



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/27/2013

Certified Mail

MICHAEL CRUMMITT
CRUMMITT & SON VAULT CORP.
P.O. BOX 277
MARTINS FERRY, OH 43935

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0607090139
Permit Number: P0115380
Permit Type: Initial Installation
County: Belmont

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CRUMMITT & SON VAULT CORP.**

Facility ID:	0607090139
Permit Number:	P0115380
Permit Type:	Initial Installation
Issued:	9/27/2013
Effective:	9/27/2013
Expiration:	10/18/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
CRUMMITT & SON VAULT CORP.

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Final Permit-to-Install and Operate
CRUMMITT & SON VAULT CORP.
Permit Number: P0115380
Facility ID: 0607090139
Effective Date: 9/27/2013

Authorization

Facility ID: 0607090139
Application Number(s): A0048761
Permit Number: P0115380
Permit Description: Initial installation PTIO for a burial vault manufacturing operation consisting of a concrete batch plant and surface coating of concrete.
Permit Type: Initial Installation
Permit Fee: \$2,400.00
Issue Date: 9/27/2013
Effective Date: 9/27/2013
Expiration Date: 10/18/2022
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

CRUMMITT & SON VAULT CORP.
NORTH SECOND STREET
MARTINS FERRY, OH 43935

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install and Operate
CRUMMITT & SON VAULT CORP.
Permit Number: P0115380
Facility ID: 0607090139
Effective Date: 9/27/2013

Authorization (continued)

Permit Number: P0115380

Permit Description: Initial installation PTIO for a burial vault manufacturing operation consisting of a concrete batch plant and surface coating of concrete.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	vault coating
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P902
Company Equipment ID:	concrete batch plant
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
CRUMMITT & SON VAULT CORP.
Permit Number: P0115380
Facility ID: 0607090139
Effective Date: 9/27/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
CRUMMITT & SON VAULT CORP.
Permit Number: P0115380
Facility ID: 0607090139
Effective Date: 9/27/2013

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
CRUMMITT & SON VAULT CORP.
Permit Number: P0115380
Facility ID: 0607090139
Effective Date: 9/27/2013

C. Emissions Unit Terms and Conditions



1. P902, concrete batch plant

Operations, Property and/or Equipment Description:

P902 is concrete batch plant used to manufacture concrete burial vaults.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) for cement unloading from truck to silo shall not exceed 0.005 ton/year. PE for cement mix truck loading from silo shall not exceed 0.214 ton/year. PE for sand and aggregate hopper loading shall not exceed 0.011 ton/year. PE for transfer of sand and aggregate drop on conveyor shall not exceed 0.011 ton/year. PE for mix truck loading of sand and aggregate from conveyor shall not exceed 0.003 ton/year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three minute average.</p> <p>The fabric filter serving the silo shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases, or there shall be no visible PE from the stack, whichever is less stringent.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)	<p>Except as otherwise specified in paragraphs (A)(1)(b), (A)(2) and (A)(3) of this rule, visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six-minute average.</p> <p>See b)(2)c. below.</p>
d.	OAC rule 3745-17-07(B)	<p>Except as provided in paragraphs (B)(2) to (B)(11) of this rule, visible particulate emissions from any fugitive dust source shall not exceed 20 per cent opacity as a three-minute average.</p> <p>See b)(2)c. below.</p>
e.	OAC rule 3745-17-08(B)	<p>No person shall cause or permit any fugitive dust source to be operated; or any materials to be handled, transported, or stored; or a building or its appurtenances or a road to be used, constructed, altered, repaired, or demolished without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne.</p> <p>The fabric filter serving the silo shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases, or there shall be no visible PE from the stack, whichever is less stringent.</p> <p>See b)(2)c. below.</p> <p>See b)(2)d. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(B)(1) (Figure II)	Stack PE shall not exceed 3.65 lb/hr. See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Permit to Install and Operate P0115380 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. At all times during the transfer of sand and aggregate, drop heights shall be minimized to the extent possible to minimize or eliminate visible emissions of fugitive dust.
- ii. Sand and aggregate loading shall, at all times, have moisture content sufficient to minimize or eliminate visible emissions of fugitive dust.
- iii. Cement unloading from truck to silo shall at all times operate baghouse controls with an efficiency of 99% or greater.
- iv. Mix truck loading from silo and mix truck loading of sand and aggregate from conveyor shall at all times use a boot into truck to reduce emissions 70% or greater.
- v. The fabric filter serving the silo shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases, or there shall be no visible PE from the stack, whichever is less stringent.



- c. This emission limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- d. The permittee shall employ the following reasonably available control measures for the above-identified cement, sand, and aggregate operations for the purpose of ensuring compliance with OAC rule 3745-17-08(B):
 - i. At all times during the transfer of sand and aggregate, drop heights shall be minimized to the extent possible to minimize or eliminate visible emissions of fugitive dust.
 - ii. Sand and aggregate loading shall, at all times, have moisture content sufficient to minimize or eliminate visible emissions of fugitive dust.
 - iii. Cement unloading from truck to silo shall at all times operate baghouse controls with an efficiency of 99% or greater.
 - iv. Mix truck loading from silo and mix truck loading of sand and aggregate from conveyor shall at all times use a boot into truck to reduce emissions 70% or greater.
 - v. The fabric filter serving the silo shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases, or there shall be no visible PE from the stack, whichever is less stringent.
- c) Operational Restrictions
 - (1) Maximum annual concrete production rate shall not exceed 3,650 cubic yard/year (10 cubic yard/day);
 - (2) Maximum annual cement usage shall not exceed 1,278 ton/year;
 - (3) Maximum annual aggregate usage shall not exceed 2,555 ton/year;
 - (4) Maximum annual sand usage shall not exceed 2,555 ton/year.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain annual records of the cubic yards or tons of concrete produced at this facility.
 - (2) The permittee shall maintain annual records of the annual usage of cement in ton/year.
 - (3) The permittee shall maintain annual records of the annual usage of aggregate in ton/year.
 - (4) The permittee shall maintain annual records of the annual usage of sand in ton/year.



- (5) The permittee shall perform weekly checks, when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the fabric filters serving this emissions unit. No inspections are required on days the material handling operations are not in operation. The presence or absence of any visible particulate emissions shall be recorded electronically or in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:

- a. the total duration of any visible emission incident and
- b. any corrective actions taken to eliminate the visible emissions.

The information above shall be kept separately for each fabric filter serving this emissions unit.

- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from each sand and/or aggregate transfer point and truck loading serving this emissions unit. No inspections are required on days the material handling operations are not in operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:

- a. whether the emissions are representative of normal operations;
- b. if the emissions are not representative of normal operations, the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

The information above shall be kept separately for each sand and/or aggregate transfer point and truck loading serving this emissions unit.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

Emission factors (EF) obtained from AP-42 Section 11.12 (6/06)

Maximum annual cement usage 1,278 ton/year

Maximum annual aggregate usage 2,555 ton/year

Maximum annual sand usage 2,555 ton/year

- a. Emissions limitation:

PE for cement unloading from truck to silo shall not exceed 0.005 ton/year.

Applicable compliance method:

$0.73 \text{ lb PE/ton cement EF} \times 1,278 \text{ ton/year} = 932.34 \text{ lb PE/yr uncontrolled}$

$932.34 \text{ lb PE/yr} \times (1 - 0.99) \text{ baghouse efficiency} = 9.33 \text{ lb PE/year} = 0.005 \text{ ton/year}$

- b. Emissions limitation:

PE for mix truck loading from silo shall not exceed 0.214 ton/year.

Applicable compliance method:

$1.118 \text{ lb PE/ton cement EF} \times 1,278 \text{ ton/year} = 1,428.80 \text{ lb PE/year uncontrolled}$

$1,428.80 \text{ lb PE/year} \times (1 - 0.70) \text{ boot into truck efficiency} = 428.64 \text{ lb PE/year} = 0.214 \text{ ton/year}$

- c. Emissions limitation:

PE for sand and aggregate hopper loading shall not exceed 0.011 ton/year.

Applicable compliance method:

$(0.0069 \text{ lb PE/ton aggregate EF} \times 2,555 \text{ ton/year}) + (0.0021 \text{ lb PE/ton sand EF} \times 2,555 \text{ ton/year}) = 23.00 \text{ lb PE/year uncontrolled} = 0.011 \text{ ton PE/year}$

- d. Emissions limitation:

PE for transfer of sand and aggregate drop on conveyor shall not exceed 0.011 ton/year.

Applicable compliance method:

$(0.0069 \text{ lb PE/ton aggregate EF} \times 2,555 \text{ ton/year}) + (0.0021 \text{ lb PE/ton sand EF} \times 2,555 \text{ ton/year}) = 23.00 \text{ lb PE/year uncontrolled} = 0.011 \text{ ton PE/year}$



e. Emissions limitation:

PE for mix truck loading of sand and aggregate from conveyor shall not exceed 0.003 ton/year.

Applicable compliance method:

$(0.0069 \text{ lb PE/ton aggregate EF} \times 2,555 \text{ ton/year}) + (0.0021 \text{ lb PE/ton sand EF} \times 2,555 \text{ ton/year}) = 23.00 \text{ lb PE/year uncontrolled}$

$23.00 \text{ lb PE year} \times (1 - 0.70) \text{ boot into truck efficiency} = 6.90 \text{ lb PE/year} = 0.003 \text{ ton PE/year}$

f. Emissions limitation:

Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three minute average.

Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six-minute average.

Visible particulate emissions from any fugitive dust source shall not exceed 20 per cent opacity as a three-minute average.

Applicable compliance method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

g. Emissions limitation:

The fabric filter serving the silo shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases, or there shall be no visible PE from the stack, whichever is less stringent.

Stack PE shall not exceed 3.65 lb/hr.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.



2. K001, vault coating

Operations, Property and/or Equipment Description:

Surface coating operations involving the painting of concrete burial vaults using brushes

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Volatile organic carbon (VOC) emissions shall not exceed 7.90 tons/yr.</p> <p>See b)(2)a. below</p>
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as



part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.

- c. Permit to Install and Operate P0115380 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. Permittee will not use top coatings with VOC content minus water and exempt solvents greater than 4.14 pounds per gallon.
 - ii. Permittee will not use paint thinner with VOC content greater than 6.51 lb/gal

c) Operational Restrictions

- (1) Maximum annual paint use for all coatings shall not exceed 3,650 gal/year;
- (2) Maximum weekly paint thinner use shall not exceed 2 gal/week.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions unit K001, combined:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating applied;
 - c. the number of gallons of each cleanup material employed;
 - d. the maximum VOC content of each coating applied, in pounds per gallon;
 - e. the maximum VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total VOC emission rate from all coatings, in pounds or tons, i.e., the summation of the products of "b" times "d" for all coating materials employed;
 - g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of "c" times "e" for all cleanup materials employed; and



- h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of "f" and "g".

These records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

Highest VOC content paint	4.14 lb VOC/gal
VOC content paint thinner	6.51 lb VOC/gal

- a. Emissions limitation:

VOC emissions shall not exceed 7.90 tons/yr.

Applicable compliance method:

$$(4.14 \text{ lb VOC/gal paint} \times 3,650 \text{ gal/year} \times 1 \text{ ton}/2,000 \text{ lb}) + 2 \text{ gal thinner/week} \times 52 \text{ week/year} \times 6.51 \text{ lb/gal} \times 1 \text{ ton}/2,000 \text{ lb} = 7.90 \text{ ton VOC/year}$$

On-going compliance demonstrated by required recordkeeping in d)(6).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745 114 01, will be less than 1.0 TPY. OAC Chapter 3745 31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745 31 01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.