



State of Ohio Environmental Protection Agency

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RE: FINAL PERMIT TO INSTALL MODIFICATION

CERTIFIED MAIL

CUYAHOGA COUNTY

Application No: 13-03530

Fac ID: 1318008192

DATE: 7/6/2006

CAJ Properties
Santina Milczewski
55 Industry Drive
Bedford, OH 44146

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

CLAA



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-03530

Application Number: 13-03530
Facility ID: 1318008192
Permit Fee: **\$0**
Name of Facility: CAJ Properties
Person to Contact: Santina Milczewski
Address: 55 Industry Drive
Bedford, OH 44146

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5000 Crayton Road
Cleveland, Ohio**

Description of proposed emissions unit(s):
Administrative Modification of the PTI to accurately reflect the control equipment and the concrete batching operation.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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>
PM	68.3 (fugitive)
PE	18.2 (stack)

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
594 tons/hour capacity concrete batch plant.	OAC rule 3745-31-05(A)(3)	Sand and aggregate transfer to elevated storage.:
Material handling		PM Limits : 8.61 lbs/hr 28.28 TPY
MODIFIED		
The terms and conditions in this permit shall supercede the terms and conditions in Permit to Install 13-03530 issued on June 3, 1999.		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.a below). The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-07(B)(1).
		<u>Sand and aggregate weigh hopper loading:</u> PM Limits : 3.56 lbs/hr 11.69 TPY
		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b below).
	OAC rule 3745-31-05(A)(3) (continued)	The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-07(B)(1).

Sand and aggregate holding
hopper loading:

PM Limits : 3.56 lbs/hr
11.69 TPY

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.c below).

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-07(B)(1).

Cement silo loading:

Particulate emissions are controlled by a fabric filter.

PE Limits: 1.62 lbs/hr
5.32 TPY

Visible Limit :particulate emissions from the fabric filter shall not exceed 5% opacity, as a 6-minute average.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.d below).

Concrete Batching consisting of
the following operations:

- cement weigh hopper loading;
- cement holding hopper loading;
- cement loading into concrete trucks; and
- loading station (loading is either into a truck or mixer).

Particulate emissions are controlled by a baghouse.

3.92 lbs/hr of particulate emissions and 12.86 TPY combined for all operations

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

<p>OAC rule 3745-31-05(A)(3) (continued)</p>	<p>Visible particulate emissions from the baghouse exhaust shall not exceed 5% opacity, as a 6-minute average.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.e below).</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-07(B)(1).</p>
<p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-17-07(B)(1)</p> <p>OAC rule 3745-17-08(B)</p>	<p>All material handling operations:</p> <p>The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.</p> <p>The control measures specified by this rule are equivalent to or less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).</p>

OAC rule 3745-17-11(B)

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

2. Additional Terms & Conditions

2.a Sand and aggregate transfer to elevated storage.

The permittee shall employ the following best available control measures for the above-identified sand and aggregate transfer operations for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. The drop height of the front-end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive particulate matter from the conveyor and transfer point to bins.
- ii. The sand and aggregate loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive particulate matter from the conveyor and transfer point to bins.
- iii. Watering shall be used frequently at a rate of 3 gallons sprayed/100 sq ft of surface or higher to maintain the control efficiency to a minimum of 50 %.

2.b Sand & aggregate weigh hopper loading.

The permittee shall employ the following best available control measures for the above-identified sand and aggregate weigh hopper loading for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. The sand & aggregate weigh hopper shall be sufficiently enclosed to eliminate visible emissions of fugitive particulate matter.

2.c Sand & aggregate holding hopper loading.

The permittee shall employ the following best available control measures for the above-identified sand and aggregate holding hopper loading for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. The sand & aggregate weigh hopper shall be sufficiently enclosed to eliminate visible emissions of fugitive particulate matter.

2.d Cement silo loading.

The permittee shall employ the following best available control measures for the above-identified cement supplement silos for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. Cement silo shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient enough to eliminate visible emissions of fugitive particulate matter at the point of capture.

2.e Concrete Batching consisting of the following operations:

- cement weigh hopper loading;
- cement holding hopper loading;
- cement loading into concrete trucks; and
- loading station (loading is either into a truck or mixer).

The permittee shall employ the following best available control measures for the above-identified concrete batching operations for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. Cement weigh hopper loading shall be adequately enclosed and vented to the baghouse. The enclosure shall be sufficient enough to eliminate visible emissions of fugitive dust at the point of capture.
- ii. Cement holding hopper loading shall be adequately enclosed and vented to the baghouse. The enclosure shall be sufficient enough to eliminate visible emissions of fugitive dust at the point of capture.
- iii. Cement loading into concrete trucks shall be adequately enclosed and vented to the baghouse. The enclosure shall be sufficient enough to eliminate visible emissions of fugitive dust at the point of capture.
- iv. Sand and aggregate loading into concrete trucks shall be sufficiently enclosed to eliminate visible emissions of fugitive dust.
- v. Sand, aggregate and Cement into mixer shall be adequately enclosed and vented to fabric filter. The enclosure shall be sufficient enough to eliminate visible emissions of fugitive particulate matter at the point of capture.
- vi. A charging boot shall be used around the hopper choke feed discharge area and transit-mix truck opening. The charging boot shall have a control efficiency sufficient to minimize or eliminate visible emissions of fugitive dust to the extent possible with good engineering design.

2.f The above-mentioned control measure(s) shall be employed for each associated operation 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.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.

B. Operational Restrictions

1. The permittee shall not operate this emissions unit more than eighteen (18) hours per day.
 - a. The pressure drop across the baghouse shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation.
 - b. The pressure drop across the fabric filter shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and Recordkeeping Requirements.

1. The permittee shall maintain daily records of the operational hours for the concrete batching plant.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse and fabric filter while the emissions units are in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse and fabric filter on a weekly basis.
3. Except as otherwise provided in this section, the permittee shall perform daily inspections of all material handling operations associated with this concrete batching plant.
4. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for the material handling operations associated with this concrete batching plant. The inspections shall be performed during representative, normal storage pile operating conditions.
5. The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, 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 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 6.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify each day during which the emissions unit exceeded the daily operating hours restriction specified above.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse and fabric filter did not comply with the allowable range specified above.
3. The permittee shall submit deviation reports to the Cleveland Division of Air Quality 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/Compliance Method Determination.

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation - (sand and aggregate transfer to elevated storage)
8.61 lbs/hr of PM emissions

Applicable Compliance Method -

Compliance with the lb/hr emission limitation shall be determined by multiplying the hourly tons of material processed, the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Chapter 11, Section 11.12, Table 11.12-2(10/01) PM emission factor total for sand and aggregate transfer (0.009 lb/ ton) and (1-.50) to account for the 50% watering emission control efficiency.

- b. Emission Limitation - (sand and aggregate transfer to elevated storage)
28.28 TPY of PM emissions

Applicable Compliance Method -

Compliance shall be determined by multiplying the lb/hr PM emission limitation calculated in section E.1.a. above by the actual annual hours of operation of the emissions unit and the factor (1 ton/2,000 lbs).

- c. Emission Limitation - (sand and aggregate weigh hopper loading)
3.56 lbs/hr of PM emissions

Applicable Compliance Method -

Compliance with the lb/hr emission limitation shall be determined by multiplying the hourly tons of material processed, the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Chapter 11, Section 11.12, Table 11.12-2(10/01) PM emission factor for sand and aggregate weigh hopper loading (0.0051 lb/ ton) and (1-.50) to account for the 50% watering emission control efficiency.

- d. Emission Limitation - (sand and aggregate weigh hopper loading)
11.69 TPY of PM emissions

Applicable Compliance Method -

Compliance shall be determined by multiplying the lb/hr PM emission limitation calculated in section E.1.c. above by the actual annual hours of operation of the emissions unit and the factor (1 ton/2,000 lbs).

- e. Emission Limitation - (sand and aggregate holding hopper loading)
3.56 lbs/hr of PM emissions

Applicable Compliance Method -

Compliance with the lb/hr emission limitation shall be determined by multiplying the hourly tons of material processed, the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Chapter 11, Section 11.12, Table 11.12-2(10/01) PM emission factor for sand and aggregate holding hopper loading (0.0051 lb/ ton) and (1-.50) to account for the 50% watering emission control efficiency.

- f. Emission Limitation - (sand and aggregate holding hopper loading)
11.69 TPY of PM emissions

Applicable Compliance Method -

Compliance shall be determined by multiplying the lb/hr particulate emission limitation calculated in section E.1.e. above by the actual annual hours of operation of the emissions unit and the factor (1 ton/2,000 lbs).

- g. Emission Limitation - (cement silo loading)
1.62 lbs/hr of particulate emissions

Applicable Compliance Method -

The permittee performed compliance testing on November 18, 1999 for the fabric filter exhaust associated with the cement silo loading operation. The average lb/hr emission rate measured at 0.009 lb/hr of particulate emissions which demonstrates compliance with the above emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation - (cement silo loading)
5.32 TPY of particulate emissions

Applicable Compliance Method -

Compliance shall be determined by multiplying the lb/hr particulate emission limitation established in section E.1.g. above by the actual annual hours of operation of the emissions unit and the factor (1 ton/2,000 lbs).

- i. Emission Limitation - (cement silo loading fabric filter)
Visible particulate emissions from the fabric filter stack shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method(s) -

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.

- j. Emission Limitation - (batching operation)
3.92 lbs/hr of particulate emissions

Applicable Compliance Method -

The permittee performed compliance testing on November 18, 1999 at the baghouse exhaust associated with the batching operation. The average lb/hr emission rate measured at 0.37 lb/hr of particulate emissions which demonstrates compliance with the above emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- k. Emission Limitation - (batching operation)
12.86 TPY of particulate emissions

Applicable Compliance Method -

Compliance shall be determined by multiplying the lb/hr particulate emission limitation established in section E.1.j. above by the actual annual hours of operation of the emissions unit and the factor (1 ton/2,000 lbs).

- l. Emission Limitation - (batching operation baghouse stack)
Visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method(s) -

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.

- m. Emission Limitation:
Visible emissions from any fugitive dust source shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

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

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	<u>Aggregate storage piles:</u> PM Limits : 0.61 lb/hr 2.67 TPY <u>Sand storage piles:</u> PM Limits : 0.3 lb/hr 1.31 TPY
Modified		
The terms and conditions in this permit shall supercede the terms and conditions in Permit to Install 13-03530 issued on June 3, 1999.		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)	The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(6). 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) The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(6).

OAC rule 3745-17-07 (B)(6)

There shall be no visible emissions of fugitive dust from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

OAC rule 3745-17-08 (B), (B)(6)

The control measures specified by this rule are equivalent to or less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

All aggregate storage piles
All sand storage piles

- 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 material(s) 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 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.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 rules 3745-17-08 and 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>
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:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
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 Cleveland Division of Air Quality, 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 to the Cleveland Division of Air Quality that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation - (Aggregate storage piles)
0.61 lb/hr of PM emissions

Applicable Compliance Method -

The lb/hr emission limitation shall be based on calculations using the equation 1 for aggregate handling and storage piles taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, section 13.2.2 (1/95) to establish the emission factor in lb per ton. The calculated emission factor is 0.00369 lb of PM emissions per ton of material handled. This emission factor is multiplied by the hourly tons of material processed and (1-.50) to account for the 50% watering emission control efficiency.

- b. Emission Limitation - (Aggregate storage piles)
2.67 TPY of PM emissions

Applicable Compliance Method -

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, if the emissions unit is in compliance with the hourly emission limitation, it is also in compliance with the annual limitation.

- c. Emission Limitation - (Sand storage piles)
0.3 lb/hr of PM emissions

Applicable Compliance Method -

The lb/hr emission limitation shall be based on calculations using the equation 1 for sand handling and storage piles taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, section 13.2.2 (1/95) to establish the emission factor in lb per ton. The calculated emission factor is 0.00227 lb of PM emissions per ton of material handled. This emission factor is multiplied by the hourly tons of material processed and (1-.50) to account for the 50% watering emission control efficiency.

- d. Emission Limitation - (Sand storage piles)
1.31 TPY of PM emissions

Applicable Compliance Method -

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, if the emissions unit is in compliance with the hourly emission limitation, it is also in compliance with the annual limitation.

e. Emission Limitation - (load in/out and wind erosion for all storage piles)

There shall be no visible emissions of fugitive dust from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable 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.

F. Miscellaneous Requirements

None.

Operations, Property, <u>and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-31-05(A)(3)	<u>Unpaved roadways:</u> PM Limits : 0.25 lb/hr 1.1 TPY
	OAC rule 3745-17-07 (B)(5)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.e through A.2.j) The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(5).
	OAC rule 3745-17-08 (B), (B)(2)	There shall be no visible emissions of fugitive dust from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period. The control measures specified by this rule are equivalent to or less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

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

paved roadways:

All

paved parking areas:

All

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
- unpaved roadways:
- All
- unpaved parking areas:
- All
- 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 watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water and/or other suitable dust suppression chemicals, Coherex solution, or emulsified asphalt at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** 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 suitable dust suppression chemicals, Coherex solution, or emulsified asphalt at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** The 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.g** 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.h** 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.i** 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.j** 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>
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All

Daily

<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 the Cleveland Division of Air Quality , modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and,
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation - (paved roadways)
2.62 lb/hr of PM emissions

Applicable Compliance Method -

The lb/hr emission limitation shall be based on calculations using the equation 1 for paved roadways and parking areas taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, section 13.2.1 (10/97) to establish the emission factor in lb/VMT. The calculated emission factor is 7.39 lbs/VMT for PM emissions. This emission factor is multiplied by the hourly vehicle miles traveled (VMT) and (1-.80) to account for the 80% watering emission control efficiency.

- b. Emission Limitation - (paved roadways)
11.48 TPY of PM emissions

Applicable Compliance Method -

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, if the emissions unit is in compliance with the hourly emission limitation, it is also in compliance with the annual limitation.

- c. Emission Limitation - (paved roadway)
There shall be no visible emissions of fugitive dust from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method -

Compliance with the visible emission limitations for the paved roadway or parking area 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.

- d. Emission Limitation - (unpaved roadways)
0.25 lb/hr of PM emissions

Applicable Compliance Method -

The lb/hr emission limitation shall be based on calculations using the equation 1 for unpaved roadways and parking areas taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, section 13.2.2 (1/96) to establish the emission factor in lb/VMT. The calculated emission factor is 1.95 lbs/VMT for PM emissions. This emission factor is multiplied by the hourly vehicle miles traveled (VMT) and (1-.50) to account for the 50% watering emission control efficiency.

- e. Emission Limitation - (unpaved roadways)
1.1 TPY of PM emissions

Applicable Compliance Method -

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, if the emissions unit is in compliance with the hourly emission limitation, it is also in compliance with the annual limitation.

- f. Emission Limitation - (unpaved roadways)
There shall be no visible emissions of fugitive dust from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method -

Compliance with the visible emission limitations for the unpaved roadway or parking area 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.

F. Miscellaneous Requirements

None.