



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-16298**

**Fac ID: 0386000076**

**DATE: 6/16/2005**

Pahl Ready Mix Concrete, Inc.  
Thomas Weber  
RR 2, 14-586 US 127  
Bryan, OH 43506

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

NWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 6/16/2005  
Effective Date: 6/16/2005**

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**FINAL PERMIT TO INSTALL 03-16298**

Application Number: 03-16298  
Facility ID: 0386000076  
Permit Fee: **\$1550**  
Name of Facility: Pahl Ready Mix Concrete, Inc.  
Person to Contact: Thomas Weber  
Address: RR 2, 14-586 US 127  
Bryan, OH 43506

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**434 W. Vine Street  
Edgerton, Ohio**

Description of proposed emissions unit(s):  
**150 TPH 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**

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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
PE (point)	0.97
PE (fugitive)	16.16

**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 - Aggregate and Sand Storage Piles:	OAC rule 3745-31-05(A)(3)	7.15 tons/yr fugitive particulate emissions (PE)
	OAC rule 3745-17-07(B)(1)	See A.2.g
	OAC rule 3745-17-08(B)(1)	See A.2.h
load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	no visible particulate 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 Sections A.2.b, A.2.c and A.2.f)
wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	no visible particulate 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 Sections A.2.d through A.2.f)

**2. Additional Terms and Conditions**

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**Pahl F**

**PTI A**

**Issued: 6/16/2005**

Emissions Unit ID: **F001**

- 2.a** The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

Aggregate Pile  
Sand Pile

- 2.b** The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the handling of wet sand and use of 'washed' aggregate to ensure compliance. If at any time the handling of wet sand and use of washed aggregate is not sufficient to comply with the applicable requirements above, the permittee shall employ 'best available control measures' to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.d** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to water application as needed 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 3745-31-05.

- 2.g** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.h** This facility is not located within an "Appendix A" area as 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)(1).

**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	once per day of operation

- 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	once per day of operation

- 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>
all storage piles	once per day of operation

- 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 specified in this permit for load-in and load-out of a storage pile, and wind erosion from the

surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

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

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

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

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

## **E. Testing Requirements**

1. Compliance with the 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:  
7.15 tons/yr fugitive PE

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 90% 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 578,000 tons per year of aggregate and 473,000 tons per year of sand. Wind erosion emissions are based on a maximum storage pile surface area of 0.67 acre for aggregate and 0.33 acre for sand 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 maximum load-in rates of 578,000 tons aggregate per year and 473,000 tons sand per year by the appropriate emission factors from AP-42 section 13.2.4.3 (1/95) [0.0174 lb PE/ton, both aggregate and sand], applying a 90% control efficiency and dividing by 2000lbs/ton. (3.34 ton PE/yr)
- ii. Load-out - emissions estimate is same estimate as for load-in. (3.34 ton PE/yr)
- iii. Wind erosion - emissions were established by multiplying a maximum combined storage pile surface area of 0.67 acre for aggregate and 0.33 acre for sand, the appropriate emission factor from USEPA's control of Open Fugitive Dust Sources (9/88) [0.91 lbs PE/day/acre for aggregate & 5.89 lbs PE/day/acre], a maximum operating schedule of 365 days per year and dividing by 2000. (0.47 ton 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: no visible particulate emissions except for a period of time not to

exceed one minute during any 60-minute observation period from load-in and load-out of the storage piles

Applicable Compliance Method: If required, 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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

- c. Emission Limitation: no visible particulate emissions except for a period of time not to exceed one minute during any 60-minute observation period from wind erosion

Applicable Compliance Method: If required, 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, 2002, 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 - Roadways and Parking Areas:	OAC rule 3745-31-05(A)(3)	0.72 tons/yr fugitive particulate emissions (PE)
	OAC rule 3745-17-07(B)(1)	See A.2.j
	OAC rule 3745-17-08(B)(1)	See A.2.k
paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)	no visible particulate 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 Sections A.2.c, and A.2.e through A.2.i)
unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-31-05(A)(3)	no visible particulate emissions except for a period of time not to exceed three minutes during any 60-minute observation period  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see

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**Issued**

**Facility ID: 0386000076**

**Emissions Unit ID: F002**

Sections A.2.d through A.2.i)

**2. Additional Terms and Conditions**

- 2.a** The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways and parking areas:

paved truck routes (raw material delivery and transit-mix cement trucks)

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways and parking areas:

unpaved truck routes (raw material delivery)

front-end loader routes

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with watering at sufficient treatment frequencies, surface improvement, and speed reduction, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** 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.f** 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.g** 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.h** 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.i** 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.
- 2.j** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.k** The facility is not located within an "Appendix A" area as 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)(1).

**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 roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	once per day of operation

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	once per day of operation

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned

**Emissions Unit ID: F002**

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:
  - 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. 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:  
0.72 tons/yr fugitive PE

Applicable Compliance Method:

The emission limitation was established by multiplying AP-42 emission factors (see below) for paved and unpaved roadways [Section 13.2.1.2 (12/03) and Section 13.2.2.2 (12/03)], applying a control efficiency of 90% (paved) and 95% (unpaved) for use of best available control measures, and the following maximum vehicle miles traveled (VMT):

Paved roadways and parking areas - 2.97 lbs PE/VMT and 3750 VMT

Unpaved roadways and parking areas - 10.1 lbs PE/VMT and 630 VMT

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:  
no visible particulate emissions except for a period of time not to exceed one minute during any 60-minute observation period for paved roadways and parking areas

Applicable Compliance Method:

If required, 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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

- c. Emission Limitation:  
no visible particulate emissions except for a period of time not to exceed three minutes

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**Facility ID: 0386000076**

Emissions Unit ID: **F002**

during any 60-minute observation period for unpaved roadways and parking areas

Applicable Compliance Method:

If required, 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, 2002, 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>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - Aggregate and Sand Weigh Hopper and Transit-Mix Cement Truck Loading	OAC rule 3745-31-05(A)(3)	8.29 ton of particulate emissions (PE)/year (fugitive)  use of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Sections A.2.a. through A.2.d)  opacity restrictions (See Section A.2.e)
	OAC rule 3745-17-07(B)	See Section A.2.f
	OAC rule 3745-17-08(B)	See Section A.2.g

**2. Additional Terms and Conditions**

- 2.a The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

sand and aggregate weigh hopper  
transit-mix truck loading

- 2.b The permittee shall employ best 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:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
sand and aggregate weigh hopper transit-mix truck loading	handle wet sand, use 'washed' aggregate employ 'water ring'

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

- 2.c** For each material handling operation, 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 mineral extraction operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.d** 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 3745-31-05.
- 2.e** Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from the following material handling operations: sand and aggregate weigh hopper; and transit-mix truck loading.
- 2.f** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.g** This facility is not located within an "Appendix A" area as 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)(1).

## **B. Operational Restrictions**

None

## **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:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
All	once per day of operation

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.

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

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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

1. Compliance with the 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:  
8.29 tons/yr fugitive PE

##### Applicable Compliance Method:

The emission limitation was established by combining the emissions from weigh hopper load-in operations and from transit-mix truck loading operations as listed in the permittee's application and applying a 90% control efficiency for use of best available control measures for the truck loading 'water ring'. Load-in operation emissions are based on a maximum load-in rate of 1,051,000 tons per year of sand and aggregate (combined). Truck loading operation emissions are based on a maximum load-in rate of 184,000 tons per year of cement and supplement (combined):

The emission rate was determined as follows:

- i. Load-in - emissions associated with load-in operations were established by multiplying maximum load-in rates of 1,051,000 tons sand and aggregate per year by the appropriate emission factors from AP-42 Table 11.12-2 (10/01) [0.0051 lb PE/ton, and dividing by 2000lbs/ton. (2.68 ton PE/yr)
- ii. Truck loading - emissions associated with truck loading operations were established by multiplying maximum load-in rates of 184,000 tons cement and supplement per year by the appropriate emission factors from AP-42 Table 11.12-2 (10/01) [0.61 lb PE/ton], applying a 90% control efficiency and dividing by 2000lbs/ton. (5.61 ton 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.

**Pahl Ready Mix Concrete, Inc.**

**PTI Application: 03-16208**

**Issued**

**Facility ID: 0386000076**

Emissions Unit ID: **F003**

- b. Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from the following material handling operations: sand and aggregate weigh hopper; and transit-mix truck loading.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) 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>
P001 - Cement Storage Silo and Supplement Storage Silo	OAC rule 3745-31-05 (A)(3)	0.02 grains particulate emissions (PE)/standard cubic foot  0.97 ton PE/year  Visible particulate emissions shall not exceed 5 percent opacity, as a six-minute average.  See A.2.a and A.2.b.
	OAC rule 3745-17-11 (B)	See A.2.c.
	OAC rule 3745-17-07 (A)	See A.2.d.

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

- 2.a All particulate emissions are assumed to be particulate matter less than 10  $\mu\text{m}$  in size ( $\text{PM}_{10}$ ).
- 2.b Best Available Technology (BAT) control requirements for the control of PE from this emissions unit shall be the use of baghouses which can achieve a maximum outlet concentration of 0.02 grains PE/standard cubic foot.
- 2.c 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.d** The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

**B. Operational Restrictions**

None

**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.

**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 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 specified in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
0.02 grains PE/dscf

Applicable Compliance Method:

The 0.02 gr/dscf limit was established in accordance with the manufacturer's guaranteed outlet concentration. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A - Methods 1-5.

b. Emission Limitation:

0.97 ton PE/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual limitation by multiplying the maximum outlet concentration from the baghouses (0.02 gr/dscf) by the maximum volumetric air flow (1300 acfm), 60 minutes/hr, and a maximum operating schedule of 8760 hrs/yr, and then dividing by 7000 grains/lb and 2000 lbs/ton. Therefore provided compliance is demonstrated with the maximum outlet concentration, compliance with the annual emission limitation will be assumed.

c. Emission Limitation:

Visible particulate emissions shall not exceed 5 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

None