



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
COSHOCTON COUNTY
Application No: 06-06763**

CERTIFIED MAIL

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

DATE: 4/11/2002

Apache Aggregate and Paving Co
Steven Senter
46626 CR 495
Coshocton, OH 43812

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

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

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 4/11/2002
Effective Date: 4/11/2002**

FINAL PERMIT TO INSTALL 06-06763

Application Number: 06-06763
APS Premise Number: 0616010086
Permit Fee: **\$4000**
Name of Facility: Apache Aggregate and Paving Co
Person to Contact: Steven Senter
Address: 46626 CR 495
Coshocton, OH 43812

Location of proposed air contaminant source(s) [emissions unit(s)]:
**46626 CR 495
Coshocton, Ohio**

Description of proposed emissions unit(s):
Portable Concrete Batch Plant.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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 Related to Monitoring and Recordkeeping 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and

conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	16.6

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 - Portable 200 TPH Concrete Batch Plant including: Cement Silo and Fly Ash Silo with Baghouses	OAC rule 3745-31-05(A)(3)	<p>There shall be no visible fugitive particulate emissions (PE) from the plant;</p> <p>The fabric filter will achieve an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases or there are no visible from the exhaust stack, whichever is less stringent; and</p> <p>PE shall not exceed 14.8 TPY.</p>

2. **Additional Terms and Conditions**

- 2.a The permittee shall employ best available control measures on the concrete batch plant and associated cement silo and fly ash silo for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee shall maintain enclosures and vent emissions to a fabric filter baghouse and/or filter sock to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- 2.b 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. The permittee shall perform daily checks while the equipment is in operation for any visible PE from the fabric filter exhaust, or any visible fugitive PE from the batch plant . The presence or absence of any visible emissions from the fabric filter exhaust, and/or the batch plant shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

D. Reporting Requirements

1. The permittee shall submit reports which (a) identify all days during which any visible PE were observed from the fabric filter exhaust, or the batch plant and (b) describe the corrective actions taken to eliminate the visible particulate emissions.

The reports shall be submitted on:

- a. July 15 and shall cover the period from January 1 until June 30 for each calendar year.
- b. January 15 and shall cover the period from July 1 until December 31 for each calendar year.

If no visible PE are observed during a given period, the permittee shall submit a report which states that no visible PE were observed during that period. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Pursuant to OAC Rule 3745-31-03 (A)(1)(p), the owner or operator of the portable or mobile source identified within this permit may relocate within the state of Ohio without first obtaining a Permit to Install providing that either a. or b. of the following is met:
 - a. The company has demonstrated the following:
 - i. the portable source is equipped with the best available control technology for such portable source;
 - ii. the portable source is operating pursuant to a currently effective permit to operate;
 - iii. the applicant has provided proper notice of intent to relocate the portable source to the director within a minimum of thirty days prior to the scheduled relocation; and
 - iv. in the director's judgment, the proposed site is acceptable under rule 3745-15-07 of the Administrative Code, or
 - b. The Director has issued a site approval for the new location pursuant to rule 3745-31-05(F) of the Administrative Code.

In order for the director to determine compliance with all of the above criteria, the owner or operator of the portable or mobile source must file a "Notice of Intent to Relocate" at least 30

days prior to relocation of the emission unit with the Southeast District Office. Upon receipt of the notice, the director, or the director's authorized representative, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio Environmental Protection Agency approval prior to relocation of the source may result in fines and civil penalties.

E. Testing Requirements

1. Compliance with the emission limitations identified in A.1. above shall be determined in accordance with the following methods:

- a. Emission limitation:

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

Applicable Compliance Method:

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

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

- b. Emission Limitation:

Particulate emissions(PE) shall not exceed 14.8 TPY.

Compliance Determination:

Compliance with the TPY emission limitation shall be demonstrated by the following one time calculations using emission factors from AP 42, Compilation of Air Pollutant Emission Factors, Chapter 11, Table 11.12-2 (issued10/01).

Average Material composition of Concrete from AP 42

Aggregate 37 %, Sand 37 %, Cement 13 %, Cement Supplement 2% and approximately 20 gallons of water

Aggregate transfer - Total PE = 0.0069 lb/ton of material loaded*

$200 \text{ tph} \times 37 \% = 74 \text{ tph} \times 0.0069 \text{ lb/ton} = 0.51 \text{ lb/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ t/lb} = 2.24 \text{ TPY}$

Sand Transfer - Total PE = 0.0021 lb/ton of material loaded*

$200 \text{ tph} \times 37 \% = 74 \text{ tph} \times 0.0021 \text{ lb/ton} = 0.16 \text{ lb/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ t/lb} = 0.70 \text{ TPY}$

*Emission factors take moisture content into consideration

Cement unloading to elevated storage silo - 0.30 gr/dscf

$0.030 \text{ gr/dscf} \times 853 \text{ acfm} \times 60 \text{ min/hr} \times 1 \text{ lb/7000} = 0.22 \text{ lb/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ t/lb} = 0.96 \text{ TPY}$

Flyash unloading to elevated storage silo - 3.14 lb/ton uncontrolled

$0.030 \text{ gr/dscf} \times 853 \text{ acfm} \times 60 \text{ min/hr} \times 1 \text{ lb/7000} = 0.22 \text{ lb/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ t/lb} = 0.96 \text{ TPY}$

Weigh Hopper loading - 0.0051 lb/ton uncontrolled

Sand & Aggregate

$148 \text{ tph} \times 0.0051 \text{ lb/ton} = 0.75 \text{ lb/hr} \times 0.001 \text{ (baghouse eff.)} = 0.00075 \text{ lb/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ t/lb} = 0.33 \text{ TPY}$

Mixer Loading (central mix) - 0.011 lb/ton controlled

$200 \text{ tph} \times 0.011 \text{ lb/ton} = 2.2 \text{ lb/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ t/lb} = 9.6 \text{ TPY}$

Total allowable emissions - 14.79 TPY

c. Emission Limitation:

There shall be no visible fugitive PE from the plant.

Applicable Compliance Method:

Compliance with the no visible fugitive particulate emission limit shall be determined using Test Method 22 if required.

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 - Material Handling	OAC rule 3745-31-05(A)(3)	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.d) Fugitive PE shall not exceed 1.8 TPY Visible emissions of fugitive dust shall not exceed 20% opacity as a three minute average

2. **Additional Terms and Conditions**

- 2.a The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Load-in and load-out of storage piles

- 2.b The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material handling operation(s)

control measure(s)

Load-in and load-out of storage piles

watering as needed

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

2.c For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

2.d Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
Load-in and load-out of storage piles	Daily

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

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

- a. the date and reason any required inspection was not performed;
- 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 deviation reports 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.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. Pursuant to OAC Rule 3745-31-03 (A)(1)(p), the owner or operator of the portable or mobile source identified within this permit may relocate within the state of Ohio without first obtaining a Permit to Install providing that either a. or b. of the following is met:
 - a.. The company has demonstrated the following:
 - i. the portable source is equipped with the best available control technology for such portable source;
 - ii. the portable source is operating pursuant to a currently effective permit to operate;
 - iii. the applicant has provided proper notice of intent to relocate the portable source to the director within a minimum of thirty days prior to the scheduled relocation; and
 - iv. in the director's judgment, the proposed site is acceptable under rule 3745-15-07 of the Administrative Code, or
 - b. The Director has issued a site approval for the new location pursuant to rule 3745-31-05(F) of the Administrative Code.

In order for the director to determine compliance with all of the above criteria, the owner or operator of the portable or mobile source must file a "Notice of Intent to Relocate" at least 30 days prior to relocation of the emission unit with the Southeast District Office. Upon receipt of the notice, the director, or the director's authorized representative, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio Environmental Protection Agency approval prior to relocation of the source may result in fines and civil penalties.

E. Testing Requirements

1. Emission Limitation:
Visible emissions of fugitive dust shall not exceed 20 % opacity as a three minute average.

Compliance Method:

Compliance with the above visible fugitive emission limit shall be determined using Test Method 22, if required.

2. Emission Limitation:
Fugitive PE shall not exceed 1.8 TPY

Compliance Method:

Compliance with the TPY emission limitation shall be demonstrated by a one time calculation using emission factors from AP 42, Compilation of Air Pollutant Emission Factors, Chapter 13, Table 13.2.4-1.

Load-in[(.002lb/ton)(60 ton/hr) + (.0009 lb/ton)(60 ton/hr) + (.009 lb/ton)(30 ton/hr)] + Load-out
[(.002lb/ton)(60 ton/hr) + (.0009 lb/ton)(60 ton/hr) + (.009 lb/ton)(30 ton/hr)] =
.40lb/hr

Allowable Emissions

0.40 lb/hr X 8760 hr/yr X.0005 ton/lb = 1.8 ton per year

F. Miscellaneous Requirements

None