State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
MONTGOMERY COUNTY

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: 08-03543

DATE: 6/26/2003

Moraine Materials Plant 20
Doug Rigsby
1400 Commerce Center Dr
Franklin, OH 45005-7203

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**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/26/2003**
Terms and Conditions **Effective Date: 6/26/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03543

Application Number:	08-03543
APS Premise Number:	0857103097
Permit Fee:	**$0**
Name of Facility:	Moraine Materials Plant 20
Person to Contact:	Doug Rigsby
Address:	1400 Commerce Center Dr Franklin, OH 45005-7203

Location of proposed air contaminant source(s) [emissions unit(s)]:
8151 Glendale-Milford Rd
Camp Dennison, **Ohio**

Description of proposed emissions unit(s):
administrative modification to restate annual allowable due to change in emission factor.

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

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

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

modified source(s) would be

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

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

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

Pollutant	Tons Per Year
particulate	5.9

Emissions Unit ID: **P901**

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, and/or Equipment
P901 - 200 cubic yard/hr Portable Concrete Batch Plant (truck mix)
Transfer of sand and aggregate to elevated bins
Weigh hopper loading of cement, sand and aggregate w/fabric filter
Truck mix loading w/fabric filter
Cement Silo w/fabric filter

Applicable Rules/Requirements		
OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)	OAC rule 3745-17-08(B)
OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(A)(3)	
OAC rule 3745-17-07(B)(1)		
OAC rule 3745-17-08(B)	OAC rule 3745-17-11(B)	OAC rule 3745-17-11(B)
OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)	OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)

Applicable Emissions Limitations/Control Measures	
	foot of exhaust gases or there are no visible emissions from the outlet, whichever is less stringent.
14.8 lbs/hr and 5.9 tons/yr of particulate from the equipment below.	The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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 opacity limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The sand and aggregate loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from the conveyor and transfer point to bins.	The weigh hopper shall be adequately enclosed and vented to a fabric filter; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the point of capture.
The visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.	The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible emissions from the outlet, whichever is less stringent.
See Term A.2.b.	
Reasonable Available Control Measures, (RACM).	The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
See Term A.2.b.	
The silo shall be adequately enclosed and vented to a fabric filter.	The opacity limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic	The visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.

See Term A.2.b.	dust shall not exceed 20 percent opacity as a 3-minute average.
Reasonable Available Control Measures, (RACM).	See Term A.2.b.
See Term A.2.b.	Reasonable Available Control Measures, (RACM).
A charging boot shall be used around the hopper discharge area and transit -mix truck opening; 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.	See Term A.2.b.
The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible emissions from the outlet, whichever is less stringent.	
The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The opacity limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The visible emissions of fugitive	

2. Additional Terms and Conditions

2.a The 14.8 lbs/hr, limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.b This rule is applicable only when the emission 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 unit shall not exceed 159,460 cubic yard of concrete.

2. Water shall be applied at all points to ensure compliance with the visible emission limitations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permitee shall maintain monthly records of the concrete production rate in cubic yards.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit annual reports which specify the total concrete produced in cubic yards. These reports shall be submitted to the Director (the appropriate OEPA District Office or local air agency) by January 31 of each year .

E. Testing Requirements

Compliance Methods

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

a. Emission Limitation-
0.030 gr/dscf

Applicable Compliance Method-
If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(7).

b. Emission limitation-
14.8 lbs/hr of particulate

Applicable Compliance Method-
Compliance shall be determined by totaling the following operations:

i. Sand and aggregate transfer to elevated bin:

The maximum process rate of 200 cubic yards of concrete multiplied by 0.0015 lb particulate/cubic yard of concrete for sand transfer and 0.0064 lb particulate/cubic

yard of concrete for aggregate transfer (AP-42,Chapter 11, Table 11.12-3 (10/01) for an uncontrolled emission rate of 1.58 lbs/hr.

ii. Cement unloading to elevated storage silo (pneumatic):

The maximum hourly production rate of 200 cu.yds/hr, is multiplied by the emission factor, 0.0002 lb PM/cubic yard (AP-42, Chapter 11, Table 11.12-3 10/01) for a controlled emission rate of 0.04 lb/hr.

iii. Weigh hopper loading:

The maximum hourly production rate of 200 cu.yds/hr, is multiplied by the emission factor, 0.0079 lb PM/cubic yard (AP-42, Chapter 11, Table 11.12-3 10/01) for an uncontrolled emission rate of 1.58 lbs/hr.

iv. Truck mix loading:

The maximum hourly production rate of 200 cu.yds/hr, is multiplied by the emission factor, 0.058 lb PM/cubic yard (AP-42, Chapter 11, Table 11.12-3 10/01) for a controlled emission rate of 11.6 lbs/hr.

c. Emission limitation-
5.9 tons/yr of particulate

Applicable Compliance Method-
Compliance with the annual emission limitation shall be based upon the record keeping in Section C.2., summing the monthly concrete production rates for the calendar year times the total facility emission factor of 0.074 lb PM/cubic yard divided by 2000.

d. Emission Limitation-
20 percent opacity as a 3-minute average

Applicable Compliance Method-
Compliance shall be determined by visible emission evaluations preformed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Method 9.

e. Emission Limitation-
no visible emissions

Applicable Compliance Method-
Compliance shall be determined by visible emission evaluations preformed in accordance with OAC rule 3745-17-03(B)(4) using the methods and procedures specified in USEPA Method 22.

F. Miscellaneous Requirements

1. Notice to Relocate a Portable or Mobile Source

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 permit to install (PTI) providing the following criteria are met:

a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;

b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);

c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Director (the appropriate Ohio EPA District Office and/or local air agency having jurisdiction over the new site) within a minimum of thirty days prior to the scheduled relocation; and

d. in the Director's (the appropriate Ohio EPA District Office and/or local air agency) judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

OR

Under OAC rule 3745-31-05(F), portable or mobile emission sources may relocate to sites that have been preapproved by the Director. The permittee may relocate the portable or mobile sources listed in this permit if:

a. the permittee has applied for and obtained a site approval for the new site from the Director;

b. the site approval is current and effective;

c. the permittee has complied with all of the conditions and restrictions contained in the site approval; and

d. the permittee has provided the appropriate Ohio EPA District Office and/or local air agency having jurisdiction over the new site at least 15 days written notice of the relocation.