



State of Ohio Environmental Protection Agency

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**RE: FINAL PERMIT TO INSTALL MODIFICATION
ERIE COUNTY
Application No: 03-13500**

CERTIFIED MAIL

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

DATE: 1/15/2004

Castalia Trenching and Ready Mix Inc
James Winkel
4814 St. Rt. 269
Castalia, OH 44824

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

cc: USEPA

NWDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13500

Application Number: 03-13500

APS Premise Number: 0322000268

Permit Fee: **\$1000**

Name of Facility: Castalia Trenching and Ready Mix Inc

Person to Contact: James Winkel

Address: 4814 St. Rt. 269
Castalia, OH 44824

Location of proposed air contaminant source(s) [emissions unit(s)]:
4814 St. Rt. 269
Castalia, Ohio

Description of proposed emissions unit(s):
Administrative modification to PTI 03-13500, issued XXXX to revise monitoring data.

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 record keeping 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 record keeping 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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE - fugitive	2.52
PE - stack	0.02

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Roadways and Parking Areas.	OAC rule 3745-31-05 (A)(3)	1.5 tons particulate emissions (PE)/yr No visible particulate emissions except for one minute during any 60-minute period Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c. through A.2.g.)
	OAC rule 3745-17-08 (A)	See A.2.a.
	OAC rule 3745-17-07 (B)(1)	See A.2.b.

2. Additional Terms and Conditions

- 2.a Castalia Trenching and Ready Mix, Inc. is not located within an “Appendix A” area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c The unpaved roadways/parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
 - i. 0.18 mile (12,000 square feet) roadway/parking area specified as truck routes in the PTI application.
 - ii. 0.06 mile (12,000 square feet) roadway/parking area specified as loader routes in the PTI application.

- 2.d** 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 with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** 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 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 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** 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 (A)(3).

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

<u>paved roadways</u>	<u>minimum inspection frequency</u>
all roadways	once during each day of operation
<u>paved parking areas</u>	<u>minimum inspection frequency</u>
all parking areas	once during each day of operation

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports in accordance with the General Terms and Conditions of this permit 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.

E. Testing Requirements

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

- a. Emission Limitation:
1.5 tons PE/yr

Applicable Compliance Method:

This emission limitation was developed by applying a 50% control efficiency for dust suppression to a maximum potential uncontrolled emission rate of 2.9 TPY PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors from Chapter 13.2.1.3 (10/97). Compliance shall be demonstrated through the monitoring and record keeping requirements in Section C of this permit.

- b. Emission Limitation Method:
There shall be no visible particulate emissions from any paved roadway except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

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

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Aggregate Storage Piles.	OAC rule 3745-31-05 (A)(3)	0.53 ton particulate emissions (PE)/yr
Load-in and Load-out of Storage Piles (See Section A.2.a for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	No visible emissions except for a period of time not to exceed one minute during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.b., A.2.c., and A.2.f.)
Wind Erosion from Storage Piles (See Section A.2.a for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	No visible emissions except for a period of time not to exceed one minute during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.d. through A.2.f.)
	OAC rule 3745-17-08 (A)	See A.2.g.
	OAC rule 3745-17-07 (B)(1)	See A.2.h.

2. Additional Terms and Conditions

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

storage pile identification:

- i. Sand; and
- ii. Aggregate

2.b The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the storage piles with the following methods in order to ensure compliance:

- i. Watering at sufficient treatment frequencies; and
- ii. Partial enclosure.

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

2.c The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the storage piles with the following methods in order to ensure compliance:

- i. Watering at sufficient treatment frequencies; and
- ii. Partial enclosure.

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

2.e The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow

and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- 2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05 (A)(3).
- 2.g Castalia Trenching and Ready Mix, Inc. is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- 2.h This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all storage piles	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 storage piles	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 storage piles	daily

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
 - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

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

D. Reporting Requirements

1. The permittee shall submit deviation reports in accordance with the General Terms and Conditions of this permit 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.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.53 ton PE/yr

Applicable Compliance Method:

This emission limitation was developed by applying a 50% control efficiency for dust suppression to a maximum potential uncontrolled emission rate of 0.6 TPY PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors from Table 11.12-2 (10/86) and Section 13.2.4 (1/95) Compliance shall be demonstrated through the monitoring and record keeping requirements specified in Section C of this permit.

- b. Emission Limitation:
There shall be no visible particulate emissions from the load-in and load-out operations of the storage piles except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

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

- c. Emission Limitation:
There shall be no visible particulate emissions from wind erosion of the storage piles except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

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

F. Miscellaneous Requirements

Castalia Trenching and Ready Mix Inc

PTI Application: 03-13500

Modification Issued: 1/15/2004

Facility ID: 0322000268

Emissions Unit ID: F002

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - Cement Unloading/Sand and Aggregate Loading to Bins/Silos. Modification to PTI #03-13500, issued 4/24/01, to replace pressure drop monitoring with visible emission monitoring.	OAC rule 3745-31-05 (A)(3)	Control Requirements (See A.2.e.) <u>Stack Emissions:</u> 0.05 lb particulate emissions (PE)/hr 0.01 ton PE/yr 20 percent opacity as a six-minute average <u>Fugitive Emissions:</u> 0.47 ton PE/yr 20 percent opacity as a three-minute average Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.f. and A.2.g.)
	OAC rule 3745-17-11 (B)	See A.2.a.
	OAC rule 3745-17-07 (A)	See A.2.b.
	OAC rule 3745-17-08 (A)	See A.2.c.
	OAC rule 3745-17-07 (B)(1)	See A.2.d.

2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.
- 2.b** In accordance with OAC rule 3745-17-07 (A)(1)(h), the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) are not applicable because OAC rule 3745-17-11 is not applicable to this emissions unit.
- 2.c** Castalia Trenching and Ready Mix, Inc. is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.d** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B)(1) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.e** "Best Available Technology" (BAT) control requirements for emissions unit P901 have been determined to be the following:
- i. Use of a baghouse for pneumatic unloading of cement. The baghouse shall achieve a 99% removal efficiency (100% capture).
 - ii. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.f.)
- 2.f** The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. In accordance with the permittee's permit application, the permittee has committed to minimize drop height for sand and aggregate transfer by belt conveyor to bins.
- Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 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 rule 3745-31-05 (A)(3).

B. Operational Restrictions

- 1.** The maximum concrete production for the concrete batch plant shall not exceed 40,000 tons per year.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. The color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to minimize or eliminate the visible emissions.

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.

2. The permittee shall collect and record the following information each month:
 - a. The total tons per month of concrete produced; and
 - b. The annual, year to date, tons of concrete produced (sum of a.) for each calendar month to date from January to December.
3. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
Sand and Aggregate Loading to Bins	daily

4. The above-mentioned inspections shall be performed during representative, normal 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;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. The dates the control measure(s) was (were) implemented; and
 - d. On a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances in the maximum concrete production of 40,000 tons per year. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviations reports, in accordance with the General Terms and Conditions of this permit, that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency; and
 - b. Each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

E. Testing Requirements

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

- a. Emission Limitation: Stack Emissions
0.05 lb PE/hr

Applicable Compliance Method:

This emission limitation was established by multiplying the maximum hourly cement unloading throughput (18 tons/hr) by the appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.27 lb PE/ton) and applying a 99% baghouse control efficiency. If required, compliance with this limitation shall be based on emission testing performed in accordance with 40 CFR Part 60 Appendix A - Method 5.

- b. Emission Limitation: Stack Emissions
0.01 ton PE/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the maximum yearly cement unloading throughput (5,876 tons/yr based on a maximum concrete production rate of 40,000 tons per year) by the appropriate emission factor from AP-42 Chapter 11.12-2 (10/86 - reformatted 01/95), (0.27 lb PE/ton), dividing by 2000 lbs/ton and applying a 99% baghouse control efficiency. The permittee shall demonstrate compliance by the monitoring and record keeping of the concrete production in Section C.2.

- c. Emission Limitation: Stack Emissions
20% opacity as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- d. Emission Limitation: Fugitive Emissions
0.47 ton PE/yr

Applicable Compliance Method:

This emission limitation was established by combining the annual fugitive emissions from #57 stone and sand transfer, where:

#57 Stone = the maximum annual #57 stone transfer (17,190 tons/yr based on a maximum concrete production rate of 40,000 tons/yr) multiplied by the

appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.029 lb PE/ton) and divided by 2000 lbs/ton

Sand = the maximum annual sand transfer (15,002 tons/yr based on a maximum concrete production rate of 40,000 tons/yr) multiplied by the appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.029 lb PE/ton) and divided by 2000 lbs/ton

The permittee shall demonstrate compliance by the monitoring and record keeping of the concrete production specified in Section C.2.

- e. Emission Limitation: Fugitive Emissions
20% opacity as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P902 - Weigh Hopper and Truck Loading/Mixing. Modification to PTI #03-13500, issued 4/24/01, to replace pressure drop monitoring with visible emission monitoring.	OAC rule 3745-31-05 (A)(3)	Control Requirements (See A.2.e.) <u>Stack Emissions:</u> 0.07 lb particulate emissions (PE)/hr 0.01 ton PE/yr 20 percent opacity as a six-minute average <u>Fugitive Emissions:</u> 0.02 ton PE/yr 20 percent opacity as a three-minute average Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.2.f. and A.2.g.)
	OAC rule 3745-17-11 (B)	See A.2.a.
	OAC rule 3745-17-07(A)	See A.2.b.
	OAC rule 3745-17-08 (A)	See A.2.c.
	OAC rule 3745-17-07 (B)(1)	See A.2.d.

2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rates of particulate emissions (PE) from these emissions units are less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.
- 2.b** In accordance with OAC rule 3745-17-07 (A)(1)(h), the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) are not applicable because OAC rule 3745-17-11 is not applicable to this emissions unit.
- 2.c** Castalia Trenching and Ready Mix, Inc. is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.d** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.e** "Best Available Technology" (BAT) control requirements for emissions unit P901 have been determined to be the following:
- i. Use of a baghouse for weigh hopper loading (100% capture efficiency) and truck mix loading (90% capture efficiency). The baghouse shall achieve a 99% removal efficiency.
 - ii. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.f.)
- 2.f** The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:
- i. Concrete Truck Loading/Mixing:
watering at sufficient treatment frequencies shall supplement the requirements specified in Section A.2.e.i.
- Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 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 rule 3745-31-05 (A)(3).

B. Operational Restrictions

1. The maximum concrete production for the concrete batch plant shall not exceed 40,000 tons per year.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. The color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to minimize or eliminate the visible emissions.

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.

2. The permittee shall collect and record the following information each month:
 - a. The total tons per month of concrete produced; and
 - b. The annual, year to date, tons of concrete produced (sum of a.) for each calendar month to date from January to December.
3. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
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Concrete Truck Loading/Mixing	daily
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4. The above-mentioned inspections shall be performed during representative, normal 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;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. The dates the control measure(s) was (were) implemented; and
 - d. On a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances in the maximum concrete production of 40,000 tons per year. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall submit deviations reports, in accordance with the General Terms and Conditions of this permit, that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency; and
 - b. Each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

E. Testing Requirements

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

- a. Emission Limitation: Stack Emissions
0.07 lb PE/hr

Applicable Compliance Method:

This emission limitation was established by combining the hourly stack emissions from cement weigh hopper loading and concrete truck loading/mixing, where:

Weigh Hopper Loading = the maximum hourly cement weigh hopper loading (18 tons/hr) multiplied by the appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.27 lb PE/ton) with an applied 99% baghouse control efficiency

Concrete Truck Loading/Mixing = the maximum hourly truck mix loading (120 tons/hr) multiplied by the appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.02 lb PE/ton) with an applied 90% capture efficiency and 99% baghouse removal efficiency

If required, compliance with this limitation shall be based on emission testing performed in accordance with 40 CFR Part 60 Appendix A - Method 5.

- b. Emission Limitation: Stack Emissions
0.01 ton PE/yr

Applicable Compliance Method:

This emission limitation was established by combining the annual stack emissions from cement weigh hopper loading and concrete truck loading/mixing, where:

Weigh Hopper Loading = the maximum annual cement weigh hopper loading (5,876 tons/yr based on a maximum concrete production rate of 40,000 tons per year) multiplied by the appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.27 lb PE/ton), divided by 2000 lbs/ton with an applied 99% baghouse control efficiency

Concrete Truck Loading/Mixing = the maximum annual truck mix loading (40,000 tons/yr) multiplied by the appropriate emission factor from AP-42 Chapter 11.12-2, 1/95 (0.02 lb PE/ton), divided by 2000 lbs/ton with an applied 90% capture efficiency and 99% baghouse removal efficiency

The permittee shall demonstrate compliance by the monitoring and record keeping of the concrete production in Section C.2.

- c. Emission Limitation: Stack Emissions
20% opacity as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- d. Emission Limitation: Fugitive Emissions
0.02 ton PE/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the maximum annual truck mix loading (40,000 tons/yr) by the appropriate emission factor from AP-42 Chapter 11.12-2 (0.02 lb PE/ton), dividing by 2000 lbs, and applying a 10% loss in capture efficiency from the baghouse and a 50% control efficiency for dust suppression with water. The permittee shall demonstrate compliance by the monitoring and record keeping of the concrete production specified in Section C.2.

- e. Emission Limitation: Fugitive Emissions
20% opacity as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix

Castalia Trenching and Ready Mix Inc

PTI Application: 03-13500

Modification Issued: 1/15/2004

Facility ID: 0322000268

Emissions Unit ID: P902

existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None