



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
DELAWARE COUNTY
Application No: 01-08769**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/12/2003

Central Ready Mix Delaware Plant
Mike Fuchs
P O Box 361537
Columbus, OH 43236

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, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/12/2003
Effective Date: 8/12/2003**

FINAL PERMIT TO INSTALL 01-08769

Application Number: 01-08769
APS Premise Number: 0121980262
Permit Fee: **\$2700**
Name of Facility: Central Ready Mix Delaware Plant
Person to Contact: Mike Fuchs
Address: P O Box 361537
Columbus, OH 43236

Location of proposed air contaminant source(s) [emissions unit(s)]:
**343 Curtis Road
Delaware, Ohio**

Description of proposed emissions unit(s):
Concrete batch plant aggregate storage piles roadways.

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 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	11.0

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 - Storage piles including load-in and load-out (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	Total particulate emissions (PE) shall not exceed 1.0 tons/yr; No visible emissions except for 1 minute in any 60 minute 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 emission except for 1 minute in any 60 minute 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:

storage pile identification

All

- 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 load-in and load-out materials with water and/or any other suitable dust suppression chemicals 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 treat the load-in and load-out materials with water and/or any other suitable dust suppression chemicals 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.

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	daily

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
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all

daily

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

storage pile identification

minimum wind erosion inspection frequency

all

daily

- 4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. 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 reports shall be submitted by:
 - a. July 15 and shall cover the period from January 1 until June 30 for each calendar year.
 - b. January 15 and shall cover the period from July 1 until December 31 for each calendar year.
3. If no deviations (excursions) are observed during a given period, the permittee shall submit a report which states that no deviations (excursions) occurred during that period. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06)

E. Testing Requirements

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

No visible particulate emissions except for 1 minute during any 60 minute period.

Compliance Method:

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

Particulate emissions shall not exceed 1.0 ton per year.

Compliance Method:

The emission factor calculation for storage piles in AP-42 section 13.2.4 (January, 1995) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing current conditions as follows:

$$E = k (0.0032)[(U/5)^{1.3}/(M/2)^{1.4}]$$

E = emission factor expressed in pounds (lbs) / ton

k = particle size multiplier (dimension less) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 9.1*

M = material moisture content (%) = 2.4**

$$E = 0.003996 \text{ pounds/ton}$$

Assuming a maximum ton per year process weight rate of 300,000, particulate emissions for each activity (load-in and load-out) is equal to 0.5994 tons per year. To account for both load-in and load-out, the emission limit of 0.5994 is multiplied by two resulting in total emissions limit of 1.2 tons per year.

Assume 50% control for watering piles

$$(1.2 \text{ tons/year}) (.50) = 0.5994 \text{ tons of particulate controlled/year}$$

* The mean average wind speed in the State Of Ohio is 9.1 miles per hour.

** Data supplied by applicant.

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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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, Central District Office;
 - d. Ohio EPA, Central District Office 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, Central District Office with fifteen days written notice of the relocation.

Any site approvals issued by the Ohio EPA, Central District Office, pursuant to this section, shall be valid for no longer than three years and are subject to renewal.

3. In order for the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office, (3232 Alum Creek Drive, Columbus, Ohio 43207-3417) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA, Central District Office, 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".

5. If this portable facility is relocated to an area listed in OAC rule 3745-17-08 then the facility must meet the requirements of OAC rules 3745-17-08 and 3745-17-07(B).

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>
F002 - Unpaved roadways and parking areas	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-08(A) OAC rule 3745-17-07(B)	Particulate emissions shall not exceed 4.0 tons per year. No visible particulate emission except for 3 minutes during any 60-minute period Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g) None (refer to section A.I.2.h of the terms and conditions of this permit).

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:

All

unpaved parking areas:

All

- 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 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 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 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.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 area in which this emissions unit will be located is not included in "Appendix A" or OAC rule 3745-17-08. Therefore, the requirements established in OAC rules 3745-17-08(A) and 3745-17-07(B) shall not apply to any fugitive dust source which is located in this area "Non-Appendix A" area. "Fugitive dust source" is defined in OAC rule 3745-17-01(B)(7).

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>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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All

Daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. 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 Ohio EPA, Central District Office, 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.

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 reports shall be submitted by:
 - a. July 15 and shall cover the period from January 1 until June 30 for each calendar year.
 - b. January 15 and shall cover the period from July 1 until December 31 for each calendar year.
3. If no deviations (excursions) are observed during a given period, the permittee shall submit a report which states that no deviations (excursions) occurred during that period. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements

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

- a. Emission Limitation:

No visible particulate emissions except for 3 minutes during any 60-minute period

Compliance Method:

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

- b. Emission Limitation:

Particulate emissions shall not exceed 4.0 tons per year.

Compliance Method:

The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2 (September, 1998) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing current conditions as follows:

$$E = \frac{k(s/12)^a(W/3)^b(365-p)}{(M/0.2)^c} / 365$$

Where

E = size-specific emission factor (lb/VMT)

s = silt content of road surface material (%) = 5.0 %

W = mean vehicle weight (tons) = 15

M = surface material moisture content (%) = 0.2%

a = 0.8 (dimension less constant)

b = 0.5 (dimension less constant)

c = 0.4 (dimension less constant)

k = 10 (dimension less constant) particle size multiplier

p = 145 days/year with greater than 0.1 inch or precipitation

Therefore, E = 6.69 lbs particulate/VMT

Maximum travel = 2,400 VMT/year

$(2,400 \text{ VMT/yr})(6.69 \text{ lbs/VMT}) = 16,056 \text{ lbs of particulate/year}$

$(16,056 \text{ lbs/year})(1 \text{ ton}/2000 \text{ lbs}) = 8.03 \text{ tons of particulate uncontrolled/year}$

Assume 50% control for roadway watering

$(8.03 \text{ tons/year}) (.50) = 4.01 \text{ tons of particulate controlled/year}$

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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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, Central District Office;
- d. Ohio EPA, Central District Office 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, Central District Office with fifteen days written notice of the relocation.

Any site approvals issued by the Ohio EPA, Central District Office, pursuant to this section, shall be valid for no longer than three years and are subject to renewal.

- 3. In order for the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office, (3232 Alum Creek Drive, Columbus, Ohio 43207-3417) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA, Central District Office, 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".

- 5. If this portable facility is relocated to an area listed in OAC rule 3745-17-08 then the facility must meet the requirements of OAC rules 3745-17-08 and 3745-17-07(B).

2.b The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

- i. Aggregate/Sand hopper load-in/load-out
- ii. Storage bins and all material transfer points
- iii. Pneumatic transfer operations
 - (a) Bulk trucks to silos
 - (b) Material transfer
- iv. Weigh Hopper
- v. Truck Loading

2.c The permittee shall employ best available control measures for the above-identified material handling operations 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 operations</u>	<u>control measures</u>
i. Aggregate/Sand hopper load-in/load-out	Maintain material moisture
ii. Storage bins and material transfer points	Enclosure
iii. Pneumatic transfer operations	
(a) Bulk trucks to silos	Baghouse and enclosure
(b) Material transfer	Baghouse and enclosure
iv. Weigh Hopper	Enclosure
v. Truck Loading	Charging Boot

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

2.d For each material handling operation that is not adequately enclosed, the above-identified control measures 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 are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.

2.e Cement shall be transferred pneumatically to storage. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emission of cement from the delivery vehicle shall be cause for the halt of the unloading process until the situation is corrected.

- 2.f The drop height of the front-end bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust. The sand and aggregate loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust.
- 2.g A charging boot shall be used around the hopper discharge area and the transit-mix truck opening and the collection efficiency shall be sufficient to minimize or eliminate visible emissions at the point of capture to the extent possible with good engineering design.
- 2.h Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-07 and 3745-31-05.

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 operations</u>	<u>minimum inspection frequency</u>
i. Aggregate/Sand hopper load-in/load-out	Daily
ii. Storage bins and all material transfer points	Daily
iii. Pneumatic transfer operations	
(a) Bulk trucks to silos	Once during each unloading event
(b) Material transfer	Daily
iv. Weigh Hopper	Daily
v. Truck Loading	Daily

- 2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
- 3. 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 each material handling operation (each sand and/or aggregate transfer point, weigh hopper, and truck loading) serving this emissions unit. No inspection is required on days the material handling operations are not in

operation. 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. Whether the emissions are representative of normal operations;
- b. if the emissions are not representative of normal operations, the cause of the visible emissions;
- c. the total duration of any visible emission incident;
- d. any corrective actions taken to eliminate the visible emissions and the dates the corrective actions were implemented; and
- e. the date and reason any required inspection was not performed.

The information above shall be kept separately for each material handling operation identified in Section A.2.c.

5. The permittee shall perform daily checks while the equipment is in operation for any visible PE from the fabric filter exhaust, or any visible fugitive PE from the batch plant . The presence or absence of any visible emissions from the fabric filter exhaust, and/or the batch plant shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.
6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience, and specified records, indicate that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each instance when 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 reports shall be submitted by:
 - a. July 15 and shall cover the period from January 1 until June 30 for each calendar year.
 - b. January 15 and shall cover the period from July 1 until December 31 for each calendar year.
3. If no deviations (excursions) are observed during a given period, the permittee shall submit a report which states that no deviations (excursions) occurred during that period. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.

E. Testing Requirements

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

- a. Emission Limitation:

The baghouse shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases and no visible PE from the exhaust stack.

Compliance Method:

Compliance shall be demonstrated through Monitoring Requirement C.5 and Reporting Requirement D.1, above.

If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(7).

If required, compliance with the no visible emission limit from the exhaust of the fabric filter shall be determined using Test Method 22-like visible emission observations (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations).

- b. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20 per cent opacity as a three-minute average.

Compliance Method:

If required, compliance with the visible emission limitations for the material handling operations identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(3) of OAC rule 3745-17-03.

- c. Emission Limitation:
 Particulate emissions (PE) shall not exceed 6.0 tons/yr.

Compliance Method:

Compliance with the tons per year emission limitation shall be demonstrated by the following one time calculations using emission factors from AP 42, Compilation of Air Pollutant Emission Factors, Chapter 11, Table 11.12-2 (issued 10/01). As provided by the applicant, the average material composition of concrete is: Aggregate 44 %, Sand 36 %, Cement 7 %, Cement Supplement 7% and 6% water.

Material Handling (Aggregate / Sand Transfer to Batch Mix Operations)

Aggregate transfer*

feed hopper loading = 132,000 tons/yr max transfer rate
 feed hopper to conveyor = 132,000 tons/yr max transfer rate
 conveyor to bin = 132,000 tons/yr max transfer rate

$132,000 \text{ tons/yr} \times 0.0069 \text{ lb PE/ton} \times \text{ton}/2000 \text{ lbs} = 0.4554 \text{ ton PE/yr}$

$132,000 \text{ tons/yr} \times 0.0069 \text{ lb PE/ton} \times \text{ton}/2000 \text{ lbs} = 0.4554 \text{ ton PE/yr}$

$132,000 \text{ tons/yr} \times 0.0069 \text{ lb PE/ton} \times \text{ton}/2000 \text{ lbs} = \underline{0.4554 \text{ ton PE/yr}}$
 1.366 tons PE/yr

Sand Transfer*

feed hopper loading = 108,000 tons/yr max transfer rate
 feed hopper to conveyor = 108,000 tons/yr max transfer rate
 conveyor to bin = 108,000 tons/yr max transfer rate

$108,000 \text{ tons/yr} \times 0.0021 \text{ lb PE/ton} \times \text{ton}/2000 \text{ lbs} = 0.1134 \text{ ton PE/yr}$

$108,000 \text{ tons/yr} \times 0.0021 \text{ lb PE/ton} \times \text{ton}/2000 \text{ lbs} = 0.1134 \text{ ton PE/yr}$

$108,000 \text{ tons/yr} \times 0.0021 \text{ lb PE/ton} \times \text{ton}/2000 \text{ lbs} = \underline{0.1134 \text{ ton PE/yr}}$
 0.3396 ton PE/yr

*Emission factor takes moisture content into consideration. AP-42, 11.12, 10/01

Cement & Cement Supplement Unloading Emission Calculations:

Truck to cement silo = 21,000 tons/yr max transfer rate
 Truck to cement sup silo = 21,000 tons/yr max transfer rate
 Cement emission factor = 0.72 lb/ton (AP-42, 11.12, 10/01)
 Supplement emission factor = 3.14 lbs/ton (AP-42, 11.12, 10/01)
 Filter control efficiency = 99.8%

Cement Silo Emissions

$21,000 \text{ tons/yr} \times 0.72 \text{ lb/ton} \times (1-0.998) \times \text{ton}/2000 \text{ lbs} = 0.0151 \text{ ton PE/yr}$

Cement Supplement Silo Emissions

21,000 tons/yr x 3.14 lbs/ton x (1-0.998) x ton/2000 lbs= 0.0659 ton PE/yr

Cement & Cement Supplement Unloading Total = 0.0811 ton PE/yr

Weigh Hopper Loading Emission Calculations:

Bins to weigh hopper = 240,000 tons/yr max transfer rate

Emission factor = 0.0051 lb/ton (AP-42, 11.12, 10/01)

240,000 tons/yr x 0.0051 lb/ton x (1-.50) x ton/2000 lbs = 0.306 ton PE/yr

Weigh Hopper Loading Total = 0.306 ton PE/yr

Truck Loading Emission Calculations:

Weigh hopper to truck = 42,000 tons/yr max transfer rate

Emission factor = 0.61 lb/ton (AP-42, 11.12, 10/01)

Filter/boot control efficiency = 71 % (AP-42, 11.12, 10/01)

42,000 tons/yr x 0.61 lb/ton x (1-.71) x ton/2000 lbs = 3.71 ton PE/yr

Truck Loading Total = 3.71 ton PE/yr

Total Emissions:

Aggregate Transfer = 1.366 tons PE/yr

Sand Transfer = 0.3396 ton PE/yr

Cement & Cement Supplement Unloading = 0.0811 ton PE/yr

Weigh Hopper Loading Total = 0.306 tons PE/yr

Truck Loading Total = 3.71 tons PE/yr

5.80 tons PE/hr

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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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, Central District Office;
 - d. Ohio EPA, Central District Office 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, Central District Office with fifteen days written notice of the relocation.

Any site approvals issued by the Ohio EPA, Central District Office, pursuant to this section, shall be valid for no longer than three years and are subject to renewal.

3. In order for the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office, (3232 Alum Creek Drive, Columbus, Ohio 43207-3417) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA, Central District Office, 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".

5. If this portable facility is relocated to an area listed in OAC rule 3745-17-08 then the facility must meet the requirements of OAC rules 3745-17-08 and 3745-17-07(B).