

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/29/2014

Certified Mail

MARTIN SAVKO
SAVKO & SONS
4636 SHUSTER ROAD
COLUMBUS, OH 43214

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125042310
Permit Number: P0112485
Permit Type: Renewal
County: Franklin

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

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, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



FINAL

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

Facility ID:	0125042310
Permit Number:	P0112485
Permit Type:	Renewal
Issued:	1/29/2014
Effective:	1/29/2014
Expiration:	1/29/2024



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

for
SAVKO & SONS

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Final Permit-to-Install and Operate
SAVKO & SONS
Permit Number: P0112485
Facility ID: 0125042310
Effective Date: 1/29/2014

Authorization

Facility ID: 0125042310
Application Number(s): A0046524
Permit Number: P0112485
Permit Description: PTIO Renewal for Portable Concrete Batch Plant
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/29/2014
Effective Date: 1/29/2014
Expiration Date: 1/29/2024
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

SAVKO & SONS
4636 SHUSTER ROAD
Columbus, OH 43214

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

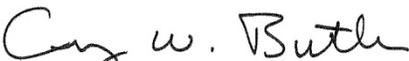
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0112485
 Permit Description: PTIO Renewal for Portable Concrete Batch Plant

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

Emissions Unit ID:	F005
Company Equipment ID:	F005
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Concrete Operations

Emissions Unit ID:	F001
Company Equipment ID:	F001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	F003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	F004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Hopper Loading and Silo

Emissions Unit ID:	F002
Company Equipment ID:	F002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
SAVKO & SONS
Permit Number: P0112485
Facility ID: 0125042310
Effective Date: 1/29/2014

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
SAVKO & SONS
Permit Number: P0112485
Facility ID: 0125042310
Effective Date: 1/29/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

SAVKO & SONS

Permit Number: P0112485

Facility ID: 0125042310

Effective Date: 1/29/2014

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
SAVKO & SONS
Permit Number: P0112485
Facility ID: 0125042310
Effective Date: 1/29/2014

C. Emissions Unit Terms and Conditions



1. F005, F005

Operations, Property and/or Equipment Description:

Roadways and Parking Lots

- 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 01-6308, as issued 3/27/1996)	Emissions shall not exceed: 2.0 lbs PE/hr and 0.5 TPY PE No visible PE from unpaved roadways and parking areas except for 3 minutes during any 60-minute observation period. No visible PE from paved roadways and parking areas except for one minute during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See b)(2)a. through b)(2)f.)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	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)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	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)	See b)(2)a. through b)(2)g.

(2) Additional Terms and Conditions

- a. 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 application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. 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 unpaved roadways and parking areas that are 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.
- c. 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.
- d. Any unpaved roadway or parking area that is subsequently paved, will require a General Permit for paved roadways and parking areas.
- e. 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.
- f. A maximum speed limit of fifteen (15) miles per hour shall be posted and enforced on the property.



- g. 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.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>unpaved/paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	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 d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- e) Reporting Requirements
 - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall



cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

Emission Limitations:

2.0 lbs PE/hr and 0.5 TPY PE

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor extrapolated from AP-42 emission factor found in the original PTI 01-6308 calculations. This was done as the AP-42 emission factors were based on an annual generation of 30,000 yd³ and that is less than the maximum annual production of this plant.

$100 \text{ yd}^3/\text{hr} \times 0.04 \text{ lb PE}/\text{yd}^3 \times 0.5$ (50% control efficiency from watering)

= 2.0 lbs PE/hr

$50,000 \text{ yd}^3/\text{yr} \times 0.04 \text{ lb PE}/\text{yd}^3 \times 0.5$ (50% control efficiency from watering)

= 1,000 lbs PE/yr = 0.5 TPY PE

a. Emission Limitation:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

b. Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").



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.

g) **Miscellaneous Requirements**

- (1) The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
 - a. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
 - b. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
 - c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
 - d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
 - e. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- (2) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.



Final Permit-to-Install and Operate

SAVKO & SONS

Permit Number: P0112485

Facility ID: 0125042310

Effective Date: 1/29/2014

It is recommended that the "Notice of Intent to Relocate" is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although "Notice of Intent to Relocate" can be submitted via U.S. postal service, hand delivered, or faxed.

The "Notice of Intent to Relocate" shall be submitted to:

Ohio EPA
Central District Office
Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

or

Fax: (614) 728-3898

Upon receipt of the notice, the permitting office Ohio EPA, Central District Office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties. The "Notice of Intent to Relocate" form can be found at <http://www.epa.ohio.gov/portals/27/files/relocate.pdf>.



2. Emissions Unit Group -Concrete Operations: F001,F003,F004,

EU ID	Operations, Property and/or Equipment Description
F001	Sand and Aggregate Storage Pile
F003	Material Handling (conveyors and aggregate dumping)
F004	Mixer Loading

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 01-6308, as issued 3/27/1996)	Emissions shall not exceed: <u>F001:</u> 10 lbs PE/hr and 2.5 TPY PE <u>F003:</u> 5.0 lbs PE/hr and 1.25 TPY PE <u>F004:</u> 2.1 lbs PE/hr and 0.53 TPY PE See b)(2)a., b)(2)b., b)(2)c.
b.	OAC rule 3745-17-07(B)(1) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	<u>F001, F003, and F004:</u> Visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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)	All sand and aggregate shall contain sufficient moisture as to minimize or eliminate visible emissions of fugitive dust.

(2) Additional Terms and Conditions

- a. During the unloading onto or removal from the sand and aggregate storage piles and loading of the sand and aggregate conveyor, the drop height of the front-end loader shall be minimized in order to minimize or eliminate visible emissions of fugitive dust.
- b. All sand and aggregate shall contain sufficient moisture as to minimize or eliminate visible emissions of fugitive dust.
- c. The use of a rubber boot shall be used at all times while loading ingredients into the mixers.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions

- (2) The permittee shall maintain annual records of the cubic yards or tons of concrete produced at this facility.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation



report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. F001:

Emission Limitation:

10 lbs PE/hr and 2.5 TPY PE

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor extrapolated from AP-42 emission factor found in the original PTI 01-6308 calculations. This was done as the AP-42 emission factors were based on an annual generation of 30,000 yd³ and that is less than the maximum annual production of this plant.

$100 \text{ yd}^3/\text{hr} \times 0.2 \text{ lb PE}/\text{yd}^3 \times 0.5$ (50% control efficiency when applying water =
10 lb PE/hr

$50,000 \text{ yd}^3/\text{yr} \times 0.2 \text{ lb PE}/\text{yd}^3 \times 0.5$ (50% control efficiency when applying water =
5,000 lbs PE/yr = 2.5 TPY PE

b. F003:

Emission Limitation:

5.0 lbs PE/hr and 1.25 TPY PE

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor extrapolated from AP-42 emission factor found in the original PTI 01-6308 calculations. This was done as the AP-42 emission factors were based on an annual generation of 30,000 yd³ and that is less than the maximum annual production of this plant.

$100 \text{ yd}^3 \times 0.10 \text{ lb PE}/\text{yd}^3 \times 0.5$ (50% control efficiency from watering)
= 5.0 lbs PE/hr

$50,000 \text{ yd}^3/\text{hr} \times 0.10 \text{ lb PE}/\text{yd}^3 \times 0.5$ (50% control efficiency from watering)
= 2,500 lbs PE/yr = 1.25 TPY PE



c. F004:

Emission Limitation:

2.1 lbs PE/hr and 0.53 TPY PE

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor extrapolated from AP-42 emission factor found in the original PTI 01-6308 calculations. This was done as the AP-42 emission factors were based on an annual generation of 30,000 yd³ and that is less than the maximum annual production of this plant.

$100 \text{ yd}^3/\text{hr} \times 0.14 \text{ lb PE}/\text{yd}^3 \times 0.15$ (based on 85% rubber boot efficiency)

= 2.1 lbs PE/hr

$50,000 \text{ yd}^3/\text{hr} \times 0.14 \text{ lb PE}/\text{yd}^3 \times 0.15$ (based on 85% rubber boot efficiency)

= 1,050 lbs PE/yr = 0.53 TPY PE

d. F001, F003 and F004:

Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emissions observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.



g) **Miscellaneous Requirements**

- (1) The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
 - a. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
 - b. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
 - c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
 - d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
 - e. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- (2) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.



Final Permit-to-Install and Operate

SAVKO & SONS

Permit Number: P0112485

Facility ID: 0125042310

Effective Date: 1/29/2014

It is recommended that the "Notice of Intent to Relocate" is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although "Notice of Intent to Relocate" can be submitted via U.S. postal service, hand delivered, or faxed.

The "Notice of Intent to Relocate" shall be submitted to:

Ohio EPA
Central District Office
Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

or

Fax: (614) 728-3898

Upon receipt of the notice, the permitting office Ohio EPA, Central District Office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties. The "Notice of Intent to Relocate" form can be found at <http://www.epa.ohio.gov/portals/27/files/relocate.pdf>.



3. Emissions Unit Group -Hopper Loading and Silo: F002,P001,

EU ID	Operations, Property and/or Equipment Description
F002	Cement Silo
P001	Weigh - Hopper

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 01-6308, as issued 3/27/1996)	Emissions shall not exceed: <u>F002:</u> 0.14 lb PE/hr and 0.1 TPY PE <u>P001:</u> 0.1 lb PE/hr and 0.1 TPY PE The fabric filter serving the weigh hopper and silo shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the outlet.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	The emission limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)(1)	The emission limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08	The emission limitations specified in this rule is less stringent than the emissions limitation established under the "Additional Terms and Conditions" pursuant to OAC 3745-31-05(A)(3).
e.	OAC rule 3745-17-11	The emission limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The cement hopper shall be adequately enclosed. The enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust. There shall be no visible emissions from the weigh-hopper.
- b. The transfer of cement/cement supplement/sand/aggregate to the concrete batching weigh hoppers shall be enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.
- c. Cement shall be transferred pneumatically to storage. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emissions of cement emanation from the delivery vehicle shall be cause for the halt of the unloading process and the refusal of the cement load until the situation is corrected.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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



particulate emissions are observed, the permittee shall also note the following in the operations log:

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

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

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

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

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

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. P001:

Emission Limitation:

0.1 lb PE/hr and 0.1 TPY PE



Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor extrapolated from AP-42 emission factor found in the original PTI 01-6308 calculations. This was done as the AP-42 emission factors were based on an annual generation of 30,000 yd³ and that is less than the maximum annual production of this plant.

$$100 \text{ yd}^3/\text{hr} \times 0.08 \text{ lb}/\text{yd}^3 \times 0.01\% \text{ control efficiency of baghouse} = 0.1 \text{ lb PE/hr}$$

$$50,000 \text{ yd}^3/\text{yr} \times 0.08 \text{ lb}/\text{yd}^3 \times 0.01\% \text{ control efficiency of baghouse}$$

$$= 40 \text{ lbs PE/yr} = 0.1 \text{ TPY PE}$$

b. F002:

Emission Limitation:

0.14 lb PE/hr and 0.1 TPY PE

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor extrapolated from AP-42 emission factor found in the original PTI 01-6308 calculations. This was done as the AP-42 emission factors were based on an annual generation of 30,000 yd³ and that is less than the maximum annual production of this plant.

$$100 \text{ yd}^3/\text{hr} \times 0.14 \text{ lb PE}/\text{yd}^3 \times 0.01 \text{ (based on pneumatic conveying with fabric filter with 99\% efficiency)} = 0.14 \text{ lb PE/hr}$$

$$50,000 \text{ yd}^3/\text{yr} \times 0.14 \text{ lb PE}/\text{yd}^3 \times 0.01 \text{ (based on pneumatic conveying with fabric filter with 99\% efficiency)} = 70 \text{ lbs PE/yr} = 0.1 \text{ TPY PE}$$

c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.



g) **Miscellaneous Requirements**

- (1) The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
 - a. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
 - b. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
 - c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
 - d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
 - e. the Director has issued a "Notice of Site Approval," stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- (2) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.



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The "Notice of Intent to Relocate" shall be submitted to:

Ohio EPA
Central District Office
Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

or

Fax: (614) 728-3898

Upon receipt of the notice, the permitting office Ohio EPA, Central District Office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties. The "Notice of Intent to Relocate" form can be found at <http://www.epa.ohio.gov/portals/27/files/relocate.pdf>.