



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

8/25/2008

DOUGLAS M REXROAD II, HS&E
ARROW CONCRETE CO
PO BOX 4336
PARKERSBURG, WV 26104-4336

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125042481
Permit Number: P0083312
Permit Type: Renewal
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
ARROW CONCRETE CO**

Facility ID: 0125042481
Permit Number: P0083312
Permit Type: Renewal
Issued: 8/25/2008
Effective: 8/25/2008
Expiration: 8/25/2018



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
ARROW CONCRETE CO

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Final Permit-to-Install and Operate
Permit Number: P0083312
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Authorization

Facility ID: 0125042481
Application Number(s): A0013675
Permit Number: P0083312
Permit Description: Concrete batch plant with roadways and storage piles
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/25/2008
Effective Date: 8/25/2008
Expiration Date: 8/25/2018
Permit Evaluation Report (PER) Annual Date: February 15, for January 1 - December 31
This document constitutes issuance to:

ARROW CONCRETE CO
816 McKinley Avenue
Columbus, OH 43222

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Chris Korleski
Director



Authorization (continued)

Permit Number: P0083312
Permit Description: Concrete batch plant with roadways and storage piles

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:	Gravel and sand aggregate storage
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Paved Roadways
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	PP# concrete batch plant
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0083312

Facility ID: 0125042481

Effective Date: 8/25/2008

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 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 Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0083312

Facility ID: 0125042481

Effective Date: 8/25/2008

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.



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Final Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0083312

Facility ID: 0125042481

Effective Date: 8/25/2008

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.



State of Ohio Environmental Protection Agency
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Final Permit-to-Install and Operate

Permit Number: P0083312

Facility ID: 0125042481

Effective Date: 8/25/2008

C. Emissions Unit Terms and Conditions



1. F001, Gravel and sand aggregate storage

Operations, Property and/or Equipment Description:

Aggregate storage with load in and load out

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 operations(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. 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) (PTI 01-08474)	Particulate emissions shall not exceed 0.10 ton/yr from load-in and load-out to storage piles, and from wind erosion of storage piles. No visible emissions of fugitive dust except for a period of one minute in any hour, during load-in and load-out to storage piles, and from wind erosion of storage piles. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See (2)b thru and (2)f, below.
b.	OAC rule 3745-17-07 (B)(6)	See (2)g



(2) Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

Sand and aggregate storage piles

- b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to wet suppression to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- d. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to wet suppression to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.
- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
Sand and aggregate piles	Daily

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
Sand and aggregate piles	Daily

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

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
Sand and aggregate piles	Daily

- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

- (6) The permittee 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.

- (7) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;



- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter

e) Reporting Requirements

- (1) 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 permit evaluation report 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 emission limitations in this permit shall be determined in accordance with the following methods :

a. Emission Limitation:

No visible emissions of fugitive dust except for a period of one minute in any hour period.

Applicable Compliance Method:

If required, compliance with the visible emission 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), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in '60.672, including reports of opacity observations made using Method 9.

b. Emission Limitation:

Particulate emissions shall not exceed 0.10 ton/yr

Applicable Compliance Method:

Storage piles compliance shall be determined by using the emission factor equation (AP-42, 13.2.4, 1/95) and multiplying by the maximum hourly and annual production and multiplying by the percentage of emissions that will be



uncontrolled. The result of multiplying the emission factor, annual production, and uncontrolled efficiency percentage is then divided by 2,000 pounds per ton.

Aggregate storage

Assumptions/emission factors:

Maximum hourly production - 85 tons/hr (application, 9/28/01)

Maximum annual production - 68,000 tons/yr (application, 9/28/01)

Silt content - 1.5

Acres of surface area - 0.05

Control efficiency - 50% (RACM, 2.22-3, 1983)

Storage piles: $K * 0.0032 * (U/5)^{1.3} / (M/2)^{1.4} = \text{lb/ton}$ (AP 42, 13.2.4, 1/95)

$K = 0.74$ TSP $U = 8.7$ MPH (National Weather Service) $M = 2.4$ % moisture content of topsoil (application, 9/28/01)

$$0.74 * 0.0032 * (8.7/5)^{1.3} / (2.4/2)^{1.4} = 0.0038 \text{ lb/ton TSP}$$

$$0.0038 \text{ lb/ton} * 85 \text{ tons/hr} * [(100-50)/100] = 0.16 \text{ lb/hr}$$

$$0.0038 \text{ lb/ton} * 68,000 \text{ tons/yr} / 2,000 \text{ lbs/ton} * [(100-50)/100] = 0.065 \text{ ton/yr}$$

Sand storage

Assumptions/emission factors

Maximum hourly production - 65 tons/hr

Maximum annual production - 52,000 tons/yr

Silt content - 0.7

Acres of surface area - 0.04

Control efficiency - 50% (RACM, 2.22-3, 1983)

Storage piles: $K * 0.0032 * (U/5)^{1.3} / (M/2)^{1.4} = \text{lb/ton}$ (AP 42, 13.2.4, 1/95)

$K = 0.74$ TSP $U = 8.7$ MPH (National Weather Service) $M = 3.0\%$ moisture content of topsoil (AP-42, 13.2.4-1, 1/95)

$$0.74 * 0.0032 * (8.7/5)^{1.3} / (3.0/2)^{1.4} = 0.0028 \text{ lb/ton TSP}$$

$$0.0028 \text{ lb/ton} * 65 \text{ tons/hr} * [(100-50)/100] = 0.089 \text{ lb/hr}$$

$$0.0028 \text{ lb/ton} * 52,000 \text{ tons/yr} / 2,000 \text{ lbs/ton} * [(100-50)/100] = 0.036 \text{ ton/yr}$$

$$\text{Total for F001} : 0.16 \text{ lb/hr} + 0.089 \text{ lb/hr} = 0.25 \text{ lb/hr}$$



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$0.065 \text{ ton/yr} + 0.036 \text{ ton/yr} = 0.10 \text{ ton/yr}.$

g) Miscellaneous Requirements

(1) None.



2. F002, Paved Roadways

Operations, Property and/or Equipment Description:

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 operations(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. 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) (PTI 01-08474)	Particulate emissions shall not exceed 1.83 tons/yr. No visible particulate emissions from roadways except for a 3 minute period during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust See (2)e through (2)h
b.	OAC rule 3745-17-07 (B)(5)	See (2)i
c.	OAC rule 3745-17-08 (B)(2)	See (2)i

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways by



water truck and sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways 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 shoulders of all paved roadways with water truck(s) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways with water truck(s) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. 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 with the control measure(s) specified above 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.
- f. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.



- i. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All paved roadways	Daily
<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All unpaved roadways	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 appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
 - (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for the paved roadways and the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.



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 permit evaluation report 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 emission limitations in this permit shall be determined in accordance with the following methods :

a. Emission limitation:

Particulate emissions shall not exceed 1.83 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated by utilizing the emission factor equation for paved roadways (AP-42 13.2.1, 9/98) - $E = [k (sL/2)^{0.65} (W/3)^{1.5}]$. This equation yields the emission factor that is multiplied by the total vehicle miles traveled/year on the unpaved roadways, divided by 2,000 pounds per ton and then multiplied by the percentage of uncontrolled emissions.

Assumptions/emission factors:

Paved roadways - 600 feet

Average load weight - 27 tons

Vehicular traffic - 10,000 VMT/yr

Control efficiency - 90% (RACm, 2.1.1-3, 1983)

Paved service road (controlled with BAT requirements):

Emission factor equation (AP-42 13.2.1, 9/98) - $E = [k (sL/2)^{0.65} (W/3)^{1.5}]$

Where:

E = size-specific emission factor (lb/VMT)

k = base emission factor for PM-30 (0.082 - AP-42, Table 13.2.1-1)

sL = road surface silt loading [$21.3 (avg. daily traffic * 100)^{-0.41} = 4.3 g/m^2$]

W = average weight of vehicles (27 tons)

Paved roads (controlled - required as BAT)

$$E = 0.082 * (4.3/2)^{0.65} * (27/3)^{1.5}$$



$$E = 0.082 * 1.65 * 27$$

$$E = 3.65 \text{ lbs/VMT}$$

$$\text{TSP} = 3.65 \text{ lbs/VMT} * 10,000 \text{ VMT/yr} / 2,000 \text{ lbs/ton} * [(100-90)/100] = 1.83 \text{ tons/yr}$$

b. Emission limitation:

No visible particulate emissions except for 3 minutes during any 60-minute period.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



3. P001, PP# concrete batch plant

Operations, Property and/or Equipment Description:

Elevated bins, auxillary silos and batcher with loading of sand and gravel into weigh hopper

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 operations(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. 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
<i>(Transfer of Sand and Aggregate to Elevated Bins)</i>		
a.	OAC rule 3745-31-05(A)(3) (PTI 01-08474)	Particulate emissions (PE) shall not exceed 15.24 tons/yr. Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a 3-minute average. Sand and aggregate loaded into the elevated bins shall, at all times, have an inherent moisture content sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)c.
<i>(Portland Cement, Fly Ash and Slag Silos)</i>		



b.	OAC rule 3745-31-05(A)(3) (PTI 01-08474)	PE shall not exceed 3.3 tons/yr. The fabric filter shall achieve an outlet emission rate of not greater than 0.020 grain of particulate emissions per dry standard cubic feet of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent. See b)(2)c.
c.	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	See b)(2)a.
d.	OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	See b)(2)b.
<i>(Weigh Hopper Loading of Cement, Fly Ash, Slag, and possibly Sand and Aggregate)</i>		
e.	OAC rule 3745-31-05(A)(3) (PTI 01-08474)	PE shall not exceed 6.3 tons/yr. 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.
f.	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	See b)(2)a.
g.	OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	See b)(2)b.
<i>(Truck Loading of Aggregate, Sand, Cement and Cement Supplement)</i>		
h.	OAC rule 3745-31-05(A)(3) (PTI 01-08474)	PE shall not exceed 0.09 ton/yr. 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 the 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 a this facility is not expected to generate visible particulate emissions.
- f. The annual emission limitations were established to reflect the potential to emit (PTE) for this emissions unit. Therefore, it is not necessary to develop additional record keeping and/or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

- (1) The maximum hourly production rate for this central mix concrete facility shall not exceed 240 tons per hour.



- (2) Water shall be applied at all points necessary to ensure compliance with the visible emission limitations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records indicating the number of tons of concrete produced.
- (2) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies::

<u>material handling operation(s)</u>	<u>inspection frequency</u>
Transfer of sand and aggregate	Daily
Batcher and auxiliary silos	Daily
Weigh hopper loading of sand and aggregate	Daily

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- (3) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (4) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (5) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in (5).d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 permit evaluation report 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 emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission limitation:

Particulate emissions shall not exceed 25.3 tons/yr

Applicable Compliance Method:

Compliance shall be demonstrated by utilizing the emission factors and equations from AP-42, Chapter 11, Section 12, 1/95 as follows:

Sand and aggregate transfer to elevated storage bin

Assumptions/emission factors:

Maximum hourly production - 240 tons of sand and aggregate/hr (application - 9/28/01)

Maximum annual production (PTE - 240 tons/hr * 8,760 hrs/yr) - 2,102,400 tons/yr

Emission factor (AP-42, Chapter 11, Section 12, 1/95) - 0.029 lb/ton of sand and aggregate

Control Efficiency (wet suppression) - 50% (RACM Section 2.22, Table 2.22-3, 1983)

PTE calculations:

$240 \text{ tons/hr} * 8,760 \text{ hrs/yr} * 0.029 \text{ lb/tons} / 2,000 \text{ lbs/ton} * [(100-50)/100] = 15.24 \text{ tons/yr}$

Sand and aggregate weigh hopper loading

Assumptions/emission factors:

Maximum hourly production - 240 tons of sand and aggregate/hr (application - 9/28/01)

Maximum annual production (PTE - 240 tons/hr * 8,760 hrs/yr) - 2,102,400 tons/yr

Emission factor (AP-42, Chapter 11, Section 12, 1/95) - 0.020 lb/ton of sand and aggregate



Control Efficiency (wet suppression) - 70% (RACM Section 2.22, Table 2.22-3, 1983)

PTE calculations:

$240 \text{ tons/hr} * 8,760 \text{ hrs/yr} * 0.020 \text{ lb/tons} / 2,000 \text{ lbs/ton} * [(100-70)/100] = 6.31 \text{ tons/yr}$

Cement silo loading

Assumptions/emission factors:

Maximum hourly production - 56 tons of cement/hr

Maximum annual production (PTE - 56 tons/hr * 8,760 hrs/yr) - 490,560 tons/yr

Emission factor (AP-42, Chapter 11, Section 12, 1/95) - 0.270 lb/ton of cement

Control efficiency (fabric filter) - 95% (application, 1/25/01)

PTE calculations:

$56 \text{ tons/hr} * 8,760 \text{ hrs/yr} * 0.270 \text{ lb/ton} / 2,000 \text{ lbs/ton} * [(100-95)/100] = 3.3 \text{ tons/yr}$

Cement weigh hopper loading

Assumptions/emission factors:

Maximum hourly production - 52 tons of cement/hr

Maximum annual production (PTE - 52 tons/hr * 8,760 hrs/yr) - 455,520 tons/yr

Emission factor (AP-42, Chapter 11, Section 12, 1/95) - 0.020 lb/ton of cement

Control efficiency (fabric filter) - 95%

PTE calculations:

$52 \text{ tons/hr} * 8,760 \text{ hrs/yr} * 0.020 \text{ lb/ton} / 2,000 \text{ lbs/ton} * [(100-95)/100] = 0.23 \text{ ton/yr}$

Cement loading into transit mixer (concrete trucks)

Assumptions/emission factors:

Maximum hourly production - 240 tons of cement/hr (application - 9/28/01)

Maximum annual production (PTE - 240 tons/hr * 8,760 hrs/yr) - 490,560 tons/yr

Emission factor (AP-42, Chapter 11, Section 12, 1/95) - 0.020 lb/ton of cement

Control efficiency (fabric filter) - 99.6% (application - 9/28/01)



PTE calculations:

$$240 \text{ tons/hr} * 8,760 \text{ hrs/yr} * 0.020 \text{ lb/ton} / 2,000 \text{ lbs/ton} * [100-99.6/100] = 0.09 \text{ tons/yr}$$

Sand and aggregate loading into transit mixers (concrete trucks)

Assumptions/emission factors:

Maximum hourly production - 240 tons of cement/hr

Maximum annual production (PTE - 240 tons/hr * 8,760 hrs/yr) - 2,733,120 tons/yr

Emission factor (AP-42, Chapter 11, Section 12, 1/95) - 0.020 lb/ton of cement

Control efficiency (fabric filter) - 99.6% (application, 9/28/01)

PTE calculations:

$$240 \text{ tons/hr} * 8,760 \text{ hrs/yr} * 0.020 \text{ lb/ton} / 2,000 \text{ lbs/ton} * [100-99.6/100] = 0.09 \text{ ton/yr}$$

Total particulate emissions for P001:

$$15.24 \text{ tons/yr} + 6.31 \text{ tons/yr} + 3.3 \text{ tons/yr} + 0.23 \text{ ton/yr} + 0.09 \text{ ton/yr} + 0.09 \text{ ton/yr} = 25.26 \text{ tons/yr}$$

b. 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 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 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 permitting Ohio EPA District Office or local air agency, 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 permitting Ohio EPA District Office or local air agency, 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 has 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 this 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 permitting Ohio EPA District Office or local air agency, 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0083312

Facility ID: 0125042481

Effective Date: 8/25/2008

source with permitting Ohio EPA District Office or local air agency, and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, permitting Ohio EPA District Office or local air agency, 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.