operation, or maintenance practices that were documented in the comprehensive performance test plan, NOC, or startup, shutdown, and malfunction plan.

If the permittee determines that a change will not adversely affect compliance with the emission standards or operating requirements, the permittee must document the change in the operating record upon making such change. The permittee must revise as necessary the NOC, and the performance test plan and Documentation of Compliance as may be applicable, and start-up, shutdown, and malfunction plan to reflect these changes.
40 CFR 63.1206(b)(5)

2.g The permittee shall provide the hazardous waste residence time in the NOC.
40 CFR 63.1206(b)(11)

2.h The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 63.1204(a)(7) (40 CFR, Part 63, Subpart EEE).

2.i The permittee shall comply with all the applicable requirements of 40 CFR, Part 63, Subpart EEE (National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors - interim standards rule) as well as with all the applicable requirements of 40 CFR, Part 63, Subpart A (General Provisions), as identified in Table 1 in the appendix for Subpart EEE.

2.j Considering US EPA's proposed clarification regarding delegation of authority in 67 FR 2311 [proposed 40 CFR 63.1214], the Director has permit authority to act on petitions from the permittee for alternative standards and/or parameters under 40 CFR 63.1206(b)(10), (b)(15); 63.1209(g), (l), (n); and 63.1211(d).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 6 to 15 inches of water while the emissions unit is in operation.

The permittee may petition to the Ohio EPA, Northwest District Office for reestablishment of the pressure drop range provided the permittee can demonstrate to the Ohio EPA, Northwest District Office's satisfaction that the new pressure drop range will ensure ongoing compliance and the operating conditions upon which the pressure drop range was previously established are no longer applicable.

II. Operational Restrictions (continued)

2. Waste-derived fuel that is to be burned in the kiln shall conform to the specifications listed in Schedule A (Specifications of Blended Waste-Derived Fuel) below:

SCHEDULE A:

SPECIFICATIONS OF BLENDED WASTE-DERIVED FUEL

Sulfur	3% sulfur
Halogens	5% maximum
Inorganic Acids and Bases	extractable pH between 4.0 and 11.0
Water	1% maximum as separated phase
PCB	<50 PPM

3. The permittee shall comply with all State and federal laws and regulations including, but not limited to, the Toxic Substances Control Act of 1979. No registered herbicides, pesticides, rodenticides, insecticides, or radioactive wastes as defined by ASTM Method D5928, or other materials shall be combusted in this emissions unit in violation of State and federal laws and regulations.

4. The combustion gas temperature at the inlet to the initial dry particulate matter control device must be 400 degrees Fahrenheit or lower, based on the average of the test run average temperatures.
40 CFR 63.1204

5. The permittee shall be subject to the startup, shutdown, and malfunction plan requirements of 40 CFR 63.6(e)(3) as follows:

a. The permittee must identify in the plan a projected oxygen correction factor based on normal operations to use during periods of startup and shutdown.

b. The permittee must record the plan in the operating record.

c. In conjunction with sections A.I.2.d and A.II.4, the permittee has committed to the inclusion of a requirement for a three-hour (180-minute) rolling average compliance time for the temperature requirement of section A.II.4 during times when hazardous waste is not in the combustion chamber (reflective of 40 CFR 63.1342 requirements).
40 CFR 63.1206(c)(2)(i), (iii), (iv)

6. During malfunctions, the automatic waste feed cutoff requirements specified in section A.II.8 shall continue to apply, except as provided in paragraphs A.II.8.e and f. If the permittee exceeds a Subpart EEE emission standard specified in section A.I.1 and is monitored by a CEMS or COMs, or a Subpart EEE operating limit specified under section A.III, the automatic waste feed cutoff system must immediately and automatically cutoff the hazardous waste feed, except as provided in section A.II.8.h. If the malfunction itself prevents immediate and automatic cutoff of the hazardous waste feed, however, the permittee shall cease feeding hazardous waste as quickly as possible.

Although the automatic waste feed cutoff requirements shall continue to apply during a malfunction, an exceedance of an emission standard monitored by a CEMS or COMS or operating limit (as mentioned above) is not a violation of this permit if the permittee takes the corrective measures prescribed in the startup, shutdown, and malfunction plan.

II. Operational Restrictions (continued)

For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, the permittee shall:

a. within 45 days of the 10th exceedance, complete an investigation of the cause of each exceedance and evaluation of approaches to minimize the frequency, duration, and severity of each exceedance, and revise the startup, shutdown, and malfunction plan as warranted by the evaluation to minimize the frequency, duration, and severity of each exceedance; and

b. record the results of the investigation and evaluation in the operating record, and include a summary of the investigation and evaluation, and any changes to the startup, shutdown, and malfunction plan, in the excess emissions report required pursuant to 40 CFR 63.10(e)(3).
40 CFR 63.1206(c)(2)(v)

7. If the permittee feeds hazardous waste during startup or shutdown, the permittee must include waste feed restrictions (e.g., type and quantity), and other appropriate operating conditions and limits in the startup, shutdown, and malfunction plan. The permittee must interlock these established operating limits with the automatic waste feed cutoff system required pursuant to section A.II.8, except as provided in paragraphs A.II.8.e and f.

When feeding hazardous waste during startup or shutdown, the automatic waste feed cutoff system must immediately and automatically cutoff the hazardous waste feed if the permittee exceeds the established operating limits, except as provided in paragraph A.II.8.h.

Although these automatic waste feed cutoff requirements shall apply during startup and shutdown, an exceedance of an emission standard or operating limit is not a violation of this permit if the permittee complies with the operating procedures prescribed in the startup, shutdown, and malfunction plan.
40 CFR 63.1206(c)(2)(v)

8. The permittee shall comply with the following:

a. Upon the compliance date, the permittee shall operate the hazardous waste combustor with a functioning system that immediately and automatically cuts off the hazardous waste feed, except as provided in paragraph A.II.8.h, as follows:

i. when any of the following are exceeded: Subpart EEE operating parameter limits specified under section A.III; an emission standard monitored by a CEMS; and the allowable combustion chamber pressure;

ii. when the span value of any CMS detector, except a CEMS, is met or exceeded;

iii. upon malfunction of a CMS monitoring Subpart EEE operating parameter limits specified under section A.III; or an emission level; or

iv. when any component of the automatic waste feed cutoff system fails.

b. During an automatic waste feed cutoff (AWFCO), the permittee shall continue to duct combustion gasses to the air pollution control system while hazardous waste remains in the combustion chamber (i.e., if the hazardous waste residence time has not transpired since the hazardous waste feed cutoff system was activated).

c. The permittee shall continue to monitor during the cutoff the Subpart EEE operating parameters for which limits are established under section A.III and the emissions required under that section to be monitored by a CEMS, and the permittee shall not restart the hazardous waste feed until the operating parameters and emission levels are within the specified limits.

II. Operational Restrictions (continued)

d. If the AWFCO system fails to automatically and immediately cutoff the flow of hazardous waste upon exceedance of a parameter required to be interlocked with the AWFCO system pursuant to paragraph A.III.8.a , the permittee has failed to comply with the AWFCO requirements of A.II.8.

e. If, after any AWFCO, there is an exceedance of an emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the combustion chamber (i.e., whether the hazardous waste residence time has transpired since the hazardous waste feed cutoff system was activated), the permittee shall investigate the cause of the AWFCO, take appropriate corrective measures to minimize future AWFCOs, and record the findings and corrective measures in the operating record.

f. The permittee shall perform the following:

i. For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, the permittee shall submit to the Director a written report within 5 calendar days of the 10th exceedance documenting the exceedances and results of the investigation and corrective measures taken.

ii. On a case-by-case basis, the Director may require excessive exceedance reporting when fewer than 10 exceedances occur during a 60-day block period.

g. The AWFCO system and associated alarms shall be tested at least weekly to verify operability, unless the permittee documents in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspection will be adequate. At a minimum, the permittee shall conduct operability testing monthly. The permittee shall document and record in the operating record AWFCO operability test procedures and results.

h. The permittee may ramp down the waste feedrate of pumpable hazardous waste over a period not to exceed one minute, except as indicated in paragraph A.II.8.i. If the permittee elects to ramp down the waste feed, the permittee shall document ramp down procedures in the operating and maintenance plan. The procedures shall specify that the ramp down begins immediately upon initiation of automatic waste feed cutoff and the procedures shall prescribe a bona fide ramping down. If an emission standard or operating limit is exceeded during the ramp down, the permittee has failed to comply with the emission standards or operating requirements of Subpart LLL.

i. If the automatic waste feed cutoff is triggered by an exceedance of any of the operating limits (i.e., minimum combustion chamber temperature, maximum hazardous waste feedrate, or any hazardous waste firing system operating limits that may be established for the combustor), the permittee may not ramp down the waste feed cutoff.
40 CFR 63.1206(c)(3)

II. Operational Restrictions (continued)

9. Combustion system leaks of hazardous air pollutants shall be controlled as follows:

a. by keeping the combustion zone sealed to prevent combustion system leaks;

b. by maintaining the maximum combustion zone pressure lower than ambient pressure using an instantaneous monitor;

c. upon prior written approval of the USEPA Administrator, an alternative means of control to provide control of combustion system leaks equivalent to maintenance of combustion zone pressure lower than ambient pressure; or

d. upon prior written approval of the US EPA Administrator, other technique(s) which can be demonstrated to prevent fugitive emissions without use of instantaneous pressure limits.

The permittee shall specify in the operating record the method used for control of combustion system leaks.
40 CFR 63.1206(c)(5)

10. The permittee shall establish training programs for all categories of personnel whose activities may reasonably be expected to directly affect emissions of hazardous air pollutants from the emissions unit. Such persons include, but are not limited to, chief facility operators, control room operators, continuous monitoring system operators, persons that sample and analyze feed streams, persons that manage and charge feed streams to the combustor, persons that operate emission control devices, and ash and waste handlers. Each training program shall be of a technical level commensurate with the person's job duties specified in the training manual. Each commensurate training program shall require an examination to be administered by the instructor at the end of the training course. Passing of this test shall be deemed the "certification" for personnel, except that, for control room operators, the training and certification program shall be as specified in sections A.II.11 and 12.

The permittee shall ensure that the source is operated and maintained at all times by persons who are trained and certified to perform these and any other duties that may affect emissions of hazardous air pollutants. A certified control room operator shall be on duty at the site at all times the source is in operation.
40 CFR 63.1206(c)(6)

II. Operational Restrictions (continued)

11. Site-specific, permittee-developed and implemented training programs for control room operators shall include the following elements:

a. training on the following subjects:

i. environmental concerns, including types of emissions;

ii. basic combustion principles, including products of combustion;

iii. operation of the specific type of combustor used by the operator, including proper startup, waste firing, and shutdown procedures;

iv. combustion controls and continuous monitoring systems;

v. operation of air pollution control equipment and factors affecting performance;

vi. inspection and maintenance of the combustor, continuous monitoring systems, and air pollution control devices;

vii. actions to correct malfunctions or conditions that may lead to malfunction;

viii. residue characteristics and handling procedures; and

ix. applicable federal, State, and local regulations, including Occupational Safety and Health Administration workplace standards.

b. an examination designed and administered by the instructor; and

c. written material covering the training course topics that may serve as reference material following completion of the course.
40 CFR 63.1206(c)(6)(v)

12. To maintain control room operator qualification under a site-specific, permittee-developed and implemented training program as provided by section A.II.11, control room operators shall complete an annual review or refresher course covering, at a minimum, the following topics:

a. update of regulations;

b. combustor operation, including startup and shutdown procedures, waste firing, and residue handling;

c. inspection and maintenance;

d. responses to malfunctions or conditions that may lead to malfunction; and

e. operating problems encountered by the operator.

The permittee shall record the operator training and certification program in the operating record.
40 CFR 63.1206(c)(6)(vi), (vii)

II. Operational Restrictions (continued)

13. The permittee shall prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants. The plan shall prescribe how you will operate and maintain the combustor in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels achieved during the comprehensive performance test.

This plan shall ensure compliance with the operation and maintenance requirements of 40 CFR 63.6(e) and minimize emissions of pollutants, automatic waste feed cutoffs, and malfunctions.

The permittee shall record the plan in the operating record.
40 CFR 63.1206(c)(7)

14. The permittee has demonstrated that hydrocarbon emissions during the comprehensive performance test do not exceed the hydrocarbon emissions standard (Trial Burn, August, 1998). The limits established on the destruction and removal efficiency (DRE) operating parameters also ensure that compliance with the hydrocarbon emission standard is maintained.
40 CFR 63.1209(a)(7)

The permittee shall document compliance with the Destruction and Removal Efficiency (DRE) standard under 40 CFR 63.1203 through 63.1205 only once provided that the permittee does not modify the source after the DRE test in a manner that could affect the ability of the source to achieve the DRE standard.
40 CFR 63.1206(b)(7)(i)(A)

15. Paragraphs (j) through (p) of 40 CFR 63.1206 require that the permittee establish limits for operating parameters based on comprehensive performance testing to ensure that the permittee maintain compliance with the emission standards of 40 CFR 63 Subpart EEE. For several parameters, the permittee shall establish a limit for the parameter to ensure compliance with more than one emission standard. An example is a limit on minimum combustion chamber temperature to ensure compliance with both the DRE standard of paragraph (j) and the dioxin/furan standard of paragraph (k) of 40 CFR, 63.1206. If the performance tests for such standards are not performed, simultaneously, the most stringent limit for a parameter derived from independent performance tests shall apply.
40 CFR 63.1207(i)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis.

2. The permittee shall collect or require the coal/coke supplier to collect a representative grab sample of each shipment of coal/coke that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal/coke sampling in accordance with ASTM method D2234, and analyze the coal sample for sulfur content (percent by weight).

The analytical methods for sulfur content determination shall be: ASTM method D3177 or ASTM method D4239. Alternative, equivalent methods may be used upon written approval by Ohio EPA Northwest District Office.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect or require the blended waste derived fuel supplier to collect a representative grab sample of each batch of blended waste derived fuel to be burned in this emissions unit. All the samples collected each calendar month shall be combined into a composite sample. Each composite sample shall be analyzed for sulfur content (percent by weight). Alternately, a separate analysis may be performed for each batch grab sample, and a monthly arithmetic average of all the analyses computed.

The analysis for sulfur content shall be performed in accordance with ASTM method D4294, ASTM method D240, or ASTM method 6010. Alternative equivalent methods may be used upon written approval by Ohio EPA Northwest District Office.

4. The permittee shall collect or require to be collected on a daily basis, a representative grab sample of raw material slurry, clinker, and cement kiln dust produced from or fed into this emissions unit. All the samples collected each calendar month shall be combined into a composite sample. Each composite sample shall be analyzed for sulfur content (percent by weight). Alternately, an analysis may be performed for each daily grab sample, and the analytical results for all the daily grab samples may be used to calculate a monthly arithmetic average.

The analysis for sulfur content shall be perfomed in accordance with ASTM method C114. Alternative equivalent methods may be used opon written approval by Ohio EPA Northwest District Office.

5. In addition to fuel analysis information, the permittee shall calculate and record each month the following information for this emissions unit:

a. the amount of each coal/coke shipment, in pounds, and the total blended waste derived fuel, in gallons and pounds per batch, burned;

b. the amount of raw material slurry, clinker, and cement kiln dust, in pounds, used in or produced;

c. the total number of pounds of sulfur dioxide emitted, calculated as follows:

i. multiply the sulfur content of coal by the number of pounds of coal that were burned;

ii. multiply the sulfur content of the blended waste-derived fuel by the number of pounds of blended waste derived fuel that were burned;

iii. multiply the sulfur content of the raw material slurry by the number of pounds of raw material slurry processed;

iv. multiply the sulfur content of the clinker by the number of pounds of clinker produced;

v. multiply the sulfur content of the cement kiln dust by the number of pounds of cement kiln dust produced; and

vi. calculate the SO2 emissions, in pounds, as follows:

SO2 emissions (lbs/month) = 2* x [(i + ii + iii) - (iv + v)]

d. the total number of tons of cement made from clinker produced during each calendar month; and

e. the sulfur dioxide emitted from this emissions unit for each ton of cement (made from clinker produced) produced, i.e., the total pounds of sulfur dioxide emitted from this emissions unit during each calendar month divided by the number of tons of cement made from clinker produced during each calendar month.

* This factor (64/32) is required to convert sulfur to SO2 since 1 lb-mole (32 lbs) of sulfur will yield 1 lb-mole (64 lbs) of SO2 (S + O2 ----> SO2).

III. Monitoring and/or Record Keeping Requirements (continued)

6. Chemical analyses of the blended waste-derived fuel fed to the kiln shall be conducted daily. The analyses shall be performed in accordance with the test methods specified in OAC rule 3745-54-13 and/or 40 CFR Part 264.13, as applicable, and, at a minimum, shall include the analyses of the following:

a. halogen content and sulfur content, in weight percent (wt %);
b. polychlorinated biphenols (PCB) concentration, in ppm; and
c. pH.

If no materials have been added to the blended waste-derived fuel being fed to the kiln, the chemical analyses from the previous day will be sufficient to demonstrate compliance with this condition.

7. A minimum sample of 100 milliliters (ml) shall be taken from each batch of blended-waste derived fuel. Each sample shall be saved for a period of at least 90 days.

Any sample or measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods, SW-846, November 1986, and additional supplements or editions thereof; or any equivalent methods as specified in the approved waste analyses plan or as such term is defined and used in the Ohio hazardous waste rules. Alternative applicable methods, as included in the permittee's feedstream analysis plan under section A.III.19, may be used with prior approval from the Ohio EPA.

8. The records of sampling and monitoring information required in sections A.III. 6 and 7 above shall specify the following:

a. the date(s), source of sample, time(s) and method(s) of sampling or measurement;

b. the individual(s) who collected the sample or performed the measurements;

c. the date(s) analyses were performed;

d. the individual(s) who performed the analyses;

e. the analytical technique(s) or method(s) used; and

f. the results of such analyses.

9. For quality assurance purposes, the Director may at his discretion, require that the permittee submit samples to an independent laboratory, other than Systech, for detailed chemical analyses for any or all of the constituents listed in Schedule A. The samples may include any materials retained as a requirement of condition A.III.2 or any sample taken at the point of generation. The frequency for these independent analyses, which shall be conducted at the permittee's expense, shall not exceed four (4) per year under normal operating conditions.

[The permittee has committed to annual submittals to an independent laboratory in its Plan submitted on August 2, 1996.]

10. The permittee shall use a carbon monoxide continuous emissions monitoring system (CEMS) to demonstrate and monitor compliance with the carbon monoxide emissions limitation of 100 ppmv. The permittee shall also use an oxygen CEMS to continuously correct the carbon monoxide level to 7 percent oxygen.
40 CFR 63.1209(a)(1)(i)

The permittee shall install, calibrate, maintain, and continuously operate the CEMS in compliance with the quality assurance procedures provided in the appendix to 40 CFR , Part 63 Subpart EEE, and Performance Specifications 4B in Appendix B of 40 CFR, Part 60.
40 CFR 63.1209(a)(2)

III. Monitoring and/or Record Keeping Requirements (continued)

11. The permittee shall use a continuous opacity monitoring system(s) (COMS) to demonstrate and monitor compliance with the 20% opacity standard.

The permittee shall install, calibrate, maintain, and continuously operate the COMS in compliance with the quality assurance procedures provided in the appendix to 40 CFR 63 Subpart EEE, and Performance Specification 1 in appendix B of 40 CFR 60.
40 CFR 63.1209(a)(2)

The permittee shall maintain and operate the COMS in accordance with the requirements of 40 CFR 63.8(c) except for the requirements under 40 CFR 63.8(c)(3). The requirements of 40 CFR 63.1211(d) shall be complied with instead of 40 CFR 63.8(c)(3).
40 CFR 63.1209(a)(1)(ii)

12. The permittee shall install, calibrate, maintain, and operate a particulate matter CEMS to demonstrate and monitor compliance with the particulate matter standard of 0.15 kg/Mg dry raw material feed. However, compliance with the requirements in this section to install, calibrate, maintain and operate the PM CEMS is not required until such time that the USEPA promulgates all performance specifications and operational requirements applicable to PM CEMS.
40 CFR 63.1209(a)(1)(iii)

13. Except as provided by section A.III.14, if a carbon monoxide CEMS detects a response that results in a one-minute average at or above the 3,000 ppmv span level required by Performance Specification 4B in Appendix B of 40 CFR, Part 60, the one-minute average shall be recorded as 10,000 ppmv. The one-minute 10,000 ppmv value shall be used for calculating the hourly rolling average carbon monoxide emissions.
40 CFR 63.1209(a)(3)(i)

14. Carbon monoxide CEMS that use a span value of 10,000 ppmv when one-minute carbon monoxide levels are equal to or exceed 3,000 ppmv are not subject to section A.III.13. Carbon monoxide CEMS that use a span value of 10,000 are subject to the same CEMS performance and equipment specifications when operating in the range of 3,000 ppmv to 10,000 ppmv that are provided by Performance Specification 4B for other carbon monoxide CEMS, except:

i. calibration drift shall be less than 300 ppmv; and
ii. calibration error shall be less than 500 ppmv.
40 CFR 63.1209(a)(3)(ii)

Note: The permittee is currently employing an interlock between the AWFCO system and a carbon monoxide CEMS span of 3000 ppmv.

15. The permittee shall ignore periods of time when one-minute values are not available for calculating the hourly rolling averages for CEMS or CMS. When one-minute values become available again, the first one-minute value is added to the previous 59 values to calculate the hourly rolling average.
40 CFR 63.1209(a)(6)(ii), (b)(5)(ii)

16. The permittee shall continue monitoring carbon monoxide and CMS parameters when the hazardous waste feed is cutoff if the emissions unit is operating. The permittee shall not resume feeding hazardous waste if the emission levels exceed the standard or the operating parameter limit.

The permittee is not, however, subject to the CEMS or CMS requirements for this emissions unit during periods of time the requirements of section A.I.2.d.ii (compliance with emissions standards for non-hazardous waste burning sources when not burning hazardous waste) are met.
40 CFR 63.1209(a)(6)(iii), (b)(5)(iii)

III. Monitoring and/or Record Keeping Requirements (continued)

17. The permittee shall use continuous monitoring systems (CMS, e.g., thermocouples, pressure transducers, flow meters) to document compliance with the Subpart EEE operating parameter limits.

The permittee shall install and operate continuous monitoring systems other than CEMS in conformance with 40 CFR 63.8(c)(3) that requires the permittee, at a minimum, to comply with the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system: The calibration of thermocouples shall be verified at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than once per year. The permittee shall operate and maintain optical pyrometers in accordance with the manufacturer specifications unless otherwise approved by the Director. The permittee shall calibrate optical pyrometers in accordance with the frequency and procedures recommended by the manufacturer, but no less frequent than once per year, unless otherwise approved by the Director.
40 CFR 63.1209(b)(2)

18. The CMS shall sample the regulated parameter without interruption, and evaluate the detector response at least once every 15 seconds, and compute and record the average values at least once every 60 seconds.

The span of the non-CEMS CMS detector shall not be exceeded. The permittee shall interlock the span limits into the automatic waste feed cutoff system required by A.II.8.
40 CFR 63.1209(b)(3), (4)

19. Prior to feeding the material, the permittee shall obtain an analysis of each feed stream that is sufficient to document compliance with the applicable feedrate limits determined in the Notification of Compliance (NOC). The permittee shall develop and implement a feed stream analysis plan and record it in the operating record. The plan shall specify at a minimum:

a. the parameters for which each feed stream will be analyzed to ensure compliance with the applicable feedrate limits;

b. whether the analysis will be obtained by performing sampling and analysis or by other methods, such as using analytical information obtained from others or using other published or documented data or information;

c. how the analysis will be used to document compliance with applicable feedrate limits (e.g., if hazardous wastes are blended and analyses of the wastes are obtained only prior to blending, the plan shall describe how the pertinent parameters of the blended waste will be determined);

d. the test methods which will be used to obtain the analyses;

e. the sampling method which will be used to obtain a representative sample of each feed stream to be analyzed using sampling methods described in Appendix I of 40 CFR 26, or an equivalent method; and

f. the frequency with which the permittee will review or repeat the initial analysis of the feed stream to ensure that the analysis is accurate and up-to-date.

[Pursuant to Section A.IV.5, the permittee has committed to submit the feed stream analysis plan in the NOC.]
40 CFR 63.1209(c)(1) - (3)

III. Monitoring and/or Record Keeping Requirements (continued)

20. To comply with the applicable feedrate limits under the NOC, the permittee must monitor and record feedrates as follows:

a. determine and record the value of the parameter for each feed stream by sampling and analysis or other method;

b. determine and record the mass or volume flow rate of each feed stream by a CMS. If the permittee determines flow rate of a feed stream by volume, the permittee must determine and record the density of the feed stream by sampling and analysis (unless the permittee reports the constituent concentration in units of weight per unit volume (e.g., mg/l)); and

c. calculate and record the mass feedrate of the parameter per unit time.
40 CFR 63.1209(c)(4)

The permittee is not required to monitor levels of metals or chlorine in the following feed streams to document compliance with the applicable feedrate limits, provided that the permittee document in the NOC that expected levels of the constituent in the feed stream were documented, and those assumed feedrate levels accounted for, in documenting compliance with feedrate limits for the August 1998 Trial Burn (see section A.V.4): natural gas, process air, and feed streams from vapor recovery systems.
40 CFR 63.1209(c)(5)

21. The requirements of 40 CFR 63.8(d) (Quality control program) and (e) (Performance evaluation of continuous monitoring systems) shall apply, except that the permittee must conduct performance evaluations of the components of the CMS under the frequency and procedures (for example, submittal of performance evaluation test plan for review and approval) applicable to performance tests as provided by 40 CFR 63.1207.

The permittee must comply with the quality assurance procedures for CEMS prescribed in the appendix to 40 CFR 63 Subpart EEE.
40 CFR 63.1209(d)

22. The provisions of 40 CFR 63.8(b) shall apply to monitoring.

The provisions of 40 CFR 63.8(c) shall apply to operation and maintenance, except:

a. the requirements of 40 CFR 63.1211(c) [that requires CMSs to be installed, calibrated, and operational on the compliance date] shall be complied with instead of section 63.8(c)(3);

b. the performance specifications for carbon monoxide and oxygen CEMSs in Subpart B of 40 CFR, Part 60 [that requires detectors to measure the sample concentration at least once every 15 seconds for calculating an average emission rate once every 60 seconds] shall be complied with instead of 40 CFR 63.8(c)(4)(ii); and

c. 40 CFR 63.8(c)(4)(i), (c)(5), and (c)(7)(i)(C) pertaining to COMS shall apply to this permit.

The provisions of 40 CFR 63.8(g) shall apply to reduction of monitoring data.
40 CFR 63.1209(e), (f), (h)

III. Monitoring and/or Record Keeping Requirements (continued)

23. To remain in compliance with the destruction and removal efficiency (DRE) standard, the permittee shall establish operating limits during the comprehensive performance test (or during a previous DRE test under provisions of 40 CFR 63.1206(b)(7)) for the following parameters, unless the limits are based on manufacturer specifications, and comply with those limits at all times that hazardous waste remains in the combustion chamber (i.e., the hazardous waste residence time has not transpired since the hazardous waste feed cutoff system was activated):

a. The permittee shall measure the temperature of the combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee shall document the temperature measurement location in the NOC.

[The permittee shall establish a minimum hourly rolling average temperature limit as the average of the test run averages.]

b. As an indicator of gas residence time in the control device, the permittee shall establish and comply with a limit on the maximum flue gas flow rate, the maximum production rate, or another parameter that can be documented in the site-specific test plan as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run.

The permittee shall comply with this limit on an hourly rolling average basis.

c. The permittee shall establish limits on the maximum pumpable and total (i.e., pumpable and non-pumpable) hazardous waste feedrate for each location where hazardous waste is fed as follows:

i. the permittee shall establish the limits as the average of the maximum hourly rolling averages for each run; an

ii. the permittee shall comply with the feedrate limit(s) on an hourly rolling average basis.

d. The permittee shall specify operating parameters and limits to ensure that good operation of each hazardous waste firing system is maintained.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(j)

III. Monitoring and/or Record Keeping Requirements (continued)

24. The permittee shall comply with the dioxin and furans emission standard by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test, unless the limits are based on he manufacturer specifications.]

a. The permittee shall establish a limit on the maximum temperature of the gas at the inlet to the baghouse on an hourly rolling average basis. The permittee shall establish the hourly rolling average limit as the average of the test run averages.

b. The permittee shall measure the temperature of the combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee shall document the temperature measurement location in the NOC.

[The permittee shall establish a minimum hourly rolling average temperature limit as the average of the test run averages.]

c. As an indicator of gas residence time in the baghouse, the permittee shall establish and comply with a limit on the maximum flue gas flow rate, the maximum production rate, or another parameter that is documented in the site-specific NOC as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run. The permittee shall comply with this limit on a hourly rolling average basis.

d. The permittee shall establish limits on the maximum pumpable and total (pumpable and non-pumpable) waste feedrate for each location where waste is fed as follows:

i. the permittee shall establish the limits as the average of the maximum hourly rolling averages for each run; an

ii. the permittee shall comply with the feedrate limit(s) on a hourly rolling average basis.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(k) * 40 CFR 63.1209(k), (m), (n), (o)

25. The permittee shall comply with the mercury emission standard by establishing and complying with the following operating parameter limits. The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications. The permittee shall establish a 12-hour rolling average limit for the total feedrate of mercury in all feed streams as the average of the test run averages.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.

The permittee may request to have mercury feedrate limits extrapolated from performance test feedrate levels under the provisions of 40 CFR 63.1209(l)(1). (see also A.I.2.j).
40 CFR 63.1209(l)

26. The permittee shall comply with the particulate matter emission standard by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications.]

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(m)

III. Monitoring and/or Record Keeping Requirements (continued)

27. The permittee shall comply with the semi-volatile metal (cadmium and lead) and low-volatile metal (arsenic, beryllium, and chromium) emission standards by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications.]

a. The permittee shall establish a limit for the maximum inlet temperature to the baghouse on an hourly, rolling average basis as the average of the test run averages.

b. The permittee shall establish feed rate limits for the semi-volatile metals (cadmium and lead) and the low-volatile metals (arsenic, beryllium, and chromium) as follows, except as provided by paragraph A.III.27.b.ii of this section:

i. the permittee shall establish a 12-hour, rolling average limit for the feedrate of cadmium and lead, combined, in all feed streams as the average of the test run averages;

ii. the permittee shall establish a 12-hour, rolling average limit for the feed rate of arsenic, beryllium, and chromium, combined, in all the feed streams as the average of the test run averages; and

iii. the permittee shall establish a 12-hour, rolling average limit for the feed rate of arsenic, beryllium, and chromium, combined, in all he pumpable feed streams as the average of the test run averages. Dual feed rate limits for both pumpable and total feed streams are not required, however, if the total feed rate limit is based solely on the feed rate of pumpable feed streams.

c. The permittee shall establish a 12-hour, rolling average limit for the feed rate of the total chlorine and chloride in all the feed streams as the average of the test run averages.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.

The permittee may request to have semi-volatile metal and low volatile metal feed rate limits extrapolated from performance test feed rate levels under the provisions of 40 CFR 63.1209(n)(2)(ii) (see also A.I.2.j).
40 CFR 63.1209(n)

28. The permittee shall comply with the hydrogen chloride and chlorine gas emission standards by establishing and complying with the following operating parameter limits: [The permittee shall base the limits on operations during the comprehensive performance test (or data in lieu), unless the limits are based on manufacturer specifications.]

The permittee shall establish a 12-hour, rolling average limit for the total feed rate of chlorine (organic and inorganic) in all the feed streams as the average of the test run averages.

The permittee has committed to establishing these operating limits in the NOC, under Section A.IV.5.
40 CFR 63.1209(o)

29. If the permittee complies with the requirements for combustion system leaks pursuant to section A.II.9 by maintaining the maximum combustion chamber zone pressure lower than ambient pressure, the permittee shall monitor the pressure instantaneously* and the automatic waste feed cutoff system shall be engaged when negative pressure is not maintained at any time.

* See also Federal Register, February 13, 14, 2002.
40 CFR 63.1209(p)

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the range specified in Section A.II.1 of the terms and conditions of this permit. The deviation reports shall be submitted in accordance with the General Terms and Condition of this permit, paragraph A.I.c.

IV. Reporting Requirements (continued)

2. The permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Northwest District Office documenting all instances of stack opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any COMS downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit quarterly reports that summarize the results of the monthly information compiled in accordance with Section A.III.6 of this permit. These reports shall be submitted to Ohio EPA, Northwest District Office by February 15, May 15, August 15 and November 15 of each year, and shall present the data collected during the previous calendar quarter.

4. The permittee shall submit quarterly deviation (excursions) reports that identify all exceedances of the limitations/restrictions specified in section A.II.2 of this permit. The deviation reports shall be submitted in accordance with the General Terms and Condition of this permit, paragraph A.I.c.

IV. Reporting Requirements (continued)

5. The Notification of Compliance (NOC) status requirements of 40 CFR 63.9(h) shall apply, except that:

a. the notification is a NOC, rather than compliance status;

b. the notification is required for the initial comprehensive performance test and each subsequent comprehensive and confirmatory performance test; and

c. the permittee shall postmark the notification before the close of business on the 90th day following completion of relevant compliance demonstration activity rather than the 60th day as required by 40 CFR 63.9(h)(2)(ii).

Upon postmark of the NOC, the operating parameter limits identified in the NOC, as applicable, shall be complied with (the limits identified in the Documentation of Compliance or a previous NOC are no longer applicable).

The NOC requirements of 40 CFR 63.1207(j) shall also apply.

By the compliance date, the permittee shall develop and include in the operating record a Documentation of Compliance. The permittee is not subject to this requirement, however, if a NOC is submitted under 40 CFR 63.1207(j) prior to the compliance date.

As a data in lieu facility, and in consideration of 40 CFR 63.1206(a)(1), the permittee has committed to the submittal of the NOC before the Subpart EEE compliance date of September 30, 2003.
40 CFR 63.1210(b), 40 CFR 63.1211(c)(1)

In consideration of 64 FR 52982 et seq. and 40 CFR 270.66, this Title V permit recognizes that the CAA authority for Subpart EEE is effective with the postmark of the Notification of Compliance (NOC). This permit further recognizes that the NOC shall meet all applicable requirements as specified in this permit.

6. In accordance with 40 CFR 63.1206(c)(1)(v), upon postmark of the NOC, the permittee shall arrange to submit an application to reopen this permit in accordance with paragraph A.10.a. of Part I - General Terms and Conditions of this permit, except that the permittee shall be required to submit the application within two months of the postmark of the NOC.

7. In consideration of 40 CFR 63.1207(c)(1) and (e)(1)(i), the permittee has submitted a performance evaluation plan for the non-CEMS continuous monitoring system. The plan shall meet the requirements of this permit or as otherwise specified in 40 CFR 63.1209.

V. Testing Requirements

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

1.a Emission Limitation:
43 pounds of sulfur dioxide per ton of cement produced

Applicable Compliance Method:
The permittee shall demonstrate compliance with the sulfur dioxide emission limitation above based on the record keeping requirements in section A.III and the results of emission testing conducted in accordance with USEPA Methods 1 - 4 and 6, 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

1.b Emission Limitation:
75 lbs/hr of PE

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

1.c Emission Limitation:
dioxins and furans:
0.40 ng TEQ/dscm, corrected to 7 percent oxygen *

Applicable Compliance Method:
The permittee shall use Method 0023A, Sampling Method for Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans emissions from Stationary Sources, EPA Publication SW-846 to determine compliance with the emission standard for dioxins and furans.

The permittee shall sample for a minimum of three hours, and must collect a minimum sample volume of 2.5 dscm.

The permittee may assume that nondetects are present at zero concentration.

1.d Emission Limitation:
mercury: 120 ug/dscm, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Method 29 to demonstrate compliance with emission standard for mercury.

1.e Emission Limitation:
lead and cadmium (combined): 330 ug/dscm, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Method 29 to determine compliance with the emission standard for cadmium and lead (combined).

1.f Emission Limitation:
arsenic, beryllium, and chromium (combined): 56 ug/dscm, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Method 29 to determine compliance with the emission standard for arsenic, beryllium, and chromium (combined).

V. Testing Requirements (continued)

1.g Emission Limitation:
carbon monoxide (midkiln): 100 ppmv, based on an hourly rolling average, dry basis, corrected to 7 percent oxygen,

hydrocarbons (midkiln): 10 ppmv, based on an hourly rolling average, dry basis, corrected to 7 percent oxygen, and reported as propane, at any time during the DRE test runs or their equivalent as provided by 40 CFR 63.1206(b)(7)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the CO emission limitation above based on the record keeping requirements in section A.III .10 of this permit.

If required, the permittee shall demonstrate compliance with the CO emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 - 4 and 10.

If required, the permittee shall demonstrate compliance with the hydrocarbons emission limitation in accordance with 40 CFR 60, Appendix A, Method 25A.

1.h Emission Limitation:
hydrochloric acid and chlorine gas (combined): 130 ppmv, expressed as hydrochloric acid equivalents, dry basis, corrected to 7 percent oxygen

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Methods 26A, 320, or 321 to determine compliance with the emission standard for hydrochloric acid and chlorine gas (combined).

1.i Emission Limitation:
particulate matter: 0.15 kg/Mg dry raw material feed

Applicable Compliance Method:
The permittee shall use 40 CFR 60, Appendix A, Methods 1 - 5 to demonstrate compliance with the particulate matter emission limitation above.

In accordance with 40 CFR 63.1204(A)(7), the permittee shall use suitable methods to determine the kiln raw material feedrate.

The permittee shall compute the particulate matter emission rate, E, from the following equation:

$E = (Cs \times Qsd) / P$

Where:

E = emission rate of particulate matter, kg/Mg of kiln raw material feed;

Cs = concentration of particulate matter, kg/dscm;

Qsd = volumetric flow rate of effluent gas, dscm/hr; and

P = total kiln raw material feed (dry basis), Mg/hr.

V. Testing Requirements (continued)

1.j Emission Limitation:
Visible emissions shall not exceed 20 percent opacity

Applicable Compliance Method:
The permittee shall demonstrate compliance with the visible emissions limitation in accordance with the record keeping requirements established in section A.III.11 of the terms and conditions of this permit.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.

c. The test method which shall be employed to demonstrate compliance with the allowable mass emission rate for PE is Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity.

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

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

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

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

a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for sulfur dioxide.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): OAC rule 3745-18-04(A). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity.

V. Testing Requirements (continued)

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

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

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

4. Through the Ohio EPA correspondence of June 5, 2001 to the permittee, this permit recognizes the approval of the data in lieu request for emissions unit P014 (Kiln 1), for the August 1998 RCRA Trial Burn (40 CFR 266 Subpart H - 'BIF'), under 40 CFR 63.1207(c)(2). In conjunction with this, the permittee has committed to specify in the NOC how the conditions of 40 CFR 63.1206(b)(6), (7), and (12), and 40 CFR 63.1207(g)(1) have been satisfied.

5. In consideration of US EPA's correspondence of October 20, 2000 to the permittee of, and in consideration of the RCRA testing (40 CFR 266 Subpart H - 'BIF') conducted on emissions unit P015 (Kiln 2) [Certification of Compliance test in 1992, and the Re-certification of Compliance test in 1995], and in conjunction with the data in lieu resolution of A.V.4 above, the Director approves the extension of data in lieu approval under A.V.4 to the 'similar unit', emissions unit P015, with the contingency that the first Comprehensive Performance test and the first Confirmatory Performance test under the re-promulgated standards (anticipated approximately 2007 and beyond) will be performed on emissions unit P015.

This data in lieu provision is intended to be extended to subsequent future testing, under alternated 'staggered' testing between these two emissions units.

V. Testing Requirements (continued)

6. An Absolute Calibration Audit (ACA) shall be conducted quarterly, and a Relative Accuracy Test Audit (RATA) (if applicable, see sections A.V.6.a and b) shall be conducted annually. An Interference Response Tests shall be performed whenever an ACA or a RATA is conducted. When a performance test is also required under 40 CFR 63.1207 to document compliance with emission standards, the RATA shall coincide with the performance test. The audits shall be conducted as follows:

a. This requirement applies to O2 and CO CEMS. The RATA shall be conducted at least annually. Conduct the RATA as described in the relative accuracy (RA) test procedure (or alternate procedures section) described in the applicable Performance Specifications. In addition, analyze the appropriate performance audit samples received from the EPA as described in the applicable sampling methods.

b. The ACA shall be conducted at least quarterly except in a quarter when a RATA (if applicable, see 'a' above) is conducted instead. Conduct an ACA as described in the calibration error (CE) test procedure described in the applicable Performance Specifications.

c. The interference response test shall be conducted whenever an ACA or RATA is conducted. Conduct an interference response test as described in the applicable Performance Specifications.

d. If the RA from the RATA or the CE from the ACA exceeds the criteria in the applicable Performance Specifications, hazardous waste burning shall cease immediately. Hazardous waste burning cannot resume until the permittee takes corrective measures and audit the CEMS with a RATA to document that the CEMS is operating within the specifications.

To provide continuation of the quality assurance currently being conducted for the permittee's RCRA requirements, the first RATA under this permit shall be required in January to March (1st quarter) 2004.

40 CFR 63 Subpart EEE, Appendix, Section 5

7. The permittee shall comply with any applicable performance testing and other requirements under the replacement standards for Subpart EEE, as may be applicable, before the expiration of this permit.

VI. Miscellaneous Requirements

1. The permittee shall comply with the Subpart EEE standards no later than the compliance date, September 30, 2003, unless the Director grants an extension of time under 40 CFR 63.6(i) or 40 CFR 63.1213.
40 CFR 63.1206(a)(1)

If the permittee chooses to comply with the emission standards of Subpart EEE prior to September 30, 2003, the compliance date is the date the Notification of Compliance under 40 CFR 63.1207(j)(1) is postmarked.
40 CFR 63.1206(a)(3)

2. The Director will determine compliance with the emission standards of this permit as provided by 40 CFR 63.6(f)(2). Conducting performance testing under operating conditions representative of the extreme range of normal conditions is consistent with the requirements of 40 CFR 63.6(f)(2)(iii)(B) and 63.7(e)(1) to conduct performance testing under representative operating conditions.

The Director will make a finding concerning compliance with the emission standards and other requirements of this permit as provided by 40 CFR 63.6(f)(3).

The Director may grant an extension of compliance with the emission standards of this permit as provided by 40 CFR 63.6(i) and 63.1213.
40 CFR 63.1206(b)(2) - (4)

VI. Miscellaneous Requirements (continued)

3. The permittee may submit a written request to the Administrator for approval to use data compression techniques to record data from CMS, including CEMS, on a frequency less than required by 40 CFR 63.1209 as specified in section A.III. The permittee shall submit the request for review and approval as part of the comprehensive performance test plan as follows:

a. The permittee shall record a data value at least once each ten minutes.

b. For each CEMS or operating parameter for which the permittee requests to use data compression techniques, the permittee shall recommend:

i. a fluctuation limit that defines the maximum permissible deviation of a new data value from a previously generated value without requiring the permittee to revert to recording each one-minute value. If the permittee exceeds a fluctuation limit, the permittee shall record each one-minute value for a period of time not less than ten minutes. If neither the fluctuation limit nor the data compression limit are exceeded during that period of time, the permittee may reinitiate recording data values on a frequency of at least once each ten minutes; and

ii. a data compression limit defined as the closest level to an operating parameter limit or emission standard at which reduced data recording is allowed. Within this level and the operating parameter limit or emission standard, the permittee shall record each one-minute average. The data compression limit should reflect a level at which the permittee is unlikely to exceed the specific operating parameter limit or emission standard, considering its averaging period, with the addition of a new one-minute average.
40 CFR 63.1211(d)

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: New RM Handling (P901)

Activity Description: Other raw material storage, conveying and handling

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
raw material storage, conveying, handling, equipped with a process baghouse	OAC rule 3745-31-05 (PTI 03-8914)	4.7 lbs/day fugitive particulate emissions (PE) [from the conveyors and storage hall] 0.005 gr/dscf or no visible emissions [from the process baghouse] Visible emissions shall not exceed 1 minute in any 60-minute observation period [from the storage hall egress points] The requirements of this rule also include compliance with the requirements of 40 CFR, 60.62(c) and 40 CFR, Part 60, Subpart LLL.
	40 CFR, Part 63 Subpart LLL	See 'Part II - Specific Facility Terms and Conditions' of this permit.
	40 CFR 60.62(c) (NSPS Subpart F)	Visible PE shall not exceed 10% opacity, as a 6-minute average, from the storage piles and conveyor transfer points.
	OAC rule 3745-17-11	See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-08(B)	See A.I.2.c.
	OAC rule 3745-17-07(B)	See A.I.2.d.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

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

2.c This facility is located in Paulding County, which is not an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A)(1), it is exempt from the requirements of OAC rule 3745-17-08(B).

2.d This emissions unit is exempt from the visible particulate emission limitation in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(7)(e).

II. Operational Restrictions

1. The pressure drop across the process baghouse, which controls the PE from the storage silos associated with this emissions unit and emissions unit P903, shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

2. The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the transfer of material into the conveyor hopper.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the process baghouse on a weekly basis.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the baghouse and for any visible fugitive dust emissions from the conveyor transfer points, storage piles, and storage hall egress points associated with 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 quarterly deviation (excursion) reports that identify each period when the recorded pressure drop was not within the range specified in Section A.II.2 above. The deviation reports shall be submitted in accordance with the General Terms and Condition of this permit, paragraph A.I.c.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from the baghouse and/or the conveyor transfer points, storage piles, and storage hall egress points associated with 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 with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
10% opacity, as a six-minute average (from the storage piles and conveyor transfer points)

Applicable Compliance Method:
Compliance with the visible PE limitation above shall be determined pursuant to Method 9 of 40 CFR, Part 60, Appendix A, with modifications as specified in 40 CFR 60.674(c).

1.b Emission Limitation:
0.005 gr/dscf [from the process baghouse]

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

1.c Emission Limitations:
no visible emissions, from the process baghouse

Visible emissions shall not exceed
1 minute in any 60-minute
observation period [from the storage hall egress points]

Applicable Compliance Method:
Compliance with the visible emission limitations above shall be determined in accordance with Method 22 of 40 CFR, Part 60, Appendix A, with modification as appropriate for point sources.

1.d Emission Limitation:
4.7 lbs/day fugitive PE [from the conveyors and storage hall]

Applicable Compliance Method:
Compliance with the daily allowable PE limitation above may be determined by multiplying the AP-42, Table 8.19-1.1 (revised 9/85) emission factor of 13.2 lbs PE/acre/day by the maximum total area of the storage hall (0.25 acre).

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: CKD Unloading (P902)

Activity Description: CKD storage, slurry and loading operations

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
cement kiln dust unloading (from the collector)	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-07(B)	See A.I.2.d below.
	40 CFR, Part 63 Subpart LLL	See 'Part II - Specific Facility 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 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

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

2.c This facility is located in Paulding County, which is not an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A)(1), it is exempt from the requirements of OAC rule 3745-17-08(B).

2.d This emissions unit is exempt from the visible particulate emission limitation in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(7)(e).

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: Raw Material Handling (P903)

Activity Description: Other raw material handling

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
fly ash conveying, handling, storage silo (raw materials), equipped with a process baghouse	OAC rule 3745-31-05 (PTI 03-7494)	0.077 lb/hr particulate emissions (PE) [from the storage silo] 0% opacity, as a six-minute average [from the baghouse and conveyor transfer points] See A.I.2.e below. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart LLL.
	40 CFR, Part 63, Subpart LLL	See 'Part II - Specific Facility Terms and Conditions' of this permit.
	OAC rule 3745-17-11	See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-08(B)	See A.I.2.c.
	OAC rule 3745-17-07(B)	See A.I.2.d.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Paulding County, which is identified as a P-2 county.

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

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

2. Additional Terms and Conditions (continued)

2.d This emissions unit is exempt from the visible particulate emission limitation in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(7)(e).

2.e The emissions unit identification in PTI 03-7494 is F005, but this identification has been changed to P903 for the Title V permit. With the EU identification change, the emissions unit has also been modified so the sand storage pile listed in the PTI is no longer part of the emissions unit.

II. Operational Restrictions

1. The pressure drop across the process baghouse, which controls the PE from the storage silos associated with this emissions unit and emissions unit P901, shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the process baghouse on a weekly basis.

2. 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 baghouse associated with this emissions unit and for any visible fugitive particulate emissions from the transfer points associated with 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 and location 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 quarterly deviation (excursion) reports that identify each period when the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted in accordance with the General Terms and Condition of this permit, paragraph A.I.c.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse, (b) identify all days during which any visible fugitive particulate emissions were observed from conveyor transfer points associated with this emissions unit and (c) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

1.a Emission Limitation:
0.077 lb/hr PE

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

V. Testing Requirements (continued)

1.b Emission Limitation:
0% opacity, as a six-minute average

Applicable Compliance Method:
Compliance with the visible emission limitation above shall be determined in accordance with 40 CFR 60, Appendix A, Method 9, with modification as specified in 40 CFR 60.674(c) for conveyance points.

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

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