

Facility ID: 1677130049 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1677130049 Emissions Unit ID: F003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadway	OAC rule 3745-31-05 (PTI 16-635)	no visible particulate emissions except for one minute during any 60-minute period
	OAC rule 3745-17-07 OAC rule 3745-17-08	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.f) less stringent than OAC rule 3745-31-05 less stringent than OAC rule 3745-31-05

**2. Additional Terms and Conditions**

- (a) The paved roadway that is covered by this permit and subject to the above-mentioned requirements is listed below:

TWINSBURG

Note:

Based on application data, there are no actual parking areas at this facility and only one roadway identified as TWINSBURG, which consists of two plant entrance/exit ways which open to a turn-around service area for raw material (sand, stone, cement) supply trucks and redi-mix concrete trucks.

The permittee shall employ best available control measures on the paved roadway 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 paved roadway by sweeping and flushing at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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 the paved roadway if it 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.

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.

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.

Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily inspections of the roadway.

- 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 the roadway if it is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in C.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 requirements of Part I - General Term and Condition 3 of this permit.
- E. **Testing Requirements**
  - 1. Compliance with the emission limitation for the paved roadway identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
- F. **Miscellaneous Requirements**
  - 1. None

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Erie Strayer central mix concrete batching plant	OAC rule 3745-31-05 (PTI 16-635)	9.30 tpy of particulates See A.2 below.

transfer of sand and aggregate to elevated bins	OAC rule 3745-17-07 OAC rule 3745-17-08	20% opacity as a 3-minute average  The drop height of the front-end bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the conveyor loading area.
cement unloading to elevated storage and silo vent with fabric filter	OAC rule 3745-17-08	The sand and stone loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from the conveyor and transfer point to bins.  The silo shall be adequately enclosed and vented to a fabric filter; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the point of capture.  The 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 or there shall be no visible emissions from the outlet, whichever is less stringent.  less stringent than OAC rule 3745-17-08
cement weigh hopper loading with fabric filter	OAC rule 3745-17-07 OAC rule 3745-17-08	The weigh hopper shall be adequately enclosed and vented to a fabric filter; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the point of capture.  The 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 or there shall be no visible emissions from the outlet, whichever is less stringent.  less stringent than OAC rule 3745-17-08
stone and sand weigh hopper loading	OAC rule 3745-17-07 OAC rule 3745-17-07 OAC rule 3745-17-08	20% opacity as a 3-minute average  The sand and stone shall have a moisture content sufficient to minimize or eliminate fugitive dust emissions.
loading of central mixer with fabric filter	OAC rule 3745-17-07  OAC rule 3745-17-08	20% opacity as a 3-minute average for transfer of stone into the tilt mixer  The mixer shall be adequately enclosed and vented to a fabric filter; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the point of capture.  The 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 or there shall be no visible emissions from the outlet, whichever is less stringent.  The sand and stone shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust that are generated during transfer into the tilt mixer.

2. **Additional Terms and Conditions**

- (a) The permittee shall employ best available technology (BAT) to control particulate emissions from this emissions unit. The control technology shall include the following:
  - i. The employment of a properly installed and maintained fabric filter, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), to adequately control particulate emissions.
  - ii. The employment of a properly installed and maintained fully enclosed pneumatic conveyor system for the transfer of cement to the storage silo(s), in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The pneumatic conveyor system shall be properly vented through the fabric filter.

iii. The employment of a properly installed and maintained hood and ductwork system for the cement weigh hopper, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), to adequately control particulate emissions from the weigh hopper loading of cement.

iv. The employment of a properly installed and maintained tilt mixer and mobile hood system properly vented through the fabric filter, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), to adequately control particulate emissions from the mixer loading of sand, stone, and cement. The mobile hood system shall have a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture to the extent possible with good engineering design.

v. The employment of sand and stone washed prior to delivery. The sand and stone shall have a sufficient moisture content throughout all plant processing activities to minimize or eliminate visible emissions of particulates.

The 9.30 TPY particulates emission limitation was established for PTI purposes to reflect the uncontrolled annual potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

The uncontrolled annual potential particulate emissions are based upon the respective Permit-to-Install (PTI) 16-635 restricted annual throughputs of sand/stone and cement of 120,000 TPY and 22,000 TPY (See B.1), and the following RACM Table 2.22-1 fugitive dust emission factors (EF):

i. Transfer of sand and stone to elevated bins: EF = 0.04 lb/ton handled;

ii. Pneumatic cement loading: EF = 0.24 lb/ton handled;

iii. Weigh hopper loading: EF = 0.02 lb/ton handled; and

iv. Mixer loading: EF = 0.04 lb/ton handled.

**B. Operational Restrictions**

1. The permittee shall limit annual stone and sand throughput and annual cement throughput to no more than 120,000 TPY and 22,000 TPY, respectively.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain annual records, on a calendar year basis, of the sand and stone, and cement throughputs for this emissions unit.
2. The permittee shall perform daily checks for any visible particulate emissions from the fabric filter control system for the cement silo(s), cement weigh hopper and the tilt mixer, while the silo(s), weigh hopper, and mixer are in operation. The presence or absence of any visible emissions from the fabric filter control system shall be noted in an operations log. If any visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each calendar year that documents an exceedance of the annual throughput limitations for sand and stone, and cement. These reports shall be submitted by January 31 of each year to the Director (District Office or local air agency).
2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the fabric filter control system and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
20% opacity as a 3-minute average  
Applicable Compliance Method:  
OAC rule 3745-17-03(B)(3)  
Emission Limitation:  
0.030 gr/dscf of particulates  
Applicable Compliance Method:  
If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(7).  
Emission Limitation:  
no visible emissions  
Applicable Compliance Method:  
Compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(4).  
Emission limitation:  
9.30 tpy of particulates

## Applicable Compliance Method:

Compliance shall be determined by totalling the following products:

## i. Sand and stone transfer to elevated bin:

The maximum annual handling rate of 120,000 TPY is multiplied by the RACM fugitive dust emission factor, 0.04 lb/ton, and divided by 2000 lbs/ton, resulting in an uncontrolled emissions rate of 2.40 TPY.

## ii. Cement unloading to elevated silo (pneumatic):

The maximum annual handling rate of 22,000 TPY is multiplied by the RACM fugitive dust emission factor, 0.24 lb/ton, and divided by 2000 lbs/ton, resulting in an uncontrolled emissions rate of 2.64 TPY.

## iii. Weigh hopper loading:

The maximum annual handling rate of 142,000 TPY (sand, stone, and cement combined) is multiplied by the RACM fugitive dust emission factor, 0.02 lb/ton, and divided by 2000 lbs/ton, resulting in an uncontrolled emissions rate of 1.42 TPY.

## iv. Mixer loading (central mix):

The maximum annual handling rate of 142,000 TPY (sand, stone, and cement combined) is multiplied by the RACM fugitive dust emission factor, 0.04 lb/ton, and divided by 2000 lbs/ton, resulting in an uncontrolled emissions rate of 2.84 TPY.

F. **Miscellaneous Requirements**

1. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the source(s).
2. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit is subject to public disclosure in accordance with OAC rule 3745-49-03.