



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MAHONING COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-15214

DATE: 8/6/2002

City Concrete LLC
John Annichenni
PO Box 3167
Youngstown, OH 44513

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 Directors 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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/6/2002
Effective Date: 8/6/2002**

FINAL PERMIT TO INSTALL 02-15214

Application Number: 02-15214
APS Premise Number: 0250111005
Permit Fee: **\$2200**
Name of Facility: City Concrete LLC
Person to Contact: John Annichenni
Address: PO Box 3167
Youngstown, OH 44513

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

**Dvision St
Youngstown, Ohio**

Description of proposed emissions unit(s):

Concrete Batch Plant.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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 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 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.

City Concrete LLC
 PTI Application: 02-15214
 Issued: 8/6/2002

Facility ID: 0250111005

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	11.4

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>
paved roadways and parking areas	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(B)(5)
	OAC rule 3745-17-08(B), (B)(2)
	OAC rule 3745-17-07(B)(4)
	OAC rule 3745-17-08(B), (B)(8), (B)(9)
unpaved roadways and parking areas	OAC rule 3745-31-05(A)(3)

Applicable Emissions
Limitations/Control Measures

4.86 tons per year of particulate emissions

There shall be no visible particulate emissions except for one minute during any sixty-minute period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.c, A.2.d, and A.2.f through A.2.j).

The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

The control measure requirements specified in this rule are less stringent than those specified pursuant to OAC rule 3745-31-05(A)(3).

There shall be no visible particulate emissions except for three minutes during any sixty-minute period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.e through A.2.j).

The visible emission limitation specified in this rule is less stringent

than that established pursuant to OAC rule 3745-31-05(A)(3).

The control measure requirements specified in this rule are less stringent than those specified pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** All paved roadways and parking areas at the facility are covered by this permit.
- 2.b** All unpaved roadways and parking areas at the facility are covered by this permit.
- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.g** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved

Emissions Unit ID: F001

surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

- 2.h 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.i Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.j Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

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

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	daily
<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	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.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

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

D. Reporting Requirements

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

E. Testing Requirements

City Concrete LLC
PTI Application: 02-15214
Issued

Facility ID: 0250111005

Emissions Unit ID: F001

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
2. Compliance with the annual particulate emission limitation shall be determined by the equations in AP-42 "Compilation of Air Pollutant Emission Factors," Chapters 13.2.1 and 13.2.2 (Paved and Unpaved Roads, respectively), Fifth Edition, dated 9/1998.

F. Miscellaneous Requirements

None

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>	<u>Applicable Emissions Limitations/Control Measures</u>
load-in and load-out of storage piles, and wind erosion from storage piles	OAC rule 3745-31-05(A)(3)	1.98 tons per year of particulate emissions There shall be no visible emissions except for one minute in any hour. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b through and A.2.f).
	OAC rule 3745-17-07(B)(6)	The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B), (B)(6)	The control measure requirements specified in this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

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

all sand and limestone storage piles

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

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
sand and limestone storage piles	daily

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
sand and limestone storage piles	daily

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

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
sand and limestone storage piles	daily

- 4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- 5. The purpose of the inspections is to determine the need for implementing the control measures

specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
 - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

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

D. Reporting Requirements

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

General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

2. Compliance with the annual particulate emission limitation shall be determined by the equations in AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 13.2.4 (Aggregate Handling and Storage Piles), Fifth Edition, dated 1/1995.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Besser-APPCO model M-12 concrete batch plant (serial # 31964), including cement silos, weigh hopper, transit-mix truck loading, and loading of sand and aggregate into the elevated storage bins with a front-end loader	OAC rule 3745-31-05(A)(3)
transit-mix truck loading, controlled by a baghouse	
loading of sand and aggregate into the elevated storage bins with a front-end loader	
cement silo and weigh hoppers, controlled by baghouses	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-17-08(B), (B)(3)

Particulate emissions shall not exceed 1.04 lbs per hour and 4.56 tons per year from the cement silos, weigh hopper, and transit-mix truck loading combined.

The visible emission limitations specified in these rules for particulate emissions from the stack and for emissions of fugitive dust are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-07(A) and (B)

Visible particulate emissions from any stack serving this emissions unit shall not exceed 10 % opacity, as a six-minute average.

The control measure requirements established in this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-08(B)

Visible emissions of fugitive dust from any portion of this emissions unit shall not exceed 10 % opacity, as a three-minute average.

The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

See sections A.2.a through A.2.d for best available control measure requirements.

OAC rule 3745-17-07(B)(1)

The particulate emission limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

The control measure and emission limitation requirements established in this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall employ the following best available control measures for the above-identified cement silos for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. Cement shall be transferred pneumatically to the cement 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 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 load until the situation is corrected.
 - ii. The cement 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.b** 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/sand/aggregate to the concrete batching weigh hoppers shall be enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.
- 2.c** The permittee shall employ the following best available control measures for the above-identified transit-mix truck loading process for the purpose of ensuring compliance with the above-mentioned applicable requirements:

The permittee shall employ a fabric filter dust collection system for the purpose of controlling fugitive dust emissions from the transit-mix truck loading process. The control system shall be operated at all times that trucks are being loaded and shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture. There shall be no visible emissions from the baghouse serving this portion of the emissions unit.

Emissions Unit ID: P901

- 2.d The permittee shall ensure that sand and aggregate loaded into the elevated storage bins contains sufficient moisture so as to minimize or eliminate visible emissions of fugitive dust.
- 2.e The hourly and annual particulate emission limitations specified above are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to be maintained to demonstrate compliance with these limits.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from any stack (outlet of any control equipment) serving this emissions unit and for any visible fugitive dust emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. The color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal visible emissions;
 - d. The total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.

D. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit or any abnormal visible fugitive dust emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions or visible fugitive dust emissions. These reports shall be submitted to the Northeast District Office of Ohio EPA (NEDO) by January 31 and July 31 of each year and shall cover the previous six-month period.

E. Testing Requirements

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

- a. Particulate Emission Limitations:

Particulate emissions shall not exceed 1.04 lbs per hour and 4.56 tons per year from the cement silos, weigh hoppers, and transit-mix truck loading combined.

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the emission factors (EFs) from AP-42, Chapter 11.12 (Concrete Batching), Fifth Edition, dated 1/1995 as follows:

silos: maximum hourly process rate (35 TPH) x (EF of 0.27 lb/ton uncontrolled) x [1 - control efficiency of fabric filter (0.99)]

weigh hopper: maximum hourly process rate (312 TPH) x (EF of 0.02 lb/ton uncontrolled) x [1 - control efficiency of fabric filter (0.90)]

transit-mix truck loading: maximum hourly process rate (312 TPH) x (EF of 0.02 lb/ton uncontrolled) x [1 - control efficiency of fabric filter (0.95)]

The annual emission limitation was calculated by multiplying the hourly emission limitation (1.04 lbs/hr) by 8,760 hrs/yr and dividing by 2,000 lbs/ton.

- b. Visible Emission Limitations:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 10 % opacity, as a six-minute average.

Visible emissions of fugitive dust from any portion of this emissions unit shall not exceed 10 % opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the above visible emission limitations shall be determined by Method 9 of 40 CFR, Part 60, Appendix A. However, compliance with the visible emission limitation for fugitive dust shall be determined in accordance with the modification specified in OAC rule 3745-17-03(B)(3)(a).

F. Miscellaneous Requirements

23

City Concrete LLC
PTI Application: 02-15214
Issued

Facility ID: 0250111005

Emissions Unit ID: P901

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-15214 Facility ID: 0250111005

FACILITY NAME City Concrete LLC

FACILITY DESCRIPTION Concrete Batch Plant CITY/TWP Youngstown

SIC CODE 3273 SCC CODE 3 05 025 99 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION paved and unpaved roadways and parking areas

DATE INSTALLED 6/98

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	n/a	0.18	none	4.86
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination 4.86 TPY of PE, no VEs except for 1 min. in any sixty minutes for paved and 3 min. in any sixty minutes for unpaved as is well established as BAT for this emissions unit in Ohio.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? n/a

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: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-15214 Facility ID: 0250111005

FACILITY NAME City Concrete LLC

FACILITY DESCRIPTION Concrete Batch Plant

CITY/TWP Youngstown

Emissions Unit ID: P901

SIC CODE 3273 SCC CODE 3-05-006-18 EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION concrete batch plant

DATE INSTALLED 6/98

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	1.04 lbs/hr	0.95	1.04 lbs/hr	4.56
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Status quo for PE limits, no VEs from any stack, and 10 % opacity for fugitives. These limits are in line with those given to similar emissions units in Ohio.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$2,800

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: