

Facility Name: **Integrated Resources Genoa Plant**

Application Number: **04-1133**

Date: **August 12, 1998**

### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

#### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### **CONSTRUCTION OF NEW SOURCES**

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

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **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.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

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3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Integrated Resources Genoa Plant** located in **Ottawa** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source <u>Number</u>  F005	F006   F006 (Cont)	F007   F008 (Cont)  F008	Ohio EPA Source <u>Number</u>  F005	Source Identification <u>Number</u>  F005	BAT <u>Determination</u>  F005
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		Weigh hopper loading		
	<u>Source Identification Description</u>		<u>BAT Determination</u>	
Roadways & Parking Areas			Use of water and or suitable dust suppressants, 5MPH limit	Minimize drop heights
	Loading onto and Loadout from piles			Opacity restrictions, maintain sufficient moisture
	Transfer of sand and aggregate to bins	Loading of transit mix trucks		Pneumatic loading of cement
Storage Piles	Cement transfer to silos		Use of water and or suitable dust suppressants Wind Screens	Enclosure and fabric filter
	Silo vents			Maintain sufficient moisture for sand and stone,

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
enclosure and fabric filter for cement loading		3745-17-08 (B)		Permit Allowable Mass Emissions and/or Control/Usage Requirements
	3745-31-05			0.03 ton/yr PM, 0.57 lb/hr PM 5
	3745-17-07 (B) (5)	3745-17-07 (B) (1) 3745-31-05		MPH vehicle speed limit no visible particulate emissions except for 13 minutes during any 60 minute period
	3745-17-08 (B)	3745-17-07 (B) (1) 3745-31-05	3745-31-05	Use of water and or suitable dust suppressants sufficient to minimize or eliminate visible emissions of fugitive dust
Adjustable chute, water spray	3745-31-05	3745-31-05	*3745-17-08 *3745-17-07	0.16 ton/yr PM 0.26 lb/hr PM
	3745-17-07 (B) (6)	3745-31-05		no visible particulate emissions except for 13 minutes during any 60 minute period

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Use of water and or suitable dust suppression sufficient to minimize or eliminate visible emissions of fugitive dust  Opacity not to exceed 20% as a three minute average for sand and stone loading.  0.09 ton/year PM 0.58 lb/hr PM	exceed 20% as a three minute average. 4.0 lbs/hr PM 1.02 tons/yr PM  Closed system No visible emissions  No visible emissions  Opacity not to exceed 10% as a three minute average for sand and stone loading.  4.4 lb/hr PM and	and/or Control/Usage Requirements  1.0 ton/yr PM  Opacity not to exceed 20% as a three minute average. 4.4 lb/hr PM and 1.0 tons/yr PM		
Opacity not to	Permit Allowable Mass Emissions			

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- \* The limitations established in these rules is less stringent than BAT.

SUMMARY  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	3.3

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport

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and disposal of any waste material generated by the operation of the sources.

#### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### **NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

#### **NOTICE OF INTENT TO RELOCATE**

Pursuant to OAC Rule 3745-31-03(A)(1)(n), the owner or operator

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of the portable or mobile source identified within this Permit to Install may relocate within the state of Ohio without first obtaining a Permit to Install providing the following criteria are met:

- a. the source is equipped with the Best Available Control Technology for such source;
- b. the source is operating pursuant to a currently effective Permit to Operate;
- c. the applicant has provided proper notice of intent to relocate the source to the Director within a minimum of 30 days prior to the scheduled relocation; and
- d. in the Director's judgement, the proposed site is acceptable under Rule 3745-15-07 of the Administrative Code.

In order for the Director to determine compliance with all of the above criteria, the owner or operator of the portable or mobile source must file a "Notice of Intent to Relocate" at least 30 days prior to relocation of the source with the **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602**. Upon receipt of the notice, the Director, or the Director's authorized representative, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio Environmental Protection Agency approval prior to relocation of the source may result in fines and civil penalties.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**F005 Roadways & Parking Areas**

**A. ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. The permittee shall employ reasonably 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

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areas with water or suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. 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 an 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.
3. Any unpaved roadway or parking area, 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, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas specified in OAC rule 3745-17-07(B)(4).
4. 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.
5. 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.

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6. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
7. Posting and enforcing 5 MPH speed limit on all unpaved parking areas and roadways.

**B. OPERATIONAL RESTRICTIONS**

none

**C. MONITORING AND/OR RECORD KEEPING REQUIREMENTS**

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

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
All	Daily

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
All	Daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the Toledo Environmental Services Division, 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

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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 updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**D. REPORTING REQUIREMENTS**

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

- 1 Compliance with the emission limitation for the unpaved roadways and parking areas 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

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paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

**F. MISCELLANEOUS REQUIREMENTS**

None.

**F006 Storage Piles**

**A. ADDITIONAL TERMS AND CONDITIONS**

1. The permittee shall minimize the drop height of material being loaded onto or being removed from all storage piles. Sufficient moisture shall be maintained in the material to comply with the allowable visible emission requirements during loadin or loadout.
2. The storage piles shall be constructed with wind guards that extend above the maximum pile height. Periodic wetting of the piles shall take place so as to comply with the allowable visible emission requirements.

**B. OPERATIONAL RESTRICTIONS**

none

**C. MONITORING AND/OR RECORD KEEPING REQUIREMENTS**

1. The permittee shall visible inspect the storage piles a minimum of once per day to verify that there are no visible emissions.
2. The permittee shall record any violations of the visible emission requiremnts and take corrective actions immediately upon discovery.

**D. REPORTING REQUIREMENTS**

1. The permittee shall report any violations of the visible emission limits to the **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602** within 15 days of discovery.

**E. COMPLIANCE DEMONSTRATION/TESTING REQUIREMENTS**

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1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

a. **Emissions Limitation:** No visible particulate emissions except for 13 minutes during any 60 minute period.

**Applicable Compliance Method:** USEPA Method 22

b. **Emissions Limitation:** 0.16 ton PM/yr (wind erosion) + 0.09 ton PM/yr (load in/out)

**Applicable Compliance Method:** Compliance is demonstrated by use of wind screens and water spray or wet suppression system

c. **Emissions Limitation:** .26 lb/hr PM (wind erosion) + .58 lb/hr PM (load in/out)

**Applicable Compliance Method:** Compliance is demonstrated by use of wind screens and water spray or wet suppression system.

**F. MISCELLANEOUS**

none

**F007 Material Handling**

**A. ADDITIONAL TERMS AND CONDITIONS**

1. The permittee shall maintain sufficient moisture in the sand and aggregate so as to comply with the visible emission requirements during transfer. Drop heights shall be minimized during loading of conveyors.

2. Cement shall be transferred pneumatically to storage silos. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emissions of cement emanating from the delivery vehicle shall be cause for the immediate halt of the unloading process and the refusal of the cement load until the situation is corrected.

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3. The cement silos vents shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize at all times visible emissions of fugitive dust at the points of capture. The fabric filter shall achieve an outlet emissions rate of not greater than 0.30 grains of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.

**B. OPERATIONAL RESTRICTIONS**

none

**. MONITORING AND/OR RECORD KEEPING REQUIREMENTS**

1. The permittee shall visible inspect the storage silo vents a minimum of once per day to verify the visible emissions limitations.
2. The permittee shall record any violations of the visible emissions limitations

**D. REPORTING REQUIREMENTS**

1. The permittee shall report any violations of the visible emissions limitations to the **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602** within 15 days of discovery.

**E. COMPLIANCE DEMONSTRATION/TESTING REQUIREMENTS**

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
  - a. **Emissions Limitation:** PM-4.0 pounds per hour  
**Applicable Compliance Method:** Compliance is demonstrated by maintaining sufficient moisture and fabric filter vents on silos.
  - b. **Emissions Limitation:** PM-1.02 tons per year  
**Applicable Compliance Method:** Compliance is demonstrated by maintaining sufficient moisture and fabric filter vents on silos.
  - c. **Emissions Limitation:** Opacity not to exceed 20% as a

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three minute average.

**Applicable Compliance Method:** USEPA Method 22

#### **F008 Weigh Hopper & transit Mix**

##### **A. ADDITIONAL TERMS AND CONDITIONS**

1. The cement weigh hopper shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient to eliminate, at all times, visible emissions of fugitive dust at the point of capture. The fabric filter shall achieve an outlet emissions rate of not greater than 0.30 grains of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is greater.
2. The aggregate and sand to be loaded into the weigh-hopper and conveyor shall have a moisture content sufficient so as to comply with the visible emission requirements.
3. Transit mix trucks shall be loaded using an adjustable chute and/or a flexible boot along with water spray during raw material loading. The equipment shall be operated so to comply with the visible emission requirements.

##### **B. OPERATIONAL RESTRICTIONS**

none

##### **C. MONITORING AND/OR RECORD KEEPING REQUIREMENTS**

1. The permittee shall record any time of operation when wet suppression or water spray was not used to control fugitive particulate emissions for this emissions unit.
2. The permittee shall record any violations of the visible emissions limitations.

##### **D. REPORTING REQUIREMENTS**

1. The permittee shall report any occurrences of when wet suppression or water spray was not used during the operation of the emissions unit to the **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602** no later than 15 days of the occurrence.
2. The permittee shall report any violations of the visible emissions limitations to the **Division of Environmental**

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**Services** within 15 days of discovery.

**E. COMPLIANCE DEMONSTRATION/TESTING REQUIREMENTS**

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

a. **Emissions Limitation:** PM-4.4 pounds per hour  
**Applicable Compliance Method:** Compliance is demonstrated by the use of water spray or wet suppression system.

b. **Emissions Limitation:** PM-1.0 tons per year  
**Applicable Compliance Method:** Compliance is demonstrated by the use of water spray or wet suppression system.

c. **Emissions Limitation:** Opacity not to exceed 20 % as a three minute average.  
**Applicable Compliance Method:** USEPA Method 22

d. **Emissions Limitation:** Opacity not to exceed 10% as a three minute average for sand and stone loading.  
**Applicable Compliance Method:** USEPA Method 22