



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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

**RE: FINAL PERMIT TO INSTALL  
SANDUSKY COUNTY  
Application No: 03-13428**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE:** 5/17/00

Millersville Lime Company  
Matt Halliday  
PO Box 128 659 Anderson Rd  
Woodville, OH 43469

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

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

cc: USEPA

NWDO



**FINAL PERMIT TO INSTALL 03-13428**

Application Number: 03-13428

APS Premise Number: 0372000104

Permit Fee: **\$2600**

Name of Facility: Millersville Lime Company

Person to Contact: Matt Halliday

Address: PO Box 128 659 Anderson Rd  
Woodville, OH 43469

Location of proposed air contaminant source(s) [emissions unit(s)]:

**659 Anderson Road PO Box 128  
Woodville, Ohio**

Description of proposed emissions unit(s):

**Synsil Pellet Preparation with Receiving and Storage, Ribbon Blender and Synsil Production.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. 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. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## **6. General Requirements**

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

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## **8. 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.

## **9. Compliance Requirements**

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

- 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 ORC section 3704.08.
  - 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.

## 10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

**3. 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.

**4. 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.

**5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**6. Construction of New Sources(s)**

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**7. Public Disclosure**

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

**8. Applicability**

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

**9. Best Available Technology**

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

**10. Construction Compliance Certification**

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

**11. 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.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
<b>PE</b>	<b>14.16</b>
<b>NOx</b>	<b>3.94</b>

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ribbon Blender	OAC Rule 3745-31-05 (A)(3)	Control Requirements (See A.I.2.a.)  0.17 lb PE/hr, 0.74 tons PE/year  0% Opacity as a 6-minute average
	OAC Rule 3745-17-11 (B)	See A.I.2.b.
	OAC Rule 3745-17-07(A)	See A.I.2.b.

2. **Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a venturi scrubber.
- 2.b The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to 3745-31-05(A)(3)

**B. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 25 inches of water at all times while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 8 gallons per minute (based on a manufacturers specification of 8 gallons/1000 cf, and an airflow rate of 1000 cfm) at all times while the emissions unit is in operation.

### C. Monitoring and/or Recordkeeping Requirements

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

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

- a. The pressure drop across the scrubber, in inches of water, on a daily basis.
- b. The scrubber water flow rate, in gallons per minute, on a daily basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate..

### E. Testing Requirements

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

- a. Emission limitation: 0.17 lb PE/hr

Applicable compliance method:

The permittee shall determine compliance with the hourly limitation by the following calculation:

$$PE = (OGL) \times (VAF) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

Where:

PE = particulate emissions, in lbs/hr

OGL = Manufacturer guaranteed maximum outlet grain loading concentration = 0.02 gr/dscf

VAF = Maximum volumetric air flow rate = 1000 dscfm

PE = (0.02 gr/dscf) x (1000 dscfm) x (60 min/hr) x (lb/7000 gr) = 0.17 lb/hr

If required the permittee shall demonstrate compliance by testing in accordance with method 5, 40 CFR 60, Appendix A.

- b. Emission limitation (long term):0.74 ton PE/yr

Applicable compliance method: The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission limitation (long term): 0% opacity as a 6-minute average

Applicable compliance method: Compliance with the opacity restriction shall be determined by using U.S. EPA Method 9. Method 9 can be located in 40 CFR Part 60 Appendix A.

## F. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ribbon Blender	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Synsil Production with oven .	OAC Rule 3745-31-05 (A)(3)	Control Requirements (See A.I.2.b.)  2.85 lbs PE/hr (*), 12.48 tons PE/year (*)  0.9 lb NOx/hr, 3.94 tons NOx/year  0% Opacity as a 6-minute average
	OAC Rule 3745-17-11 (B)	See A.I.2.c.
	OAC Rule 3745-17-07(A)	See A.I.2.c.

\* - All particulate emissions (PE) are assumed to be PM<sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a The total PE limitation is comprised three emission points, two dust collectors (BHN and BHF) and natural gas combustion emissions from the oven. The emission limitation of 2.85 lbs PE/hr is a summation of the emissions from all three emission points and was established in accordance with the following:

$$2.85 \text{ lb PE/hr} = \text{BHN} + \text{BHF} + \text{NGE}$$

$$\begin{aligned} \text{BHN} &= \text{PE from baghouse BHN} \\ &= (0.01 \text{ gr/dscf})(6000 \text{ dscfm})(60\text{min/hr})(1\text{b}/7000\text{gr}) \\ &= 0.52 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{BHF} &= \text{PE from baghouse BHF} \\ &= (0.01 \text{ gr/dscf})(26400 \text{ dscfm})(60\text{min/hr})(1\text{b}/7000\text{gr}) \\ &= 2.26 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{NGE} &= \text{PE from natural gas combustion from process oven} \\ &= (0.009 \text{ MMCF of NG/hr})(7.6 \text{ lbs PE/MMCF of NG}) = 0.07 \end{aligned}$$

$$2.85 \text{ lb PE/hr} = 0.52 \text{ lb PE/hr} + 2.26 \text{ lb PE/hr} + 0.07 \text{ lb PE/hr}$$
$$2.85 \text{ lb/hr} (8760 \text{ hrs/year})(1/2000) = 12.48 \text{ tons/year}$$

- 2.b** Best Available Technology (BAT) for this emissions unit has been determined to be the use of baghouses capable of achieving an outlet concentration of 0.01 gr/dscf.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC Rule 3745-05(A)(3).

## **B. Operational Restrictions**

1. The pressure drop across the dust collectors (BHN and BHF) shall be maintained within the range of 1 - 4 inches of water while the emissions unit is in operation.
2. The permittee shall burn only natural gas in the oven for this emissions unit.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drops across the dust collectors (BHN and BHF) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drops across the dust collectors (BHN and BHF) for this emissions unit on a daily basis.
2. For each day during which the permittee burns a fuel other than natural gas in the oven of this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

## **D. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across dust collectors (BHN and BHF) did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the oven of this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission limitation: 2.85 lb PE/hr

Applicable compliance method: The emission limitation was developed by using manufacturer's guaranteed outlet grain loading concentrations and maximum volumetric air flow rates for baghouse emissions and maximum firing rates and AP-42 Chapter 1.4.5, (7/98) emission factors for oven emissions, see A.I.2.a. for specific details. If required the permittee shall demonstrate compliance by testing in accordance with method 5, 40 CFR 60, Appendix A.

- b. Emission limitation (long term): 12.48 tons PE/yr

Applicable compliance method: The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission limitation (long term): 0% opacity as a 6-minute average

Applicable compliance method: Compliance with the opacity restriction shall be determined by using U.S. EPA Method 9. Method 9 can be located in 40 CFR Part 60 Appendix A.

- d. Emission Limitation: 0.9 lb NOx/hr

Applicable compliance method: The emission limitation was established in accordance with AP-42 1.4.5, (7/98) emission factors and a maximum firing rate of 0.09 MMCF/hr. If required the permittee shall demonstrate compliance by testing in accordance with method 7, 40 CFR 60, Appendix A.

- e. Emission limitation (long term): 3.94 tons NOx/yr

Applicable compliance method: The tons/yr limitation was developed by multiplying the lb/hr limitations by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

## F. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Synsil Production with oven	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Raw material unloading, (truck dumping, pneumatic truck unloading), handling (bucket elevator) and storage	O A C R u l e 3 7 4 5 - 3 1 - 0 5  OAC Rule 3745-17-11 (B)  OAC Rule 3745-17-07(A)  OAC Rule 3745-17-08	Control requirements (See A.I.2.d.)  0.10 lb PE/hr (*), 0.44 tons PE/year (*)  0% Opacity as a 6-minute average  Fugitive Emissions: 0.50 tons PE/year  20% Opacity as a 3 minute average  See A.I.2.b.  See A.I.2.b.  See A.I.2.c.

\* All PE from baghouses are considered to be PM<sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a The baghouse PE limitation is comprised of two baghouses (BVL and BVF). The emission limitation of 0.01 lb PE/hr is a summation of the emissions from both emission points and was established in accordance with the following:

$$0.1 \text{ lb PE/hr} = \text{BVL} + \text{BVF}$$

$$\begin{aligned} \text{BVL} &= \text{PE emissions from baghouse BVL} \\ &= (0.01 \text{ gr/dscf})(150 \text{ dscfm})(60\text{min/hr})(\text{lb}/7000\text{gr}) \\ &= 0.013 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{BVF} &= \text{PE emissions from baghouse BVF} \\ &= (0.01 \text{ gr/dscf})(1000 \text{ dscfm})(60\text{min/hr})(\text{lb}/7000\text{gr}) \end{aligned}$$

= 0.086 lb PE/hr

0.1 lb PE/hr = 0.013 lb/hr + 0.086 lb/hr

0.1 lb/hr (8760 hrs/year)(1/2000) = 0.44 tons/year

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC Rule 3745-05(A)(3).
- 2.c** The Millersville Lime Company facility is not located within an "Appendix A" area as identified in OAC Rule 3745-17-08. Therefore, pursuant to OAC Rule 3745-17-08(A) this emissions unit is exempt from the requirements of OAC Rule 3745-17-08 (B).
- 2.d** The Best Available Technology (BAT) control requirements for emissions unit P901 have been determined to be the use of a partial enclosure exhausted to baghouse control.

## **B. Operational Restrictions**

- 1. The pressure drop across the dust collectors (BVL and BVF) shall be maintained within the range of 1 - 4 inches of water while the emissions unit is in operation.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drops across the fabric filters (BVL and BVF) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drops across the fabric filters (BVL and BVF) for this emissions unit on a daily basis.
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any fugitive visible particulate emissions from the emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across fabric filters (BVL and BVF) did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any fugitive visible particulate emissions were observed from 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.

#### E. Testing Requirements

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

- a. Emission limitation: 0.10 lb PE/hr (baghouse emission)

Applicable compliance method: The emission limitation was developed by using manufacturer's guaranteed outlet grain loading concentration and maximum volumetric air flow rates (see A.I.2.a for specific details). If required the permittee shall demonstrate compliance by testing in accordance with method 5, 40 CFR 60, Appendix A.

- b. Emission limitation (long term): 0.44 ton PE/yr (baghouse emission)

Applicable compliance method: The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission limitation: 0% opacity as a 6-minute average

Applicable compliance method: Compliance with the opacity restriction shall be determined by using U.S. EPA Method 9. Method 9 can be located in 40 CFR Part 60 Appendix A.

- d. Emission Limitation: 0.50 tons PE/year (fugitive)

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual fugitive limitation by multiplying AP-42, Chapter 11.19.2, (1/95) emission factors, a maximum annual material throughput of 65,700 tons, and a control efficiency 50% obtained from the use of a partial enclosure.

- e. Emission limitation: 20% opacity as a 3-minute average

Applicable compliance method: Compliance with the opacity restriction shall be determined by using U.S. EPA Method 9. Method 9 can be located in 40 CFR Part 60 Appendix A.

**F. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Raw material unloading, (truck dumping, pneumatic truck unloading), handling (bucket elevator) and storage	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13428

Facility ID: 0372000104

FACILITY NAME Millersville Lime Company

FACILITY DESCRIPTION Synsil Pellet Preparation with Receiving and Storage, Ribbon Blender and Synsil Production.

CITY/TWP Woodville

SIC CODE 3274

SCC CODE \_\_\_\_\_

EMISSIONS UNIT ID \_\_\_\_\_

P023

EMISSIONS UNIT DESCRIPTION \_\_\_\_\_

Ribbon Blender

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.17 lb/hr	0.74	0.17 lb/hr	0.74
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_

NESHAP? \_\_\_\_\_

PSD? \_\_\_\_\_

OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Use of venturi scrubber and compliance with the terms and conditions in this permit**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? \_\_\_\_\_

NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \_\_\_\_\_

\$N/K

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_

YES \_\_\_\_\_

X

NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13428

Facility ID: 0372000104

FACILITY NAME Millersville Lime Company

FACILITY DESCRIPTION Synsil Pellet Preparation with Receiving and Storage, Ribbon Blender and Synsil Production.

CITY/TWP Woodville

SIC CODE 3274

SCC CODE \_\_\_\_\_

EMISSIONS UNIT ID \_\_\_\_\_

P024

EMISSIONS UNIT DESCRIPTION \_\_\_\_\_

Synsil Production

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.85 lb/hr	12.48	2.82	12.48
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides	Attainment	0.9 lb/hr	3.94	0.9 lb/hr	3.94
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_

NESHAP? \_\_\_\_\_

PSD? \_\_\_\_\_

OFFSET POLICY? \_\_\_\_\_

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Use of baghouses and compliance with the terms and conditions in this permit**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? \_\_\_\_\_

NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \_\_\_\_\_

\$N/K

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_

YES \_\_\_\_\_

X

NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13428

Facility ID:

FACILITY NAME Millersville Lime Company

FACILITY DESCRIPTION Synsil Pellet Prepa

CITY/TWP Woodville

SIC CODE 3274

SCC CODE \_\_\_\_\_

EMISSIONS UNIT ID \_\_\_\_\_

P901

EMISSIONS UNIT DESCRIPTION \_\_\_\_\_

Truck dumping/pneumatic unloading

DATE INSTALLED \_\_\_\_\_

Not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.10 lb/hr (baghouse)	0.44 (baghouse) 0.5(fugitive)	0.10 lb/hr (baghouse)	0.44 (baghouse) 0.5 (fugitive)
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_

NESHAP? \_\_\_\_\_

PSD? \_\_\_\_\_

OFFSET POLICY? \_\_\_\_\_

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? \_\_\_\_\_

NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \_\_\_\_\_

\$N/K

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_

YES \_\_\_\_\_

X

NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13428

Facility ID:

FACILITY NAME Millersville Lime Company

FACILITY DESCRIPTION Synsil Pellet Prepa

CITY/TWP Woodville

**Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

**Permit review forms and calculations**

**Please provide any additional permit specific notes as you deem necessary:**

**NONE**

**Permit To Install Synthetic Minor Write-Up**

**NONE**

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
<b>PE</b>	<b>14.16</b>
<b>NOx</b>	<b>3.94</b>