Ohio Environmental Protection Agency

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

Certified Mail

1/11/2016

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Jim Allega
Allega Concrete Corporation, Plant #9
5585 Canal Rd
Valley View, OH 44125

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318578711
Permit Number: P0119852
Permit Type: Initial Installation
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: CDAQ

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Allega Concrete Corporation, Plant #9

Facility ID:	1318578711
Permit Number:	P0119852
Permit Type:	Initial Installation
Issued:	1/11/2016
Effective:	1/11/2016
Expiration:	1/11/2026

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Allega Concrete Corporation, Plant #9

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Authorization

Facility ID:	1318578711
Application Number(s):	A0054742
Permit Number:	P0119852
Permit Description:	Initial General Permit PTIO for paved and unpaved roadways and parking areas (F001), material storage piles (F002), and a portable central ready mix concrete batch plant (P901).
Permit Type:	Initial Installation
Permit Fee:	$1,650.00
Issue Date:	1/11/2016
Effective Date:	1/11/2016
Expiration Date:	1/11/2026

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Allega Concrete Corporation, Plant #9
5585 Canal Road
Valley View, OH 44125

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:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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

Authorization (continued)

Permit Number: P0119852
Permit Description: Initial General Permit PTIO for paved and unpaved roadways and parking areas (F001), material storage piles (F002), and a portable central ready mix concrete batch 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:	paved and unpaved roadways and parking areas
Superseded Permit Number:	
General Permit Category and Type:	Unpaved Roadways and Parking Areas - Maximum of 125,000 vehicle miles traveled/year (GP5.1)
Emissions Unit ID:	**F002**
Company Equipment ID:	storage piles
Superseded Permit Number:	
General Permit Category and Type:	Storage Piles - Max production of 3 million tons/year, max storage pile surface area < 6 acres (GP7.2)
Emissions Unit ID:	**P901**
Company Equipment ID:	Central mix concrete batch plant
Superseded Permit Number:	
General Permit Category and Type:	Ready Mix Concrete Batch Plants - Central Mix (GP4.2)

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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.

C. Emissions Unit Terms and Conditions

1. F001, paved and unpaved roadways and parking areas

Operations, Property and/or Equipment Description:

Paved and 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)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(4)	No visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-07(B)(5)	No visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	See b)(2)a.

(2) Additional Terms and Conditions

a. For emissions units located in Appendix A areas, the permittee shall employ reasonably available control measure to minimize or eliminate visible PE of fugitive dust by:

i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) or rule 3745-279-01 of the Administrative Code), water, or other suitable dust suppression chemicals on gravel roads and parking lots.

ii. The prompt removal, 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.

iii. Requiring open-bodied vehicles transporting materials likely to become airborne to have such materials covered at all times if the control measure is necessary for the materials being transported.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

a. An identification of each roadway or parking area, or segment of roadway or parking area, for which the plan applies. The permittee can select whether to develop a plan based on segments or entire roads.

b. A determination of the frequency that each roadway, parking area, or segment will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all segments of the roadway or parking areas or may be identified separately for various segments of the roadway or parking areas.

c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This from/record should include, at a minimum, the following elements:

i. roadway, parking area, or segment inspected;

ii. date inspected;

iii. name of employee responsible for inspection;

iv. result of the inspection (needs treatment or does not need treatment);

v. date treated;

vi. name of employee responsible for roadway, parking area, or segment treatment; and

vii. method used to treat the roadway, parking area, or segment.

d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Cleveland Division of Air Quality (CDAQ) for review and approval. The permittee can begin using the revised Work Practice Plan once Cleveland DAQ has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing 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) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

a. the records required to be collected under the Work Practice Plan, and

b. the date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part A of this permit.

e) Reporting Requirements

(1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Cleveland DAQ.

(2) The permittee shall submit annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the annual Permit Evaluation Report (PER).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

<u>Emission Limitation:</u>

No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.

No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.

<u>Applicable Compliance Method:</u>

If required, compliance with the applicable visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.

2. F002, storage piles

Operations, Property and/or Equipment Description:

Material storage piles associated with portable concrete mix 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
a.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(6)	No visible particulate emissions except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-08(B)	Utilize reasonably available control measure to prevent fugitive dust from becoming airborne. See b)(2)a. through b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(F)	3.1 tons/year of fugitive particulate matter of 10 microns or less (PM_{10}) 6.4 tons/year of fugitive particulate emissions (PE)

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measure 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 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 the use of the measure(s) is unnecessary.

c. 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 systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. 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.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittee's material storage piles. This work practice plan shall include, at a minimum, the following elements:

a. An identification of each storage pile or each storage pile area for which the plan applies.

b. A determination of the frequency that each storage pile or each storage pile area will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all storage piles or may be identified separately for various storage pile areas.

c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the storage piles. This form/record should include, at a minimum, the following elements:

i. storage pile or storage pile area inspected;

ii. date inspected;

iii. name of employee responsible for the inspection;

iv. result of the inspection (needs treatment or does not need treatment);

v. a description of why no treatment was needed;

vi. date treated

vii. name of employee responsible for treatment of the storage pile or storage pile areas; and

viii. method used to treat the storage pile or storage pile area.

d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Cleveland Division of Air Quality (CDAQ) for review and approval. The permittee can begin using the revised Work Practice Plan once the Cleveland DAQ has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the storage piles or storage pile areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing

control measures. The inspections shall be performed during representative, normal storage pile operating conditions. No inspection shall be necessary for a storage pile or storage pile area that is covered with snow and/or ice or if the 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 records required to be collected under the Work Practice Plan, and

b. the date and reason any element of the Work Practice Plan was not implemented.

e) Reporting Requirements

(1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Cleveland DAQ.

(2) The permittee shall submit annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the annual Permit Evaluation Report (PER).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

3.1 tons/year of fugitive PM_{10}

6.4 tons/year of fugitive PE

<u>Applicable Compliance Method:</u>

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/95), for load-in operations, load-out operations, and wind erosion. These emission limits in the General Permit were based on a maximum production of 3,000,000 tons per year, a maximum storage surface area less than or equal to 6 acres, and a 95% overall control efficiency for PE and PM_{10}.

b. Emissions Limitation:

No visible particulate emissions except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance with the visible PE limitations 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").

g) Miscellaneous Requirements

(1) None.

3. P901, Central mix concrete batch plant

Operations, Property and/or Equipment Description:

Central 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
Transfer of Sand and Aggregate to Elevated Bins		
a.	OAC rule 3745-31-05(A)(3)	See b)(2)c.
b.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 3.42 tons/year. Visible emissions of fugitive dust shall not exceed ten percent opacity, as a three-minute average. At all times during the transfer of sand and aggregate, the drop height of the front-end bucket shall be minimized to the extent possible to minimize or eliminate visible emissions of fugitive dust. Sand and aggregate loaded into the elevated bins shall, at all times, have an

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		inherent moisture content sufficient to minimize or eliminate visible emissions of fugitive dust.
Portland Cement, Fly Ash and Slag Silos		
c.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 0.21 tons/year. Each fabric filter(s) serving a silo shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the outlet(s). See b)(2)c.
d.	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	See b)(2)a.
e.	OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	See b)(2)b.
Weigh Hooper Loading of Cement, Fly Ash, Slag, and possible Sand and Aggregate)		
f.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 1.22 tons/year. The fabric filter serving the weigh hopper shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the outlet. See b)(2)d.
g.	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	See b)(2)a.
h.	OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	See b)(2)b.
Truck loading of Aggregate, Sand, Cement and Cement Supplement		
i.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 0.46 tons/year. The central mix drum shall be adequately enclosed and vented to a fabric filter.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The enclosure shall be sufficient to eliminate visible emissions of fugitive dust during transfer operations. The fabric filter serving the central mix drum shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the outlet.

(2) Additional Terms and Conditions

a. For facilities in Appendix A areas as defined in OAC rule 3745-17-08(D), the requirements established pursuant to OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

b. The requirements established pursuant to OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

c. The permittee shall employ the following best available control measures for the above-identified cement and cement supplement silos for the purpose of ensuring compliance with the above-mentioned applicable requirements:

i. Cement and cement supplement shall be transferred pneumatically to the cement and cement supplement 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 and/or cement supplement dust emanating from the delivery vehicle during transfer shall be cause for immediate halt of the unloading process and the refusal of the cement and/or cement supplement load until the situation is corrected.

ii. Each cement and cement supplement silo vent shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust at the point of capture.

d. The permittee shall employ the following best available control measures for the above-identified weigh hoppers for the purpose of ensuring compliance with the above-mentioned applicable requirements:

i. The weigh hoppers shall be sufficiently enclosed so as to minimize or eliminate at all times visible emissions of fugitive dust.

ii. The transfer of cement/cement supplement/sand/aggregate to the concrete batching weigh hoppers shall be enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.

e. Truck loading of wet concrete at this facility is not expected to generate visible particulate emissions.

c) Operational Restrictions

(1) The maximum hourly production rate for this central mix concrete facility shall not exceed 300 cubic yards of concrete (600 tons) per hour.

(2) The maximum annual production rate for this central mix concrete facility shall not exceed 300,000 cubic yards of concrete (600,000 tons) per year.

d) Monitoring and/or Recordkeeping Requirements

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

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

a. the total duration of any visible emission incident; and

b. any corrective actions taken to eliminate the visible emissions.

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

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

a. whether the emissions are representative of normal operations;

b. if the emissions are not representative of normal operations, the cause of the visible emissions;

c. the total duration of any visible emission incident; and

d. any corrective actions taken to eliminate the visible emissions.

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

e) Reporting Requirements

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

f) Testing Requirements

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

a. Emission Limitation:

Each fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Transfer of San and Aggregate to Elevated Bins Emission Limitation:

PE shall not exceed 3.42 tons/year.

Applicable Compliance Method:

Maximum throughput and calculations are based on a mix design consisting of 44% aggregate, 36% sand, 7% cement, 7% cement supplement (slag/fly ash), and 6% water.

Aggregate emission factor = 0.0069 lb PE/ton (AP-42, 11.12, 10/01)
Sand emission factor = 0.0021 lb PE/ton (AP-42, 11.12, 10/01)

Aggregate feed hopper loading = 264,000 tons/year max transfer rate
264,000 tons/year x 0.0069 lb/ton x ton/2000 lbs = 0.91 ton PE/year
Aggregate feed hopper to conveyor = 264,000 tons/year max transfer rate
264,000 tons/year x 0.0069 lb/ton x ton/2000 lbs = 0.91 ton PE/year
Aggregate conveyor to bin = 264,000 tons/year max transfer rate

264,000 tons/year x 0.0069 lb/ton x ton/2000 lbs = 0.91 ton PE/year
Sand feed hopper loading = 216,000 tons/year max transfer rate
216,000 tons/year x 0.0021 lb PE/ton x ton/2000 = 0.23 ton PE/year
Sand feed hopper to conveyor = 216,000 tons/year max transfer rate
216,000 tons/year x 0.0021 lb PE/ton x ton/2000 = 0.23 ton PE/year
Sand conveyor to bin = 216,000 tons/year max transfer rate
216,000 tons/year x 0.0021 lb/ton x ton/2000 lbs = 0.23 ton PE/year
Aggregate and sand transfer total = 3.42 tons PE/year

c. Portland Cement, Fly Ash and Slag Silos Emission Limitation:

PE shall not exceed 0.21 ton/year.

Applicable Compliance Method:

Maximum throughput and calculations are based on a mix design consisting of 44% aggregate, 36% sand, 7% cement, 7% cement supplement (slag/fly ash), and 6% water.

Cement emission factor = 0.00099 lb/PE ton (AP-42, 11.12, 10/01)
Supplement emission factor = 0.0089 lb PE/ton (AP-42, 11.12, 10/01)

Truck to cement silo = 42,000 tons/year max transfer rate
42,000 tons/year x 0.00099 lb/ton x ton/2000lbs = 0.02 ton PE/year
Truck to cement sup silo = 42,000 tons/year max transfer rate
42,000 tons/year x 0.0089 lb/ton x ton/2000 labs = 0.019 ton PE/year

Cement and cement supplement unloading total = 0.21 ton PE/year

d. Weigh Hopper Loading of Cement, Fly Ash, Slag, and possibly Sand and Aggregate Emission Limitation:

PE shall not exceed 1.22 tons/year.

Applicable Compliance Method:

Maximum throughput and calculations are based on a mix design consisting of 44% aggregate, 36% sand, 7% cement, 7% cement supplement (slag/fly ash) and 6% water.

Emission factor = 0.0051 lb PE/ton (AP-42, 11.12, 10/01)

Bins to weigh hopper = 480,000 tons/year max transfer rate
480,000 tons/year x 0.0051 lb/ton x ton/2000 lbs = 1.22 tons PE/year

Weigh hopper loading total = 1.22 tons PE/year

e. Central Mix Drum Loading Emission Limitation:

PE shall not exceed 0.46 ton/year.

Applicable Compliance Method:

Maximum throughput and calculations are based on a mix design consisting of 44% aggregate, 36% sand, 7% cement, 7% cement supplement (slag/fly ash) and 6% water.

Emission factor = 0.011 lb PE/ton (AP-42, 11.12, 10/01)

Weigh hopper to central mixer = 84,000 tons/year max transfer rate
84,000 tons/year x 0.011 lb/ton x ton/2000 lbs = 0.46 ton PE/year

Central Mixer loading total = 0.46 ton PE/year

f. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 10 percent opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 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, 1997.

g. Emission Limitation:

There shall be no visible particulate emissions from the fabric filters serving this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 22 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, 1997.

g) Miscellaneous Requirements

(1) The permittee may replace equipment, add additional equipment, or alter existing equipment as long as the change is consistent with applicable Ohio EPA guidance document(s) and does not meet the definition of a "modification" or "new source" as defined in OAC rule 3745-31-01(B).

(2) For permittees who qualify as a portable source as defined in OAC rule 3745-31-01, the permittee is subject to the following terms and conditions:

Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):

   i. the portable source is equipped with the best available technology for such a portable source;

   ii. the portable source is operating pursuant to a currently effective permit to operate (PTO) or registration status;

   iii. the applicant has provided proper notice of intent to relocate the portable source to the Cleveland Division of Air Quality (CDAQ), and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and

   iv. in Cleveland DAQ and the appropriate field office's (having jurisdiction over the new site) judgment, the proposed site is acceptable under OAC rule 3745-15-07.

b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:

   i. the portable source permittee possesses an Ohio EPA PTI, PTO, or registration status;

   ii. the portable source is equipped with best available technology;

   iii. the portable source owner had identified the proposed site to Ohio EPA;

   iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;

   v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;

   vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to the proposed site; and

   vii. the portable source owner has provided Ohio EPA with 15 days written notice of the relocation.

   Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the Cleveland DAQ, and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the source with Cleveland DAQ, and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, Cleveland DAQ, and 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 source may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.