



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

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

**RE: FINAL PERMIT TO INSTALL
TRUMBULL COUNTY
Application No: 02-3368**

CERTIFIED MAIL

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

DATE: October 20, 1999

R.W. Sidley, Inc.
Robert C Roberti
PO Box 150
Painesville, OH 44077

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
DAPC, NEDO
Mahoning-Trumbull APC



FINAL PERMIT TO INSTALL 02-3368

Application Number: 02-3368

APS Premise Number: 0278000762

Permit Fee: **\$3200**

Name of Facility: R.W. Sidley, Inc.

Person to Contact: Robert C Roberti

Address: PO Box 150
Painesville, OH 44077

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7364 Tod Avenue
Lordstown, Ohio**

Description of proposed emissions unit(s):
**PORTABLE CONCRETE PLANT, MATERIAL HANDLING, PAVED & UNPAVED ROADWAYS &
PARKING AREAS, STORAGE PILES.**

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 are inadequate 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 prove to be inadequate 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>
PM	12.56

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>
Batch concrete plant- material handling operations including, front-end loaders, dump trucks, & sand/aggregate conveyor/stacker systems.	OAC rule 3745-31-05(A)(3)	PM: 0.56 tpy VE: 10 opacity, as a three-minute average
	OAC rule 3745-17-07 (B)(1)	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)
	OAC rule 3745-17-08 (B)	Less stringent than, or equal in stringency to, the above-mentioned visible emission limitation
		Less stringent than, or equal in stringency to, the above-mentioned control measure

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:

Aggregate handling by front-end loaders
 Aggregate feed bins to conveyor

- 2.b The permittee shall employ best available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall perform the following control measure(s) to ensure compliance:

material handling operation(s)

control measure(s)

Aggregate handling by front-end loaders

permittee will only use aggregate material with inherently high moisture content and minimize drop height distance from front-end loader(s) to truck beds, stock piles, and/or aggregate cold feed bins

Aggregate feed bins to conveyor

permittee will only use aggregate material with inherently high moisture content to control dust emissions during subsequent aggregate handling.

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 measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that the use of the control measures is unnecessary.

2.d 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 3745-17-08 and 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

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

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
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Aggregate handling by front-end loaders	daily
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Aggregate feed bins to conveyors	daily
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2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local 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;
 - 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 basis within 30 days after the end of each calendar quarter.

5. The permittee shall record the annual 12-month summation of aggregate throughput (in tons).

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.

E. Testing Requirements

1. Emission limitation:

0.56 ton of PM per year

Applicable compliance method:

Compliance shall be determined by the following equation:

$$E = A * B * [1 - 80\%] * [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

- E = particulate matter emission rate in tons per year
- A = uncontrolled emission factor, 0.029 lb/ton (AP-42, table 11.12-2 (10/'86 version))
- B = annual 12-month summation of aggregate throughput (tons)
- 80% = particulate matter control efficiency of material handling operation

2. Emission limitation:

10 percent opacity, as a three minute average

Applicable compliance method:

Compliance with the visible emission limitation for the material handling operation identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standard of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (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) [Continued]

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>
Load-in and load-out of storage (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
Wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	no visible emissions except for one minute in any hour 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)
Load-in and load-out of storage piles, and wind erosion from storage piles	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07 (B)(6) OAC rule 3745-17-08 (B), (B)(6)	PM: 0.99 tpy less stringent than the above-mentioned visible emission limitation less stringent than the above-mentioned control measures

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:

Sand storage piles
 Stone 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. The permittee shall only use aggregate material with inherently high moisture 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. The permittee shall only use aggregate material with inherently high moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08 and 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall record the annual throughput of sand and aggregate material.
- 2. 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:

storage pile identification

minimum load-in inspection frequency

all

weekly

3. 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-in inspection frequency</u>
all	weekly

4. 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 load-in inspection frequency</u>
all	weekly

5. 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.

6. 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.

7. 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.

8. The permittee shall maintain records of the following information:
- 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;
 - the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - the dates the control measures were implemented; and,
 - 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 8.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

E. Testing Requirements

1. Emission limitation:

0.99 ton of PM per year

Applicable compliance method:

Compliance can be determined by using the wind erosion emission factor of 3.50 lb/acre/day (from AP-42, Section 12, table 11.12-2 (10/83 version)) and the following equation:

$$E = k (0.0032)[(U/5)^{1.3} / (M/2)^{1.4}] \quad (\text{AP-42, section 13.2.4, Eq (1)}) \quad (\text{January, '95 version), load-in}$$

Where: E = emission factor (lb/ton)
 k = 0.74 (particle size multiplier for PM < 30 μm, dimension less)
 U = 10 mph (mean wind speed, 10 mph for Youngstown City)
 M = material moisture content (%)

The calculated emission factors (E) shall be added and multiplied by the maximum annual throughput of sand and aggregate through-put and divided by 2,000 lbs/ton.

2. Compliance with the visible emission limitations for the storage piles identified in Section A.1. 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) [Continued]

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>
paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)	PM: 3.75 tpy 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, and A.2.e through A.2.i)
	OAC rule 3745-17-07 (B)(4)	less stringent than the above-mentioned visible emission limitation
	OAC rule 3745-17-08 (B), (B)(8), (B)(9)	less stringent than the above-mentioned control measure requirements
unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-31-05(A)(3)	PM: 5.25 tpy no visible particulate emissions except for 3 minutes during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.i)
	OAC rule 3745-17-07 (B)(5)	less stringent than the above-mentioned visible emission limitation

OAC rule 3745-17-08 (B), (B)(2)

less stringent than the above-mentioned control measure requirements

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:

Main gate to batch plant

paved parking areas:

Employee parking areas

- 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 roadways in and around storage piles

unpaved parking areas:

Employee parking areas

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee is required to treat the paved roadways and parking areas by flushing with water and/or sweeping, when necessary, such paved roadways and parking areas at sufficient 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 all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee is required to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.e** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has

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

- 2.f Any unpaved roadway or parking area, which 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.g The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.h Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

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

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
Main gate to batch plant	Daily
Employee parking areas	Daily
<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All roadways in and around storage piles	Daily
Employee parking areas	Daily

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

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

D. Reporting Requirements

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

sL = road surface silt loading (grams per square meter) (g/m^2), 12 g/m^2

W = average weight (tons) of the vehicles traveling the road, 40 tons

The calculated emission factor shall be multiplied by the total miles traveled (in miles/yr) and dividing by 2,000 lbs/ton.

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

F. Miscellaneous Requirements

None.

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

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>
Cement silo loading operations equipped with a 1500 acfm fabric filter baghouse	OAC rule 3745-31-05(A)(3)	PM: 0.02 gr/dscf PM: 0.26 lb/hr; 1.13 tpy Less than or equal to 5 percent opacity, as a 6-minute average Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section 2.a.)
	OAC rule 3745-17-07 (B)(1)	This rule is less stringent than OAC rule 3745-31-05
	OAC rule 3745-17-08 (B)	This rule is less stringent than OAC rule 3745-31-05
Concrete batching operation (mixer) equipped with a 1,000 acfm fabric filter baghouse.	OAC rule 3745-31-05(A)(3)	PM: 0.02 gr/dscf PM: 0.17 lb/hr; 0.75 tpy Less than or equal to 5 percent opacity, as a 6-minute average Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section 2.a.)
	OAC rule 3745-17-07(B)(1)	This rule is less stringent than OAC rule 3745-31-05
	OAC rule 3745-17-08 (B)	This rule is less stringent than OAC

Concrete batching operation (weight hopper) equipped with a 180 acfm fabric filter baghouse.	OAC rule 3745-31-05(A)(3)	<p>rule 3745-31-05</p> <p>PM: 0.02 gr/dscf PM: 0.03 lb/hr; 0.13 tpy</p> <p>Less than or equal to 5 percent 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 section 2.a.)</p>
	OAC rule 3745-17-07(B)(1)	<p>This rule is less stringent than OAC rule 3745-31-05.</p>
	OAC rule 3745-17-08 (B)	<p>This rule is less stringent than OAC rule 3745-31-05.</p>

2. Additional Terms and Conditions

2.a The permittee shall employ the following best available control measures for the above-identified cement silo loading operation for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. Cement shall be transferred pneumatically to the cement silo. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emissions of cement dusts emanating from the delivery vehicle during transfer shall be cause for the immediate halt of the unloading process and the refusal of the cement load until the situation is corrected.
- ii. The cement silo vent shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize at all times visible emissions of fugitive dust at the point of capture.

2.b The permittee shall employ the following best available control measures for the above-identified mixing operation for the purpose of ensuring compliance with the above-mentioned applicable requirements:

- i. The concrete batching mixer shall be adequately enclosed and the enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust.
- ii. The emissions from the sand and aggregate mixing operation shall be vented to a fabric filter baghouse.

- 2.c** The permittee shall employ the following best available control measures for the above-identified concrete batching operation for the purpose of ensuring compliance with the above-mentioned applicable requirements:
- i. The concrete batching weigh hopper shall be adequately enclosed and the enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust.
 - ii. The sand/aggregate weigh hopper transfer conveyor discharge to the concrete batching weigh hopper shall be enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust at the point of capture.

B. Operational Restrictions

1. The permittee shall regularly maintain the baghouse and fabric filter control equipment associated with this emissions unit in accordance with manufacturers recommendations. Maintenance shall include regular repair and/or replacement of filters so as to maximize the particulate collection efficiency of this dust control system.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the amounts of sand, aggregate, and cement processed at this plant so as to be able to determine the actual amount of fugitive dust emissions generated over any annual period. The permittee shall also maintain records of the gross yards (or tonnage) of concrete produced from the facility on a monthly basis for purpose of determining the annual amount of fugitive dusts emitted from this emissions unit. These records shall be kept at the facility and shall be made available for review by Ohio EPA personnel upon request.
2. The permittee shall inspect the baghouse fabric filter control system serving the cement silo, the mixer, and the batching operation at least once per week for the purpose of determining the need to maintain, repair, and/or replace any of the filters in the system or any portion of the system electrical controls. A broken or severely worn filter, or worn electrical control components, shall be replaced/repared immediately so as to prevent unnecessary emissions of fugitive dust from this emissions unit. Records of inspections, repairs, and maintenance to this emissions control system shall be noted in a facility log.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day or week during which an inspection was not performed by the required frequency; and,
 - b. each instance when a control measure, repair, or maintenance function that was to be performed as a result of an inspection, was not implemented.

E. Testing Requirements

1. Emission limitation (cement silo loading operation):

0.02 grain of particulate matter per dry standard cubic foot

Applicable Compliance Method:

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5.

2. Emission limitation (cement silo loading operation):

0.26 pound of particulate matter per hour

Applicable Compliance Method:

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5.

3. Emission limitation (cement silo loading operation):

1.13 tons of PM per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation of this permit shall be based on the allowable emissions rate of 0.26 lb/hr particulate matter multiplied by the maximum operating schedule of 8760 hours per year and divided by 2000 pounds per ton.

4. Emission limitation (mixer):

0.02 grain of particulate matter per dry standard cubic foot

Applicable Compliance Method:

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5.

5. Emission limitation (mixer):

0.17 pound of PM per hour

Applicable Compliance Method:

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5.

6. Emission limitation (mixer):

0.75 ton of particulate matter per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation of this permit shall be based on the allowable emissions rate of 0.17 lb/hr particulate matter multiplied by the maximum operating schedule of 8760 hours per year and divided by 2000 pounds per ton.

7. Emission limitation (weigh hopper):

0.02 grain of particulate matter per dry standard cubic foot

Applicable Compliance Method:

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5.

8. Emission limitation (weigh hopper):

0.03 pound of particulate matter per hour

Applicable Compliance Method:

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5.

9. Emission limitation (weigh hopper):

0.13 ton of PM per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation of this permit shall be based on the allowable emissions rate of 0.03 lb/hr particulate matter multiplied by the maximum operating schedule of 8760 hours per year and divided by 2000 pounds per ton.

10. Compliance with the "no visible emissions" limitation, as stipulated in OAC rule 3745-17-08(B)(3)(b), for both the cement silo loading operation and the concrete batching operation identified above shall be determined in accordance with and 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.
11. Compliance with the five (5) percent opacity visible emissions limitation for fabric filter baghouses identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

NOTICE OF INTENT TO RELOCATE

Pursuant to OAC rule 3745-31-03 (A) (1) (P), the owner or operator of the portable or mobile source identified within this Permit to Install may relocate within the state of Ohio without first obtaining a Permit to Install providing the following criteria are met:

- a. the source is equipped with the Best Available Control Technology for such source;
- b. the source is operating pursuant to a currently effective Permit to Operate;
- c. the applicant has provided proper notice of intent to relocate the source to the Director within a minimum of 30 days prior to the scheduled relocation; and,
- d. in the Director's Judgement, the proposed site is acceptable under Rule 3745-15-07 of the Administration 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 source with the Ohio EPA, Central District Office. Upon receipt of the notice, the Director, of 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.

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R.W. Sidley, Inc.
PTI Application: **02-3368**
October 20, 1999

Facility ID: **0278000762**
Emissions Unit ID: **F004**