

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

12/20/2013

Certified Mail

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

Mr. Mark Schmidt
Lordstown Construction Recovery - Lafarge NA, Inc.
10325 State Route 43
Unit F
Streetsboro, OH 44241

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0278000777
Permit Number: P0110220
Permit Type: Renewal
County: Trumbull

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, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

Lordstown Construction Recovery - Lafarge NA, Inc.

Facility ID:	0278000777
Permit Number:	P0110220
Permit Type:	Renewal
Issued:	12/20/2013
Effective:	12/20/2013
Expiration:	7/12/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Lordstown Construction Recovery - Lafarge NA, Inc.

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Authorization

Facility ID: 0278000777
Application Number(s): A0044630
Permit Number: P0110220
Permit Description: Operating permit renewal for the construction and demolition debris landfill and the slag processing plant
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/20/2013
Effective Date: 12/20/2013
Expiration Date: 7/12/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Lordstown Construction Recovery - Lafarge NA, Inc.
6205 NEWTON-FALLS BAILEY RD
Lordstown, OH 44481

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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
Lordstown Construction Recovery - Lafarge NA, Inc.
Permit Number: P0110220
Facility ID: 0278000777
Effective Date: 12/20/2013

Authorization (continued)

Permit Number: P0110220

Permit Description: Operating permit renewal for the construction and demolition debris landfill and the slag processing plant

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

Emissions Unit ID:	F002
Company Equipment ID:	Construction and Demolition Debris Landfill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	Slag Screening Plant
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Lordstown Construction Recovery - Lafarge NA, Inc.
Permit Number: P0110220
Facility ID: 0278000777
Effective Date: 12/20/2013

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 submitting 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 emission 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.



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
Lordstown Construction Recovery - Lafarge NA, Inc.
Permit Number: P0110220
Facility ID: 0278000777
Effective Date: 12/20/2013

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
Lordstown Construction Recovery - Lafarge NA, Inc.
Permit Number: P0110220
Facility ID: 0278000777
Effective Date: 12/20/2013

C. Emissions Unit Terms and Conditions



1. F002, Construction and Demolition Debris Landfill

Operations, Property and/or Equipment Description:

Construction and Demolition Debris (CDD) Landfill operations, to include CD&D material handling, construction, daily or weekly cover placement, and wind erosion for 1,368,750 tons per year. This facility is not permitted to accept regulated asbestos-containing material.

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) (PTI 02-16553 Effective 7/11/2002)	No visible particulate emissions except for 3 minutes during any 60-minute period. Fugitive particulate emissions shall not exceed 25 tons per year. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a through b)(2)e.
b.	OAC rule 3745-17-07(B)(1)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B)	The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
d.	OAC rule 3745-19	There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.
e.	OAC rule 3745-20-02 OAC rule 3745-20-06	<p>This landfill shall not accept regulated asbestos-containing materials (RACM).</p> <p>Deposition and burial operations of any suspected non-regulated asbestos-containing waste or demolition debris shall be conducted in a manner that prevents any asbestos content from being broken up or dispersed before such materials are buried.</p> <p>See c)(1) and c)(1).</p>

(2) Additional Terms and Conditions

- a. The entire landfill area is covered by this permit and subject to the requirements of OAC rule 3745-31-05(A)(3). The following landfill fugitive dust operations/sources are covered by this permit and subject to the above requirements:
 - i. Truck loading and unloading – slag cover material
 - ii. Truck loading and unloading – cell construction
 - iii. CD&D Waste Dumping
 - iv. Bulldozer- cover material, cell construction, waste spreading
 - v. Wind erosion - construction
 - vi. Wind erosion - landfill
- b. All vehicles hauling construction and demolition (C & D) materials shall be closed, covered or tarped when coming to or leaving the facility in order to minimize or eliminate visible emissions of fugitive dust and to eliminate load loss.
- c. The permittee shall ensure C & D materials are deposited, spread and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust.



- d. When dumping C & D materials, the permittee shall implement the following procedures:
 - i. Any loads which appear to contain dusty C & D materials shall be watered prior to dumping of the load.
 - ii. No dusty C & D materials shall be dumped during periods of high wind speed, unless they have been treated to prevent them from becoming airborne.
 - iii. The permittee shall ensure that all truckloads of C & D materials are unloaded in a manner which will minimize the drop height of the C & D materials and are dumped as near to the point of final placement as possible.
 - iv. During the dumping of any load of C & D materials, in which dusty C & D materials become airborne, the C & D materials shall be watered as necessary to minimize or eliminate visible emissions of fugitive dust.
- e. When handling and stockpiling C & D materials and/or cover materials, the permittee shall implement the following procedures:
 - i. Any dusty C&D materials to be stored prior to disposal, shall be watered, as necessary, or have a temporary soil cover.
 - ii. All exposed C&D material shall be covered with cover materials by the end of each week's operation.
 - iii. Spreading and compacting shall occur in one operation in order to minimize handling of the C&D materials
 - iv. Minimize the handling and the stockpiling of cover materials, except for top soil.
 - v. Unvegetated cover materials and soil in the waste disposal area must be periodically wetted with water and shall be handled in such a manner as to minimize or eliminate visible particulate emissions of fugitive dust. The frequency and amounts of this water application will depend on weather conditions, cover material conditions, and soil conditions.
- f. Under Substitute Amended House Bill 397 (Sub. Am. H.B. 397), effective December 22, 2005, Ohio EPA is required to develop rules governing the operation of construction and demolition (C & D) landfills. Sub. Am. H.B. 397 authorizes the Director of Ohio EPA to adopt rules requiring contingency plans for effective action in response to hydrogen sulfide or other gases created by the operation of a C & D facility. Because these rules are not yet written, Ohio EPA has not placed terms and conditions detailing the contingency plan requirements in this permit. However, Ohio EPA believes it is important to have in place a contingency plan to deal with potential hydrogen sulfide/other gas emissions from C & D facilities. Therefore, as a condition of this permit, the permittee is required



to develop and implement a hydrogen sulfide/other gas emission contingency plan by the dates required for sources in the C & D rules developed in response to Sub. Am. H.B. 397.

- g. If this landfill is permanently closed, the permittee shall comply with all of the applicable provisions of ORC 3704.03(T).

c) Operational Restrictions

- (1) The facility cannot accept for disposal any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any subsequent revisions to either rule. Regulated asbestos-containing material is defined to include:

- a. friable asbestos material;
- b. Category I nonfriable asbestos-containing material that has become friable;
- c. Category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; or
- d. Category II nonfriable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

- (2) Deposition and burial operations of any suspected non-regulated Category I or Category II asbestos-containing waste or demolition debris shall be conducted in a manner that prevents any asbestos-containing material from being broken up or dispersed before such materials are buried.

The permittee shall be limited to accepting only non-regulated asbestos-containing waste materials. The permittee shall ensure that any non-regulated Category I or II nonfriable asbestos-containing waste materials accepted for disposal will not become friable during processing at the landfill; and asbestos-containing waste materials accepted for disposal do not become crumbled, pulverized, or reduced to powder by the forces expected to act on the material during its handling, transfer, and burial at the landfill. If any regulated Category II asbestos-containing waste material arrives at the landfill it cannot be accepted for disposal; and if any non-regulated asbestos-containing material becomes friable after it is accepted for disposal the permittee shall:

- a. not cause or permit visible emissions from the non-regulated Category I or II asbestos-containing waste materials during on-site transportation, transfer, deposition, or compacting operations;
- b. assure that deposition and burial operations are conducted in a manner which prevents handling by equipment or persons that causes the non-regulated Category I or II asbestos-containing waste materials to be broken-up or dispersed before the materials are buried;



- c. cover the non-regulated Category I or II asbestos-containing waste material with at least twelve inches of non-asbestos-containing material, as soon as practicable after deposition, but no later than at the end of the operating day; and
 - d. during the unloading, deposition, burial, and initial compaction of the non-regulated Category I or II asbestos-containing waste materials, assure that the disposal site is restricted adequately to deter unauthorized entry of the general public and any unauthorized personnel to within one hundred feet of the operations.
- (3) The permittee shall ensure that solid wastes are deposited, spread, and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust. The permittee shall require all truckloads of solid waste to be unloaded in a manner that will minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be conducted in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods of high wind speed, unless the material has been treated to prevent fugitive dust emissions from becoming airborne.
- (4) The permittee shall employ best available control measures for the above-identified landfill fugitive dust operations/sources for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee maintains that the inherent moisture content of the materials involved in fugitive dust operations/sources is at a level which is more than sufficient to comply with all applicable requirements. If at any time the moisture content is not sufficient to meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance.
- (5) The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary.
- (6) Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the landfill fugitive dust operations/sources in accordance with the following frequencies:



Landfill Fugitive Dust Operation/Source	Minimum Inspection Frequency
waste handling and placement	once during each day of operation
waste spreading, grading and compaction	once during each day of operation
Cover material spreading, grading and compaction	once during each day of operation if applying cover material
soil handling for cell construction	once during each day of operation

The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill fugitive dust operation/source 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 event shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.

- (2) The permittee shall maintain a daily operations log which records/documents any watering activity employed to minimize or eliminate visible emissions of fugitive dust for each waste placement area.

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 or due to the facility is not operating;
- 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 control measures were required but not implemented.

The information above shall be kept separately for each landfill fugitive dust operation/source identified above, and shall be updated on calendar quarter basis within 30 days after the end of each calendar quarter.

- (3) The permittee shall record the amount of C&DD waste deposited on a daily and annual basis and shall be compared to the permitted rate of 1,368,750 tons per year.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-



Business Center: Air Services” although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The annual PER shall include:
 - a. the weight of waste and slag deposited during the year.
 - b. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - c. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (3) This PER does not exempt the permittee from the control equipment malfunction and scheduled maintenance requirements of OAC rule 3745-15-06.

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:

- a. Emissions Limitation:

Visible fugitive PE from the C&D landfill operations shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluation performed in accordance with USEPA Reference Method 9 as set forth in "Appendix A 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 paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745 17-03(B)(3).

- b. Emission Limitation:

Fugitive particulate emissions (PE) shall not exceed 25 tons per year.

Applicable Compliance Method:

Compliance with the fugitive PE limitation shall be determined by the sum of the fugitive PE from each regulated operation.

Compliance with fugitive PE limitations for truck loading and unloading for slag cover handling, cell construction and waste dumped shall be determined by using the emission factor equations in AP-42 Section 13.2.4 (revised 11/06).

$$PE = k \times 0.0032 [(U/5)^{1.3}/(M/2)^{1.4}] \times T \times (1 - CE) / 2,000$$



where:

U = mean wind speed, mph (assumed 9.05);

M = material moisture content, %
slag 4% per Table 13.2.4-1,
soil for construction 15% used in the application
CD&D waste 20% used in the application

0.0032 = equation constant;

k = particle size multiplier for <30 μm size, unitless (0.74 for PE);

T = actual material handled per year, in tons
200,000 tons/yr slag cover material both for load-in and load-out;
600,000 tons/yr soil moved during construction for load-in and load-out;
1,368,750 tons/yr CD&D waste dumped

CE = fractional control efficiency, dimensionless (assumed 0.25 for low drop height); and

2,000 = lbs/ton.

Compliance with fugitive PE limitations for CD&D and slag cover grading and compaction, and wind erosion during construction and landfill shall be determined by using the emission factor equations in AP-42 Section 11.9 (revised 7/98). Should further updates in AP-42 occur, the most current equations shall be used.

$$E_{WG} = 0.040 \times S^{2.5} \times HR_{WG} / 2,000$$

where:

S = mean vehicle speed, mph (assumed 1.0);

HR_{WG} = operating hours per year for each bulldozer employed in slag cover grading, CD&D spreading and construction operations,
2,496 hours per bulldozer times 2 bulldozers
2,000 hours per bulldozer times 2 bulldozers
7,300 hours per bulldozer times 2 bulldozers

2,000 = lbs/ton

Compliance with fugitive PE limitations for wind erosion during construction and during time the landfill is not covered by vegetation shall be determined by using the emission factor equations in AP-42 Section 11.9-4 (revised 7/98). Should further updates in AP-42 occur, the most current equations shall be used.

PE = 0.38 tons per acre per year x A

where:

A = Acres of without vegetative cover
3 acres for construction area
10 acres for landfill



Final Permit-to-Install and Operate
Lordstown Construction Recovery - Lafarge NA, Inc.
Permit Number: P0110220
Facility ID: 0278000777
Effective Date: 12/20/2013

g) Miscellaneous Requirements

(1) None.



2. F004, Slag Screening Plant

Operations, Property and/or Equipment Description:

Slag processing plant including batch loading to feeder, ten belt conveyors, two screeners, and iron removal by magnetic separation.

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 (PTI 02-2784 Effective 4/28/1999)	Particulate emissions (PM) shall not exceed 1.39 lbs/hr and 6.1 TPY. PM ₁₀ (less than 10 microns) shall not exceed 0.64 lb/hr and 2.8 TPY. Visible particulate emissions from operations at the steel slag processing plant including slag feeding, screening, drop transfer, magnetic separations and conveying shall not exceed ten (10) percent opacity as a six-minute average. See also b)(2)a.
b.	OAC rule 3745-17-07	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08	The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

(2) Additional Terms and Conditions

- a. A wet suppression system capable of achieving a control efficiency of 90% shall be employed to minimize or eliminate visible particulate emissions of fugitive dust generated by the steel slag processing plant. The wet suppression system shall be capable of using chemical dust suppressants for fugitive dust control. Spray nozzles shall be installed at the slag feed hopper, slag screens, batch and continuous drop transfer points or conveyors, as needed, to minimize or eliminate visible particulate emissions of fugitive dust generated during slag processing.
- b. The slag material located on site and currently processes through the mill contains sufficient residual moisture such that a wet suppression system has not been necessary to eliminate visible particulate emissions of fugitive dust. If conditions change or if material brought on site that does not contain sufficient residual moisture to eliminate visible particulate emissions of fugitive dust, a wet suppression system shall be promptly installed and operated.

c) Operational Restrictions

- (1) The maximum material processes in this emissions unit shall not exceed 6000,000 tons per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the fugitive dust operations/sources in accordance with the following frequencies:

Fugitive Dust Operation/Source	Minimum Inspection Frequency
Slag plant drop point	once during each week of operation

The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. Any required inspection that is not performed due to any of the above identified event shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.



- (2) 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 total duration of any visible emissions incident;
 - b. any corrective actions taken to eliminate the visible emissions.

The above records shall be kept separately for the areas identified in d)(1).

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 (a) above or continue the weekly 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).

If visible emissions are noted in the operations log during three of the weekly checks during the previous calendar quarter, the permittee shall investigate installation of a wet suppression system or other suitable fugitive dust control measures.

- (3) If a wet suppression system is installed, the following recordkeeping superseded d)(2).

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 total duration of any visible emissions incident;
- b. the operating status of the water sprays or other dust controls; and
- c. any corrective actions taken to 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 (a) above or continue the weekly 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).

- (4) The permittee shall record the amount of material processed on a daily and annual basis and shall be compared to the permitted rate of 600,000 tons per year.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.



- (2) The annual PER shall include:
- a. each day during which an inspection was not performed by the required frequency;
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented; and
 - c. each day control measures were not implemented due to a unsafe or hazardous condition;
 - d. the actual material processed, in tons per year.
- (3) The permittee shall submit a notification 30 days after any calendar quarter showing that visible fugitive emissions were observed during three of the weekly checks during the previous calendar quarter. The notification shall include the milestones to implement corrective action or install control measures needed to eliminate the fugitive particulate emissions.

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:

a. Emissions Limits

Particulate emissions (PM) shall not exceed 1.39 lbs/hr and 6.1 TPY.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by the sum of the emissions from the screens, the transfer points and the load-in as calculated below for each operation.

$$PM = EF \times TP \times 400 \text{ tph}$$

Were:

EF =the emission factors for crushing, screening, and material handling operations in AP-42, Chapter 11.19.2, Table 11.19.2-2, Crushed Stone Processing and Pulverized Mineral Processing, Fifth Edition, (8/04) or latest revision. The emission factors are:

- 0.000016 lb/ton for PE for truck unloading to hopper,
- 0.0022 lb/ton for PE for screening, and
- 0.00014 lb/ton for PE for conveyor transfer point.

TP = the number to transfer points or units per operation:

- for conveyor loading, (12);
- for screening, (3); and



for load-in (1).

400 tph = the maximum short term process weight rate.

The tons per year limitation were developed by multiplying the pound/hour by the maximum operating hours of 1,500 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitations and the annual operating hour restriction, compliance will also be shown with the annual limitation.

b. Emissions Limits

PM10 (less than 10 microns) shall not exceed 0.64 lb/hr and 2.8 TPY.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by the sum of the emissions from the screens, the transfer points and the load-in as calculated below for each operation.

$$PM = EF \times TP \times 400 \text{ tph}$$

Were:

EF = the emission factors for crushing, screening, and material handling operations in AP-42, Chapter 11.19.2, Table 11.19.2-2, Crushed Stone Processing and Pulverized Mineral Processing, Fifth Edition, (8/04) or latest revision. The variables are:

EF = emission factors:

0.000016 lb/ton for PM₁₀ for truck unloading to hopper,
0.00074 lb/ton for PM₁₀ for screening, and
0.000046 lb/ton for PM₁₀ for conveyor transfer point,

TP = the number to transfer points or units per operation:

for conveyor loading, (12);
for screening, (3); and
for load-in (1).

400 tph = the maximum short term process weight rate.

The tons per year limitation were developed by multiplying the pound/hour by the maximum operating hours of 1,500 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitations and the annual operating hour restriction, compliance will also be shown with the annual limitation.



c. Emission Limitation

Visible particulate emissions from operations at the steel slag processing plant including slag feeding, screening, drop transfer, magnetic separations and conveying shall not exceed ten (10) percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined by visible emission evaluations performed in accordance with USEPA Reference Method 9 as set forth in "Appendix A 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 paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03(B)(3). This compliance method shall be used whenever a compliance determination is warranted.

g) Miscellaneous Requirements

(1) None.