



State of Ohio Environmental Protection Agency

Summit County

RE: Final Permit to Install

Street
1800 \\
Column

address:

16-1049

Application No: **16-1883**

DATE: **August 4, 1999**

**W.G. Lockhart Construction Company
Richard Stanley
800 West Waterloo Road
Akron, Ohio 44314**

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

Akron Regional Air Quality Mgmt



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Application Number: 16-1883

Permit
Title

APS Premise 1677011013

Number:

Permit Fee: **\$2200**

Name of Facility: W.G. Lockhart Construction Company

Person to Contact: Richard Stanley

Address: 800 West Waterloo Road

Akron, Ohio 44314

Location of proposed air contaminant source(s) [emissions unit(s)]:

800 West Waterloo Road

Akron, Ohio

Description of proposed emissions unit(s):

REX MOBILE 5 600 TON/HR PORTABLE CONCRETE BATCH PLANT.

Date of Issuance: August 4, 1999

Effective Date:

August 4, 1999

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate Matter	3.87

PART II: SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or <u>Equipment</u>	Loading of transit-mix truck	Applicable <u>Rules/Requirements</u>
Rex mobile 5 Portable concrete batch plant		OAC rule 3745-31-05
Transfer of sand and aggregate to elevated bins		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
Cement Silo		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-08(B)(3)(b)
		OAC rule 3745-17-11
Weigh hopper loading of cement, sand and aggregate		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-08(B)(3)(b)
		OAC rule 3745-17-11
		OAC rule 3745-17-07(B)(1)

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OAC rule 3745-17-08(B)

Applicable Emissions
Limitations/Control
Measures

OAC rule 3745-17-11

1.15 lb/hr and 0.35 ton/yr of
particulate emissions from
the equipment below.

See A.2.a below.

See A.2.b through A.2.d
below.

See A.2.a below.

See A.2.b through A.2.d
below.

See A.2.a below.

See A.2.e below.

See A.2.f below.

See A.2.g below.

See A.2.a below.

See A.2.h below.

See A.2.f below.

See A.2.g below.

See A.2.a below.

See A.2.i below.

See A.2.g below

2. Additional Terms and Conditions

- 2.a** The visible particulate emissions from this emissions unit shall not exceed twenty (20) percent opacity as a 3-minute average.
- 2.b** The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) 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 perform the following control measure(s) to ensure compliance:
- i.** 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.
 - ii.** The sand and aggregate 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.

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

- 2.c** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.d** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.e** The permittee shall employ the following reasonably available control measures for the above-identified cement silo loading operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i.** Cement shall be transferred pneumatically to silo no. 1. The pneumatic

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system shall be adequately enclosed so as to eliminate at all time visible emissions of fugitive dust. Any visible emissions of cement dusts emanating from the delivery vehicle during transfer shall be cause for the immediate halt of the unloading process and the refusal of the cement load until the situation is corrected.

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- ii. The cement silo vent shall be adequately enclosed and vented to baghouse no. 1. The enclosure shall be sufficient so as to minimize at all times visible emissions of fugitive dust at the point of capture.
- 2.f Emissions from the outlet of the control equipment serving this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.
- 2.g The limit based on this rule is less stringent than the limit specified above.
- 2.h The permittee shall employ the following reasonably available control measures for the above-identified concrete batching operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements:
 - i. The concrete batching weigh hopper shall be adequately enclosed and the enclosure shall be sufficient so as to eliminate at all times visible emission of fugitive dust.
 - ii. The sand/aggregate weigh hopper transfer conveyor discharge to the concrete batching weigh hopper shall be enclosed and vented to the cement silo. The enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust at the point of capture.
- 2.i The permittee shall employ the following reasonably available control measures for the above-identified mix-truck loading operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements:
 - i. The point at which the transit mix truck is loaded shall be adequately enclosed and the drop height of the cement/sand/aggregate mixture into the truck shall be minimized or controlled by either a telescopic or hooded chute (shroud) so as to minimize or eliminate visible emissions of fugitive dust from this operation.

B. Operational Restrictions

- 1. The maximum annual operating hours for this emissions unit shall not exceed 600 hours.
- 2. The permittee shall regularly maintain the baghouse and fabric filter control equipment associated with this emissions unit in accordance with manufacturers

recommendations. Maintenance shall include regular repair and/or replacement of filters so as to maximize the particulate collection efficiency of this dust control system.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations on a daily basis.
2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
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 operation 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;
 - 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 4.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.

5. The permittee shall maintain records of the amounts of sand, aggregate, and cement processed at this plant so as to be able to determine the actual amount of fugitive dust emissions generated over any annual period. The permittee shall also maintain records of the gross yards (or tonnage) of concrete produced and transported from the facility on a monthly basis for the purpose of determining the annual amount of fugitive dust emitted from this emissions unit. These records shall be kept at the facility and

shall be made available for review by Ohio EPA personnel upon request.

6. The permittee shall inspect the baghouse fabric filter control system serving both the cement silo and the batching operation at least once per week for the purpose of determining the need to maintain, repair, and/or replace any of the filters in the system or any portion of the system electrical controls. A broken or severely worn filter, or worn electrical control components, shall be replaced/repared immediately so as to prevent unnecessary emissions of fugitive dust from this emissions unit. Records of inspections, repairs, and maintenance to this emissions control system shall be noted in a facility log.
7. The permittee shall maintain monthly records of the operating hours for this emission unit.
8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and,
 - e. any corrective actions taken to eliminate the visible emissions.
9. The permittee shall inspect the shroud and chute used to load the sand/aggregate/cement mixture into the concrete mix-trucks on a weekly basis to determine if these devices adequately minimize fugitive dust emissions which arise during the loading of the mix-trucks. If either the shroud or the chute is excessively worn, they should be replaced immediately so as to minimize fugitive dust emissions from this emissions unit. The results of this inspection and any maintenance which is performed as a result of this inspection should be noted in a facility log.

D. Reporting Requirements

1. The permittee shall submit annual reports of the total operating hours for this emissions unit. 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 semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day or week during which an inspection was not performed by the required frequency; and,
 - b. each instance when a control measure, repair, or maintenance function that was to be performed as a result of an inspection, was not implemented.

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4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance Methods

Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s):

- a.** Emission limitation-
1.15 lbs/hr of particulate

Based on application data, a maximum hourly design production capacity for each of the four concrete plant operations is listed below, along with the appropriate uncontrolled particulate emission factor from the AP-42, 5th edition, Table 11.12-2 (1/95):

Applicable Compliance Method-
Compliance shall be determined by totaling the following products:

- i.** Sand and aggregate transfer to elevated bin:

The maximum hourly production rate of 60 tons/hr, is multiplied by the AP-42 emission factor, 0.029 lb/ton. The resulting uncontrolled emissions rate, 1.74 lbs/hr, is then multiplied by a moisture emission control factor of 70% (1 - .70), resulting in a controlled emissions rate of 0.52 lb/hr.

- ii.** Cement unloading to elevated storage silo (pneumatic):

The maximum hourly production rate of 50 tons/hr, is multiplied by the AP-42 emission factor, 0.27 lb/ton. The resulting uncontrolled emission rate, 13.5 lbs/hr, is then multiplied by a fabric filter control factor of 99.8% (1 - .998), resulting in a controlled emission rate of 0.03 lb/hr.

- iii.** Weigh hopper loading:

The maximum hourly production rate of 15 tons/hr, is multiplied by the AP-42 emission factor, 0.02 lb/ton, resulting in an uncontrolled emission rate of 0.3 lb/hr.

- iv.** Mixer loading (transit mix):

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The maximum hourly production rate of 15 tons/hr, is multiplied by the AP-42 emission factor, 0.02 lb/ton, resulting in an uncontrolled emission rate of 0.3 lb/hr.

The lb/hr emissions rate for each of the four areas are summed.

- b.** Emission limitation-
0.35 ton/yr of particulate

Applicable Compliance Method-

The 0.35 ton/yr emissions limitation was developed by multiplying the 1.15 lbs/hr emissions limitation by a maximum annual operating schedule of 600 hrs/yr. Therefore compliance shall be based upon the 12-month summation of the number of operating hours times the 1.15 lb/hr emissions limitation, divided by 2,000 lbs/ton.

- c.** Emission Limitation-
20 percent opacity as a 3-minute average

Applicable Compliance Method-

Compliance with the twenty (20) percent opacity visible emissions limitation, as stipulated in OAC rule 3745-17-07(B)(1), for the transfer of sand and aggregate to elevated bins, cement silo loading operations, the concrete batching operation, and the mix-truck loading operation(s) identified above shall be determined in accordance with Test Method 9 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)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- d.** Emission Limitation-
0.030 gr/dscf

Applicable Compliance Method-

Compliance with the particulate emissions limitation of this permit shall be based on the maximum flow rate of the control device (500 scfm) times the allowable emissions rate of 0.030 grains/dscf particulate matter [per OAC rule 3745-17-08(B)(3)(b)] and the maximum operating schedule of 8760 hours per year. If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5, and in OAC rule 3745-17-03(B)(7).

- e.** Emission Limitation-
no visible emissions

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Applicable Compliance Method-

Compliance with the "no visible emissions" limitation, as stipulated in OAC rule 3745-17-08(B)(3)(b), for both the cement silo loading operation(s) and the concrete batching operations 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.

F. Miscellaneous Requirements

1. Notice to Relocate a Portable or Mobile Source

- a.** Pursuant to Ohio Administrative Code (OAC) rule 3754-31-03 (A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a Permit to Install (PTI) providing the following criteria are met:
- i.** the portable emissions unit is equipped with the best available control technology for such portable emission unit;
 - ii.** the portable emissions unit is operating pursuant to a currently effective Permit to Operate (PTO);
 - iii.** the applicant has provided proper notice of intent to relocate the portable emissions unit to the Akron Regional Air Quality Management District (ARAQMD) and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and,
 - iv.** in the ARAQMD's and the appropriate field offices's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.
- b.** In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:
- i.** the portable emissions unit permittee possesses an Ohio Environmental Protection Agency (Ohio EPA) PTI, PTO or Registration Status;
 - ii.** the portable emissions unit is equipped with best available technology;
 - iii.** the portable emissions unit owner has identified the proposed site to Ohio EPA;
 - iv.** Ohio EPA has determined that the portable emissions unit, at the

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proposed site, will have an acceptable environmental impact;

- v. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
- vi. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and,
- vii. the portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.

- c. Any site approvals issued by the Ohio EPA, pursuant to F.1.a or F.1.b above, shall be valid for no longer than three years and are subject to renewal.

In order for the ARAQMD 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 or mobile emissions unit must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the ARAQMD (146 S. High Street, Suite 904, Akron, OH 44308) and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the ARAQMD, and/or 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 Environmental Protection Agency approval prior to relocation of the emissions unit may result in fines and civil penalties.

2. 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 emissions unit.
3. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

PART II: SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
Portable concrete batch plant--sand and aggregate material storage piles: load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	1.0 ton/yr of particulate emissions. no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
Portable concrete batch plant--sand and aggregate material storage piles: wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)
Portable concrete batch plant--sand and aggregate material storage piles: load-in and load-out of storage piles, and wind erosion from storage piles	OAC rule 3745-17-07 (B)(6) OAC rule 3745-17-08 (B), (B)(6)	less stringent than the above-mentioned visible emission limitation less stringent than the above-mentioned control measure requirements

2. Additional Terms and Conditions

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

One sand pile and two limestone piles

- 2.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 using wind guard - block enclosures, and reducing drop height of front-end loader buckets to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.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.
- 2.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 maintenance of as low of a pile height as possible to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.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.
- 2.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.

B. Operational Restrictions

None

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C. 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:

All on a daily basis.

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:

All on a daily basis.

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:

All on a daily basis.

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.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance Methods

Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission limitation-
1.0 ton per year of particulate

Based on application data, maximum hourly load-in and load-out rates, mean wind speed, and material moisture content for each of the sand and aggregate material storage piles are listed below, along with the appropriate uncontrolled particulate emission factor for aggregate handling and storage piles from the AP-42, 5th edition, Chapter 13, section 13.2.4 (1/95), equation (1): The emission factors are calculated as follows:

$$E = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4}$$

where:

E = emission factor (pound [lb]/ton)

k = particle size multiplier (dimensionless) = 0.74 for total suspended particulates

U = mean wind speed (miles per hour) = 9.9

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M = material moisture content (%) = 5 for concrete sand; 0.5 for limestone

E = 0.0016 lb/ton of sand

E = 0.04 lb/ton of limestone

Applicable Compliance Method-
Compliance shall be determined by taking the annual load in/ load out amount (in tons) as required in Part II of emissions unit P901, term (C)(5) of these terms and conditions and multiplying it by the following equation:

$$\text{ton PM/yr} = \frac{\text{sand} * 2 * 0.0016 \text{ lb/ton} + \text{limestone} * 4 * 0.04 \text{ lb/ton}}{2000 \text{ lb/ton}}$$

where:

sand = annual amount of sand used, in tons.

2 = conversion factor to account for load in and load out.

limestone = annual amount of sand used, in tons.

4 = conversion factor to account for load in and load out of two piles.

2. 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.

F. Miscellaneous Requirements

None.

PART II: SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or <u>Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Portable concrete batch plant--unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-31-05	2.52 ton/yr of particulate emissions.
	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 3 minutes during any 60-minute period
	OAC rule 3745-17-08(B)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)
	OAC rule 3745-17-07(B)(5)	less stringent than the above-mentioned visible emission limitation
	OAC rule 3745-17-08(B)	less stringent than the above-mentioned control measure requirements

2. Additional Terms and Conditions

- 2.a The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

Unpaved roadways: access drive to portable concrete batch plant

Unpaved parking areas: employee parking area

- 2.b 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 and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.
- 2.e** 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.
- 2.f** 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.
- 2.g** 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.
- 2.h** The use of used oil as a dust suppressant is prohibited per OAC rule

3745-279-82.

B. Operational Restrictions

1. A maximum speed limit of ten (10) miles per hour for vehicular traffic shall be posted and enforced on the roadways and parking areas of this facility.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:
 - a. All unpaved roadways shall be inspected daily.
 - b. All unpaved parking areas shall be inspected daily.

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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 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,

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- b.** each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- 2.** The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance Methods

Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission limitation-
2.52 ton/yr of particulate

Based on application data, surface type, silt content, mean vehicle weight, and total vehicle miles traveled are listed below, along with the appropriate uncontrolled particulate emission factor for unpaved surfaces from the AP-42, 5th edition, Chapter 13, section 13.2.2 (9/98), equation (1): The emission factor is calculated as follows:

$$E = k * (s/12)^a * (w/3)^b / (M/0.2)^c$$

where:

E = size-specific emission factor (lb/vehicle miles traveled [VMT])

k = 10

a = 0.8

b = 0.5

c = 0.4

s = surface material silt content (%) = 2.5

w = mean vehicle weight (tons) = 20

M = surface material moisture content (%) = 0.03 (worst case from Table 13.2.2-3)

VMT = 320 per year

$$E = 15.72 \text{ lbs/VMT}$$

Applicable Compliance Method-

Compliance shall be determined by multiplying the size-specific emission factor by the VMT, and dividing by 2,000 lbs/ton, resulting in an emission rate of 2.52 ton/yr.

2. 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

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"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.

F. Miscellaneous Requirements

None.