



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-03915

DATE: 1/22/2002

Allega Concrete Corp. Old Grayton Rd Pt
James Allega
5585 Canal Road
Valley View, OH 44125

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CBAPC



**Permit To Install
Terms and Conditions**

**Issue Date: 1/22/2002
Effective Date: 1/22/2002**

FINAL PERMIT TO INSTALL 13-03915

Application Number: 13-03915
APS Premise Number: 1318008158
Permit Fee: **\$1400**
Name of Facility: Allega Concrete Corp. Old Grayton Rd Pt
Person to Contact: James Allega
Address: 5585 Canal Road
Valley View, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:

**Old Grayton Road
Cleveland, Ohio**

Description of proposed emissions unit(s):

Portable Batch Concrete Plant, Material handling, storage piles, and roadways/parking -- P902, F004-F006.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	10.4
PM10	3.06

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F004 -load-in, load-out and wind erosion of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	PM, 4.99 TPY load in and load out PM10, 2.49 TPY
		PM, 0.9 TPY wind erosion PM10, 0.45 TPY
		best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c, A.2.d and A.2.f)
		no visible particulate emissions except for 1 minute during any 60-minute period
	OAC rule 3745-17-07 (B)(6)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08 (B)(6)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The storage piles that are covered by this permit and subject to the requirements of OAC

rules 3745-17-07 and 3745-17-08 are:

- (2) - limestone storage piles
- (1) - sand storage pile
- (1) - slag storage pile

- 2.b** The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to applying water to the storage piles and reducing the drop height of the front-end loader where applicable to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.d** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to using water atop the storage piles to ensure compliance. The permittee shall also maintain as low a pile height as possible. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile 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.
- 2.f** 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.

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Emissions Unit ID:F004

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of each load-in operation, each load-out operation and wind erosion at each storage pile.
2. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity 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 purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
5. 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, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 5.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar

quarter.

6. The permittee shall maintain records of the annual amount of material handled and the amount of material stored, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -

no visible particulate emissions except for 1 minute during any 60-minute period

Applicable Compliance Method -

Compliance with the emission limitation for the storage piles identified 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," 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.
 - b. Emission Limitation -

PM, 4.99 TPY from load in/ load out operations
PM10, 2.49 TPY

Applicable Compliance Method

The TPY emission limitation shall be based on calculations using the equation 1 for Aggregate Handling and Storage Piles taken from U.S. EPA reference document AP-42,

Emissions Unit ID: **F004**

5th edition, Compilation of Air Pollution Emission Factors, Section 13.2.4 (1/95) to establish the emission factor in lb/ton. The calculated emission factors are: 0.002 lb per ton of materials handled for PM emissions and 0.001 lb per ton of materials handled for PM10 emissions. This emission factor is multiplied by the annual tons of material handled and (1-0.50) to account for the 50% watering emission control efficiency. The calculated value is then divided by 2000 lbs/ton to determine emissions in tons/year.

c. Emission Limitation -

PM, 0.9 TPY from wind erosion
PM10, 0.45 TPY

Applicable Compliance Method

The TPY emission limitation shall be based on calculations using the equation 1 for Aggregate Handling and Storage Piles taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 13.2.4 (1/95) to establish the emission factor in lb/ton. The calculated emission factors are: 0.002 lb per ton of materials stored for PM emissions, and 0.001 lb per ton of materials stored for PM10 emissions. This emission factor is multiplied by the annual tons of material stored and (1-0.50) to account for the 50% watering emission control efficiency. The calculated value is then divided by 2000 lbs/ton to determine emissions in tons/year.

F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:
 - a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
 - b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
 - c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
 - d. in the Cleveland Bureau of Air Pollution Control's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:
 - a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - b. the portable emissions unit is equipped with best available technology;
 - c. the portable emission unit owner has identified the proposed site to Ohio EPA;
 - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
 - f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and
 - g. the portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.
3. Any site approvals issued by the Ohio EPA, pursuant to 2.7. above, shall be valid for no longer than three years and are subject to renewal.

In order for the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the Cleveland Bureau of Air Pollution Control (1925 St. Clair Ave., Cleveland, OH 44114) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Cleveland Bureau of Air Pollution Control and/or the appropriate field office having jurisdiction over the newsite, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
F005 -paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07 (B)(5)
	OAC rule 3745-17-08 (B)(2)
	OAC rule 3745-17-07 (B)(4)
	OAC rule 3745-17-08 (B)(8), (B)(9)
unpaved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)

Allega

PTI A

Issued: 1/22/2002

Emissions Unit ID: **F005**

Applicable Emissions
Limitations/Control Measures

PM, 0.09 TPY
PM10, 0.018 TPY
best available technology control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, and A.2.d through A.2.h)

no visible particulate emissions except for 1 minute during any 60-minute period

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

The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

PM, 0.47 TPY
PM10, 0.10 TPY
best available technology control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c, and A.2.d through A.2.h)

no visible particulate emissions

except for 3 minutes during any 60-minute period for unpaved roads

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

The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The paved and unpaved roadways that are covered by this permit and subject to the above-mentioned requirements are 0.20 miles of paved roadway and 0.25 miles of unpaved roadway.
- 2.b** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.e** Any unpaved roadway, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, shall be controlled by flushing with water to minimize or eliminate at all times, visible emissions of fugitive dust generated by vehicular traffic. Any unpaved roadway that takes the characteristics of a paved roadway due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways. Any unpaved roadway that is paved shall be subject to the visible emission limitation for paved roadways in accordance with OAC rule 3745-17-07(B)(4).
- 2.f** 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

Emissions Unit ID: F005

has been deposited by trucking or earth moving equipment or erosion by water or other means.

- 2.g** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.h** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of all the roadways.
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 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 may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. 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 4.d. shall be kept for all of the roadways and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall maintain records of the vehicle miles traveled (VMT) for each calendar year.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
no visible particulate emissions except for 3 minutes during any 60-minute period for unpaved roads

Applicable Compliance Method -

Compliance with the emission limitation for the unpaved roadway identified 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," 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.

b. Emission Limitation -

PM, 0.47 TPY Unpaved roadway
 PM10, 0.10 TPY

Applicable Compliance Method -

The TPY emission limitation shall be based on calculations using the equation 1 for Unpaved Roadways and Parking areas taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 13.2.2 (1/95) to establish the emission factor in lb/VMT. The calculated emission factors are: 9.28 lbs/VMT for PM emissions and 2.00 lbs/VMT for PM10 emissions. This emission factor is multiplied by the annual vehicle miles traveled (VMT) and (1-0.50) to account for the 50% watering emission control efficiency. The calculated value is then divided by 2000 lbs/ton to determine emissions in tons/year.

c. Emission Limitation -

no visible particulate emissions except for 1 minute during any 60-minute period for paved roads

Applicable Compliance Method -

Compliance with the emission limitation for the paved roadway identified 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," 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.

d. Emission Limitation -

PM, 0.09 TPY Paved roadway
 PM10, 0.018 TPY

Applicable Compliance Method -

The TPY emission limitation shall be based on calculations using the equation 1 for Paved Roadways and Parking areas taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 13.2.1(10/97) to establish the emission factor in lb/VMT. The calculated emission factors are: 1.83 lbs/VMT for PM emissions and 0.36 lbs/VMT for PM10 emissions. This emission factor is multiplied by the annual vehicle miles traveled (VMT) and (1-0.50) to account for the 50% watering emission control efficiency. The calculated value is then divided by 2000 lbs/ton to determine emissions in tons/year.

F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:
 - a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
 - b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
 - c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
 - d. in the Cleveland Bureau of Air Pollution Control's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:
 - a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - b. the portable emissions unit is equipped with best available technology;
 - c. the portable emission unit owner has identified the proposed site to Ohio EPA;
 - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
 - f. the owner of the proposed site has provided the portable emissions unit owner with

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approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and

- g. the portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.
3. Any site approvals issued by the Ohio EPA, pursuant to 2.7. above, shall be valid for no longer than three years and are subject to renewal.

In order for the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the Cleveland Bureau of Air Pollution Control (1925 St. Clair Ave., Cleveland, OH 44114) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Cleveland Bureau of Air Pollution Control and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P902 - 500 TPH portable concrete batching plant	OAC rule 3745-31-05(A)(3)	PM 0.01 gr/dscf; 0.9 lb/hr; and 3.9 TPY
	OAC rule 3745-17-08 (B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
	OAC rule 3745-17-07 (B)	See A.2 below.
	OAC rule 3745-17-07 (A)	Visible particulate emissions of fugitive dust generated by operating this emissions unit shall not exceed twenty per cent (20%) opacity as a three-minute average.
	OAC rule 3745-17-11	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
		The emission limitation 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

- 2.a** The permittee shall vent the emissions generated by the cement silo filling, mixing and truck loading operations to the baghouse to meet the following requirements:
- i. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.b** The permittee shall add water or other suitable dust suppressant at the sand and aggregate storage bins and aggregate belt conveyor as needed to minimize or eliminate visible particulate emissions of fugitive dust.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 8 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis whenever this emissions unit is in operation.
2. The permittee shall perform daily checks for any visible particulate emissions from the baghouse control systems for the cement silo filling, mixing and truck loading operations. The presence or absence of any visible emissions from the baghouse control system shall be noted in an operations log. If any visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.
3. The permittee shall maintain records of the amount of concrete produced, in tons, for each calendar year.

D. Reporting Requirements

Emissions Unit ID: **P902**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit on a semi-annual basis a report which:
 - a. identifies all days during which any visible particulate emissions were observed from the fabric filter control systems; and
 - b. describes the corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emission Limitation:
PM 0.01 gr/dscf; 0.9 lb/hr; and 3.9 TPY

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined through the use of the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 11.12 (1/95) for concrete batching for each activity for this emissions unit which is multiplied by the maximum production rate for the emissions unit (tons/hr) and (1-0.999) which is the 99.9% baghouse removal efficiency. This lb/hr emission rate is multiplied by (7000 grains/lb)*(1 hr/60min)*(min/10000 ft3) to arrive at the emission rate in grains of particulate emissions per dry standard cubic foot of exhaust gases.

The TPY emission rate is determined by multiplying the lb/ton emission factor by the annual amount of concrete produced in tons and the factor of (1.0 ton/2000 lbs) and (1-0.999) which is the 99.9% baghouse removal efficiency.

If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(8).

- b. Emission Limitation-
Visible particulate emissions of fugitive dust generated by operating this emissions unit shall not exceed twenty per cent (20%) opacity as a three-minute average.

Applicable Compliance Method(s) -

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation-

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method(s) -

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:
 - a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
 - b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
 - c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
 - d. in the Cleveland Bureau of Air Pollution Control's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:
 - a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - b. the portable emissions unit is equipped with best available technology;
 - c. the portable emission unit owner has identified the proposed site to Ohio EPA;
 - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
 - f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the

portable emissions unit to the proposed site; and

- g. the portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.
3. Any site approvals issued by the Ohio EPA, pursuant to 2.7. above, shall be valid for no longer than three years and are subject to renewal.

In order for the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the Cleveland Bureau of Air Pollution Control (1925 St. Clair Ave., Cleveland, OH 44114) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Cleveland Bureau of Air Pollution Control and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.