



State of Ohio Environmental Protection Agency

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Lazarus Gov. Center
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P.O. Box 1049
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RE: FINAL PERMIT TO INSTALL

SUMMIT COUNTY

Application No: 16-02514

Fac ID: 1677080040

DATE: 2/21/2008

Hanson Pipe and Products Macedonia Plant
Chris Ann Gahagan
2900 Terminal Ave
Richmond, VA 23234

CERTIFIED MAIL

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

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 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

ARAQMD



Permit To Install
Terms and Conditions

Issue Date: 2/21/2008
Effective Date: 2/21/2008

FINAL PERMIT TO INSTALL 16-02514

Application Number: 16-02514

Facility ID: 1677080040

Permit Fee: **\$600**

Name of Facility: Hanson Pipe and Products Macedonia Plant

Person to Contact: Chris Ann Gahagan

Address: 2900 Terminal Ave
Richmond, VA 23234

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

**7925 Empire Pkwy
Macedonia, Ohio**

Description of proposed emissions unit(s):

Concrete batch plant and part forming replaced PTI 16-01539 issued final 8/28/96.

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

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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	
OC	

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 -(P001) - Concrete part forming

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8.0 pounds per hour or 40.0 pounds per day when employing any photochemically reactive materials.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the part forming operation:
 - a. the company identification for each photochemically reactive form release agent employed;
 - b. the number of gallons of each form release agent employed;
 - c. the organic compound content of each form release agent, in pounds per gallon;
 - d. the total organic compound emission rate for all form release agents, in pounds per day;

- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all form release agents, i.e., (d)/(e), in pounds per hour (average).

[Note: The form release agent information must be for the form release agent as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the form release agents exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the form release agent exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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

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. Emission Limitation:

Organic compound emissions shall not exceed 8.0 pounds per hour or 40.0 pounds per day when employing any photochemically reactive materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of any materials employed in this emissions unit.

F. Miscellaneous Requirements

None

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Hanson Pipe and Products Macedonia Plant

PTI Application: 16-02514

Issued: 2/21/2008

Facility ID: 1677080040

Emissions Unit ID: P001

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 - (P901) - Concrete batch plant

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	0.64 tons particulate emissions (PE) per year (See A.2.a.)
OAC rule 3745-17-07	Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a 3-minute average.
OAC rule 3745-17-08	<p>At all times during the transfer of sand and aggregate, the drop height of the front-end bucket shall be minimized to the extent possible to minimize or eliminate visible emissions of fugitive dust.</p> <p>Sand and aggregate loaded into the elevated bins shall, at all times, have an inherent moisture content sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>The fabric filters serving the weigh hopper, central mix drum, and silos shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the outlets.</p>
OAC rule 3745-17-11	The requirements established pursuant to OAC rule 3745-17-11 is less stringent than the requirements established pursuant to OAC rule 3745-17-08.

2. Additional Terms and Conditions

- 2.a Permit to Install 16-02514 for this air contaminant source takes into account the use of a fabric filter/dust collector control system, whenever this air contaminant source is in operation, with a minimum control efficiency of 99%, by weight for PE, as a 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).

- 2.b** The permittee shall employ the following best available control measures for the above-identified cement and cement supplement silos for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. Cement and cement supplement shall be transferred pneumatically to the cement and cement supplement silos. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emissions of cement and/or cement supplement dust emanating from the delivery vehicle during transfer shall be cause for the immediate halt of the unloading process and the refusal of the cement and/or cement supplement load until the situation is corrected.
 - ii. Each cement and cement supplement silo vent shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust at the point of capture.
- 2.c** The permittee shall employ the following best available control measures for the above-identified weigh hoppers for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. The weigh hoppers shall be sufficiently enclosed so as to minimize or eliminate at all times visible emissions of fugitive dust.
 - ii. The transfer of cement/cement supplement to the concrete batching weigh hoppers shall be enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain annual records of the cubic yards or tons of concrete produced at this facility.
- 2. The permittee shall perform weekly checks, when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the fabric filters serving this emissions unit. No inspections are required on days the material handling operations are not in operation. The presence or absence of any visible particulate emissions shall be recorded electronically or in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:

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Hanson Pipe and Products Macedonia Plant

PTI Application: 16-02514

Issued: 2/21/2008

Facility ID: 1677080040

Emissions Unit ID: P901

- a. the total duration of any visible emission incident; and
- b. any corrective actions taken to eliminate the visible emissions.

The information above shall be kept separately for each fabric filter serving this emissions unit.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from each sand and/or aggregate transfer point and truck loading serving this emissions unit. No inspections are required on days the material handling operations are not in operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:

- a. whether the emissions are representative of normal operations;
- b. if the emissions are not representative of normal operations, the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

The information above shall be kept separately for each sand and/or aggregate transfer point and truck loading serving this emissions unit.

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the total cubic yards or total tons of concrete produced at this facility. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous 12-month period.
2. The permittee shall submit quarterly deviation (excursion) reports which note the following:
 - a. identify all days during which any abnormal visible fugitive particulate emissions were observed from each sand and/or aggregate transfer point serving this emissions unit;
 - b. describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions;
 - c. identify all days during which any visible particulate emissions were observed from any fabric filter serving this emissions unit; and
 - d. describe any corrective actions taken to eliminate the visible particulate emissions.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section 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. Emission Limitation:

Each fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 set forth in "Appendix on Test methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1997.

c. Emission Limitation:

There shall be no visible particulate emissions from the fabric filters serving this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 22 set forth in "Appendix on Test methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1997.

d. Emission Limitation:

0.64 tons particulate emissions (PE) per year

Applicable Compliance Method:

This value represents the potential to emit for the emissions unit as calculated using the most recent version of AP-42 section 11.12 (6/06).

F. Miscellaneous Requirements

1. The terms and conditions of this Permit to Install shall supersede all the air pollution control requirements for this emissions unit contained in Permit to Install 16-01539.