



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
WAYNE COUNTY**

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: 02-13828**

**DATE: 3/15/00**

Orrville Trucking & Grading  
David B. Renner  
PO Box 220  
Orrville, OH 44667

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,

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

cc: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 3/15/00

**FINAL PERMIT TO INSTALL 02-13828**

Application Number: 02-13828  
APS Premise Number: 0285010403  
Permit Fee: **\$2200**  
Name of Facility: Orrville Trucking & Grading  
Person to Contact: David B. Renner  
Address: PO Box 220  
Orrville, OH 44667

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

**475 Orr St  
Orrville, Ohio**

Description of proposed emissions unit(s):

**Ready Mix 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 Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

**14. Construction Compliance Certification**

**Orrville Trucking & Grading**  
**PTI Application: 02-13828**  
**Issued: 3/15/00**

**Facility ID: 0285010403**

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> |
|------------------|----------------------|
| Particulates     | 71.62                |

**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>   |
|---|---|--|
| Batch Concrete Plant--All paved and unpaved roadways and parking areas (F001)       | OAC rule 3745-31-05                     | Particulate emissions (PE) from this emissions unit shall not exceed 42.07 TPY (see section A.2.2.k)   |
| Batch concrete plant--paved roadways and parking areas (F001) (see Section A.2.a)   | OAC rule 3745-17-07 (B)(4)              | No visible particulate emissions except for six (6) minutes during any 60-minute period.   |
|   | OAC rule 3745-17-08 (B), (B)(8), (B)(9) | Reasonably 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) |
| Batch concrete plant--unpaved roadways and parking areas (F001) (see Section A.2.b) | OAC rule 3745-17-07 (B)(5)              | No visible particulate emissions except for 13 minutes during any 60-minute period   |
|   | OAC rule 3745-17-08 (B), (B)(2)         | Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.e through A.2.j)                   |

**2. Additional Terms and Conditions**

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**Orrvil**

**PTI A**

**Issued: 3/15/00**

Emissions Unit ID: **F001**

- 2.a** The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Paved roadways:

- i. West entrance/exit driveway (including apron) onto Orr Street (approximately 0.10 mile).
- ii. East entrance driveway apron onto Orr Street (approx. 12 feet).

Paved parking areas: Parking area directly in front of main office (approx. 15 ft. by 80 ft.).

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Unpaved roadways:

- i. East entrance/exit drive to concrete batching plant (approx. 0.10 mile);
- ii. Inner East/N.E. roadway between/around large sand & small coarse aggregate (gravel) piles leading to north reclamation pit (approx. 0.10 mile); and
- iii. Inner facility roadway (west side of batching plant) from end of paved drive past aggregate piles to north reclamation pit (approx. 0.10).

Unpaved parking areas:

- i. West (larger) parking and equipment storage area (approx. 70,200 sq. ft.); and
- ii. East (smaller) parking lot (approx. 9800 sq. ft.).

- 2.c** The permittee shall employ reasonably 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 and sweeping each roadway and parking area 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 reasonably 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 by either watering or by application of other suitable dust suppressants 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 reasonably 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 by either watering or by application of other suitable dust suppressants 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 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 requirements of OAC rule 3745-17-08.

- 2.k The 42.07 tons per year fugitive PE emissions limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.l The use of used oil as a dust suppressant is prohibited per OAC rule 3745-279-82.

## B. Operational Restrictions

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

## C. Monitoring and/or Recordkeeping Requirements

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

Emissions Unit ID: **F001**

- 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**

1. Emissions Limitation: Particulate emissions from this emissions unit shall not exceed 42.07 TPY.  
  
Applicable Compliance Method(s): Compliance with this fugitive particulate emissions limitation shall be upon U.S. EPA emissions factors listed in A.P-42, Chapter 13, Sections 2.1 and 2.2 (paved and unpaved roadways-10/97).
2. 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"),

**Orrvil**

**PTI A**

**Issued: 3/15/00**

Emissions Unit ID: **F001**

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.

**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>  |
|--|--------------------------------------|---|
| Batch Concrete Plant–Sand and Aggregate Storage Piles (F002)   | OAC rule 3745-31-05                  | Particulate emissions (PE) from this emissions unit shall not exceed 5.57 TPY (see section A.2.2.g).  |
| Batch concrete plant--sand and aggregate material storage piles (F002): load-in and load-out of storage piles (see Section A.2.a for identification of storage piles). | OAC rule 3745-17-07 (B)(6)           | Visible particulate emissions from this emissions unit shall not exceed twenty (20) percent opacity as a three-minute average.                              |
|  | OAC rule 3745-17-08 (B), (B)(6)      | Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f) |
| Batch concrete plant--sand and aggregate material storage piles (F002): wind erosion from storage piles (see Section A.2.a for identification of storage piles)        | OAC rule 3745-17-07 (B)(6)           | No visible emissions except for thirteen (13) minutes during any sixty-minute period.   |
|  | OAC rule 3745-17-08 (B), (B)(6)      | Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)    |

**2. Additional Terms and Conditions**

- 2.a** The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
- i. Two (2) sand (fine aggregate) storage piles covering approximately 0.30 acre;
  - ii. Eight (8) coarse aggregate (gravel/limestone) storage piles covering approximately 0.20 acres;
- 2.b** 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 permit application, the permittee has committed to maintaining sufficient moisture levels for each aggregate by either watering as needed using a spraying application rate of 2 gallons per 100 square feet of surface or through material washing 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 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 permittee's permit application, the permittee has committed to maintaining sufficient moisture levels for each aggregate by either watering as needed using a spraying application rate of 2 gallons per 100 square feet of surface or through material washing 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 rule 3745-17-08.
- 2.g** The 5.57 tons per year fugitive PE emissions limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**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:  
  
All storage pile load-in operations on a daily basis.
2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:  
  
All storage pile load-out operations on a daily basis.
3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:  
  
All sand and coarse aggregate storage piles on a daily basis.
4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures

Emissions Unit ID: **F002**

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. Emissions Limitation: Particulate emissions from this emissions unit shall not exceed 5.57 TPY.

Applicable Compliance Method(s): Compliance with this fugitive particulate emissions limitation shall be based upon U.S. EPA emissions factors listed in A.P-42, Chapter 13, Section 2.4 (10/97) or Chapter 11, Section 12, Table 11.12-2 (1/95).

2. Compliance with the twenty (20) percent opacity visible emissions limitation, as stipulated in OAC rule 3745-17-07(B)(1), for the load-in/load-out operations, concrete identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
3. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

**F. Miscellaneous Requirements**

None.

**PART II - SPECIAL TERMS AND CONDITIONS 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> |
|--|--------------------------------------|
| Batch Concrete Plant--Concrete Batching Operations including Materials Handling, Loading of Two Cement Silos, Loading of Sand, Aggregate, and Cement into Weigh Hopper, and Mix Truck Loading.(F003) | OAC rule 3745-31-05                  |
| Batch concrete plant--material handling operations (F003) including front-end loaders, dump trucks, & sand/aggregate conveyor systems.   | OAC rule 3745-17-07 (B)(1)           |
| Batch concrete plant (F003)--concrete batching operation.  | OAC rule 3745-17-08 (B)              |
| Batch concrete plant (F003)--cement silo loading operations.   | OAC rule 3745-17-08(B)(3)(b)         |
| Concrete batch plant (F003)--mix-truck loading operations.   |                                      |

| OAC rule 3745-17-07(B)(1)    | <u>Applicable Emissions<br/>Limitations/Control Measures</u>  | emissions of fugitive dust (see section 2.d.)   |
|------------------------------|---|---|
| OAC rule 3745-17-08(B)       | Particulate emissions from this emissions unit shall not exceed 23.98 TPY.  | Emissions from the outlet of the control equipment serving this emissions unit shall achieve an emissions rate of not more than 0.030 grain per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent. |
| OAC rule 3745-17-08(B)(3)(b) | Visible particulate emissions from this emissions unit shall not exceed twenty (20) percent opacity as a three-minute average.  | Visible particulate emissions from this emissions unit shall not exceed twenty (20) percent opacity as a three-minute average.  |
| OAC rule 3745-17-07(B)(1)    | Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c, and A.2.g)  | Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section 2.e.)  |
| OAC rule 3745-17-08(B)       | Emissions from the outlet of the control equipment serving this emissions unit shall achieve an emissions rate of not more than 0.030 grain per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent. | Visible particulate emissions from this emissions unit shall not exceed twenty (20) percent opacity as a three-minute average.  |
| OAC rule 3745-17-07(B)(1)    | Emissions from the outlet of the control equipment serving this emissions unit shall achieve an emissions rate of not more than 0.030 grain per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent. | Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section 2.f.)  |
| OAC rule 3745-17-08(B)       | Visible particulate emissions from this emissions unit shall not exceed twenty (20) percent opacity as a three-minute average.<br><br>Reasonably available control measures that are sufficient to minimize or eliminate visible  |   |

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

- 2.a** The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
- i. Transfer of sand, gravel, and/or limestone aggregate from storage pile(s) to open dump bin by front-end loader or dump truck.
  - ii. Transfer of sand, gravel, and/or limestone aggregate from open dump bin to batch plant weigh-hopper by stationary conveyor system.
  - iii. Transfer of sand or gravel from storage pile(s) by front-end loader to dump truck(s) for off site sales/delivery of these materials.
- 2.b** The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:
- i. For transfer of sand, gravel, and/or limestone aggregate from storage pile(s) to open dump bin by front-end loader or dump truck, fugitive particulate emissions shall be minimized or eliminated by controlling the moisture content of the sand, gravel, and/or limestone material through application of water or other suitable dust suppressants and by minimizing the drop height from the front-loader and/or dump truck into the open bin.
  - ii. For transfer of sand, gravel, and/or limestone aggregate from open dump bin to batch plant weigh-hopper by stationary conveyor system, fugitive particulate emissions shall be minimized or eliminated by controlling the moisture content of the sand/gravel and/or limestone materials through application of water or other suitable dust suppressants and by enclosure of the batch plant weigh-hopper and use of an appropriate particulate emissions control system.
  - iii. For transfer of sand or gravel from storage pile(s) by front-end loader to dump truck(s) for off site sales/delivery of these materials, fugitive particulate emissions shall be minimized or eliminated by controlling the moisture content of the sand, gravel, and/or limestone material through application of water or other suitable dust suppressants and by minimizing the drop height from the front-loader into the dump truck(s).

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

- 2.c** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.d** The permittee shall employ the following reasonably available control measures for the above-identified cement silo loading operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. Cement shall be transferred pneumatically to the storage silo; this transfer system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emissions of cement dusts emanating from the delivery vehicle during transfer shall be cause for the immediate halt of the unloading process and the refusal of the cement load until the situation is corrected.
  - ii. The cement silo vent shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize at all times visible emissions of fugitive dust at the point of capture.
- 2.e** The permittee shall employ the following reasonably available control measures for the above-identified concrete batching operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. The concrete batching weigh hopper shall be adequately enclosed and the enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust.
  - ii. The sand/aggregate weigh hopper transfer conveyor discharge to the concrete batching weigh hopper shall be 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.f** The permittee shall employ the following reasonably available control measures for the above-identified mix-truck loading operation(s) for the purpose of ensuring compliance

with the above-mentioned applicable requirements. The point at which the transit mix truck is loaded shall be adequately enclosed and the drop height of the cement/sand/aggregate mixture into the truck shall be minimized or controlled by either a telescopic or hooded chute (shroud) so as to minimize or eliminate visible emissions of fugitive dust from this operation.

- 2.g** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

**B. Operational Restrictions**

1. The permittee shall regularly maintain the baghouse and fabric filter control equipment associated with this emissions unit in accordance with manufacturers recommendations. Maintenance shall include regular repair and/or replacement of filters so as to maximize the particulate collection efficiency of this dust control system.

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

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

All material handling (sand/gravel/aggregate transfer) operation(s) shall be inspected on a daily basis.

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if 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;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):

- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall maintain records of the amounts of sand, aggregate, and cement processed at this plant so as to be able to determine the actual amount of fugitive dust emissions generated over any annual period. The permittee shall also maintain records of the gross yards (or tonnage) of concrete produced and transported from the facility on a monthly basis for purpose of determining the annual amount of fugitive dusts emitted from this emissions unit. These records shall be kept at the facility and shall be made available for review by Ohio EPA personnel upon request.
6. The permittee shall inspect the baghouse fabric filter control system serving both the cement silo and the batching operation at least once per week for the purpose of determining the need to maintain, repair, and/or replace any of the filters in the system or any portion of the system electrical controls. A broken or severely worn filter, or worn electrical control components, shall be replaced/repared immediately so as to prevent unnecessary emissions of fugitive dust from this emissions unit. Records of inspections, repairs, and maintenance to this emissions control system shall be noted in a facility log.
7. The permittee shall inspect the shroud and shute used to load the sand/aggregate/cement mixture into the concrete mix-trucks on a weekly basis to determine if these devices adequately minimize fugitive dust emissions which arise during the loading of the mix-trucks. If either the shroud or shute is excessively worn, they should be replaced immediately so as to minimize fugitive dust emissions from this emissions unit. The results of this inspection and any maintenance which is performed as a result of this inspection should be noted in a facility log.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be performed 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. Emissions Limitation: Particulate emissions from this emissions unit shall not exceed 23.98 TPY.

Applicable Compliance Method(s): Compliance with this fugitive particulate emissions limitation shall be determined by calculations utilizing U.S. EPA emissions factors listed in AP-42, Chapter 11, Section 12, Table 11.12-2 (1/95), and annual sand and aggregate throughput and annual concrete production (yardage/cubic feet) figures recorded as required in section C.5 above.

2. Compliance with the "no visible emissions" limitation, as stipulated in OAC rule 3745-17-08(B)(3)(b), for both the cement silo loading operation(s) and the concrete batching operations identified above shall be determined in accordance with and 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.
3. Compliance with the twenty (20) percent opacity visible emissions limitation, as stipulated in OAC rule 3745-17-07(B)(1), for the materials handling operations, cement silo loading operations, concrete batching operations, and the mix-truck loading operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
4. Compliance with the particulate emissions limitation of this permit shall be based on the maximum flow rate of the control device (470 acfm) times the allowable emissions rate of 0.030 grains/dscf particulate matter [per OAC rule 3745-17-08(B)(3)(b)] and the maximum operating schedule of 8760 hours per year. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5, and in OAC 3745-17-03(B)(7).

#### **F. Miscellaneous Requirements**

None.

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13828 Facility ID: 0285010403

FACILITY NAME Orrville Trucking & Grading

FACILITY DESCRIPTION Ready Mix Concrete Batch Plant CITY/TWP Orrville

SIC CODE 3273 SCC CODE 3-05-999-99 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Batch Concrete Plant--Paved and Unpaved Roadways and Parking Areas.

DATE INSTALLED April, 1986

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                   | 22.51         | N/A             | 42.07         |
| PM <sub>10</sub>   |                         |                       |               |                 |               |
| 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** BAT is monitoring of roadway/parking lot surface conditions and use of appropriate control measures [application of dust suppressants (water, etc.) or sweeping] when surfaces are subject to fugitive dust emissions; also, use of speed limit restriction of 10 mph for all vehicle traffic (RACM).

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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 SC**

PTI Num

FACILITY

Emissions Unit ID: **F003**

FACILITY DESCRIPTION Ready Mix Concrete Batch Plant CITY/TWP Orrville

SIC CODE 3273 SCC CODE 3-05-011-06, -08, -10 EMISSIONS UNIT ID F003

EMISSIONS UNIT DESCRIPTION Batch Concrete Plant--Material Handling, Cement Silo Loading, Concrete Batching, & Mix Truck Loading Operations.

DATE INSTALLED April, 1986

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                   | 2.30          | N/A             | 23.98         |
| PM <sub>10</sub>   |                         |                       |               |                 |               |
| 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** BAT consists of appropriate monitoring of material handling conditions, cement silo fabric filter ("sock") condition, and use of shroud at point of mix-truck loading with use of appropriate control measures [water spraying at conveyor transfer points, emissions control of cement silo vent, replacement of worn silo fabric filter, and appropriate enclosure for mix-truck loading] to control fugitive dust emissions (RACM). Also, use of "Hydromix System" control for pre-mixing dry cement (from weigh hopper) with water prior to transferring to mix-trucks to reduce fugitive dust emissions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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: 02-13828

Facility ID: 0285010403

FACILITY NAME Orrville Trucking & Grading

FACILITY DESCRIPTION Ready Mix Concrete Batch Plant

CITY/TWP Orrville

Emissions Unit ID: **F003**

**Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

**Copy of emissions calculations submitted by permittee (and verified by NEDO/DAPC) with summary of results and drawing showing facility layout.**

**Please provide any additional permit specific notes as you deem necessary:**

**NONE**

**Permit To Install Synthetic Minor Write-Up**

**NONE**

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| Particulates     | 71.62                |