



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
MIAMI COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-02367

DATE: 7/1/2003

Piqua Concrete Co
Henry Ernst
8395 N Piqua-Lockington Rd
Piqua, OH 45356-9731

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 7/1/2003
Effective Date: 7/1/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-02367

Application Number: 08-02367
APS Premise Number: 0855100451
Permit Fee: **\$500**
Name of Facility: Piqua Concrete Co
Person to Contact: Henry Ernst
Address: 8395 N Piqua-Lockington Rd
Piqua, OH 45356-9731

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10400 Haddix Rd
Fairborn, Ohio**

Description of proposed emissions unit(s):
administrative modification of P901, emission factor increase. 300 TPH portable concrete batch plant.

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

This permit is granted subject to the conditions attached hereto.


Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be

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prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
particulate	10.8 TPY

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, <u>and/or Equipment</u>	aggregate
P901 - 300 TPH (150 cubic yard/hour) Portable Concrete Batch Plant - Transit Mix (Modification, See Section F.2)	Cement and Auxiliary silos with fabric filter dust collector
Transfer of sand and aggregate to elevated bins	Transit mix truck loading with fabric filter dust collector
Weigh hopper loading of sand and	

Applicable Rules/Requirements

OAC rule 3745-31-05 (A)(3)

OAC rule 3745-35-07(B)
Synthetic Minor to Avoid Title V
Permitting

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-11

OAC rule 3745-17-11

OAC rule 3745-17-07(A)

OAC rule 3745-17-07(A)

OAC rule 3745-17-07(B)

OAC rule 3745-17-07(A)(3)

OAC rule 3745-17-07(B)

OAC rule 3745-17-07(B)

OAC rule 3745-17-08

OAC rule 3745-17-08

OAC rule 3745-17-08

OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(A)(3)

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Applicable Emissions <u>Limitations/Control Measures</u>		
PM: 13.5 lb particulate emissions (PE)/hour	shall be sufficient to eliminate visible emissions of fugitive dust.	3745-31-05(A)(3).
10.8 TPY PE as a rolling 12 month summation. See Section B.1.	The fabric filter dust collector shall achieve an outlet emission rate of not greater than 0.020 grain of PE per dry standard cubic foot of exhaust gases, combined, or there shall be no visible emissions from the outlet, whichever is less stringent.	A charging boot shall be used around the hopper discharge area and transit-mix truck opening and vented to a fabric filter dust collector; the charging boot shall have a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture to the extent possible with good engineering design.
The drop height of the front-end bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the conveyor loading area.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	The fabric filter dust collector shall achieve an outlet emission rate of not greater than 0.020 grain of PE per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.
The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(B).	The opacity limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The visible PE shall not exceed 20 percent opacity as a 3-minute average. See Section A.2.b.	The weigh hopper shall be adequately enclosed; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust as the last point of capture.	The opacity limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	The visible PE shall not exceed 20 percent opacity as a 3-minute average. See Section A.2.b.	The visible PE shall not exceed 20 percent opacity as a 3-minute average. See Section A.2.b.
See Section A.2.b. The silos shall be adequately enclosed and vented to a fabric filter dust collector; the enclosure	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule	The emission limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule
 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The 13.5 lb/hr PE limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** OAC rules 3745-17-07(B) and 3745-17-08 are applicable only when the emissions unit is located in an Appendix A area as specified in OAC rule 3745-17-08.

B. Operational Restrictions

1. The maximum annual production rate for this emissions units shall not exceed 240,000 cubic yards per year based on a rolling, 12-month summation.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following production rates for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Cubic Yard Production</u>
1-6	120,000
1-7	140,000
1-8	160,000
1-9	180,000
1-10	200,000
1-11	220,000
1-12	240,000

After the first 12 calendar months of operation following the issuance of this permit, the permittee shall comply with the annual cubic yard production limitation based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the production rate, in tons;
 - b. the particulate emissions rate, in tons (as calculated in Section E.1.b.);
 - c. the rolling, 12-month particulate emissions rate summation, in TPY (beginning the 13th calendar month after issuance of this permit);

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- d. the first 12 months cumulative production rates;
 - e. the rolling, 12-month production rate summation, in cubic yards (beginning the 13th calendar month after issuance of this permit).
2. The permittee shall perform daily checks while the equipment is in operation for any visible particulate emissions from the fabric filter dust collectors and for any visible emissions of fugitive dust. The presence or absence of any visible emissions shall be noted in an operations log. If any visible particulate emissions exceedances are observed, corrective actions shall be taken to minimize or eliminate the visible particulate emissions, and these actions shall also be noted in the operations log.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Section A.2 of the General Terms and Conditions of this permit, which identify all exceedances of:
 - a. the rolling, 12-month production rate limitation;
 - b. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable production rate;
 - c. the rolling, 12 month PE limitation.
2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions and/or fugitive dust were observed and (b) describes the corrective actions taken to minimize or eliminate the visible emissions. The report shall be submitted by January 31 and July 31 of each year to the Director (District Office or Local Air Agency).

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
 - a. Emission Limitation -
13.5 lb PE/hour

Applicable Compliance Method-
Compliance shall be demonstrated by the maximum hourly production rate of 150 cubic

yard/hour is multiplied by the emission factor (total facility controlled), 0.090 lb-particulate/cubic yard (AP-42, Chapter 11, Table 11.12-3, 10/2001) resulting in a controlled emission rate of 13.5 lb/hr.

- b. Emission Limitation -
10.8 TPY PE, as a 12-month, rolling summation

Applicable Compliance Method-

The 10.8 TPY emission limitation was developed by multiplying the maximum hourly production rate of 150 cubic/yard by the restricted operating schedule of 1600 hours/year, resulting in the production rate limitation of 240,000 cubic yard/year. This result was then multiplied by the AP-42 emissions factor of 0.090 lb-particulate/cubic yard and divided by 2000 lb/ton. Therefore, compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

The monthly particulate emission rates shall be added to the total particulate emissions rates from the previous eleven months to determine the rolling, 12-month summation.

- c. Emission Limitation -
Visible fugitive PE emissions shall not exceed 20 percent opacity as a 3-minute average

Applicable Compliance Method-

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 22.

- d. Emission Limitation -
No visible emissions

Applicable Compliance Method-

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- e. Emission Limitation-
240,000 cubic yard/year production, as a rolling 12-month summation

Applicable Compliance Method-

Compliance shall be based on record keeping requirements specified in Section C.1. The monthly production rates shall be added to the total production rates from the previous

eleven months to determine the rolling, 12-month summation.

F. Miscellaneous Requirements

1. Notice to Relocate a Portable or Mobile Source

- a. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:
 - i. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
 - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
 - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the RAPCA and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
 - iv. in RAPCA's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.
- b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:
 - i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - ii. the portable emissions unit is equipped with best available technology;
 - iii. the portable emission unit owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and

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- vii. the portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.
- c. Any site approvals issued by the Ohio EPA, pursuant to F.1. above, shall be valid for no longer than three years and are subject to renewal.

In order for the RAPCA and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the RAPCA (451 W. Third Street, Dayton,

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OH 45422) and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the RAPCA and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

2. This is an administrative modification required due to a change in AP-42 emission factors and results in an increase of 3.22 TPY PE.