OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL MODIFICATION
HAMILTON COUNTY
Application No: 14-06024
Fac ID: 1431403186

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
OOO	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 6/10/2008

Morrow Gravel Company Plant
Daniel Crago
11641 Mosteller Road
Cincinnati, OH 45241

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **HCDES**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-06024

Application Number: 14-06024

Facility ID: 1431403186

Permit Fee: **$0**

Name of Facility: Morrow Gravel Company Plant

Person to Contact: Daniel Crago

Address: 11641 Mosteller Road
Cincinnati, OH 45241

Location of proposed air contaminant source(s) [emissions unit(s)]:
11641 Mosteller Road
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
Administrative modification to PTI 14-06024.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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

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 (i.e., postmarked) quarterly 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) 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

Pollutant	Tons Per Year
PM	8.2
PM10	3.2

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.

Operations, Property, and/or Equipment - (F014) - 400,000 Tons Per Year Portable Recycled Asphalt Processing Plant

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See term and conditions A.2.a.
40 CFR Part 60 Subpart OOO	See terms and conditions A.2.b, A.2.c, A.2.d and A.2.e.
OAC rule 3745-17-07(B)	The emission limitations and opacity restrictions specified by this rule are less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart OOO.
OAC rule 3745-17-08(B)	See terms and conditions A.2.g. and A.2.h.

2. Additional Terms and Conditions

2.a Permit to Install 14-06024 for this air contaminant source takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. The use of water sprays.

2.b Fugitive particulate emissions from any transfer point on belt conveyors and from any other emissions point (excluding crushers and truck dumping) where process materials are not saturated, shall not exceed 10 percent opacity, except as provided by rule 40 CFR 60.672.

2.c Fugitive particulate emissions from any crusher shall not exceed 15 percent opacity.

2.d Fugitive particulate emissions from wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

material in the production line up to the next crusher, grinding mill or storage bin shall not exceed 0 percent opacity.

2.e Fugitive particulate emissions from screening operations, bucket elevators, and belt conveyors in the production line downstream of wet mining operations, where such screening operations, bucket elevators, and belt conveyors process saturated materials up to the first crusher, grinding mill, or storage bin in the production line shall not exceed 0 percent opacity.

2.f The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

2.g Water sprays shall be operated at points necessary to ensure compliance with the visible emission limitations specified in section A.2.b, A.2.c, A.2.d and A.2.e for crushing, transfer points, screening, and conveying operations.

2.h Aggregate product loaded onto trucks shall have a moisture content sufficient to minimize visible emissions of fugitive dust and the loading drop height shall not exceed fifteen (15) feet.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the amount of aggregate processed in emissions unit F014.

D. Reporting Requirements

1. A screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to 40 CFR 60.672(h) and subsequently processes unsaturated material shall submit a report of this change within 30 days following such change to the Hamilton County Department of Environmental Services. This screening operation, bucket elevator, or belt conveyor is then subject to the 10 percent opacity limitation in 40 CFR 60.672(b) and the emission test requirements of 40 CFR 60.11 and 60.675. 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 limitation in 40 CFR 60.672(h).

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

2. The permittee shall notify Hamilton County Department of Environmental Services in writing prior to re-configuration of any aggregate processing and material handling equipment that will increase the maximum hourly production rate from that identified in the PTI application 14-06024, submitted February 14, 2008, for this emissions unit. This notification shall include information sufficient to determine if the proposed re-configuration will comply with the existing permit to install limitations. If the proposed re-configuration will not comply with the existing permit to install limitations, the permittee shall not commence the re-configuration until a permit to install modification is issued.

3. The permittee shall notify Hamilton County Department of Environmental Services in writing prior to the replacement of any existing aggregate processing and material handling equipment of equal or smaller size subject to the requirements of 40 CFR Part 60.670(d). The notification shall include the equipment-specific design and capacity information required in 60.676(a).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emissions Limitations:

      Particulate (PE) emissions from the asphalt processing plant are less than 10 tons per year.

      Particulate emissions ten microns in diameter and less (PM10) from the asphalt processing plant are less than 10 tons per year.

      Applicable Compliance Method:

      The PE and PM10 emissions were calculated by using the emission factors from US EPA AP-42 Fifth Edition, Table 11.19.2-2, dated 8/2004 multiplied by the hourly and annual production rates provided by the facility in PTI application #14-06024, as submitted on February 14, 2008.

F. Miscellaneous Requirements

1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 14-04722 issued on July 8, 1999.

2. At the discretion and following the approval of the Director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI)

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

providing the appropriate notification and exemption requirements have been met. The Director may issue a "Notice of Site Approval" through either of the following scenarios:

a. If future location(s) of the proposed portable source are unknown, the approval to relocate the portable source shall be in acquired in accordance with OAC rule 3745-31-03(A)(1)(p)(i) and the following criteria shall be met:

   i. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination;

   ii. the portable source is operating pursuant to a currently effective PTI and/or a current permit to operate (PTO) and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

   iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;

   iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07 and that the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and

   v. the Director has issued a “Notice of Site Approval”, stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source.

   The portable source can be relocated upon receipt of the Director’s “Notice of Site Approval” for the site; or

b. Pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the Director may issue a “Notice of Site Approval” for any pre-disclosed location(s) if the portable source meets the requirements of OAC rule 3745-31-05(E), as follows:

   i. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination;

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

ii. the portable source is operating pursuant to a currently effective PTI and/or a current permit to operate (PTO) and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

iii. the permittee has identified the proposed site(s) to the permitting District Office or local air agency;

iv. the permitting District Office/local air agency and the District Office/Local air agency having jurisdiction over the new site have determined that the portable source will have an acceptable environmental impact at the proposed site(s);

v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site(s) is/are located;

vi. the owner of the proposed site(s) (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site(s); and

vii. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site. Any site approval(s) 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. 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.

If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or

\\cnas\dapc\prod\attachments\Facilities/1431403186/Permits/116111\517779.wpd

local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

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.

Operations, Property, and/or Equipment - (F015) - Recycled Asphalt Storage Piles

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(B)(6)	There shall be no visible particulate emissions from the material storage piles except for a period of time not to exceed thirteen minutes during any 60-minute observation period.
OAC rule 3745-17-08(B)	See terms and conditions A.2.a through A.2.d.

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably 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 application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

2.c The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

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

2.d The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

B. Operational Restrictions

None

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:

storage pile identification	minimum load-in inspection frequency
all	weekly

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:

storage pile identification	minimum load-out inspection frequency
all	weekly

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:

storage pile identification	minimum wind erosion inspection frequency
all	weekly

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

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

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 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 6.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 quarterly 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.

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

a. Emissions Limitations:

Fugitive Particulate emissions (PE) from the storage piles are less than 10 tons per year.

Fugitive Particulate emissions ten microns or less in diameter (PM10) from the storage piles are less than 10 tons per year.

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Sections 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06).

b. Emission Limitation:

There shall be no visible PE except for a period of time not to exceed thirteen minutes in any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”).

F. Miscellaneous Requirements

1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 14-04722 issued on July 8, 1999.

2. At the discretion and following the approval of the Director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate notification and exemption requirements have been met. The Director may issue a "Notice of Site Approval" through either of the following scenarios:

   a. If future location(s) of the proposed portable source are unknown, the approval to relocate the portable source shall be in acquired in accordance with OAC rule 3745-31-03(A)(1)(p)(i) and the following criteria shall be met:

      i. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination;

\\cnas\dapc\prod\attachments\Facilities/1431403186/Permits/116111\517779.wpd

ii. the portable source is operating pursuant to a currently effective PTI and/or a current permit to operate (PTO) and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;

iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07 and that the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and

v. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site; or

b. Pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the Director may issue a "Notice of Site Approval" for any pre-disclosed location(s) if the portable source meets the requirements of OAC rule 3745-31-05(E), as follows:

i. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination;

ii. the portable source is operating pursuant to a currently effective PTI and/or a current permit to operate (PTO) and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

iii. the permittee has identified the proposed site(s) to the permitting District Office or local air agency;

iv. the permitting District Office/local air agency and the District Office/Local air agency having jurisdiction over the new site have determined that the portable source will have an acceptable environmental impact at the proposed site(s);

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site(s) is/are located;

vi. the owner of the proposed site(s) (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site(s); and

vii. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site. Any site approval(s) 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. 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.

If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

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.

Operations, Property, and/or Equipment - (F016) - Roadways and Parking Areas

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from the roadways and parking areas except for a period of time not to exceed thirteen minutes during any 60-minute observation period.
OAC rule 3745-17-08(B)	See terms and conditions A.2.a through A.2.d.

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably available control measures on all roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b 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 roadways and parking areas that are 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.c 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.d 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.

\\cnas\dapc\prod\attachments\Facilities/1431403186/Permits/116111\517779.wpd

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

roadways and parking areas	minimum inspection frequency
all roads and parking areas	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 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 3.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:

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

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 with the emission limitations in section A.I.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

Fugitive Particulate emissions (PE) from the roadways and parking areas are less than 10 tons per year.

Fugitive Particulate emissions ten microns or less in diameter (PM10) from the roadways and parking areas are less than 10 tons per year.

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways (worst case) multiplied by 50% reduction for watering. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used.

b. Emission Limitation:

No visible PE from roadways and parking areas except for a period of time not to exceed thirteen minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

F. Miscellaneous Requirements

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 14-04722 issued on July 8, 1999.

2. At the discretion and following the approval of the Director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate notification and exemption requirements have been met. The Director may issue a "Notice of Site Approval" through either of the following scenarios:

   a. If future location(s) of the proposed portable source are unknown, the approval to relocate the portable source shall be in acquired in accordance with OAC rule 3745-31-03(A)(1)(p)(i) and the following criteria shall be met:

      i. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination;

      ii. the portable source is operating pursuant to a currently effective PTI and/or a current permit to operate (PTO) and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

      iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;

      iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07 and that the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and

      v. the Director has issued a “Notice of Site Approval”, stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source.

      The portable source can be relocated upon receipt of the Director’s “Notice of Site Approval” for the site; or

   b. Pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the Director may issue a “Notice of Site Approval” for any pre-disclosed location(s) if the portable source meets the requirements of OAC rule 3745-31-05(E), as follows:

\\cnas\dapc\prod\attachments\Facilities/1431403186/Permits/116111\517779.wpd

i. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination;

ii. the portable source is operating pursuant to a currently effective PTI and/or a current permit to operate (PTO) and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

iii. the permittee has identified the proposed site(s) to the permitting District Office or local air agency;

iv. the permitting District Office/local air agency and the District Office/Local air agency having jurisdiction over the new site have determined that the portable source will have an acceptable environmental impact at the proposed site(s);

v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site(s) is/are located;

vi. the owner of the proposed site(s) (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site(s); and

vii. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site. Any site approval(s) 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. 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.

If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

\\cnas\dapc\prod\attachments\VFacilities/1431403186/Permits/116111\517779.wpd

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 14-06024 Facility ID: 1431403186

FACILITY NAME Morrow Gravel Company Plant

FACILITY DESCRIPTION Administrative modification to PTI 14-06024 CITY/TWP Cincinnati

SIC CODE 1411 SCC CODE 30500204 EMISSIONS UNIT ID F014

EMISSIONS UNIT DESCRIPTION 400,000 Tons Per Year Portable Recycled Asphalt Processing Plant

DATE INSTALLED 1999

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.6 lb/hr	0.6	0.6 lb/hr	0.6
PM_{10}	Attainment	0.24 lb/hr	0.24	0.24 lb/hr	0.24
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? OOO NESHAP? No PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
NA - Less than 10 TPY.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 14-06024 Facility ID: 1431403186

FACILITY NAME Morrow Gravel Company Plant

FACILITY DESCRIPTION Administrative modification to PTI 14-06024 CITY/TWP Cincinnati

SIC CODE 1411 SCC CODE 30500203 EMISSIONS UNIT ID F015

EMISSIONS UNIT DESCRIPTION Recycled Asphalt Storage Piles

DATE INSTALLED 1999

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment		5.08		5.08
PM_{10}	Attainment		2.45		2.45
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
NA - Less than 10 TPY.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 14-06024 Facility ID: 1431403186

FACILITY NAME Morrow Gravel Company Plant

FACILITY DESCRIPTION Administrative modification to PTI 14-06024 CITY/TWP Cincinnati

SIC CODE 1411 SCC CODE 2270002051 EMISSIONS UNIT ID F016

EMISSIONS UNIT DESCRIPTION Roadways and Parking Areas

DATE INSTALLED 1999

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment		2.52		2.52
PM_{10}	Attainment		0.51		0.51
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
NA - Less than 10 TPY.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

\\cnas\dapc\prod\attachments\/Facilities/1431403186/Permits/116111\517779.wpd