MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

EFFECTIVE DATE: November 19, 2020

ISSUED TO

Graymont Western US Inc. Graymont Western Lime, Inc.

State Registration Number (SRN): N7362

LOCATED AT

181 W County Road 432, Gulliver, Schoolcraft County, Michigan 49840

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N7362-2020

Expiration Date: November 19, 2025

Administratively Complete ROP Renewal Application Due Between May 19, 2024 and May 19, 2025

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N7362-2020

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

Ed Lancaster, Marquette District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

General Provisions

- The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
- 2. 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 conditions of this ROP. (R 336.1213(1)(b))
- 3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (**R 336.1213(1)(c)**)
- 4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: (**R 336.1213(1)(d**))
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (**R 336.1213(1)(e)**)

- 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

- 9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² (R 336.1370)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

- 11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² (R 336.1301(1))
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

- 12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (R 336.1901(a))
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (R 336.1901(b))

Testing/Sampling

- 13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (**R 336.2001**)
- 14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
- 15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

Monitoring/Recordkeeping

- 16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
- 17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (**R 336.1213(3)(c)**)
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

- 22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
- 25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² (**R 336.1912**)

Permit Shield

- 26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. (R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

- 27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. (R 336.1213(6)(b)(i))
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. (R 336.1213(6)(b)(ii))
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. (R 336.1213(6)(b)(iii))

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (**R 336.1216(1)(c)(iii)**)
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (**R 336.1210(10)**)
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(9))

Stratospheric Ozone Protection

- 36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
- 37. If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
- 39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R 336.1213(12))

Permit to Install (PTI)

- 43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (**R 336.1201(1)**)
- 44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (**R 336.1201(8)**, Section 5510 of Act 451)
- 45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

SOURCE-WIDE CONDITIONS

DESCRIPTION

All process equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT

Baghouses

I. EMISSION LIMIT(S)

- 1. Visible emissions from the process equipment at the facility shall not exceed 10% opacity.² (R 336.1301)
- 2. There shall be no visible emissions from buildings that contain process stone or coal handling equipment.² (R 336.1301)

II. <u>MATERIAL LIMIT(S)</u>

1. The permittee shall not process more than 584,000 tons of limestone feed in EU-KILN#1 per year based upon a 12-month rolling time period as determined at the end of each calendar month. **(40 CFR 52.21 (c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate the equipment at the facility unless the AQD District Supervisor has approved a plan that describes how emissions will be minimized during startup(s), shutdown(s) and malfunction(s). The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved.² (R 336.1911, R 336.1912)
- The permittee shall not operate the equipment at the facility unless the AQD District Supervisor has approved a written Operations, Maintenance and Monitoring (OM&M) plan. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved.² (R 336.1911, R 336.1912)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

 The permittee shall conduct monthly visible emission checks on all process stone handling operations, buildings and/or any vents. The frequency of these checks may decrease as allowed in 40 CFR Part 63, Subpart AAAAA.² (40 CFR 52.21(c) & (d))

- 2. The permittee shall keep a record of the following information in a format acceptable to the AQD District Supervisor:² (R 336.1205(3), 40 CFR 52.21 (c) & (d))
 - a. Calculations determining the total amount of limestone processed for each calendar month and total tons of limestone processed for the most recent 12-month rolling time period as determined at the end of each calendar month.
 - b. Visible emission checks on all process stone handling operations, buildings and/or any vents.

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-KILN#1	Kiln #1 – Limestone enters a rotary kiln via a ram style preheater. The stone is heated as it travels through the kiln. The lime then enters a counterflow Neimis style cooler. Exhaust gas particulate from the preheater, cooler, and kiln is controlled by a fabric filter dust collector using modular baghouse sections. This table includes requirements from 40 CFR Part 63, Subpart AAAAA, <i>National Emission Standards for Hazardous</i> <i>Air Pollutants for Lime Manufacturing</i> <i>Plants. {PTI #26-04, 40 CFR Part 60,</i> <i>Subpart HH, 40 CFR Part 63, Subpart</i> <i>AAAAA, 40 CFR 52.21</i> }	05-14-2007	FG-MACT AAAAA FG-NSPS-HH
EU-HAULING	Hauling – Fugitive emissions from the vehicle traffic in the plant area. <i>{PTI #26-04}</i>	05-14-2007	NA
EU-STONE HANDLING	Stone Handling - Raw limestone is unloaded to a stacking conveyor and stockpiled. Stone is then reclaimed by vibrating under pile feeders and moved by conveyor belt to a screen. Screened stone is conveyed to the kiln pre-heater via conveyor belt. Limestone pile fugitive dust emissions are included. { <i>PTI</i> #26-04}	05-14-2007	NA
EU-COAL HANDLING	Coal Handling – Unloading, reloading, conveyors, coal and petroleum coke storage pile fugitive emissions. <i>{PTI #26-04}</i>	05-14-2007	FG-NSPS-Y
EU-COAL SILO (BAGHOUSE 191)	Coal Silo (Baghouse 191) – Coal and petroleum coke silos which are controlled by a bin vent dust collector and exhausted within a building. { <i>PTI</i> #26-04}	05-14-2007	FG-NSPS-Y
EU-DUST HANDLING (BAGHOUSE 188)	Dust Handling (Baghouse 188) – Lime dust collected from the kiln baghouse is conveyed through screw conveyors to the dust silo via the dust silo elevator. The screw conveyor and dust silo are controlled by a fabric filter dust collector. <i>{PTI #26-04}</i>	05-14-2007	FG-BAGHOUSES

Emission Unit ID Emission Unit Description Installation Flexible Group				
	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID	
EU-DUST LOADING (BAGHOUSE 189)	Dust Loading (Baghouse 189) – Truck loading of lime dust (collected from the lime kiln baghouse) which is controlled by a fabric filter dust collector. <i>{PTI #26-04}</i>	05-14-2007	FG-BAGHOUSES	
EU-PRODUCT LOADING (BAGHOUSE 161)	Product Loading (Baghouse 161) – Dry lime is loaded into trucks via a loading spout. The truck loader is controlled by a fabric filter dust collector. <i>{PTI #26-04}</i>	05-14-2007	FG-BAGHOUSES	
EU-PRODUCT LOADING 2 (BAGHOUSE 162)	Product Loading 2 (Baghouse 162) – Dry lime is loaded into trucks via a loading spout. The truck loader is controlled by a fabric filter dust collector. { <i>PTI</i> #26-04}	05-14-2007	FG-BAGHOUSES	
EU-BAGHOUSE 133	Baghouse 133 – Lime product from the kiln discharge elevator and/or the lime product sizing operation are conveyed to the kiln run silo. The lime kiln discharge elevator head, the feed conveyor from the lime kiln discharge elevator, the feed conveyor from the lime sizing operation, and the kiln run silo are controlled by a fabric filter dust collector. <i>{PTI #26-04}</i>	05-14-2007	FG-BAGHOUSES	
EU-BAGHOUSE 132	Baghouse 132 – Lime product is conveyed to the crusher infeed elevator, crushed to size and discharged from the crusher to the product silo elevator. The crushed product may be returned to the kiln run silo conveyor. The feed conveyor from the kiln run silos, kiln run silo feeder 1 & 2, sizing elevator, and the oversized product crusher are controlled by a fabric filter dust collector. { <i>PTI</i> #26-04}	05-14-2007	FG-BAGHOUSES	
EU-BAGHOUSE 131	Baghouse 131 – Lime product from the kiln product cooler is discharged via conveyor to the kiln discharge elevator or to the kiln run silo conveyor. The product cooler discharge to conveyor, the Nemis-style lime cooler discharge, the lime cooler discharge conveyor, the lime elevator boot and the lime core bin vent are controlled by a fabric filter dust collector. <i>{PTI #26-04}</i>	05-14-2007	FG-BAGHOUSES	
EU-BAGHOUSE 141	Baghouse 141 – Lime product from the kiln discharge elevator and/or the lime product elevator is sized and sent to product silos prior to being loaded into rail cars and/or trucks. The lime screening operation, the lime product elevator head, the lime product silos, the feed conveyor from the kiln discharge elevator, and the feed conveyor from the screening operation are controlled by a fabric filter dust collector. <i>{PTI #26-04}</i>	05-14-2007	FG-BAGHOUSES	

h 	r	r	
Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-BAGHOUSE 163	Baghouse 163 – Lime product is discharged from the product silos by feeders to the rail car loading system. The product silo feeders and the railcar loading spout are controlled by a fabric filter dust collector. { <i>PTI</i> #26-04}	05-14-2007	FG-BAGHOUSES
EU-BAGHOUSE 231	Baghouse 231 – Lime product from the kiln discharge elevator and/or the lime product sized operation are conveyed to the kiln run silo. The lime kiln discharge elevator head, the feed conveyor from the lime kiln discharge elevator, the feed conveyor from the lime sizing operation, and the kiln run silo are controlled by a fabric filter dust collector. { <i>R</i> 336.1284(<i>k</i>), <i>R</i> 336.1331}	02-2012	FG-BAGHOUSES
EU-AUXENGINE	Auxiliary Engine – Any reciprocating internal combustion engine (RICE) subject to the RICE NESHAP found in 40 CFR Part 63, Subpart ZZZZ. This includes the 68.5 hp non-emergency compression ignition engine. The Yamnar 4TNV98 diesel fired auxiliary engine is utilized during times when the facility loses power and the main drive ceases operation. This ensures no damage to the kiln occurs during times of power- outages. <i>{40 CFR 63.6580}</i>	Pre 06-12-2006	FG-RICEMACT
EU- COALPRECRUSHER	Coal Pre-Crusher – The coal pre-crusher is an attachment to the existing coal chute. The chute connects at the top and bottom of the pre-crusher via a sealed flange. $\{R \ 336.1290(a)(ii)(A), 40 \ CFR \ 60.250\}$	10-2014	FG-RULE290 FG-NSPS-Y

EU-KILN#1 EMISSION UNIT CONDITIONS

DESCRIPTION

Limestone enters a rotary kiln via a ram style preheater. The stone is heated as it travels through the kiln. The lime then enters a counterflow Neimis style cooler. Exhaust gas particulate from the preheater, cooler, and kiln is controlled by a fabric filter dust collector using modular baghouse sections. {PTI #26-04}

Flexible Group ID: FG-MACT-AAAAA, FG-NSPS-HH

POLLUTION CONTROL EQUIPMENT

Baghouse

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	PM10	7.5 lb/ hr ²	Hourly	EU-KILN#1	SC V.1	R 336.1205
					SC V.3	40 CFR 52.21(j)
					SC VI.1	
2.	PM10	0.1 lb/ton of	Hourly	EU-KILN#1	SC V.1	R 336.1205
		stone feed ²			SC V.3	40 CFR 52.21(j)
					SC VI.1	
3.	PM10	29.2 tpy ²	12-month rolling time period	EU-KILN#1	SC VI.6	R 336.1205
						40 CFR 52.21(j)
4.	NOx	132.6 lb/hr ^{2,a}	24-hour rolling average as	EU-KILN#1	SC VI.2	R 336.1205
			determined each hour by		SC VI.3	40 CFR 52.21(j)
			Continuous Emissions			
			Monitoring Systems (CEMS)			
5.	NOx	532 tpy ²	12-month rolling time period	EU-KILN#1	SC VI.2	R 336.1205
					SC VI.3	40 CFR 52.21(j)
6.	SO2	60.2 lb/hr ^{2,a}	Monthly Basis	EU-KILN#1	SC VI.7	R 336.1205
						40 CFR 52.21(j)
7.	SO2	242 tpy ²	12-month rolling time period	EU-KILN#1	SC VI.7	R 336.1205
						40 CFR 52.21(j)
8.	CO	113.2 lb/hr ^{2,a}	24-hour rolling average as	EU-KILN#1	SC VI.2	R 336.1205
			determined each hour by CEMS		SC VI.3	40 CFR 52.21(j)
9.	CO	456 tpy ²	12-month rolling time period	EU-KILN#1	SC VI.2	R 336.1205
			J		SC VI.3	40 CFR 52.21(j)

^a Permit Limit based on maximum stone feed rate (tons of stone feed/hr) and the known lb/ton of stone feed emission factor.

 Visible emissions from EU-KILN#1 shall not exceed 10% opacity as measured by the Continuous Opacity Monitoring (COM) System. This opacity limit shall not include periods of startup when using No. 2 Fuel Oil/propane and no stone feed.² (R 336.1301, 40 CFR 52.21(j))

II. <u>MATERIAL LIMIT(S)</u>

1. The permittee shall not process more than 584,000 tons of limestone feed in EU-KILN#1 per year based upon a 12-month rolling time period as determined at the end of each calendar month.² (40 CFR 52.21 (c) & (d))

- 2. The permittee shall only burn No. 2 Fuel Oil, propane, coal, or coal combined with petroleum coke in EU-KILN#1.² (40 CFR 52.21(j))
- 3. The combined coal and petroleum coke sulfur content of the fuel shall not exceed 2.5% by weight based upon a monthly average.² (R 336.1205, 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate EU-KILN#1 during periods of startup, while bypassing the baghouse unless the kiln is burning only No. 2 fuel oil or propane and there is no stone feed to EU-KILN#1.² (R 336.1205, R 336.1224, R 336.1225)
- The permittee shall not operate EU-KILN#1 unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns, and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices.² (R 336.1911, R 336.1912, 40 CFR 52.21(j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall install maintain, calibrate and operate in a satisfactory manner a device to monitor and record the NOx and CO emissions at the outlet of the control device from EU-KILN#1 on a continuous basis and according to the procedures outlined in 40 CFR Part 60, Appendix B.² (R 336.1205, 40 CFR 52.21(j))
- The permittee shall operate EU-KILN#1 with a fabric filter collection system which is installed, maintained, and operated in a satisfactory manner. Bypassing of the collection system will only be allowed during startup on No. 2 fuel oil with no stone feed to the kiln.² (R 336.1224, R 336.1225, R 336.1205, R 336.1910)
- The permittee shall install, maintain, calibrate and operate in a satisfactory manner, a COM system according to the procedures outlined in 40 CFR Part 60, Appendix B, Performance Specification 1.² (R 336.1205, R 336.1213(3), 40 CFR 51.21(j))
- 4. The permittee shall not operate EU-KILN#1 unless the preheater is installed, maintained, and operated in a satisfactory manner.² (40 CFR 52.21(j))

See Appendix 3

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall verify particulate emission rate and the stone feed rate from EU–KILN#1 by testing, at owner's expense, in accordance with Department requirements. Testing must be done operating as reasonably close to operating capacity as possible. Visible emission observation procedures, particulate emission rate testing procedures and the stone feed measurement procedures must have prior approval by the AQD. Verification of visible emissions and particulate emission rates includes the submittal of a complete report of opacity observations and particulate emission rate test results to the AQD within 60 days following the last date of the evaluation. (R 336.1301, 40 CFR 52.21(j))
- 2. The permittee shall verify PM10 emission rates from EU-KILN#1 by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM10	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The submission of the test plan will include time and place of the

performance test and act as notification to the AQD Technical Programs Supervisor and the District Supervisor of that information. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- 3. The permittee shall verify the PM10 emission rates from EU-KILN#1, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (**R 336.1213(3)**)
- 5. The permittee shall conduct an analysis of the combined coal and petroleum coke, in a manner acceptable to the AQD, to determine the sulfur content and higher heating value. The analysis shall be performed for each shipment of coal and petroleum coke received. The AQD may require more frequent analyses. (**R 336.1213(3)**)
- 6. The permittee shall monitor and record the differential pressure of the baghouse during testing. (R. 336.1213(3))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall monitor and record the visible emissions from the EU-KILN#1 on a continuous basis. The COM system shall be installed, calibrated, maintained and operated in accordance with the procedures set forth in 40 CFR Part 63, Subpart A, General Provisions and according to Performance Specification 1, Appendix B of 40 CFR Part 60 and Appendix 3 of this permit.² (R336.1205, 40 CFR 52.21(j))
- The permittee shall monitor and record NOx and CO emissions from EU-KILN#1 on a continuous basis. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in appropriate Performance Specifications of 40 CFR Part 60, Appendix B and 40 CFR 60.13.² (R 336.1205, 40 CFR 52.21(j))
- The permittee shall keep, in a satisfactory manner, 24-hour rolling average pound per hour NOx and CO emission records and 12-month rolling time period NOx and CO emission records for EU-KILN#1.² (R 336.1205, 40 CFR 52.21(j))
- 4. The permittee shall install and maintain a device to determine the daily amount of fuel consumed by EU-KILN#1.² (R 336.1205, 40 CFR 52.21(j))
- The permittee shall keep a written record of the following information for EU-KILN#1 in a format acceptable to the AQD District Supervisor for the purpose of compliance demonstration:² (R 336.1205, R 336.1224, R 336.1225, R 336.1901, R 336.1910)
 - a. Daily recording of the pressure drops across the fabric filter using the pressure transmitter monitoring system on any days that the Kiln is in operation.
 - b. Monthly calculations, determining the pounds per hour emission rate based upon a monthly average for SO2.
 - c. Calculations determining the mass emission rate in tons per year for SO2 based upon a 12-month rolling time period as determined at the end of each calendar month using the SO2 removal efficiency as determined by testing.
 - d. Daily records of the coal/petroleum coke samples (date, time, weight) and the amount of No. 2 Fuel Oil, propane, and/or coal/petroleum coke used.
 - e. Records determining the combined average monthly sulfur content of the coal and petroleum coke, as determined in accordance with ASTM methods or alternative methods approved by the District Supervisor.
 - f. The hours of operation for the lime kiln per month and 12 month rolling time period as determined at the end of each month.

- g. The hours of operation per month and 12-month rolling time period which the kiln was operated during startup, shutdown, and upset conditions.
- 6. The permittee shall calculate the PM10 emissions in tons per year on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. The most recent stack test results, or emission factors acceptable to the AQD, shall be used to calculate the pollutant emissions subject to the approval of the AQD. The permittee shall make all records available to the AQD upon request. (R 336.1213(3))
- The permittee shall calculate and keep, in a satisfactory manner acceptable to the AQD, records of limestone feed in EU-KILN#1 in tons per year on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. The permittee shall make all records available to the AQD upon request. (R 336.1213(3))
- 8. The permittee shall continuously monitor and record, in a satisfactory manner, the daily limestone feed rate to EU-KILN#1. (R 336.1213(3))
- The permittee shall keep records of the determinations of the BTU/hr heat input rates of coal to EU-KILN#1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1213(3), R 336.1402(1))
- 10. The permittee shall keep records of monthly coal consumption rates by EU-KILN#1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (**R 336.1213(3)**)
- 11. The permittee shall utilize COM-recorded opacity as an indicator of the proper operation of the dust collector. The indicator range of opacity defining proper function of the dust collector is 0-10%. Six-minute average values shall be based on 36 or more equally spaced instantaneous opacity measurements per six- minute period. The COM system shall be calibrated in accordance with 40 CFR Part 60, Subpart A. **(40 CFR 64.6(c)(1)(i) and (ii))**
- 12. The opacity monitor shall continuously monitor opacity. The averaging period is 6 minutes. The monitor shall be calibrated quarterly. (40 CFR 64.6(c)(1)(iii))
- An excursion is a departure from the indicator range of 0-10% opacity when the 3-hour block average opacity value exceeds 10%. This does not include periods of startup or when running No. 2 fuel oil and/or propane and no stone feed. (40 CFR 64.6(c)(2))
- 14. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). (40 CFR 64.7(d))
- 15. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))

- 16. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 17. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

See Appendix 3

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
- In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an Excess Emission Report (EER) and/or the Summary Report in an acceptable format to the AQD within 30 days following the end of each calendar quarter for NOx, CO, and Opacity. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). (40 CFR 60.7(d), R 336.1201(3))
- 6. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))
- 7. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**
- Each semiannual report of monitoring and deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. If a QIP has been completed, the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. (40 CFR 64.9(a)(2)(iii))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SV-2	822	120 ²	R 336.1225 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all provisions of the federal National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants as specified in 40 CFR Part 63, Subparts A and AAAAA, as they apply to EU-KILN#1.² (40 CFR Part 63, Subparts A and AAAAA)
- 2. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources for Lime Manufacturing Plants as specified in 40 CFR Part 60, Subparts A and HH, as they apply to EU-KILN#1.² (40 CFR Part 60, Subparts A and HH)
- 3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)
- 4. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))
- 5. The permittee shall submit a QIP if 6 excursions occur in a rolling 3-month period. (40 CFR 64.8(a))

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-HAULING EMISSION UNIT CONDITIONS

DESCRIPTION

Fugitive emissions from vehicle traffic in the plant area. {PTI #26-04}

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EU–HAULING, shall not exceed 5% opacity.² (R 336.1301, 40 CFR 52.21(c) & (d))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-HAULING unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix 9 has been implemented and is maintained.² (R 336.1371)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall record and keep records as required by the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix 9. The records shall be made available to the AQD upon request. (**R 336.1213(3**))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

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3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes: ¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-STONE HANDLING EMISSION UNIT CONDITIONS

DESCRIPTION

Raw limestone is unloaded to a stacking conveyor and stockpiled. Stone is then reclaimed by vibrating under pile feeders and moved by conveyor belt to a screen. Screened stone is then conveyed to the kiln pre-heater via conveyor belt. Limestone pile fugitive dust emissions are included. {PTI #26-04}

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Visible emissions from each of the material storage piles maintained under EU-STONE HANDLING shall not exceed 5% opacity.² (R 336.1301, 40 CFR 52.21(c) & (d))

II. <u>MATERIAL LIMIT(S)</u>

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-STONE HANDLING unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix 9 has been implemented and is maintained.² (R 336.1371)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

 The permittee shall record and keep records as required by the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix 9. The records shall be made available to the AQD upon request. (R 336.1213(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

ROP No: MI-ROP-N7362-2020 Expiration Date: November 19, 2025 PTI No: MI-PTI-N7362-2020

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes: ¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-BAGHOUSES	Baghouses located throughout the facility used to capture dust generated by various conveyors, elevators, screens, crushers and feeders.	EU-DUST HANDLING EU-BAGHOUSE 131 EU-BAGHOUSE 132 EU-BAGHOUSE 133 EU-BAGHOUSE 141 EU-BAGHOUSE 163 EU-PRODUCT LOADING EU-PRODUCT LOADING 2 EU-DUST LOADING EU-BAGHOUSE 231
FG-NSPS-Y	The provisions of this subpart apply to affected facilities in coal preparation and processing plants that process more than 200 tons of coal per day. The provisions of this subpart are applicable to any of the following affected facilities: Thermal dryers, pneumatic coal- cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), and coal storage systems, transfer and loading systems. Applicable provisions depend upon the construction/modification date of each type of equipment as outlined in 40 CFR 60.250.	EU-COALPRECRUSHER EU-COAL HANDLING EU-COAL SILO
FG-NSPS-HH	40 CFR Part 60, Subpart HH- Standards of Performance for New Stationary Sources for Lime Manufacturing Plants. Applicable to each rotary lime kiln used in the manufacturing of lime that commences construction or modification after May 3, 1977.	EU-KILN#1
FG-RICEMACT	National Emission Standards for Hazardous Air Pollutants for Stationary RICE, located at a major source of hazardous air pollutant (HAP) emissions, existing non-emergency, combustion ignition RICE less than 100 brake hp.	EU-AUXENGINE

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-MACT-AAAAA	The affected source is a new lime manufacturing plant (LMP) that is a major source of HAP emissions. An existing affected source is a source that commences construction or reconstruction before December 23, 2002. A new affected source includes a new lime kiln (and, if applicable, it's associated lime cooler), and a processed stone handling (PSH) operations system for which construction or reconstruction began after December 20, 2002. An existing lime kiln (and, if applicable, its associated lime cooler) and an existing PSH operations system are those that do not meet the definition of a new kiln or a new PSH operations system. The regulations cover the existing lime kilns and their associated coolers, and PSH operations located at an LMP that is a major source.	EU-KILN#1
FG-RULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EU-COALPRECRUSHER

FG-BAGHOUSES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Baghouses located throughout the facility used to capture dust generated by various conveyors, elevators, screens, crushers and feeders.

Emission Units: EU-DUST HANDLING (Baghouse 188), EU-BAGHOUSE 131, EU-BAGHOUSE 132, EU-BAGHOUSE 133, EU-BAGHOUSE 141, EU-BAGHOUSE 163, EU-PRODUCT LOADING (Baghouse 161), EU-PRODUCT LOADING 2 (Baghouse 162), EU-DUST LOADING (Baghouse 189), EU-BAGHOUSE 231

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	PM10	0.014 lb/1000 lb of exhaust gases ²	Hourly	Baghouse 131	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
2.	PM10	0.44 lb/hr ²	Hourly	Baghouse 131	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
3.	PM10	0.015 lb/1000 lb exhaust gases ²	Hourly	Baghouse 132	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
4.	PM10	0.25 lb/hr ²	Hourly	Baghouse 132	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
5.	PM10	0.006 lb/1000 lb exhaust gases ²	Hourly	Baghouse 133	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
6.	PM10	0.13 lb/hr ²	Hourly	Baghouse 133	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
7.	PM10	0.019 lb/1000 lb exhaust gases ²	Hourly	Baghouse 141	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d),
8.	PM10	0.85 lb/hr ²	Hourly	Baghouse 141	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
9. PM10	0.009 lb/1000 lb exhaust gases ²	Hourly	Baghouse 161	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
10. PM10	0.04 lb/hr ²	Hourly	Baghouse 161	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
11. PM10	0.009 lb/1000 lb exhaust gases ²	Hourly	Baghouse 162	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
12. PM10	0.04 lb/hr ²	Hourly	Baghouse 162	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
13. PM10	0.011 lb/1000 lb exhaust gases ²	Hourly	Baghouse 163	SC V.1, SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
14. PM10	0.19 lb/hr ²	Hourly	Baghouse 163	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
15. PM10	0.019 lb/1000 lb exhaust gases ²	Hourly	Baghouse 188	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
16. PM10	0.09 lb/hr ²	Hourly	Baghouse 188	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
17. PM10	0.019 lb/1000 lb exhaust gases ²	Hourly	Baghouse 189	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)
18. PM10	0.09 lb/hr ²	Hourly	Baghouse 189	SC V.1 SC VI.1	40 CFR 52.21(j) 40 CFR 52.21 (c) & (d)

19. Visible emissions from baghouse 161 and baghouse 162 shall not exceed 5% opacity.² (R 336.1301)

20. Visible emissions from each baghouse associated with FG-BAGHOUSES (except baghouse 161 and baghouse 162) shall not exceed 10%.² (R 336.1301)

II. <u>MATERIAL LIMIT(S)</u>

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

N/A

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

The permittee shall monitor in a satisfactory manner the condition of dry filter particulate control system through visual inspection (or other program proposed by the permittee) on a weekly basis during operation. The permittee shall keep in a satisfactory manner records of visual inspections of the dry filter particulate control system which includes the dates and results of the inspections and the date and reasons for repairs.² (R 336.1331, 40 CFR 52.21 (c) & (d))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SV-3 (Baghouse 188)	7.5 ²	68²	R 336.1225 40 CFR 52.21 (c) & (d)
2.	SV-4 (Baghouse 133)	17 ²	106²	R 336.1225 40 CFR 52.21 (c) & (d)
3.	SV-5 (Baghouse 132)	14.5 ²	66²	R 336.1225 40 CFR 52.21 (c) & (d)
4.	SV-6 (Baghouse 131)	20²	66²	R 336.1225 40 CFR 52.21 (c) & (d)
5.	SV-7 (Baghouse 141)	24 ²	88.5 ²	R 336.1225 40 CFR 52.21 (c) & (d)
6.	SV-8 (Baghouse 163)	14 ²	82.0 ²	R 336.1225 40 CFR 52.21 (c) & (d)
7.	SV-9 (Baghouse 161)	7.5 ²	90.0 ²	R 336.1225 40 CFR 52.21 (c) & (d)
8.	SV-10 (Baghouse 162)	7.5 ²	90.0 ²	R 336.1225 40 CFR 52.21 (c) & (d)

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
9.	SV-11 (Baghouse 189)	7.5²	44.0 ²	R 336.1225 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b). ² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-NSPS-Y FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The provisions of this subpart apply to affected facilities in coal preparation and processing plants that process more than 200 tons of coal per day. The provisions of this subpart are applicable to any of the following affected facilities: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), and coal storage systems, transfer and loading systems.

Emission Units: EU-COALPRECRUSHER (Coal Pre-Crusher), EU-COAL HANDLING, EU-COAL SILO

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Visible Emissions	10% opacity	6-minute average	Coal Pre-Crusher	SC VI.1, SC VI.2, SC VI.3	40 CFR 60.254 (b)(1)
2.	Visible Emissions	20% opacity	6-minute average	Coal Handling (unloading, reloading, and conveyors only) Coal Silo (storage system only)	SC V.1, SC V.3	40 CFR 60.254(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall verify Visible Emission rates from the emission units in SC I.1&2 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the

method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.257(a)(2), 40 CFR 60.257(a)(3))

- 2. The permittee shall verify the Visible Emission rates from EU-COALPRECRUSHER, at a minimum, every five years from the date of the last test. (40 CFR 60.255(f)(1)(iii))
- 3. The permittee shall verify the Visible Emission rates from EU-COALHANDLING and EU-COALSILO with a onetime EPA Method 9 performance test. (40 CFR 60.255(a))
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall monitor visible emissions using daily, 15-second Method 22 visible emissions test and Method 9 observations within 45 operating days of when visible emissions are observed (if any). (40 CFR 60.255(f)(1)(i))
- 2. The permittee shall conduct monthly visible emissions observations, using corrective maintenance if needed. (40 CFR 60.255(f)(1)(ii))
- 3. The permittee shall maintain a logbook with the manufacturer's recommended maintenance procedures and the date and time of any maintenance and inspection activities. The permittee shall maintain records of the date and time any visible emissions were observed. The permittee will also maintain records of the amount and type of coal processed each calendar month. (40 CFR 60.258(a)(1)-(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the Standards of Performance for New Stationary Sources, as specified in 40 CFR Part 60, Subparts A and Y for Coal Preparation and Processing Plants by the compliance date. **(40 CFR Part 60, Subparts A and Y)**

FG-NSPS-HH FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 60, Subpart HH- Standards of Performance for New Stationary Sources for Lime Manufacturing Plants. Applicable to each rotary lime kiln used in the manufacturing of lime that commences construction or modification after May 3, 1977.

Emission Unit: EU-KILN#1

POLLUTION CONTROL EQUIPMENT

Baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.60 lb/ton of stone feed	Hourly	EU-KILN#1	SC IV.1	40 CFR 60.342(a)(1)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

 The permittee shall install, calibrate, maintain, and operate a continuous monitoring system to monitor and record the opacity of a representative portion of the gases discharged into the atmosphere from EU-KILN#1. (40 CFR 60.343(a))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

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3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources for Lime Manufacturing Plants as specified in 40 CFR Part 60, Subparts A and HH, as they apply to EU-KILN#1. (40 CFR Part 60, Subparts A and HH)

FG-RICEMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary RICE, located at a major source of HAP emissions, existing non-emergency, combustion ignition RICE less than 100 brake hp.

Emission Unit: EU-AUXENGINE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Each engine in FG-RICEMACT shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 2 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the recommended work practices specified in 40 CFR Part 63, Subpart ZZZZ, Table 2c:
 - a. Change oil and filter every 1000 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 2)
- The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63, Subpart ZZZZ. (40 CFR 63.6625(i))
- The permittee shall install, maintain and operate each engine in FG-RICEMACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6605, 40 CFR 63.6625(e))
- 4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FG-RICEMACT to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine is not in operation when the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. For each engine in FG-RICEMACT the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(e), 40 CFR 63.6660)

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or Part 71 must report all deviations as defined in Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. (40 CFR 63.6650(f))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. (40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)

FG-MACT-AAAAA FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The affected source is a new LMP that is a major source of HAP emissions. An existing affected source is a source that commences construction or reconstruction before December 23, 2002. A new affected source includes a new lime kiln (and, if applicable, its associated lime cooler), and a processed stone handling (PSH) operations system for which construction or reconstruction began after December 20, 2002. An existing lime kiln (and, if applicable, its associated lime cooler) and an existing PSH operations system are those that do not meet the definition of a new kiln or a new PSH operations system. The regulations cover the existing lime kilns and their associated coolers, and PSH operations located at an LMP that is a major source.

Emission Unit: EU-KILN#1

POLLUTION CONTROL EQUIPMENT

Fabric Filter Baghouse (Baghouse 188)

I. EMISSION LIMIT(S)

Pollutant		Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	PM	0.10 lb/ ton of stone feed	Hourly	EU-KILN#1	SC V.1 SC V.2	40 CFR 63.7090(a)
2.	PM	0.05 grams/ dscm	Hourly	Stack or building vent SC V.I emissions at the SC V.2 facility		40 CFR 63.7090(a)
3.	Visible Emissions	7% Opacity	6-minute average	Stack or building vent emissions at the facility		40 CFR 63.7090(a)
4.	Visible Emissions	10% Opacity	6-minute average	Fugitive emissions from operations associated at the facility that are not enclosed in a building.	SC VI.6	40 CFR 63.7090(a)
5.	Visible Emissions	0% Opacity	Instantaneous	Fugitive emissions from the building containing operations associated at the facility, except for emissions from a vent.	SC VI.6	40 CFR 63.7090(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall comply with the emission limits above, and any other emission and operating limits put forth in 40 CFR Part 63, Subpart AAAAA, at all times, except during periods of startup, shutdown, or malfunction. (40 CFR 63.7100(a))
- 2. In lieu of using a bag leak detection system (BLDS) or particulate matter (PM) detector, the permittee shall maintain the baghouse such that the 6-minute average opacity for any 6-minute block period does not exceed 15%, and comply with the requirements in 40 CFR 63.7113(f) and SC VI.1. (40 CFR 63.7090(b))
- 3. The permittee shall be in compliance with the opacity and visible emission limits in 40 CFR Part 63, Subpart AAAAA during the times specified in 40 CFR Part 63.6(h)(1). (40 CFR 63.6(h)(1), 40 CFR 63.7100(b))
- 4. The permittee shall submit to the AQD District Supervisor, for review and approval, a written OM&M Plan for the facility. Any subsequent changes to the plan must be submitted to the AQD District Supervisor for review and approval. The plan shall contain the following information:
 - a. Process and control device parameters to be monitored to determine compliance, along with established operating limits or ranges, as applicable, for each emission unit. (40 CFR 63.7100(d)(1))
 - b. A monitoring schedule for each emission unit. (40 CFR 63.7100(d)(2))
 - c. Procedures for the proper operation and maintenance of each emission unit and each air pollution control device used to meet the applicable emission limitations and operating limits in Tables 1 and 2 of 40 CFR, Part 63, Subpart AAAAA, respectively. **(40 CFR 63.7100(d)(3))**
 - d. Procedures for the proper installation, operation and maintenance of monitoring devices or systems used to determine compliance, including: (40 CFR 63.7100(d)(4))
 - i. Calibration and certification of accuracy of each measuring device.
 - ii. Performance and equipment specifications for the sample interface, parametric signal analyzer, and the data collection and reduction systems.
 - iii. Ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR 63.8(c)(1), (3) and (4)(ii).
 - iv. Ongoing data quality assurance procedures in accordance with the general requirements of 40 CFR 63.8(d).
 - e. Procedures for monitoring process and control device parameters. (40 CFR 63.7100(d)(5))
 - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the operating limits specified in Table 2 of 40 CFR Part 63, Subpart AAAAA, including: (40 CFR 63.7100(d)(6))
 - i. Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended.
 - ii. Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date the corrective action was completed.
 - g. A maintenance schedule for each emission unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance. (40 CFR 63.7100(d)(7))
- 5. The permittee shall develop and implement a written Startup, Shutdown and Malfunction (SSM) Plan in accordance with 40 CFR 63.6(e)(3). (40 CFR 63.7100(e), 40 CFR 63.6(e)(3))

- 6. For each emission unit equipped with an add-on air pollution control device, such as the baghouse associated with EU-KILN#1, the permittee shall do the following: **(40 CFR 63.7090(b))**
 - a. Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to the baghouses.
 - b. Operate each capture/collection system according to the procedures and requirements in the Malfunction Abatement Plan (MAP) in SC III.5.

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall verify PM emission rates from EU-KILN#1 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The submission of the test plan will include time and place of the performance test and act as notification to the AQD Technical Programs Supervisor and the District Supervisor of that information. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 63.7111, 40 CFR 63.7130(d))
- 2. The permittee shall verify the PM emission rates from EU-KILN#1, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
- 3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (**R 336.1213(3)**)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- For each emission unit equipped with an add-on air pollution control device, the permittee shall inspect each capture/collection and closed vent system, at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in SC III.6 and record the results of each inspection. (40 CFR 63.7113(f))
- 2. The permittee shall keep the following records:
 - a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart AAAAA, including all documentation supporting an Initial Notification or Notification of Compliance Status that was submitted in accordance with the requirements of 40 CFR 63.10(b)(2)(xiv).
 - b. Records in accordance with 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown and malfunction.
 - c. Records of performance tests, performance evaluations, and opacity and visible emission observations as required in 40 CFR 63.10(b)(2)(viii).
 - d. Records of visible emission observations as required by 40 CFR 63.6(h)(6).
 - e. Records required by Tables 5 and 6 of 40 CFR Part 63, Subpart AAAAA that demonstrate continuous compliance of FG-MACT-AAAAA with each applicable emission limitation in Subpart AAAAA.
 - f. Records which document the basis for the initial applicability determination as required by 40 CFR 63.7081.

All of these records shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record, and each record must be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record in accordance with 40 CFR 63.10(b)(1). (40 CFR 63.7132, 40 CFR 63.7133)

- 3. The permittee must install, operate and maintain each continuous parameter monitoring system according to the MAP required by 40 CFR 63.7100(d) and 40 CFR 63.7113(a). **(40 CFR 63.7113(a))**
- 4. For each flow measurement device, the permittee must meet the requirements in paragraphs (a)(1) through (5) and (b)(1) through (4) of 40 CFR 63.7113. (40 CFR 63.7113(b))
- 5. For each pressure measurement device, the permittee must meet the requirements in paragraphs (a)(1) through (5) and (c)(1) through (7) of 40 CFR 63.7113. (40 CFR 63.7113(c))
- 6. For each PSH operation subject to an opacity limit as specified in 40 CFR Part 63, Subpart AAAAA, and any vents from buildings at the facility subject to an opacity limit, the permittee must conduct a visible emissions check according to Item 1 of Table 6 of Subpart AAAAA, and as follows: (40 CFR 63.7121(e))
 - a. Conduct visible inspections that consist of a visual survey of each stack or process emission point over the test period to identify if there are visible emissions, other than condensed water vapor.
 - b. Select a position at least 15 but not more than 1,320 feet from the affected emission point with the sun or other light source generally at your back.
 - c. The observer conducting the visible emission checks need not be certified to conduct USEPA Method 9 in Appendix A to Part 60 of this chapter, but must meet the training requirements as described in USEPA Method 22 of Appendix A to 40 CFR Part 60.

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
- If a startup, shutdown, or malfunction occurs during the semiannual reporting period, that is not consistent with the SSM Plan, the permittee shall submit an immediate SSM report according to the requirements of 40 CFR 63.10(d)(5)(ii). (40 CFR 63.10(d)(5)(ii), 40 CFR 63.7131(a))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and AAAAA for Lime Manufacturing Plants by the compliance date. **(40 CFR Part 63, Subparts A and AAAAA)**

FG-RULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: EU-RULE290 and any future emission unit that meets the requirements of this flexible group.

Emission Units installed prior to December 20, 2016: EU-COALPRECRUSHER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

- Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(2)(a)(i))
- 2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (**R 336.1290(2)(a)(ii)**)
 - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(A))
 - b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(B))
 - c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (**R 336.1290(2)(a)(ii)(C)**)
 - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed <u>on or after</u> December 20, 2016. (R 336.1290(2)(a)(ii)(D))
 - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed <u>on or after</u> December 20, 2016. (R 336.1290(2)(a)(ii)(E))
- Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: (R 336.1290(2)(a)(iii))
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(2)(a)(iii)(A))

- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(2)(a)(iii)(B))
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(2)(a)(iii)(C))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)
- 2. The following requirements apply to emission units installed <u>on or after</u> December 20, 2016, utilizing control equipment:
 - An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: (R 336.1290(2)(b)(i), R 336.1910)
 - i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
 - ii. Wet scrubbers equipped with a liquid flow rate monitor.
 - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
 - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. (R 336.1290(2)(b)(ii), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (**R 336.1213(3)**)
 - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
 - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))

- d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**
- Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed <u>on or after</u> December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. (R 336.1213(3), R 336.1290(2)(d))
- f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. (R 336.1213(3), R 336.1290(2)(e))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(2)(c), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (**R 336.1213(3)**)
- 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (**R 336.1213(3)**)

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms			Pollutant / Measurement Abbreviations		
AQD	Air Quality Division	acfm Actual cubic feet per minute			
BACT	Best Available Control Technology	BTU	British Thermal Unit		
CAA	Clean Air Act	°C	Degrees Celsius		
CAM	Compliance Assurance Monitoring	co	Carbon Monoxide		
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent		
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot		
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter		
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit		
Department/	Michigan Department of Environment,	gr	Grains		
department	Great Lakes, and Energy	HAP	Hazardous Air Pollutant		
EGLE	Michigan Department of Environment,	Hg	Mercury		
	Great Lakes, and Energy	hr	Hour		
EU	Emission Unit	HP	Horsepower		
FG	Flexible Group	H ₂ S	Hydrogen Sulfide		
GACS	Gallons of Applied Coating Solids	kW	Kilowatt		
GC	General Condition	lb	Pound		
GHGs	Greenhouse Gases	m	Meter		
HVLP	High Volume Low Pressure*	mg	Milligram		
ID	Identification	mm	Millimeter		
IRSL	Initial Risk Screening Level	MM	Million		
ITSL	Initial Threshold Screening Level	MW	Megawatts		
LAER	Lowest Achievable Emission Rate	NMOC	Non-methane Organic Compounds		
MACT	Maximum Achievable Control Technology	NOx	Oxides of Nitrogen		
MAERS	Michigan Air Emissions Reporting System		Nanogram		
MAERS	Malfunction Abatement Plan	ng PM	Particulate Matter		
MSDS	Material Safety Data Sheet	PM10	Particulate Matter equal to or less than 10		
NA	Not Applicable	1	microns in diameter		
NAAQS	National Ambient Air Quality Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter		
NESHAP	National Emission Standard for Hazardous	pph	Pounds per hour		
	Air Pollutants	ppm	Parts per million		
NSPS	New Source Performance Standards	ppmv	Parts per million by volume		
NSR	New Source Review	ppmw	Parts per million by weight		
PS	Performance Specification	%	Percent		
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute		
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge		
PTI	Permit to Install	scf	Standard cubic feet		
RACT	Reasonable Available Control Technology	sec	Seconds		
ROP	Renewable Operating Permit	SO ₂	Sulfur Dioxide		
SC	Special Condition	TAC	Toxic Air Contaminant		
SCR	Selective Catalytic Reduction	Temp	Temperature		
SNCR	Selective Non-Catalytic Reduction	THC	Total Hydrocarbons		
SRN	State Registration Number	tpy	Tons per year		
TEQ	Toxicity Equivalence Quotient	μg	Microgram		
USEPA/EPA	United States Environmental Protection	μm	Micrometer or Micron		
	Agency	VOC	Volatile Organic Compounds		
VE	Visible Emissions	yr	Year		

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-KILN#1.

A. NOx and CO Monitoring – Continuous Emission Monitoring System (CEMS) Requirements

1. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table.

Pollutant	Applicable PS	
NOx	2	
CO	4 or 4A	

- 2. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.
- 3. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 and 4 or 4A of Appendix B, 40 CFR Part 60.
- 4. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F)
- 5. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an EER and/or the summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
 - a. A report of each exceedance above the limits specified in the conditions of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of CEMS downtime and corrective action.
 - c. A report of the total operating time of the EU-KILN#1 during the reporting period.
 - d. A report of any periods that the CEMS exceeds the instrument range.
 - e. If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.

All monitoring data shall be kept on file for a period of at least five years and made available to the AQD upon request.

6. The permittee shall use all reasonable measures necessary to operate the CEMS system during periods of startup, shutdown and malfunction. Any deficiencies of the CEMS monitoring system up-time shall be submitted in an acceptable format to the District Supervisor, AQD, within 30 days following the end of the quarter.

7. The permittee shall perform an annual audit of the CEMS. The results of the annual audit shall be submitted to the District Supervisor within 30 days of receipt. Further, all monitoring data shall be kept on file for a period of at least five years and made available to the District Supervisor upon request.

B. Continuous Opacity Monitoring (COM) System Requirements

- 1. The COM System shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 1 of Appendix B, 40 CFR Part 60.
- 2. The permittee shall perform an annual audit of the COM System using the procedures set forth in 40 CFR Part 60, Appendix F, Procedure 3. Within 30 days after the completion of the audit, the results of the annual audit shall be submitted to the AQD.
- 3. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an EER and/or the summary report in an acceptable format to Air Quality Division, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
 - a. A report of each exceedance above 10% opacity. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of COM System downtime and corrective action.
 - c. A report of the total operating time of the EU-KILN#1 during the reporting period.
 - d. If no exceedances or COM System downtime occurred during the reporting period, the permittee shall report that fact.

All monitoring data is shall be kept on file for a period of at least five years and made available to the AQD upon request.

- 4. The permittee shall use all reasonable measures necessary to operate the COM System during periods of startup, shutdown and malfunction. In accordance with 40 CFR Part 63.7113(g) the magnitude, in actual percent opacity, of all six minute averages of opacity greater than 10% and the time period represented by such averages and any deficiencies of the opacity monitoring system up-time shall be submitted in an acceptable format to the District Supervisor, AQD, within 30 days following the end of the quarter.
- 5. The permittee shall perform an annual audit of the COM System using the procedures put forth in 40 CFR Part 60, Appendix F, Procedure 3. The results of the annual audit shall be submitted to the District Supervisor within 30 days of receipt. Further, all monitoring data shall be kept on file for a period of at least five years and made available to the District Supervisor upon request.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N7362-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-ROP-N7362-2015 is being reissued as Source-Wide PTI No. MI-PTI-N7362-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

Appendix 9. Fugitive Dust Management Plan

I. Site Roadways / Plant Yard

- A. The dust on the site roadways/plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet the 5% opacity limits.
- B. All paved roadways/plant yards shall be swept as needed between applications.
- C. Any material spillage on roads shall be cleaned up promptly.

II. Plant

- A. The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve. The transfer point from the re-circulating belt to the feed belt shall be equipped with an enclosed chute.
- B. All stone transfer conveyors and transfer points (except conveyor 113) will be kept covered.

III. Storage Piles

- A. Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.
- B. Stockpiles shall be watered on an as needed basis in order to meet the opacity limit of 5%. Also, equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day. A record of all watering shall be kept on file and be made available to the AQD upon request.

IV. Truck Traffic

A. On-site: Finished lime transport vehicles shall be loaded with telescopic chutes into railcars or trucks.

V. AQD/EGLE Inspection

A. The provisions and procedures of this plan are subject to adjustment if following an inspection and written notification the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.