State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
WILLIAMS 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: 03-17010
Fac ID: 0386970001
DATE: 8/18/2005

Center Concrete
Don Pahl
8790 US 6
Edgerton, OH 43517

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

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

CC: USEPA **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 8/18/2005**
Terms and Conditions	**Effective Date: 8/18/2005**

FINAL PERMIT TO INSTALL 03-17010

Application Number:	03-17010
Facility ID:	0386970001
Permit Fee:	**$2900**
Name of Facility:	Center Concrete
Person to Contact:	Don Pahl
Address:	8790 US 6 Edgerton, OH 43517

Location of proposed air contaminant source(s) [emissions unit(s)]:
14894 County Road 8.50
Montpelier, **Ohio**

Description of proposed emissions unit(s):
Portable concrete batch plant.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PE (fugitive)	7.26
PM10 (stack)	2.38
PM10 (fugitive)	2.87

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Aggregate and Sand Storage Piles:	OAC rule 3745-31-05(A)(3)	4.13 tons/yr fugitive particulate emissions (PE) 1.96 tons/yr fugitive particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10)
	OAC rule 3745-17-07(B)(1)	See A.2.g
	OAC rule 3745-17-08(B)(1)	See A.2.g
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

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 (No. 57 stone)
Sand Pile

Note: Load-out emissions from the storage piles involve the transfer of material to elevated bins

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 treat the storage pile materials 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.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 The storage piles are associated with the portable concrete batching operations (emissions unit P901) permitted under facility ID 0386970001. The emission limitations in Section A.1 above represent the maximum emissions which will be emitted from the storage piles associated with the concrete batching operations.

The storage piles are associated with a portable source and are subject to the requirements of OAC rule 3745-17-07(B) and 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. Best Available Technology (BAT) for the storage piles, as set forth by the requirements / emissions limitations of this permit under OAC 3745-31-05(A)(3), are more stringent than any requirements / emissions limitations as may be applicable under OAC 3745-17-07(B) and OAC 3745-17-08(B).

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:

storage pile identification	minimum load-in inspection frequency
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:

storage pile identification	minimum load-out inspection frequency
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:

storage pile identification	minimum wind erosion inspection frequency
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 quarterly 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. <u>Emission Limitation:</u>
   4.13 tons/yr fugitive PE

   <u>Applicable Compliance Method:</u>
   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 1,156,000 tons per year of aggregate and 946,000 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 1,156,000 tons aggregate per year and 946,000 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. (1.83 ton PE/yr)

ii. Load-out - emissions rate is same the as for load-in. (1.83 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 for sand], 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. <u>Emission Limitation:</u>
1.96 tons/yr fugitive PM10

<u>Applicable Compliance Method:</u>
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 1,156,000 tons per year of aggregate and 946,000 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 1,156,000 tons aggregate per year and 946,000 tons sand per year by the appropriate emission factors from AP-42 section 13.2.4.3 (1/95) [0.0082 lb PM10 /ton, both aggregate and sand], applying a 90% control efficiency and dividing by 2000lbs/ton. (0.86 ton PM10 /yr)

ii. Load-out - emissions rate is the same as for load-in.(0.86 ton PM10 /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) [0.46 lbs PE/day/acre for aggregate & 2.95 lbs PE/day/acre for sand], a maximum operating schedule of 365 days per year and dividing by 2000. (0.23 ton PM10 /yr)

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PM10 limitation will be assumed.

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 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.

d. 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

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 - Roadways and Parking Areas (unpaved)	OAC rule 3745-31-05(A)(3)	1.69 tons/yr fugitive particulate emissions (PE) 0.50 tons/yr fugitive particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) 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 Sections A.2.b through A.2.g)
	OAC rule 3745-17-07(B)(1)	See A.2.h
	OAC rule 3745-17-08(B)(1)	See A.2.h

2. Additional Terms and Conditions

2.a 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:

access plant roadway (raw material delivery, transit-mix trucks)
front-end loader routes

2.b 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, and speed reduction, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c 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.d 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 using watering. 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 of: no visible particulate emissions except for one minute during any 60-minute period.

2.e 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.f 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.g 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.h The unpaved roadways and parking areas are associated with the portable concrete batching operations (emissions unit P901) permitted under facility ID 0386970001. The emission limitations in Section A.1 above represent the maximum emissions which will be emitted from the roadways and parking areas for any proposed site for relocation of the portable concrete batching plant.

The unpaved roadways and parking areas are associated with a portable source and are subject to the requirements of OAC rule 3745-17-07(B) and 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. Best Available Technology (BAT) for the roadways and parking areas, as set forth by the requirements / emissions limitations of this permit under OAC 3745-31-05(A)(3), are more stringent than any requirements / emissions limitations as may be applicable under OAC 3745-17-07(B) and OAC 3745-17-08(B).

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 and parking areas in accordance with the following frequencies:

unpaved roadways	minimum inspection frequency
all roadways	once per day of operation

unpaved parking areas	minimum inspection frequency
all parking areas	once per day of operation

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has

occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

   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 updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit quarterly 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. <u>Emission Limitation:</u>
   1.69 tons/yr fugitive PE

Applicable Compliance Method:
The emission limitation was established by multiplying AP-42 emission factor for unpaved roadways of 10.3 lb PE /VMT [Section 13.2.2.2 (12/03)], applying a control efficiency of 95% for use of best available control measures, and the maximum vehicle miles traveled (VMT) based of 6550 per year.

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:
0.50 tons/yr fugitive PM10

Applicable Compliance Method:
The emission limitation was established by multiplying AP-42 emission factor for unpaved roadways of 3.03 lbs PM10 /VMT [Section 13.2.2.2 (12/03)], applying a control efficiency of 95% for use of best available control measures, and the maximum vehicle miles traveled (VMT) of 6550 per year.

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PM-10 limitation will be assumed.

c. Emission Limitation:
no visible particulate emissions except for a period of time not to exceed three minutes 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)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Cement Storage Silo and Supplement Storage Silo (includes pneumatic loading operations)	OAC rule 3745-31-05 (A)(3)	0.01 grains particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) per dry standard cubic foot 2.38 tons PM10/yr, for emissions unit P001 and stack emissions of emissions unit P901 combined 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.c.

2. Additional Terms and Conditions

2.a All emissions or particulate matter are PM10.

2.b Best Available Technology (BAT) control requirements for the control of PE from this emissions unit shall be the use of a baghouse which can achieve a maximum outlet concentration of 0.01 grains PM10/dscf.

2.c The cement and supplement storage silo operations are associated with the portable concrete batching operations (emissions unit P901) permitted under facility ID 0386970001. The emission limitations in Section A.1 above represent the maximum emissions which will be emitted from the cement and supplement storage silo operations associated with the concrete batching operations.

The cement and supplement storage silo operations are associated with a portable source and are subject to the requirements of OAC rule 3745-17-07(B) and 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. Best Available Technology (BAT) for the cement and supplement storage silo operations, as set forth by the requirements / emissions limitations of this permit under OAC 3745-31-05(A)(3), are more stringent than any requirements / emissions limitations as may be applicable under OAC 3745-17-07(B) and OAC 3745-17-08(B).

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.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
0.01 grains PM10/dscf

Applicable Compliance Method:
The 0.01 gr PM10/dscf limit was established in accordance with the manufacturer's guaranteed outlet concentration. If required, the permittee shall demonstrate compliance with the gr/dscf limitation by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

b. Emission Limitation:
2.38 tons PM10/yr, for emissions unit P001 and point emissions of emissions unit P901 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual limitation by multiplying the maximum outlet concentration from the baghouses (0.01 gr PM10/dscf) by the maximum volumetric air flow (6350 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

Emissions Unit ID: **P901**

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P901 - Portable Concrete Batch Plant: Aggregate and Sand Weigh Hopper, Cement and Supplement Weigh Hopper, and Transit-Mix Cement Truck Loading	OAC rule 3745-31-05	
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)(1)
		OAC rule 3745-17-11 (B)
		OAC rule 3745-17-07 (A)

Applicable Emissions Limitations/Control Measures	
1.44 tons/yr of fugitive particulate emissions (PE)	See A.2.h
0.41 tons/yr fugitive particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10)	See A.2.h
use of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Sections A.2.b. through A.2.d)	See A.2.h
opacity restrictions (See Section A.2.e)	
0.01 grains particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) per dry standard cubic foot (from stack)	
2.38 tons PM10/yr, for emissions unit P001 and stack emissions of emissions unit P901 combined	
Visible (stack) particulate emissions shall not exceed 5 percent opacity, as a six-minute average.	
See A.2.f and A.2.g.	
See A.2.h	

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

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:

material handling operation(s)	control measure(s)
sand and aggregate weigh hopper	watering

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 measures(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures(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 All stack emissions of particulate matter are PM10.

2.g Best Available Technology (BAT) control requirements for the control of particulate matter from this emissions unit shall be the use of baghouses for the cement and supplement weigh hopper and transit-mix truck loading which can

achieve a maximum outlet concentration of 0.01 grains PM10/dscf.

2.h The emission limitations in Section A.1 above represent the maximum emissions which will be emitted from the portable concrete batching plant for any proposed site for relocation.

The concrete batching plant is a portable source and is subject to the requirements of OAC rule 3745-17-07(B) and 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. Best Available Technology (BAT) for the concrete batching plant, as set forth by the requirements / emissions limitations of this permit under OAC 3745-31-05(A)(3), are equivalent to or more stringent than any requirements / emissions limitations as may be applicable under OAC 3745-17-07(B) and OAC 3745-17-08(B).

B. Operational Restrictions

1. The maximum concrete production for the concrete batch plant shall not exceed 100,000 tons per year.

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:

material handling operation(s)	minimum inspection frequency
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 required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. 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 abnormal visible emissions.

6. The permittee shall collect and record the following information each month:

   a. The total tons per month of concrete produced

   b. The annual, year-to-date tons of concrete produced (summation of 'a', for each calendar month to date from January to December).

D. Reporting Requirements

1. The permittee shall submit quarterly 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 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 abnormal 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.

3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances in the maximum concrete production of 100,000 tons per year. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. 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. <u>Emission Limitation:</u>
1.44 tons/yr fugitive PE

<u>Applicable Compliance Method:</u>
The emission limitation was established by combining the emissions from sand and aggregate weigh hopper load-in operations and from transit-mix truck loading operations as listed in the permittee's application and applying a (1 - 0.71) factor, for uncaptured emissions for truck loading. Load-in operation emissions are based on a maximum load-in rate of 80,000 tons per year of sand and aggregate (combined). Truck loading operation emissions are based on a maximum load-in rate of 14,000 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 80,000 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, both sand and aggregate] and dividing by 2000lbs/ton. (0.20 ton PE/yr)

ii. Truck loading - emissions associated with truck loading operations were established by multiplying maximum load-in rates of 14,000 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 29% factor for uncaptured emissions and dividing by 2000 lbs/ton. (1.24 ton PE/yr)

Therefore, provided compliance is shown with the production restriction and 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:
0.41 tons/yr fugitive PM10

Applicable Compliance Method:
The emission limitation was established by combining the emissions from sand and aggregate weigh hopper load-in operations and from transit-mix truck loading operations as listed in the permittee's application and applying a (1 - 0.71) factor, for uncaptured emissions for truck loading. Load-in operation emissions are based on a maximum load-in rate of 80,000 tons per year of sand and aggregate (combined). Truck loading operation emissions are based on a maximum load-in rate of 14,000 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 80,000 tons sand and aggregate per year by the appropriate emission factors from AP-42 Table 11.12-2 (10/01) [0.0024 lb PE/ton, both sand and aggregate] and dividing by 2000lbs/ton. (0.10 ton PM10 /yr)

ii. Truck loading - emissions associated with truck loading operations were established by multiplying maximum load-in rates of 14,000 tons cement and supplement per year by the appropriate emission factors from AP-42

Table 11.12-2 (10/01) [0.15 lb PE/ton], applying a 29% factor for uncaptured emissions and dividing by 2000lbs/ton. (0.31 ton PM10 /yr)

Therefore, provided compliance is shown with the production restriction and the requirements of this permit to apply best available control measures, compliance with the ton per year PM10 limitation will be assumed.

c. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from the following material handling operations and uncaptured emissions: 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.

d. Emission Limitation:
0.01 grains PM10/dscf

Applicable Compliance Method:
The 0.01 gr/dscf limit was established in accordance with the manufacturer's guaranteed outlet concentration. If required, the permittee shall demonstrate compliance with the gr/dscf limitation by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

e. Emission Limitation:
2.38 tons PM10/year, for emissions unit P001 and stack emissions of emissions unit P901 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual limitation by multiplying the maximum outlet concentration from the baghouse (0.01 gr PM10/dscf) by the maximum volumetric air flow (6350 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.

f. 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

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

   a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;

   b. the portable emissions unit is operating pursuant to a currently effective permit to install, permit to operate or registration;

   c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Northwest District Office (NWDO) and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and,

   d. in the NWDO's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

   a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;

   b. the portable emissions unit is equipped with best available technology;

   c. the portable emission unit owner has identified the proposed site to Ohio EPA;

d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;

e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;

f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and,

g. the portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to section F.2. above, shall be valid for no longer than three years and are subject to renewal.

3. In order for the NWDO and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the NWDO (347 North Dunbridge Road, Bowling Green, OH 43402) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the NWDO and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

4. The permittee should be advised that when portable emission units are located at a stationary source or at a source comprised of portable emission units, potential emissions from the portable emission units are included in the facility potential to emit calculations for Title V and PSD applicability.

   The permittee shall include a potential to emit analysis of facility-wide emissions (including the portable sources) for the proposed relocation in the "Notice of Intent to Relocate".