



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**

**PREBLE COUNTY**

**Application No: 08-04692**

**Fac ID: 0868030194**

**DATE: 6/21/2005**

Camden Ready Mix-Eaton  
Carroll Wysong  
5897 St Rte 503 N  
Eaton, OH 45338-0000

**CERTIFIED MAIL**

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

RAPCA



Permit To Install  
Terms and Conditions

Issue Date: 6/21/2005  
Effective Date: 6/21/2005

**FINAL PERMIT TO INSTALL 08-04692**

Application Number: 08-04692  
Facility ID: 0868030194  
Permit Fee: **\$600**  
Name of Facility: Camden Ready Mix-Eaton  
Person to Contact: Carroll Wysong  
Address: 5897 St Rte 503 N  
Eaton, OH 45338-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**805 S Franklin St  
Eaton, Ohio**

Description of proposed emissions unit(s):  
**Chapter 31 modification replacing PTI 08-04183 issued 8/1/00 to add roadways parking areas and fly ash silo.**

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><b>Pollutant</b></u>	<u><b>Tons Per Year</b></u>
particulate	7.00



sand and gravel storage piles a & b

- 2.c** 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 maintain minimal drop heights for stackers and front-end loaders, and to treat the load-in and load-out materials with water and/or any other suitable dust suppression sufficient treatment frequencies to ensure compliance.

The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.d** 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.e** The permittee shall employ best available control measures for wind erosion for 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 each storage pile 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.f** 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.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 requirements of OAC rules 3745-17-08 and 3745-31-05(A)(3).

**B. Operational Restrictions**

None

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

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
sand and gravel a & b	daily

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
sand and gravel a & b	daily

3. 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.
4. 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.
5. 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.
6. 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 6.a. through 6.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 (excursion) reports in accordance with the general terms and conditions in Section A.2. and shall include the following information:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
No visible PE for load-in, load-out and wind erosion, except for 1 minute during any 60-minute period.  
  
Applicable Compliance Method:  
Compliance with the emission limitation for the paved roadways and parking areas identified above shall be determined in accordance with USEPA 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:  
1.94 tons/year PE  
  
Applicable Compliance Method:
    - i. The PE for load-in and load-out of storage piles (0.56 tons/year) was calculated by multiplying the emission factor of 0.0017 lbs PE/ton material [Equation 1 of Section 13.2.4 in Compilation of Air Pollutant Emission Factors, AP-42, , Fifth Edition, Volume I, (January 1995)] by the maximum annual material throughput (657,000 ton/year), and then dividing by 2000 pounds/ton.
    - ii. The PE for wind erosion (1.38 tons/year) for the surfaces of all storage piles was calculated by multiplying the emission factor of 3.78 lb/acre/day [Equation 4-9 from the EPA document 450/3-88-008 "Control of Open Fugitive Dust Sources," Section

4.1.3 (September 1988)] by the maximum surface area of the storage piles (2 acres) times 365 days, and then dividing by 2000 pounds/ton.

iii. sum i + ii above.

## **F. Miscellaneous Requirements**

1. This is a modification of PTI 08-04183 issued on August 8, 2000 for emissions unit F001 and P901. Included in this PTI is a new emissions unit F002 for roadways and parking areas. The PTI reflects an overall a decrease of 2.26 TPY PE from the facility: a decrease of 0.29 TPY PE from updating the operations data for load-in and load-out of storage piles (F001); an addition of 1.75 TPY PE of new emissions for roadways and parking areas (F002), and a decrease of 6.72 TPY PE due to the updated AP-42 emission factors (October 2001), inclusion of an additional silo, and controls for the concrete batch plant (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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - paved and unpaved plant roadways and parking areas (see Section A.2.b below)	OAC rule 3745-31-05 (A)(3)	<p>Particulate emissions (PE) shall not exceed 1.75 tons per year.</p> <p>There shall be no visible particulate emissions from any paved roadways or parking areas except for a period of time not to exceed 1 minute during any sixty-minute observation period.</p> <p>There shall be no visible particulate emissions from any unpaved roadways or parking areas except for a period of time not to exceed 3 minutes during any sixty-minute observation period.</p> <p>The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c through A.2.i).</p>
	OAC rule 3745-17-07 (B)(4)	<p>The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).</p>
	OAC rule 3745-17-07 (B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	<p>The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).</p>

OAC rule 3745-17-08 (B)  
(applicable only if this emissions unit  
is located in an area identified in  
Appendix A of OAC rule 3745-17-  
08)

The visible emission limitation  
specified by this rule is less stringent  
than the visible emission limitation  
established pursuant to OAC rule  
3745-31-05 (A)(3).

## 2. Additional Terms and Conditions

- 2.a** The annual emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these terms.
- 2.b** The paved and unpaved roadways and parking areas that are covered by this permit are listed below:
- paved roadways:  
all paved roadways
- paved parking areas:  
all paved parking areas
- unpaved roadways:  
all unpaved roadways
- unpaved parking areas:  
all unpaved parking areas
- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water and sweeping at sufficient treatment frequencies to ensure compliance and vehicle speed reduction. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or other non-toxic dust suppressants at sufficient treatment frequencies to ensure compliance and vehicle speed reduction. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking

area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- 2.f Any unpaved roadway or parking area, which is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.g The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.h Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

**B. Operational Restrictions**

None

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

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

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	daily
<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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 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.a. through 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

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

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 emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

1.75 tons/year particulate emissions from paved roadways and parking areas.

Applicable Compliance Method:

- i. The PE for paved roadways and parking areas was calculated by multiplying the emission factor of 2.94 lbs PE/vehicle mile traveled [Equation 1 of Section 13.2.1 in Compilation of Air Pollutant Emission Factors, AP-42, , Fifth Edition, Volume I, (revised 12/03)] by the maximum vehicle miles traveled (1,244 vehicle) and by a control factor of  $[(100 - 95) / 100]$  for the application of water and sweeping, and speed reduction, and then dividing by 2000 pounds/ton.
- ii. The PE for unpaved roadways and parking areas was calculated by multiplying the emission factor of 5.32 lbs PE/vehicle mile traveled [Equation 1a of Section 13.2.1 in Compilation of Air Pollutant Emission Factors, AP-42, , Fifth Edition, Volume I, (revised 12/03)] by the maximum vehicle miles traveled (6,222 vehicle) and by a control factor of  $[(100 - 90) / 100]$  for the application of water and speed reduction, and then dividing by 2000 pounds/ton.
- iii. i + ii above.

\* The control efficiency for the application of water and sweeping is assumed to be 80% for paved roadways, and the control efficiency for the application of water and/or dust suppression chemicals is assumed to be 50% for unpaved roadways. Additional control efficiency for the reduction of speed to 15 miles per hour is assumed to be 80%. (Reasonably Available Control Measures For Fugitive Dust Sources, 1980, Ohio EPA).

- b. Emission Limitation:

No visible PE from any paved roadway or parking areas, except for 1 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the emission limitation for the paved roadways and parking areas identified above shall be determined in accordance with USEPA 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.

- c. **Emission Limitation:**  
No visible PE from any unpaved roadway or parking areas, except for 3 minutes during any 60-minute period.

**Applicable Compliance Method:**

Compliance with the emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with USEPA 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.

**F. Miscellaneous Requirements**

1. This is a modification of PTI 08-04183 issued on August 8, 2000 for emissions unit F001 and P901. Included in this PTI is a new emissions unit F002 for roadways and parking areas. The PTI reflects an overall a decrease of 2.26 TPY PE from the facility: a decrease of 0.29 TPY PE from updating the operations data for load-in and load-out of storage piles (F001); an addition of 1.75 TPY PE of new emissions for roadways and parking areas (F002), and a decrease of 6.72 TPY PE due to the updated AP-42 emission factors (October 2001), inclusion of an additional silo, and controls for the concrete batch plant (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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - portable 200 TPH (100 cubic yard/hour) concrete batch plant (transit mix) *Modification	OAC rule 3745-31-05(A)(3)	The particulate emissions (PE) from this emissions unit shall not exceed 1.51 lbs/hr and 3.31 tons per year.
Transfer of sand and aggregate to elevated bins	OAC rule 3745-31-05(A)(3)	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 from the conveyor loading area.  The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(B).  Sand and aggregate loaded into the elevated bins shall, at all times, have an inherent moisture content sufficient to minimize or eliminate visible emissions of fugitive dust
	OAC rule 3745-17-07(B)	The visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.  See Section A.2.b.
	OAC rule 3745-17-08(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Cement and fly ash silos with fabric filters

OAC rule 3745-31-05(A)(3)

See Section A.2.b.

The silos shall be adequately enclosed and vented to fabric filter dust collectors. The enclosure shall be sufficient to eliminate visible emissions of fugitive dust.

The fabric filter dust collectors shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases, combined, or there shall be no visible emissions from the outlet, whichever is less stringent.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c.).

OAC rule 3745-17-07(A)

The visible emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Weigh hopper loading of cement, fly ash, sand and aggregate with fabric filter baghouse

OAC rule 3745-31-05(A)(3)

The weigh hopper shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the last point of capture.

The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.

Truck loading of cement, fly ash, sand and aggregate with fabric filter (transit-mix) with fabric filter baghouse

OAC rule 3745-17-07(A)

OAC rule 3745-17-11

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d.).

The visible emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

A charging boot shall be used around the hopper discharge area and transit-mix truck opening and vented to a fabric filter dust collector. The charging boot shall have a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture to the extent possible with good engineering design.

The fabric filter dust collector shall achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.e.).

The visible emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-07(B)

The visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.

See Section A.2.b.

OAC rule 3745-17-08

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See Section A.2.b.

## 2. Additional Terms and Conditions

- 2.a** The 1.51. lb PE/hour limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these terms.
- 2.b** For facilities in Appendix A areas defined in OAC rule 3745-17-08(D), the requirements established pursuant to OAC 3745-17-07(B) and OAC rule 3745-17-08(B) are equivalent or less stringent than the requirements established pursuant to OAC 3745-31-05(A)(3).
- 2.c** The permittee shall employ the following best available control measures for the above identified cement and cement supplement silos for the purpose of ensuring compliance with the above mentioned applicable requirements:
- i. Cement and cement supplement shall be transferred pneumatically to the cement and cement supplement silos. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emission of fugitive dust. Any visible emissions from cement and/or cement supplement dust emanating from the delivery vehicle during transfer shall be cause for the immediate halt of the unloading process and the refusal of cement and/or cement supplement load until the situation is corrected.
  - ii. Each cement and cement supplement silo vent shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient to eliminate at all times visible emission of fugitive dust at the point of capture.

- 2.d** The permittee shall employ the following best available control measures for the above identified weigh hopper for the purpose of ensuring compliance with the above mentioned applicable requirements:
- i. The cement batching weigh hopper shall be sufficiently enclosed so as to eliminate at all times visible emissions of fugitive dust.
  - ii. The transfer of cement/cement supplement/sand/aggregate to the concrete batching weigh hopper shall be enclosed and vented to a fabric filter dust collection system. The enclosure shall be sufficient to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.
- 2.e** The permittee shall employ the following best available control measures for the above identified truck mix loading process for the purpose of ensuring compliance with the above mentioned applicable requirements.

The permittee shall install and employ a fabric filter dust collection system for the purpose of controlling dust emissions from the truck mix loading process. The fabric filter dust collection system shall be sufficient to minimize or eliminate at all times visible emissions of fugitive dust at the point of capture.

## **B. Operational Restrictions**

1. The maximum hourly production rate for this truck mix concrete facility shall not exceed 100 cubic yards (200 tons) of concrete per hour.
2. The maximum annual hours of operation for this truck mix concrete facility shall not exceed 4380 hours per year. The 4380 hours per year operation corresponds to a maximum annual production rate of 438,000 cubic yards (876,000tons) of concrete per year.

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

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the annual hours of operation and annual concrete production rate, in cubic yards; and
  - b. the annual particulate emission rate, in tons (as calculated in Section E.1.b.).
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., emissions capture systems, building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

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

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

1. The permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible particulate emissions were observed in excess of the allowable opacity limit specified above from the stack of the fabric filters serving this emissions unit;
  - b. describe any corrective actions taken to minimize or eliminate the visible particulate from the fabric filters;
  - c. identify all days during which any visible fugitive particulate emissions were observed in excess of the allowable opacity limit specified above from the egress points (i.e., sand/aggregate transfer points, truck loading, enclosures, building windows, doors, roof monitors, , etc.) serving this emissions unit; and
  - d. describe any corrective actions taken to minimize or eliminate the abnormal visible fugitive particulate.

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.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
  - a. The total hours of operation and concrete production rate, in cubic yards.

- b. The total particulate emissions, in tons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

- 1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation:  
1.51 lbs/hr PE

Applicable Compliance Method:

Compliance shall be determined by totaling the following products:

- i. Sand and aggregate transfer to elevated bins:

The maximum process rate of 100 cubic yards of concrete multiplied by the sum of by 0.0015 lb PE/cubic yard of concrete for sand transfer and 0.0064 lb PE/cubic yard of concrete for aggregate transfer (AP-42,Chapter 11, Table 11.12-3 (10/01)) for an uncontrolled emission rate of 0.800 lbs/hr.

- ii. Cement delivery to elevated silo (pneumatic):

The maximum process rate of 100 cubic yards of concrete multiplied by the emission factor of 0.0002 lb PE/cubic yard of concrete for pneumatic cement delivery to silo (AP-42,Chapter 11, Table 11.12-3 (10/01)) for an controlled emission rate of 0.020 lb/hr.

- iii. Fly ash cement supplement unloading to elevated silo (pneumatic):

The maximum process rate of 100 cubic yards of concrete multiplied by the emission factor of 0.0003 lb PE/cubic yard of concrete for pneumatic cement supplement delivery to silo (AP-42,Chapter 11, Table 11.12-3 (10/01)) for an controlled emission rate of 0.030 lb/hr.

- iv. Weigh hopper loading:

The maximum process rate of 100 cubic yards of concrete multiplied by the emission factor of 0.0079 lb PE/cubic yard of concrete for weigh hopper loading (AP-42,Chapter 11, Table 11.12-3 (10/01)), then multiplied by a control factor of (1-0.90) for a controlled emission rate of 0.079 lb/hr.

- v. Truck mix loading:

The maximum process rate of 100 cubic yards of concrete multiplied by the emission factor of 0.058 lb PE/cubic yard of concrete for transit mix loading (AP-42, Chapter 11, Table 11.12-3 (10/01)), then multiplied by a control factor of (1-0.90) for an controlled emission rate of 0.580 lbs/hr.

- b. Emission Limitation:  
3.31 tons/year PE

**Applicable Compliance Method:**

The 3.31 TPY emission limitation was developed by multiplying the sum total maximum hourly emission rate determined in E.1.a by the maximum operating schedule of 4380 hours/year and dividing by 2000 lb/ton. Therefore, compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

- c. Emission Limitation:  
0.030 grain/dscf outlet emission rate for each fabric filter

**Applicable Compliance Method:**

If required, compliance with this mass emission limitation shall be based on stack testing in accordance with procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:  
Visible fugitive PE shall not exceed 20 percent opacity as a 3-minute average for transfer of sand and aggregate and truck mix loading

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 9.

- e. Emission Limitation:  
No visible PE from outlets of fabric filters

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

**F. Miscellaneous Requirements**

- 1. Notice to Relocate a Portable or Mobile Source
  - a. 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:

- i. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
  - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
  - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the RAPCA and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
  - iv. in RAPCA's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.
- b. 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:
- i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
  - ii. the portable emissions unit is equipped with best available technology;
  - iii. the portable emission unit owner has identified the proposed site to Ohio EPA;
  - iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
  - v. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
  - vi. 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 this proposed site; and
  - vii. the portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.
- c. Any site approvals issued by the Ohio EPA, pursuant to F.1. above, shall be valid for no longer than three years and are subject to renewal.

In order for the RAPCA 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 RAPCA (451 W. Third Street, Dayton, OH 45422) and the appropriate field office having jurisdiction over

the new site. Upon receipt of the notice, the RAPCA and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

2. This is a modification of PTI 08-04183 issued on August 8, 2000 for emissions unit F001 and P901. Included in this PTI is a new emissions unit F002 for roadways and parking areas. The PTI reflects an overall a decrease of 2.26 TPY PE from the facility: a decrease of 0.29 TPY PE from updating the operations data for load-in and load-out of storage piles (F001); an addition of 1.75 TPY PE of new emissions for roadways and parking areas (F002), and a decrease of 6.72 TPY PE due to the updated AP-42 emission factors (October 2001), inclusion of an additional silo, and controls for the concrete batch plant (P901).