



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
ASHLAND 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: 03-13853**

**DATE: 11/5/2002**

Moritz Materials Inc.  
Joe Moritz  
PO Box 392 859 Faultless Drive  
Ashland, OH 44805

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

NWDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 11/5/2002  
Effective Date: 11/5/2002**

**FINAL PERMIT TO INSTALL 03-13853**

Application Number: 03-13853  
APS Premise Number: 0303010176  
Permit Fee: **\$6400**  
Name of Facility: Moritz Materials Inc.  
Person to Contact: Joe Moritz  
Address: PO Box 392 859 Faultless Drive  
Ashland, OH 44805

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**859 Faultless Drive  
Ashland, Ohio**

Description of proposed emissions unit(s):  
**Concrete batch plant with storage piles and roadways and parking areas.**

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

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**Facility ID: 0303010176**

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.

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**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	1.00

**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>
F001 - Paved and Unpaved Roadways.	OAC rule 3745-31-05 (A)(3)	0.27 ton fugitive particulate emissions (PE)/yr
Unpaved roadways (See A.2.c.)		no visible particulate emissions except for three minutes during any 60-minute period.  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.e, and A.2.g. through A.2.k. )
Paved Roadways (See A.2.d)	OAC rule 3745-31-05 (A)(3)	No visible particulate emissions except for one minute during any 60-minute period.  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.f, through A.2.k. )
	OAC rule 3745-17-08 (B)	See A.2.a
	OAC rule 3745-17-07 (B)	See A.2.b.

**2. Additional Terms and Conditions**

- 2.a** Moritz Materials, Inc. is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).
- 2.b.** This emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07 (B), pursuant to OAC rule 3745-17-07 (B) (11) (e).
- 2.c** The unpaved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below.
- i. 350 feet (5,000 square foot) roadway area specified as unpaved area in the PTI application.
- 2.d** The paved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below.
- i. 1000 feet or (35,000 square foot) roadway specified as paved area in the PTI application.
- 2.e** The permittee shall employ best available control measures on all unpaved 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 roadways 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.f** The permittee shall employ best available control measures on 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 paved roadways with water and sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.g** 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 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.

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**Emissions Unit ID: F001**

- 2.h** Any unpaved roadway 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 measures specified above for paved surfaces. Any unpaved roadway that takes the characteristics of a paved roadway due to the application of

Emissions Unit ID: **F001**

certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways. Any unpaved roadway that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.

- 2.i** 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.j** 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.k** 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(A)(3).

**B. Operational Restrictions**

None

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

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

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
all roadways	daily
<u>paved roadways</u>	<u>minimum inspection frequency</u>
all roadways	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 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:
  - 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 (ii) the unpaved roadways 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**

**Moritz Materials Inc.**  
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**Issued**

**Facility ID: 0303010176**

**Emissions Unit ID: F001**

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
0.27 ton fugitive PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance by applying a 95% control efficiency for dust suppression to a maximum potential uncontrolled emission rate of 5.36 TPY PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors from Chapter 13.2.2 (9/98) and Chapter 13.2.1 (10/97).

b. Emission Limitation Method:

There shall be no visible particulate emissions from any unpaved roadway except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation specified 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.

c. Emission Limitation Method:

There shall be no visible particulate emissions from any paved roadway except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation specified 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>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 -Sand and aggregate storage piles	OAC rule 3745-31-05 (A)(3)	0.10 ton of fugitive particulate emissions (PE)/yr
Load -in and Load-out of Storage Piles (See Section A.2.c. for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	No visible emissions except for a period of time not to exceed one minute during any 60-minute observation period.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.d A.2.e. A.2.h.)
Wind Erosion from Storage Piles (See Section A.2.c. for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	No visible emissions except for a period of time not to exceed one minute during any 60-minute period.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.f. through A.2.h.)
	OAC rule 3745-17-08 (B)	See A.2.a.
	OAC rule 3745-17-07 (B)	See A.2.b.

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**Morit**

**PTI A**

**Issued: 11/5/2002**

Emissions Unit ID: **F002**

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

- 2.a** Moritz Materials, Inc. is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).
- 2.b.** This emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07 (B), pursuant to OAC rule 3745-17-07 (B) (11) (e).
- 2.c.** The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:
- storage pile identification:
- sand  
aggregate
- 2.d.** 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 reduction of drop heights 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 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.f.** 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 maintenance of as low a pile height as possible to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.g.** 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

Emissions Unit ID: F002

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.h 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 3745-31-05 (A)(3).

**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:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all 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>
all 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>
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Emissions Unit ID: **F002**

1. The permittee shall submit deviation reports in accordance with the general terms and conditions of this permit 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.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
0.10 ton fugitive PE/yr

Applicable Compliance Method:

The emission limitation was established by combining the emissions from load-in and load-out operations and from wind erosion from each storage pile as listed in the permittee's application and applying a 95% control efficiency for use of best available control measures. Load-in and load-out operation emissions are based on a maximum load-in and load-out rate of 142,000 tons product per year of product. Wind erosion emissions are based on a maximum storage pile surface area of 0.031 acre as listed in the permit application:

The emission rate was determined as follows:

- i. Load-in - emissions associated with load-in operations were established by multiplying the maximum load-in rate of 142,000 tons of product per year by the appropriate emission factor from AP-42 section 13.2.4 (1/95) [0.01 lb PE/ton product], applying a 95% control efficiency and dividing by 2000 lbs/ton (0.04 ton fugitive PE/yr)
- ii. Load-out - emissions associated with load-out operations were established by multiplying the maximum load-out rate of 142,000 tons of product per year by the appropriate emission factor from AP-42 section 13.2.4 (1/95) [0.01 lb PE/ton product], applying a 95% control efficiency and dividing by 2000 lbs/ton (0.04 ton fugitive PE/yr)
- iii. Wind erosion - emissions were established by multiplying a maximum combined storage pile surface area of 0.031 acre for product, by the appropriate emission factor from AP-42 section 11.12. (10/86) [3.5 lb PE/acre-day], by 365 days per year and dividing by 2000 lbs/ton. (0.02 ton fugitive PE/yr)

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PE limitation will be assumed.

b. Emission Limitation:

There shall be no visible particulate emissions from the load-in and load-out operations of the storage piles except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation specified 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.

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- c. Emission Limitation:  
There shall be no visible particulate emissions from wind erosion of the storage piles except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation specified 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**

- 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>	
P001 -Cement unloading/Aggregate transfer to bins/silos.	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-11 (B)(2)
		OAC rule 3745-17-07 (A)
		OAC rule 3745-17-08 (B)
		OAC rule 3745-17-07 (B)

Applicable Emissions	six-minute average
<u>Limitations/Control Measures</u>	See A.2.e.
<u>Control Requirements:</u> See A.2.b.	See A.2.f.
<u>Stack Emissions:</u> 0.92 lb particulate emissions (PE)/hr 0.52 ton PE/yr	
The requirements of this rule also include compliance with the requirements of OAC Rule 3745-17-07 (A)	
<u>Fugitive Emissions</u> Visible fugitive particulate emissions shall not exceed 20 percent opacity as a three-minute average for sand/aggregate loading onto conveyor	
Visible fugitive particulate emissions shall not exceed 0% opacity as a six-minute average from enclosure of aggregate transfer to bins	
Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.c. and A.2.d.)	
See A.2.a.	
Visible particulate emissions shall not exceed 20 percent opacity as a	

**2. Additional Terms and Conditions**

- 2.a** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.b** "Best Available Technology" (BAT) control requirements for emissions unit P001 has been determined to be the following:
- i. use of a baghouse for pneumatic unloading of cement. The baghouse shall achieve a 95.0% control efficiency;
  - ii. best available control measures that are sufficient to minimize or eliminate emissions of fugitive dust (See A.2.c.)
  - iii. use of enclosure for sand/aggregate transfer to bins
- 2.c** The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. In accordance with the permittee's permit application, the permittee has committed to minimize drop height from front end loader to conveyor. The application of BAT control requirements and best available control measures will result in negligible fugitive dust emissions. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** Implementation of the above-mentioned control measures and requirements in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05 (A)(3).
- 2.e** Moritz Materials, Inc. is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).
- 2.f** This emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07 (B), pursuant to OAC rule 3745-17-07 (B)(11)(e).

## **B. Operational Restrictions**

1. The maximum concrete production for the concrete batch plant shall not exceed 70,000 tons per year.

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the sand/aggregate loading onto conveyor serving 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 location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the enclosure of aggregate transfer to bins. 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. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

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

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack unit serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the sand/aggregate loading onto conveyor and/or enclosure of aggregate transfer to bins serving this emissions unit, and (c) describe any corrective actions taken to eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **E. Testing Requirements**

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

- a. Emission Limitation: Stack Emissions  
0.92 lb PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum hourly cement unloading throughput (25 tons/hr) by the appropriate emission factor from AP-42 Chapter 11.12-2, (10/86 - reformatted 1/95) (0.27 lb PE/ton), and applying a 95% baghouse control efficiency, and by multiplying the maximum hourly aggregate transfer to bins/silos (400 tons/hr) by the appropriate emission factor from AP-42 Chapter 11.12-2, (10/86-reformatted 1/95) (0.029 lb PE/ton), and applying a 95% baghouse control efficiency. If required testing shall be performed in accordance with 40 CFR Part 60 Appendix A Method 1-5.

- b. Emission Limitation: Stack Emissions  
0.52 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum annual cement unloading throughput (70,000 tons/yr based on a maximum concrete production rate of 70,000 tons per year) by the appropriate emission factor from AP-42 Chapter 11.12-2 (10/86 - reformatted 01/95), (0.27 lb PE/ton), dividing by 2000 lbs/ton and applying a 95% baghouse control efficiency, and by multiplying the maximum annual aggregate transfer to bins/silos (70,000 tons/yr) by the appropriate emission factor from AP-42 Chapter 11.12-2, (10/86-reformatted 1/95) (0.029 lb PE/ton), dividing by

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2000 lbs/ton and applying a 95% baghouse control efficiency.

- c. Emission Limitation: Stack Emissions  
Visible particulate emissions shall not exceed 20% opacity as a six-minute average

Applicable Compliance Method:

If required compliance with the visible PE limitation shall be determined in accordance with OAC rule 3745-17-03 (B)(3)

- d. Emission Limitation: Fugitive Emissions  
Visible fugitive particulate emissions shall not exceed 20 percent opacity as a three-minute average for sand/aggregate loading onto conveyor

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in the "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.

- e. Emission Limitation:  
Visible fugitive emissions shall not exceed 0% opacity as a six-minute average from enclosure of aggregate transfer to bins

Applicable Compliance Method:

If required, compliance shall be determined in accordance with US EPA Method 9 in 40 CFR , Part 60.

**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>
P002 -Weigh hopper and mixer loading.	OAC rule 3745-31-05 (A)(3)	<u>Control Requirements:</u> See A.2.b  1.20 lb particulate emissions (PE)/hr 0.11 ton PE/yr
	OAC rule 3745-17-07 (A)	The requirements of this rule also include compliance with OAC rule 3745-17-07 (A)  Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average
	OAC rule 3745-17-11 (B)(2)	See A.2.a.

### 2. Additional Terms and Conditions

- 2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant OAC rule 3745-31-05 (A)(3).
- 2.b. "Best Available Technology" (BAT) control requirements for emissions unit P002 has been determined to be the following:
- i. use of a baghouse for weigh hopper loading and mixer loading. The baghouse

shall achieve a 95.0% control efficiency.

- 2.c** Implementation of the above-mentioned control measures and requirements in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05 (A)(3).

**B. Operational Restrictions**

1. The maximum concrete production for the concrete batch plant shall not exceed 70,000 tons per year

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving 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 emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

**D. Reporting Requirements**

Emissions Unit ID: **P002**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period

## **E. Testing Requirements**

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

- a. Emission Limitation:

1.20 lbs PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum hourly weigh hopper loading throughput (400 tons/hr) by the appropriate emission factor from AP-42 Chapter 11.12-2, (10/86 - reformatted 1/95) (0.02 lb PE/ton), and applying a 95% baghouse control efficiency, and by multiplying the maximum hourly mixer loading throughput (400 tons/hr) by the appropriate emission factor from AP-42 Chapter 11.12-2, (10/86-reformatted 1/95) (0.04 lb PE/ton), and applying a 95% baghouse control efficiency. If required testing shall be performed in accordance with 40 CFR Part 60 Appendix A Method 1-5.

- b. Emission Limitation:

0.11 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum yearly weigh hopper loading throughput (70,000 tons/yr based on a maximum concrete production rate of 70,000 tons per year) by the appropriate emission factor from AP-42 Chapter 11.12-2 (10/86 - reformatted 01/95), (0.02 lb PE/ton), dividing by 2000 lbs/ton and applying a 95% baghouse control efficiency, and by multiplying the maximum yearly mixer loading throughput (70,000 tons/yr) by the appropriate emission factor from AP-42 Chapter 11.12-2, (10/86-reformatted 1/95) (0.04 lb PE/ton), dividing by 2000 lbs/ton and applying a 95% baghouse control efficiency.

- c. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average

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Applicable Compliance Method:

If required compliance with the visible PE limitation shall be determined in accordance with OAC 3745-17-03 (B)(3) rule

**F. Miscellaneous Requirements**

None