

A. Source Description

Emissions unit P901 is a portable truck mix concrete batch plant consisting of four concrete silos, sand and aggregate hoppers with conveyors to storage bins, concrete and sand/aggregate weigh hoppers, and hooded truck mix loading. A common fabric filter baghouse "enclosed" dust collection system provides common particulate emissions (PE) control for the silos, weigh hoppers, and truck loading. A second fabric filter dust collector was added to the silos (i.e., silo 2). The baghouse control design efficiency is 99.6%. This site specific efficiency is applied in calculating emission from the truck loading activity. The standard AP-42 after control emission factors are used for determining the emissions from the other components of the batch plant.

Emissions unit F001 is for paved and unpaved roadways and parking areas. Emissions of paved areas are controlled by watering and by speed reduction. Emissions from unpaved areas are controlled by treating with water and/or non-toxic dust suppressants and speed reduction.

B. Facility Emissions and Attainment Status

The Ernst Company's Valley Concrete Plant #64 is located in Montgomery County which is currently in attainment for all criteria pollutants except ozone and PM2.5. Prior to this PTI, the facility was not a major source as defined by Title V. With the increased production rate of the batch plant and using updated emission factors incorporated in this PTI, the facility has the potential to be a major source for PE. This synthetic minor PTI will require a federally enforceable operating restriction on the annual concrete production ensuring the PE emissions are maintained below thresholds requiring Title V permitting. The potential emissions for the facility, after control and with operating restrictions, are:

P901 - concrete batch plant	4.60 TPY PE
<u>F001 - roadway & parking areas</u>	<u>1.71 TPY PE</u>
Total	6.31 TPY PE

C. Source Emissions

The PTE of PE for P901 is 23.27 lb/hr and 101.91 TPY before control. This is greater than the 100 TPY threshold for Title V. This PTI contains federally enforceable operating restrictions on the annual concrete production to ensure the PE emissions are maintained below major source thresholds to prevent triggering Title V permitting requirements. The after control PTE for P901 will be 2.95 lb/hr and 4.60 TPY PE. The prior annual emissions limitation for P901 contained in PTI 08-3718 was 4.07 TPY PE. A net increase of 0.53 TPY PE will result for P901. Emissions for F001 are 1.71 TPY PE. The prior annual emissions limitation for F001 contained in PTI 08-3718 was < 1 TPY PE. A net increase of 0.71 TPY PE will result. The total overall increase of PE for the facility is 1.24 TPY.

D. Conclusion

This PTI will be issued as a synthetic minor containing federally enforceable requirements to ensure the PE emissions for the facility are maintained below the Title V thresholds. It will limit the annual concrete production limiting emissions for P901 to 4.07 TPY PE, and the facility's overall emissions to 6.31 TPY PE. These restrictions will insure the PE will be well below 100 TPY. Monitoring, record keeping and quarterly deviation reporting will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, Ernst Enterprises Valley Concrete Plant #64 will not trigger

major Title V for PE emissions.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04723

Fac ID: 0857190049

DATE: 11/15/2005

Ernst Enterprises Inc Valley Concrete 64
Brad Jamison
3361 Successful Way
Dayton, OH 454144317

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

A handwritten signature in cursive script that reads "Michael W. Ahern".

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN

KY

MONTGOMERY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04723 FOR AN AIR CONTAMINANT SOURCE FOR
Ernst Enterprises Inc Valley Concrete 64**

On 11/15/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ernst Enterprises Inc Valley Concrete 64**, located at **4710 Soldiers Home - West Carrollton Rd., West Carrollton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04723:

Chapter 31 modification replacing PTI 08-03718 issued 8/27/97 to increase production and add dust collector 2 and cement silo 4.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04723

Application Number: 08-04723
Facility ID: 0857190049
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ernst Enterprises Inc Valley Concrete 64
Person to Contact: Brad Jamison
Address: 3361 Successful Way
Dayton, OH 454144317

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4710 Soldiers Home -West Carrollton Rd.
West Carrollton, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification replacing PTI 08-03718 issued 8/27/97 to increase production and add dust collector 2 and cement silo 4.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Ernst Enterprises Inc Valley Concrete 64
PTI Application: 08-04723
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0857190049

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,

Ernst Enterprises Inc Valley Concrete 64

Facility ID: 0857190049

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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.

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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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(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	6.31

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
F001 - paved and unpaved plant roadways and parking areas (see Section A.2.b below) *Modification	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-07 (B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)
		OAC rule 3745-17-08 (B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)

OAC rule 3745-17-07 (B)(4)

**Ernst
PTI A**

Emissions Unit ID: **F001**

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Applicable Emissions
Limitations/Control Measures

The particulate emissions (PE) shall not exceed 1.71 tons per year.

There shall be no visible particulate emissions from any paved roadways or parking areas except for a period of time not to exceed 1 minute during any sixty-minute observation period.

There shall be no visible particulate emissions from any unpaved roadways or parking areas except for a period of time not to exceed 3 minutes during any sixty-minute observation period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c through A.2.i).

The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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

The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a The annual emission limitation was established 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 these terms.

2.b The paved and unpaved roadways and parking areas that are covered by this permit are listed below:

paved roadways:

all paved roadways

paved parking areas:

all paved parking areas

unpaved roadways:

all unpaved roadways

unpaved parking areas:

all unpaved parking areas

2.c The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by watering to ensure compliance and vehicle speed reduction. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or other non-toxic dust suppressants at sufficient treatment frequencies to ensure compliance and vehicle speed reduction. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a

Emissions Unit ID: **F001**

paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- 2.f** Any unpaved roadway or parking area, which is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.g** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.h** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

paved roadways and parking areas

minimum inspection frequency

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all

daily

unpaved roadways and parking areasminimum inspection frequency

all

daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 3.a. through 3.d. shall be kept separately for the paved roadways and parking areas and the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required

Ernst Enterprises Inc Valley Concrete 64

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frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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E. Testing Requirements

1. Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

1.71 tons/year particulate emissions from paved roadways and parking areas.

Applicable Compliance Method:

- i. The PE for paved roadways and parking areas was calculated by multiplying the emission factor of 3.86 lbs PE/vehicle mile traveled [Equation 1 of Section 13.2.1 in Compilation of Air Pollutant Emission Factors, AP-42, , Fifth Edition, Volume I, (revised 12/03)] by the maximum vehicle miles traveled (4,500 vehicle miles traveled /year) and by a control factor of $[(100 - 90) / 100]$ for the application of water and speed reduction and then dividing by 2000 pounds/ton.
- ii. The PE for unpaved roadways and parking areas was calculated by multiplying the emission factor of 3.72 lbs PE/vehicle mile traveled [Equation 2 of Section 13.2.2 and Equation 1a of Section 13.2.1 in Compilation of Air Pollutant Emission Factors, AP-42, , Fifth Edition, Volume I, (revised 12/03)] by the maximum vehicle miles traveled (4,500 vehicle) and by a control factor of $[(100 - 90) / 100]$ for the application of water and/or dust suppressant and speed reduction, and then dividing by 2000 pounds/ton.
- iii. i + ii above.

* The control efficiency for the application of water (i.e., watering) for paved roadways and the control efficiency for the application of water and/or dust suppression chemicals for unpaved roadways is assumed to be 50%. Additional control efficiency for the reduction of speed to 15 miles per hour is assumed to be 80%. (Reasonably Available Control Measures For Fugitive Dust Sources, 1980, Ohio EPA).

- b. Emission Limitation:

No visible PE from any paved roadway or parking areas, except for 1 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the emission limitation for the paved roadways and parking

Ernst

PTI A

Emissions Unit ID: **F001**

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areas identified above shall be determined in accordance with USEPA Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

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- c. Emission Limitation:
No visible PE from any unpaved roadway or parking areas, except for 3 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with USEPA Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

1. This is a modification of PTI 08-3718 issued on August 27, 1997 for emissions unit F001 and P901. The PTI reflects an overall increase of 1.24 TPY PE from the facility: an increase of 0.71 TPY PE from updating the operations data for roadways and parking areas (F001), and an increase of 0.53 TPY PE due to the updated AP-42 emission factors (October 2001), inclusion of an additional silo, and additional controls for the concrete batch plant (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.

<u>Operations, Property, and/or Equipment</u>		
P901 - portable 350 TPH (120 cubic yard/hour) concrete batch plant No. 64 (truck mix) with baghouses *Modification	Four Cement silos with fabric filter baghouses	Weigh hopper loading of cement, fly ash, sand and aggregate with fabric filter baghouse
Transfer of sand and aggregate to elevated bins		Truck loading of cement, fly ash, sand and aggregate with fabric

**Ernst
PTI A**

Emissions Unit ID: **P901**

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filter baghouse (transit-mix)

Applicable Rules/Requirements

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

OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B)

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 3745-17-08(B) and OAC rule 3745-17-07(B)

OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)

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

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PTI A**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B)	The particulate emissions (PE) from this emissions unit shall not exceed 2.95 lbs/hr.	dust shall not exceed 20 percent opacity as a 3-minute average. See Section A.2.b below.
OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-17-07(A), 3745-17-07(B), 3745-17-08(B) and 3745-17-11.	The silos shall be adequately enclosed and vented to fabric filter dust collectors. The enclosure shall be sufficient to eliminate visible emissions of fugitive dust.
OAC rule 3745-31-05(A)(3)	<p>The PE from this emissions unit shall not exceed 4.60 tons per year (TPY), as a rolling, 12-month summation.</p> <p>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.</p> <p>The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(B).</p>	<p>The fabric filter dust collectors shall achieve an outlet emission rate of not greater than 0.030 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.</p> <p>See Section A.2.d below.</p> <p>See Section 2.b below.</p>
OAC rule 3745-17-07(B) and OAC rule 3745-17-08	Sand and aggregate loaded into the elevated bins shall, at all times, have an inherent moisture content sufficient to minimize or eliminate visible emissions of fugitive dust	See Section A.2.c below. 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 last point of capture.
OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	The visible emissions of fugitive	The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust

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PTI A**

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gases or there shall be no visible emissions from the outlet, whichever is less stringent.

See Section A.2.f below.

See Section A.2.b.

See Section A.2.e below.

See Section A.2.c.

See Section A.2.b below.

See Section A.2.c below.

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 fabric filter dust collector 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 emissions from the outlet, whichever is less stringent.

The visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.

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Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The 2.95 lb PE/hour limitation was established 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 these terms.
- 2.b** For facilities in Appendix A areas defined in OAC rule 3745-17-08(D), the requirements established pursuant to OAC 3745-17-07(B) and OAC rule 3745-17-08(B) are equivalent or less stringent than the requirements established pursuant to OAC 3745-31-05(A)(3).
- 2.c** The requirements established pursuant to OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall employ the following best available control measures for the above identified cement and cement supplement silos for the purpose of ensuring compliance with the above mentioned applicable requirements:
- i. Cement and cement supplement shall be transferred pneumatically to the cement and cement supplement silos. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emission of fugitive dust. Any visible emissions from cement and/or cement supplement dust emanating from the delivery vehicle during transfer shall be cause for the immediate halt of the unloading process and the refusal of cement and/or cement supplement load until the situation is corrected.
 - ii. Each cement and cement supplement silo vent shall be adequately enclosed and vented to a fabric filter dust collection system. The enclosure shall be sufficient to eliminate at all times visible emission of fugitive dust at the point of capture.
- 2.e** The permittee shall employ the following best available control measures for the above identified weigh hopper for the purpose of ensuring compliance with the above mentioned applicable requirements:
- i. The cement batching weigh hopper shall be sufficiently enclosed so as to eliminate at all times visible emissions of fugitive dust.
 - ii. The transfer of cement/cement supplement/sand/aggregate to the concrete batching weigh hopper shall be enclosed and vented to a fabric

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filter dust collection system. The enclosure shall be sufficient to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.

- 2.f** The permittee shall employ the following best available control measures for the above identified truck mix loading process for the purpose of ensuring compliance with the above mentioned applicable requirements.

The permittee shall install and employ a fabric filter dust collection system for the purpose of controlling dust emissions from the truck mix loading process. The fabric filter dust collection system shall be sufficient to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.

B. Operational Restrictions

1. The maximum annual production rate shall not exceed 374,400 cubic yards of concrete per year, on a rolling 12-month basis.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the annual concrete production rate, in cubic yards; and
 - b. the annual particulate emission rate, in tons (as calculated in Section E.1.b.).
2. 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 stack and for any visible fugitive particulate emissions from the egress points (i.e., emissions capture systems, 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;

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- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the abnormal 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.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that:
 - a. identify all days during which any visible particulate emissions were observed in excess of the allowable opacity limit specified above from the stack of the fabric filter dust collection systems serving this emissions unit;
 - b. describe any corrective actions taken to minimize or eliminate the visible particulate from the fabric filters;
 - c. identify all days during which any visible fugitive particulate emissions were observed in excess of the allowable opacity limit specified above from the egress points (i.e., sand/aggregate transfer points, truck loading, enclosures, building windows, doors, roof monitors, , etc.) serving this emissions unit; and
 - d. describe any corrective actions taken to minimize or eliminate the abnormal visible fugitive particulate.

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 to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:

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- a. The concrete production rate, in cubic yards.
- b. The total particulate emissions, in tons, as a rolling 12-month summation.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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:
The PE shall not exceed 2.95 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined by totaling the following products:

- i. Sand and aggregate transfer from storage to conveyor:

The maximum process rate of 120 cubic yards of concrete multiplied by the sum of by 0.0015 lb PE/cubic yard of concrete for sand transfer and 0.0064 lb PE/cubic yard of concrete for aggregate transfer (AP-42,Chapter 11, Table 11.12-3 (10/01)) for an uncontrolled emission rate of 0.948 lbs/hr.

- ii. Sand and aggregate transfer from conveyors to elevated bins:

The maximum process rate of 120 cubic yards of concrete multiplied by the sum of by 0.0015 lb PE/cubic yard of concrete for sand transfer and 0.0064 lb PE/cubic yard of concrete for aggregate transfer (AP-42,Chapter 11, Table 11.12-3 (10/01)) for an uncontrolled emission rate of 0.948 lbs/hr.

- iii. Cement delivery to elevated silo (pneumatic):

The maximum process rate of 120 cubic yards of concrete multiplied by the emission factor of 0.0002 lb PE/cubic yard of concrete for pneumatic cement delivery to silo (AP-42,Chapter 11, Table 11.12-3 (10/01)) for an controlled emission rate of 0.024 lb/hr.

iv. Weigh hopper loading:

The maximum process rate of 120 cubic yards of concrete multiplied by the emission factor of 0.0079 lb PE/cubic yard of concrete for weigh hopper loading (AP-42, Chapter 11, Table 11.12-3 (10/01)) for a controlled emission rate of 0.948 lb/hr.

v. Truck mix loading:

The maximum process rate of 120 cubic yards of concrete multiplied by the emission factor of 0.17 lb PE/cubic yard of concrete for transit mix loading (AP-42, Chapter 11, Table 11.12-3 (10/01)), then multiplied by a control factor of (1-0.996) for an controlled emission rate of 0.082 lbs/hr.

b. Emission Limitation:

The PE shall not exceed 4.60 tons/year, as a rolling 12-month summation.

Applicable Compliance Method:

The 4.60 TPY emission limitation was developed by multiplying the sum total maximum hourly emission rate determined in E.1.a by the maximum operating schedule of 3120 hours/year and dividing by 2000 lb/ton. Therefore, compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

c. Emission Limitation:

The PE shall not exceed 0.030 grain/dscf at the outlet for each fabric filter.

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Applicable Compliance Method:

If required, compliance with this mass emission limitation shall be based on stack testing in accordance with procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
The visible fugitive PE shall not exceed 20 percent opacity as a 3-minute average for transfer of sand and aggregate and truck mix loading.

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 9.

- e. Emission Limitation:
There shall be no visible PE from outlet of each fabric filters.

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.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:
 - a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - i. the portable source is equipped with the best available technology for such portable source;
 - ii. the portable source is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;
 - iii. the applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency

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- responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
- iv. in the judgement of the Ohio EPA District Office or local air agency having jurisdiction over the new site, the proposed site is acceptable under OAC rule 3745-15-07.
- b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
- i. the portable source permittee possesses an Ohio EPA PTI, PTO or registration status;
 - ii. the portable source is equipped with best available technology;
 - iii. the portable source owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and
 - vii. the portable source owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the permitting Ohio EPA District Office or local air agency and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office

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or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency 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 portable source may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

2. This is a modification of PTI 08-3718 issued on August 27, 1997 for emissions unit F001 and P901. The PTI reflects an overall increase of 1.24 TPY PE from the facility: an increase of 0.71 TPY PE from updating the operations data for roadways and parking areas (F001), and an increase of 0.53 TPY PE due to the updated AP-42 emission factors (October 2001), inclusion of an additional silo, and additional controls for the concrete batch plant (P901).
3. The following terms and conditions are federally enforceable: Sections A.1 (only the requirements associated with OAC 3745-35-07(B)), A.2.d-f, B.1, and C.1, D.2, and E.1.b.