



7/31/2014

Certified Mail

DAVID SCHMITZ
CEMENT PRODUCTS INC
389 PARK AVENUE EAST
MANSFIELD, OH 44905

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0370010202
Permit Number: P0117286
Permit Type: Renewal
County: Richland

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, Northwest District Office at (419)352-8461 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-NWDO



FINAL

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

Facility ID:	0370010202
Permit Number:	P0117286
Permit Type:	Renewal
Issued:	7/31/2014
Effective:	7/31/2014
Expiration:	7/31/2024



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

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Final Permit-to-Install and Operate
CEMENT PRODUCTS INC
Permit Number: P0117286
Facility ID: 0370010202
Effective Date: 7/31/2014

Authorization

Facility ID: 0370010202
Application Number(s): A0051287
Permit Number: P0117286
Permit Description: Renewal PTIO for unpaved roadways and parking areas (F001), sand and aggregate storage piles (F002), and 200 ton/hr concrete transit-mix plant (P901)
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/31/2014
Effective Date: 7/31/2014
Expiration Date: 7/31/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CEMENT PRODUCTS INC
389 PARK AVENUE EAST
Mansfield, OH 44905

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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
Director



Final Permit-to-Install and Operate
CEMENT PRODUCTS INC
Permit Number: P0117286
Facility ID: 0370010202
Effective Date: 7/31/2014

Authorization (continued)

Permit Number: P0117286
Permit Description: Renewal PTIO for unpaved roadways and parking areas (F001), sand and aggregate storage piles (F002), and 200 ton/hr concrete transit-mix plant (P901)

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

Emissions Unit ID:	F001
Company Equipment ID:	Unpaved roadways and parking areas
Superseded Permit Number:	03-3022
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Sand and aggregate storage piles
Superseded Permit Number:	03-3022
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P901
Company Equipment ID:	200 tons/hr transit mix concrete batch plant
Superseded Permit Number:	03-3022
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
CEMENT PRODUCTS INC
Permit Number: P0117286
Facility ID: 0370010202
Effective Date: 7/31/2014

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
CEMENT PRODUCTS INC
Permit Number: P0117286
Facility ID: 0370010202
Effective Date: 7/31/2014

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
CEMENT PRODUCTS INC
Permit Number: P0117286
Facility ID: 0370010202
Effective Date: 7/31/2014

C. Emissions Unit Terms and Conditions



1. F001, Unpaved roadways and parking areas

Operations, Property and/or Equipment Description:

Unpaved roadways and parking areas

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)	2.48 tons fugitive particulate emissions (PE)/yr No visible PE except for a period of time not to exceed three minutes during any 60-minute observation period for unpaved roadways Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust [See b)(2)a. through b)(2)e.]
b.	OAC rule 3745-17-07(B)(5)	See b)(2)f.
c.	OAC rule 3745-17-08(B)(2)	See b)(2)f.



(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 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. 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.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).
- f. The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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 roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	once per day of operation



- (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) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:
 - i. 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
 - ii. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the



PER that all inspections were performed by the required frequency, and control measure(s) were properly implemented.

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. Emission Limitation: 2.48 tons fugitive PE/yr

Applicable Compliance Method: The permittee shall determine compliance with the annual emission limitation by multiplying the appropriate emission factor for unpaved roadways from AP-42, Section 13.2.2 (11/06) by the maximum vehicle miles traveled, dividing by 2000 lbs/ton, then applying a control efficiency of 50% for the use of best available control measures. Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation: No visible PE except for a period of time not to exceed 3 minutes during any sixty-minute observation period.

Applicable Compliance Method: If required, compliance shall be determined by visible emissions evaluations performed using the methods and procedures specified in Method 22 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



2. F002, Sand and aggregate storage piles

Operations, Property and/or Equipment Description:

Sand and aggregate storage piles

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)	0.16 ton fugitive particulate emissions (PE)/yr No visible PE except for a period of time not to exceed 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.]
b.	OAC rule 3745-17-07(B)(6)	See b)(2)g.
c.	OAC rule 3745-17-08(B)(6)	See b)(2)g.

(2) Additional Terms and Conditions

a. 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 application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

- b. The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 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.
- 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 application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling system/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 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.
- 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 requirements of OAC rule 3745-31-05(A)(3).
- g. The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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 load-in operation at each storage pile in accordance with the following frequencies:



<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	once per day of operation

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all	once per day of operation

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	once per day of operation

- (4) 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.

- (5) 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.

- (6) 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)(6)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.



e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(6) above:
 - i. 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
 - ii. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measure(s) were properly implemented.

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. Emission Limitation: 0.16 ton fugitive PE/yr

Applicable Compliance Method: The permittee shall determine compliance with the annual emission limitation by multiplying the appropriate emission factors for load-in and load-out from AP-42, Section 13.2.4 (11/06) and for wind erosion from AP-42, Section 11.12 (6/06) by the maximum material loaded-in/loaded out, the maximum amount of material stored, dividing by 2000 lbs/ton and applying a control efficiency of 50% for the use of best available control measures. Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual emission limitation shall also be demonstrated.
 - b. Emission Limitation: No visible PE except for a period of time not to exceed 1 minute during any sixty-minute observation period.



Final Permit-to-Install and Operate
CEMENT PRODUCTS INC
Permit Number: P0117286
Facility ID: 0370010202
Effective Date: 7/31/2014

Applicable Compliance Method: If required, compliance shall be determined by visible emissions evaluations performed using the methods and procedures specified in Method 22 of 40 CFR, Part 60, Appendix A.

- g) Miscellaneous Requirements
 - (1) None.



3. P901, 200 tons/hr transit mix concrete batch plant

Operations, Property and/or Equipment Description:

200 tons/hr transit mix concrete batch plant

- 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
(Sand and Aggregate Transfer to Storage Bins)		
a.	OAC rule 3745-31-05(A)(3)	1.08 tons fugitive particulate emissions (PE)/yr See b)(2)a.
b.	OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average
c.	OAC rule 3745-17-08(B)	See b)(2)f.
(Cement Pneumatic Loading to Silo)		
d.	OAC rule 3745-31-05(A)(3)	0.41 lb PE/hr and 0.20 ton PE/yr from the fabric filter Visible PE shall not exceed 0% opacity, as a 6-minute average from the fabric filter See b)(2)b.
e.	OAC rule 3745-17-07(A)(1)	See b)(2)f.
f.	OAC rule 3745-17-11(B)	See b)(2)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
(Sand and Aggregate Weigh Hopper Loading)		
g.	OAC rule 3745-31-05(A)(3)	0.45 ton fugitive PE/yr See b)(2)c.
h.	OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average
i.	OAC rule 3745-17-08(B)	See b)(2)f.
(Cement Weigh Hopper Loading)		
j.	OAC rule 3745-31-05(A)(3)	0.03 lb PE/hr and 0.02 ton PE/yr from the fabric filter Visible PE shall not exceed 0% opacity, as a 6-minute average from the fabric filter See b)(2)d.
k.	OAC rule 3745-17-07(A)(1)	See b)(2)f.
l.	OAC rule 3745-17-11(B)	See b)(2)f.
(Transit Mix Truck Loading)		
m.	OAC rule 3745-31-05(A)(3)	0.54 ton fugitive PE/yr See b)(2)e.
n.	OAC rule 3745-17-07(B)(1)	Visible emissions shall not exceed 20% opacity, as a 3-minute average
o.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

- a. The permittee shall employ the following Best Available Technology (BAT) control measures for the above-identified sand and aggregate transfer to storage bins process for the purpose of ensuring compliance with the above-mentioned applicable requirements:
 - i. The drop height of the front-end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive particulate matter from the conveyor loading area.
 - ii. The sand and aggregate loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive particulate matter from the conveyor and transfer point to bins.
- b. The permittee shall employ the following BAT control measures for the above-identified cement unloading to storage silo process for the purpose of ensuring compliance with the above-mentioned applicable requirements:



- i. The silo shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient to eliminate visible emissions of fugitive particulate matter at the point of capture.
 - ii. The collection efficiency of the fabric filters shall be sufficient to minimize or eliminate visible fugitive dust to the extent possible with good engineering design.
 - iii. The fabric filters shall achieve an emissions rate of not greater than 0.03 grain of particulate emissions per dry standard cubic foot of exhaust gases, or achieve no visible emissions from the exhaust stack(s), whichever is less stringent.
- c. The permittee shall employ the following BAT control measures for the above-identified weigh hopper loading of sand and aggregate process for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. The weigh hopper shall be adequately enclosed. The enclosure shall be sufficient to minimize or eliminate visible emissions of fugitive particulate matter.
- d. The permittee shall employ the following BAT control measures for the above-identified weigh hopper loading of cement process for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. The weigh hopper shall be adequately enclosed. The enclosure shall be sufficient to minimize or eliminate visible emissions of fugitive particulate matter.
 - ii. The collection efficiency of the fabric filters shall be sufficient to minimize or eliminate visible fugitive dust to the extent possible with good engineering design.
 - iii. The fabric filters shall achieve an emissions rate of not greater than 0.03 grain of particulate emissions per dry standard cubic foot of exhaust gases, or achieve no visible emissions from the exhaust stack(s), whichever is less stringent.
- e. The permittee shall employ the following BAT control measures for the above-identified loading of transit-mix truck process for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. A charging boot shall be used around the hopper choke-feed discharge area and transit-mix truck opening. The charging boot shall have a control efficiency sufficient to minimize or eliminate visible emissions of fugitive dust to the extent possible with good engineering design.
 - ii. The loading of transit-mix truck process shall be adequately enclosed. The enclosure shall be sufficient to minimize or eliminate visible emissions of fugitive particulate matter.



- f. The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
 - (1) The maximum annual production rate for this emission unit shall not exceed 178,500 tons/yr.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the production rate for this emissions unit (in tons per month and total tons, to date for the calendar year).
 - (2) 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 stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - i. the color of the emissions;
 - ii. the total duration of any visible emissions incident; and
 - iii. any corrective actions taken to eliminate the visible emissions.
 - (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the sand and aggregate transfer to storage bins, sand and aggregate weigh hopper loading and transit mix truck loading operations. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - i. the location and color of the emissions;
 - ii. whether the emissions are representative of normal operations;
 - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. the total duration of any visible emissions incident; and
 - v. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(3)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were



taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. All days during which any visible fugitive particulate emissions were observed from the sand and aggregate transfer to storage bins, sand and aggregate weigh hopper loading and transit mix truck loading operations; and
 - b. Any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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. Emission Limitation: Sand and aggregate transfer to storage bin - 1.08 tons fugitive PE/yr

Applicable Compliance Method: The annual emission limitation was established by multiplying the maximum throughput of sand and aggregate of 148,500 tons/yr by an emission factor of 0.029 lb PE/ton from AP-42, Table 11.12-2 (revised 10/86), dividing by 2000 lbs/ton and applying a 50% control efficiency for the application of the BAT control measures outlined in b)(2)a.

- b. Emission Limitation: Sand and aggregate transfer to storage bin - Visible PE shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with OAC rule 3745-17-01(B)(3).

- c. Emission Limitation: Cement pneumatic loading to silo - 0.41 lb PE/hr and 0.20 ton PE/yr from the fabric filter

Applicable Compliance Method: The hourly emission limitation was established by multiplying the maximum process weight rate of 30 tons/hr by an emission factor of 0.27 lb PE/ton from AP-42, Table 11.12-2 (revised 10/86) and applying a 95% control efficiency for the application of the BAT control measures outlined in b)(2)b. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the maximum throughput of cement of 30,000 tons/yr by an emission factor of 0.27 lb PE/ton from AP-42, Table 11.12-2 (revised 10/86), dividing by 2000 lbs/ton and applying a 95% control efficiency for the application of the BAT control measures outlined in b)(2)b. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

- d. Emission Limitation: Cement pneumatic loading to silo - Visible PE shall not exceed 0% opacity, as a 6-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation: Sand and aggregate weigh hopper loading – 0.45 ton fugitive PE/yr

Applicable Compliance Method: The annual emission limitation was established by multiplying the maximum throughput of sand and aggregate of 148,500 tons/yr by an emission factor of 0.02 lb PE/ton from AP-42, Table 11.12-2 (revised 10/86), dividing by 2000 lbs/ton and applying a 70% control efficiency for the application of the BAT control measures outlined in b)(2)c.



- f. Emission Limitation: Sand and aggregate weigh hopper loading - Visible PE shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with OAC rule 3745-17-01(B)(3).

- g. Emission Limitation: Cement weigh hopper loading – 0.03 lb PE/hr and 0.02 ton PE/yr from the fabric filter

Applicable Compliance Method: The hourly emission limitation was established by multiplying the maximum process weight rate of 30 tons/hr by an emission factor of 0.02lb PE/ton from AP-42, Table 11.12-2 (revised 10/86) and applying a 95% control efficiency for the application of the BAT control measures outlined in b)(2)d. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the maximum throughput of cement of 30,000 tons/yr by an emission factor of 0.02 lb PE/ton from AP-42, Table 11.12-2 (revised 10/86), dividing by 2000 lbs/ton and applying a 95% control efficiency for the application of the BAT control measures outlined in b)(2)d.

- h. Emission Limitation: Cement weigh hopper loading - Visible PE shall not exceed 0% opacity, as a 6-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- i. Emission Limitation: Transit mix truck loading – 0.54 ton fugitive PE/yr

Applicable Compliance Method: The annual emission limitation was established by multiplying the maximum throughput of 178,500 tons/yr by an emission factor of 0.02 lb PE/ton from AP-42, Table 11.12-2 (revised 10/86), dividing by 2000 lbs/ton and applying a 70% control efficiency for the application of the BAT control measures outlined in b)(2)e. Therefore, provided compliance is shown with the annual production restriction in c)(1), compliance with the annual emission limitation shall also be demonstrated.

- j. Emission Limitation: Transit mix truck loading - Visible PE shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with OAC rule 3745-17-01(B)(3).

- g) Miscellaneous Requirements

- (1) None.