



State of Ohio Environmental Protection Agency

**Summit County**

**RE: Final Permit to Install**

Street  
1800 \\  
Column

address:

16-1049

Application No: **16-1932**

DATE: **July 8, 1999**

**S&S Aggregate - Plant #9**  
**Larry E. Young**  
**P.O. Box 1585**  
**Zanesville, OH 43702**

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**



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Application Number: 16-1932

Per  
Title

APS Premise 1677020094

Number:

Permit Fee: **\$600.00**

Name of Facility: S&S Aggregate - Plant #9

Person to Contact: Larry E. Young

Address: P.O. Box 1585

Zanesville, OH 43702

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

**691 S. VAN BUREN STREET  
BARBERTON, OH**

Description of proposed emissions unit(s):

**AGGREGATE PLANT #9.**

Date of Issuance: July 8, 1999

Effective Date:

July 8, 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

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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>
PM <sub>10</sub>	3.04

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**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>
200 TPH Aggregate processing plant #9 with washing system	OAC rule 3745-31-05
Crushing and screening operations - primary vibrating wet screen, secondary cage mill, and secondary vibrating washing screen	OAC rule 3745-31-05
Material handling - conveyor transfer points (9 belt conveyors) - sand pump, slurry box, and sand classifier	OAC rule 3745-17-07 OAC rule 3745-17-08
	40 CFR Part 60 Subpart OOO

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-31-05	<p>3.04 tpy PM<sub>-10</sub> See A.2.a below.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Section A.2.b below.)</p> <p>See A.2.h below.</p> <p>See A.2.h below.</p>	<p>production line up to the next crusher, grinding mill, or storage bin (see Section A.2.g).</p> <p>10% opacity as a 3-minute average (dredge dumping onto slurry box)</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Section A.2.b below.)</p> <p>See A.2.h below.</p> <p>See A.2.h below.</p>
OAC rule 3745-17-07	<p>No permittee shall cause to be discharged into the atmosphere from any crusher, at which a capture system is not used,</p>	<p>No permittee shall cause to be discharged into the atmosphere from any transfer point any</p>
OAC rule 3745-17-08	<p>fugitive emissions which exhibit greater than 15 percent opacity.(see Section A.2.g).</p>	<p>fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).</p>
40 CFR Part 60 Subpart OOO	<p>No permittee shall cause to be discharged into the atmosphere from any screening operation any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).</p>	<p>No permittee shall cause to be discharged into the atmosphere any visible emissions from wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production line up to the next crusher, grinding mill, or storage bin (see Section A.2.g).</p>
	<p>No permittee shall cause to be discharged into the atmosphere any visible emissions from wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the</p>	

## **2. Additional Terms and Conditions**

- 2.a** The 3.04 tpy PM<sub>10</sub> limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust from emissions unit F001. If the inherent moisture in the sand and gravel is not sufficient to comply with the opacity restrictions of this permit, the permittee shall install equipment to apply water, or any other suitable dust suppressant, at appropriate locations in the production line.
- 2.c** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Dredge - SB1 slurry box  
SB1 slurry box - S1 wet screen  
S1 wet screen - C1 conveyor  
C1 conveyor - CR1 crusher  
CR1 crusher - C2 conveyor  
C2 conveyor - SB1 slurry box  
S1 wet screen - SP1 sand pump  
SP1 sand pump - SC1 sand classifier  
S1 wet screen - C3 conveyor  
C3 conveyor - S2 washing screen  
S2 washing screen - C4 conveyor  
C4 conveyor - C5 conveyor  
S2 washing screen - C6 conveyor  
C6 conveyor - C7 conveyor  
S2 washing screen - C8 conveyor  
C8 conveyor - C9 conveyor

- 2.d** The permittee shall employ best 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:

material handling operation(s)

control measure(s)

dredge dumping onto slurry box                      maintain a low drop height and a high moisture content for the material being processed

all conveyors and transfer points                      maintain a high moisture content for the material being processed or employ wet screening

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

- 2.e 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.f 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 3745-31-05.
- 2.g Compliance with the opacity limitations shall have been achieved on and after the sixtieth day after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup.
- 2.h The emissions limit based on this applicable rule is less stringent than the limit established pursuant to either OAC rule 3745-31-05 or 40 CFR 60 Subpart OOO.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

1. 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 crushing and screening operations. 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.
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:

material handling operation(s)      minimum inspection frequency



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which any visible particulate emissions were observed from the crushing and screening operations 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.

4. The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR Part 60, Subpart OOO, including the reports of opacity observations made using Method 9 to demonstrate compliance with this subpart.
5. The permittee of any screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to the no visible emission limit and subsequently processes unsaturated materials, shall submit a report of this change within 30 days following such change. This screening operation, bucket elevator, or belt conveyor is then subject to the 10 percent opacity limit and the emission test requirements of Section 60.11 of 40 CFR Part 60, subpart A and 40 CFR Part 60, subpart OOO. Likewise a screening operation, bucket elevator, or belt conveyor that processes unsaturated material but subsequently processes saturated material shall submit a report of this change within 30 days following such change. This screening operation, bucket elevator, or belt conveyor is then subject to the no visible emission limit.
6. The permittee shall submit the following information for each piece of equipment that is replaced by a piece of equipment of equal or smaller size having the same function as the existing facility:
  - a. for a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:
    - i. the rated capacity in tons per hour of the existing facility being replaced, and
    - ii. the rated capacity in tons per hour of the replacement equipment;
  - b. for a screening operation:
    - i. the total surface area of the top screen of the existing screening operation being replaced, and
    - ii. the total surface area of the top screen of the replacement screening operation;
  - c. for a conveyor belt:
    - i. the width of the existing belt being replaced, and

- ii. the width of the replacement conveyor belt; and
- d. for a storage bin:
  - i. the rated capacity in tons of the existing bin being replaced, and
  - ii. the rated capacity in tons of replacement storage bins.

The notification shall be submitted within 30 days after equipment replacement.

7. The permittee shall submit a notification of the actual date of initial startup of each affected facility to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

**E. Testing Requirements**

- 1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days after the final issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with opacity emission limitations for the primary crusher and the transfer points listed in Section A.2.c of these terms and conditions with an emission limitation of 10% opacity and subject to 40 CFR Part 60, subpart OOO. The emission testing is not required for wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production line up to, but not including the next crusher, grinding mill or storage bin, or for screening operations, bucket elevators, and belt conveyors in the production line downstream of wet mining operations, that process saturated materials up to the first crusher, grinding mill, or storage bin in the production line.
  - c. The following test method(s) shall be employed to demonstrate compliance: for particulate emissions Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A, with the following additions:

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- i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
    - ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
    - iii. For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.
  - d. When demonstrating compliance with the fugitive emissions standard for any crusher at which a capture system is not used as described under Section 60.672(c) of 40 CFR Part 60, subpart OOO, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
    - i. There are no individual readings greater than 15 percent opacity; and
    - ii. There are no more than 3 readings of 15 percent for the 1-hour period.
  - e. When demonstrating compliance with the fugitive emissions standard for the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions with an emission limitation of 10% opacity and subject to 40 CFR Part 60, subpart OOO, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
    - i. There are no individual readings greater than 10 percent opacity; and
    - ii. There are no more than 3 readings of 10 percent for the 1-hour period.
  - f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an

"Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. The initial performance tests required in Sections E.1 through E.4 of these terms and conditions is not required for wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production line up to, but not including the next crusher, grinding mill, or storage bin.
6. 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:**

3.04 tpy PM<sub>-10</sub>

**Applicable Compliance Method:**

Total Emissions =  $\Sigma$  crushing + screening + unloading + transfer points

Crushing: for each crusher, multiply the AP-42 (9/95, Table 11.19.2-2) emission factor of 0.0024 lb PM-10/ton by the maximum process weight rate and divide the result by 2,000.

Screening: for each screen, multiply the AP-42 (9/95, Table 11.19.2-2) emission factor of 0.0084 lb PM-10/ton by the maximum process weight rate and divide the result by 2,000.

Unloading: multiply the AP-42 (9/95, Table 11.19.2-2) emission factor of  $1.6 \times 10^5$  lb PM-10/ton by the maximum process weight rate and divide the result by 2,000.

Conveyor transfer points: for each transfer point, multiply the AP-42 (9/95, Table 11.19.2-2) emission factor of 0.0014 lb PM-10/ton by the maximum process weight rate and divide the result by 2,000.

b. **Emission Limitation:**

10% opacity as a three-minute average  
(dredge dumping onto slurry box)

**Applicable Compliance Method:**

OAC rule 3745-17-03(B)(3)

c. **Emission Limitation:**

15% opacity for crushing operations  
10% opacity for screening operations  
10% opacity for material handling operations

**Applicable Compliance Method:**

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S&S A

PTI A<sub>1</sub>

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Emissions Unit ID: **F001**

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Part 60, Subpart OOO as specified in sections E.1 through E.5 above.

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Emissions Unit ID: **F001**

d. **Emission Limitation:**

no visible particulate emissions

**Applicable Compliance Method:**

Method 22 of 40 CFR Part 60, Appendix A

**F. Miscellaneous Requirements**

None.