



Louisville Metro Air Pollution Control District  
 850 Barret Avenue  
 Louisville, Kentucky 40204-1745



**Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: O-1246-15-F

Plant ID: 1246

Effective Date: 5/18/2013

Expiration Date: 5/31/2018

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Advance Ready Mix – Plant #5  
 6801 Enterprise Drive  
 Louisville, KY 40214

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM<sub>10</sub>  
 Tons/year: 25

Application No.:	18299	Application Received:	3/18/2008
	18296		11/29/2010
	52844		1/2/2013
	59011		9/9/2013

Permit Writer: Bob Wesely

Date of Public Notice: 3/2/2013; 06/23/2015

{Manager1}  
 Air Pollution Control Officer  
 {date1}

**TABLE OF CONTENTS**

FEDOOP Permit Revisions/Changes..... 3

Abbreviations and Acronyms ..... 4

Preamble ..... 5

General Conditions ..... 6

Emission Unit U1: Ready Mix Concrete Batch Plant..... 10

    U1 Unit Description: Concrete Batch Plant..... 10

    U1 Applicable Regulations: ..... 10

    U1 Equipment: ..... 10

    U1 Controls ..... 11

    U1 Specific Conditions ..... 12

    U1 Comments ..... 18

Insignificant Activities..... 19

    IA Comments ..... 19

Insignificant Activity Emission Unit IA1 ..... 20

    IA1 Unit Description: Parts Washer, cold solvent..... 20

    IA1 Applicable Regulations..... 20

    IA1 Equipment..... 20

    IA1 Specific Conditions..... 21

    IA1 Comments ..... 23

Fee Comment ..... 23

Attachment A - Protocol Checklist for a Performance Test ..... 24

**FEDOOP Permit Revisions/Changes**

<b>Revision No.</b>	<b>Permit No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Change Type</b>	<b>Change Scope</b>	<b>Description</b>
Initial	27840-13-F	5/18/2013	3/2/2013	Initial	Entire Permit	Initial Permit Issuance
Revision	O-1246-15-F	x/xx/2015	06/23/2015	Administrative	Standard	<p>PM<sub>10</sub> &lt; 25 tn/yr to be FEDOOP STAR Exempt</p> <p>Removed TAC requirements</p> <p>Deleted non-applicable Permit Shield, Off-Permit Document, and Alternative Operating Scenario references.</p> <p>Added controlled and uncontrolled emission factors to clarify how to calculate emissions.</p>

### Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

**Preamble**

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

### General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as

the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning

<b>Regulation</b>	<b>Title</b>
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

*Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745*

**Emission Unit U1: Ready Mix Concrete Batch Plant****U1 Unit Description: Concrete Batch Plant**

One (1) Erie-Strayer, transit mix (dry) ready-mix concrete batch plant, MG-11T, with one (1) two compartment cement silo, aggregate batcher, batch transfer conveyor, truck loadout and an additional outside aggregate/sand handling conveyor with a loading hopper.

**U1 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permit	All
7.08	Standards of Performance for New Process Operations	1, 2, and 3

**U1 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Maximum Capacity</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Application Date</b>
E1	Cement silo	93 tons	2.17 7.08	C1	S1	2/10/97
E2	Flyash silo	88 tons		C1	S1	2/10/97
E3	Aggregate Weigh Hopper	231 tn/hr		None	Fugitive	2/10/97
E4	Cement/Fly Ash Weigh Hopper	50 tn/hr		C2	S2	2/10/97
E5	Truck Loadout	281 tn/hr		C1	S1	2/10/97
E6	Aggregate Stockpiles	NA		None	Fugitive	2/10/97
E7	Aggregate Handling	NA		None	Fugitive	2/10/97
E8	Agg. Transfer Conveyor	231 tn/hr		None	Fugitive	2/10/97
E9	Aggregate Bins	231 tn/hr		None	Fugitive	2/10/97
E10	Roads & Yard	NA		None	Fugitive	2/10/97
E11	Agg/sand bins loading conveyor	231 tn/hr		None	Fugitive	2/10/97
E12	Conveyor loading hopper	231 tn/hr		None	Fugitive	2.10/97

**U1 Controls**

<b>Control ID</b>	<b>Description</b>	<b>Make/Model</b>	<b>Maximum Capacity</b>	<b>Pollutant Controlled</b>	<b>Application Date</b>
C1	Baghouse	RA-140	6500 cfm	PM/PM <sub>10</sub>	2/10/97
C2	Baghouse	CP-35-219	140 cfm	PM/MP <sub>10</sub>	4/28/03

One (1) dust collection system, make C&W, model CP-35-219 for controlling the cement/flyash weigh batcher or scale. One (1) dust collection system, make C&W Dust Collection Systems, model RA-140, for controlling the mix/transit truck loading, cement silo loading and flyash silo loading processes.

The Erie Strayer transit mix ready-mix concrete batch plant, model MG-11T, consists of the components listed in the above table, which are described in more detail below, in addition to the two baghouses listed above:

One (1) exterior aggregate/sand handling conveyor loading hopper

One (1) exterior aggregate/sand handling conveyor from outside conveyor loading hopper to inside four compartment aggregate/sand bins

One (1) four compartment aggregate bin for coarse aggregate, fine aggregate and sand

One (1) aggregate weigh hopper (single compartment) located below the aggregate/sand bins

One conveyor belt that transfers material from aggregate weigh hopper to truck loadout chute

One (1) two compartment cement storage silo, one compartment for cement and one compartment for flyash (cement supplement)

One (1) cement/flyash weigh hopper, located beneath cement silos and above the truck loadout chute with a telescopic boot

### U1 Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.1)

##### a. PM/PM<sub>10</sub>

- i. The owner or operator shall not allow the plant-wide emissions of the pollutant PM<sub>10</sub> to equal or exceed twenty-five (25) tons per twelve (12) consecutive month period. (Reg. 2.17, Section 5.1)(See U1 Comment #3)
- ii. The owner or operator shall not allow the plant throughput to exceed 300,000 cubic yards of ready mix concrete per twelve consecutive month period. (Reg. 2.17, Section 5.1)(See U1 Comment #2)
- iii. The owner or operator shall utilize the baghouse filters at all times the process is in operation and shall, to the extent practicable, maintain and operate any effected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Reg. 2.17, section 5.1)
- iv. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand bin loading conveyor fill hopper to equal or exceed 41.32 lb/hr. (Reg 7.08, Section 3.1.2)
- v. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand bin loading conveyor to equal or exceed 37.73 lb/hr. (Reg 7.08, Section 3.1.2)
- vi. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate transfer conveyor to equal or exceed 37.73 lb/hr. (Reg 7.08, Section 3.1.2)
- vii. The owner or operator shall not allow the emissions of the pollutant PM emitted from the sand transfer conveyor to equal or exceed 36.15 lb/hr. (Reg 7.08, Section 3.1.2)
- viii. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand weigh hopper to equal or exceed 41.32 lb/hr. (Reg 7.08, Section 3.1.2)
- ix. The owner or operator shall not allow the emissions of the pollutant PM emitted from the cement silo to equal or exceed 30.48 lb/hr. (Reg 7.08, Section 3.1.2)

- x. The owner or operator shall not allow the emissions of the pollutant PM emitted from the flyash (cement supplement) silo to equal or exceed 22.73 lb/hr. (Reg 7.08, Section 3.1.2)
- xi. The owner or operator shall not allow the emissions of the pollutant PM emitted from the mix/transit truck loadout to equal or exceed 42.67 lb/hr. (Reg 7.08, Section 3.1.2)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed twenty percent (20%) opacity. (Reg. 7.08, section 3.1.1)

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of five (5) years and make the records readily available to the District upon request.

a. **PM/PM<sub>10</sub>**

- i. The owner or operator shall monthly, perform a visual inspection of the structural and mechanical integrity of the process equipment for signs of damage, air leakage, corrosion, etc. and repair shall be performed as needed. The emission points to be surveyed shall include, but not be limited to, the emission points listed below:
  - 1) Aggregate/sand bin loading conveyor fill hopper
  - 2) Aggregate/sand bin loading conveyor
  - 3) Aggregate/sand weigh hopper
  - 4) Sand transfer conveyor
  - 5) Aggregate transfer conveyor
  - 6) Cement silo
  - 7) Flyash silo
  - 8) Mix/transit truck loadout
- ii. The owner or operator shall keep records, monthly of the visual inspection of the structural and mechanical integrity of the process equipment.

- iii. The owner or operator shall maintain records monthly of the below listed items:
- 1) Monthly amount of concrete produced and the 12 consecutive month period total of concrete produced.
  - 2) The owner or operator shall calculate and record, during the first thirty calendar days of the following month, the monthly total and the twelve (12) consecutive month total emissions of the pollutant PM<sub>10</sub>. All total shall include PM<sub>10</sub> emitted during control bypasses. (See U1 Comment #3)
  - 3) The owner or operator shall use the below listed AP-42, Concrete Batching, emission factors when calculating the controlled plant-wide emissions for the pollutant PM<sub>10</sub>, or other emission factors that become available, as approved by District. (See U1 Comment #4)

<b>Equipment</b>	<b>AP-42 Emission Factor, Controlled lb PM<sub>10</sub>/tn</b>	<b>Controlled PM<sub>10</sub> Emission Factor converted to lb PM<sub>10</sub>/yd<sup>3</sup> dry concrete</b>
Aggregate Transfer	0.0033	0.0031
Sand Transfer	0.00099	0.0007
Weight hopper (Agg+Sand) <sup>a</sup>	0.00014	0.00023
Mix/transit truck loading (cement+flyash) <sup>b</sup>	0.0263	0.0074
Cement silo filling	0.00034	0.00008
Flyash silo filling	0.0049	0.0002
Aggregate ground storage	NA	0.0031
Sand ground storage	NA	0.0007
Aggregate hopper loading	NA	0.0031
Sand hopper loading	NA	0.0007

- 4) The owner or operator shall use the below listed AP-42, Concrete Batching, emission factors when calculating the uncontrolled plant-wide emissions for the pollutant PM<sub>10</sub>, or other emission factors that become available, as approved by District. (See U1 Comment #4)

<b>Equipment</b>	<b>AP-42 Emission Factor Uncontrolled (lb PM<sub>10</sub>/tn)</b>	<b>Uncontrolled PM<sub>10</sub> Emission Factor converted to lb PM<sub>10</sub>/yd<sup>3</sup> dry concrete mix</b>
Aggregate Transfer	0.0033	0.0031
Sand Transfer	0.00099	0.0007
Weight hopper (Agg+Sand) <sup>a</sup>	0.0028	0.0046

<b>Equipment</b>	<b>AP-42 Emission Factor Uncontrolled (lb PM<sub>10</sub>/tn)</b>	<b>Uncontrolled PM<sub>10</sub> Emission Factor converted to lb PM<sub>10</sub>/yd<sup>3</sup> dry concrete mix</b>
Mix/transit truck loading (cement+flyash) <sup>b</sup>	0.310	0.0874
Cement silo filling	0.47	0.1152
Flyash silo filling	1.10	0.0402
Aggregate ground storage	NA	0.0031
Sand ground storage	NA	0.0007
Aggregate hopper loading	NA	0.0031
Sand hopper loading	NA	0.0007

<sup>a</sup>The unit for weigh hopper emission factor is lb of pollutant per ton of aggregate and sand, AP-42, table 11.12-2, footnote e.

<sup>b</sup>The unit for central mixer loading emission factor is lb of pollutant per ton of cement and flyash, AP-42, table 11.12-2, footnote f.

- iv. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure. The emission points to be surveyed shall include, but not be limited to, the emission points listed below:
  - 1) Aggregate/sand bin loading conveyor fill hopper
  - 2) Aggregate/sand bin loading conveyor
  - 3) Aggregate/sand weigh hopper
  - 4) Sand transfer conveyor
  - 5) Aggregate transfer conveyor
  - 6) Cement silo
  - 7) Flyash silo
  - 8) Mix/transit truck loadout

- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 test, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**S3. Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete.”
- Signature and title of the responsible official of the company.

The Annual Compliance Report is due on or before the following date of each calendar year: (See U1 Comment #6)

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

The Annual Compliance Certification is due on or before the following date of each calendar year: (See U1 Comment #7)

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	April 15 <sup>th</sup>

If a change in the “Responsible Official” (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

a. **PM/PM<sub>10</sub>**

- i. The owner or operator shall report the monthly totals and the monthly twelve (12) consecutive month period totals of plant-wide emissions of the pollutant PM<sub>10</sub>.
- ii. The owner or operator shall report the monthly totals and the monthly twelve (12) consecutive month period totals of cubic yards of ready mix concrete produced at the plant.

b. **Opacity**

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.
- ii. The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.
- iii. Description of any corrective action taken for each exceedance of the opacity standard.

### U1 Comments

1. This equipment was previously permitted under Operating Permits 237-07-O, 76-04-O which replaced Construction Permits 42-97-C, 189-03-C.
2. The source's March 18, 2008, FEDOOP application requested a plant-wide throughput limit of 300,000 cubic yards of ready mix concrete per year and a limit of 50 tn/yr for the pollutant PM<sub>10</sub>.
3. On September 9, 2013, the source requested a plant-wide throughput limit of 25 tn/yr for the pollutant PM<sub>10</sub>, to become a FEDOOP STAR Exempt source per Regulation 5.00, section 1.13.5. The plant-wide throughput limit of 300,000 cubic yards of ready mix concrete per year does not exceed the 25 tn/yr PM<sub>10</sub> emission limit controlled.
4. The PM emissions were calculated utilizing the emission factors from AP-42, Chapter 11.12, Concrete Batching, Table 11.12-2, and the standard concrete mix proportions listed in AP-42, chapter 11.12.
5. Uncontrolled PM emissions cannot exceed the Regulation 7.08 PM lb/hr emission limit for any emission point.
6. The Annual Compliance Report is due each year and shall include all emissions and throughput data required to be reported by the permit to show compliance with the standards of the permit.
7. The Annual Compliance Certification is due each year and shall include the information required in the FEDOOP Annual Compliance Certification for 9440-O.

### Insignificant Activities

Equipment	Quantity	PTE (tn/yr)	Basis for Exemption
Cold Solvent Parts Washer	1	0.00058 VOC	Regulation 1.02, Appendix A
Diesel Fuel storage tank, 10,000 gal	1	0.0093 VOC	Regulation 1.02, Appendix A

### IA Comments

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A, shall comply with generally applicable requirements.
- 3) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential To Emit (PTE) as the annual emission for each piece of equipment.
- 6) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 7) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.

**Insignificant Activity Emission Unit IA1****IA1 Unit Description: Parts Washer, cold solvent**

One (1) Safety-Kleen, cold solvent parts washer, model 16/17.4R, with 16 gallon reservoir.

**IA1 Applicable Regulations**

<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.03	Permit Requirements for Non-Title V Construction and Operating Permits and Demolition/Renovation Notices and Permit Regulations	1, 2, 3, 4 and 5
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3 and 4

**IA1 Equipment**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Maximum Capacity</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Application Date</b>
E17	Safety-Kleen Model 16/17.4R	16 gallon	6.18	None	N/A	11/29/2010

**IA1 Specific Conditions****S1. Standards (Regulation 2.17, section 5.1)****VOC**

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
  - 1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
  - 2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
  - 3) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.ii. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
  - 4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
  - 5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
  - 6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
  - 1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only

- in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
- 2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
  - 3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
  - 4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
  - 5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
  - 6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
  - 7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

**S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain, at the facility, the required records for a minimum of five (5) years and make the records readily available to the District upon request.

**VOC**

- i. The owner or operator shall maintain records that include the following for each sale: (Regulation 6.18, section 4.4.1)
  - 1) The name and address of the solvent purchaser,
  - 2) The date of the sale,
  - 3) The type of the solvent,
  - 4) The unit volume of the solvent, and

- 5) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- ii. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)
  - 1) The name and address of the solvent supplier,
  - 2) The date of the solvent purchase,
  - 3) The type and amount of the solvent, and
  - 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

**S3. Reporting (Regulation 2.17, section 5.2)**

**VOC**

There are no routine compliance reporting requirements for Regulation 6.18.

**IA1 Comments**

1. TACs emitted from Insignificant Activities, defined in Regulation 2.16, are considered de minimis per Regulation 5.21, section 2.3.
2. The cold solvent parts washer insignificant activity is the result of the construction permit application received November 29, 2010.

**Fee Comment**

On May 15, 2013, the Board approved revisions to Regulation 2.08, which implemented a new fee structure. As a result, the Advance Ready Mix – Plant 5 facility will be required to pay an Administration Revision fee as well as annual fees.

The Administration Permit Revision fee for a FEDOOP is \$508.48 in accordance with the Schedule of Fees table, Regulation 2.08, section 12.9.6. This fee shall be paid to the District prior to the issuance of the permit.

**Attachment A - Protocol Checklist for a Performance Test**

A completed protocol should include the following information:

- 1. Facility name, location, and ID #;
- 2. Responsible Official and environmental contact names;
- 3. Permit numbers that are requiring the test to be conducted;
- 4. Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- 5. Alternative test methods or description of modifications to the test methods to be used;
- 6. Purpose of the test including equipment and pollutant to be tested; the purpose may be described in the permit that requires the test to be conducted or may be to show compliance with a federal regulation or emission standard;
- 7. Tentative test dates (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.);
- 8. Maximum rated production capacity of the system;
- 9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits);
- 10. Method to be used for determining rate of production during the performance test;
- 11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- 12. Description of normal operation cycles;
- 13. Discussion of operating conditions that tend to cause worse case emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- 14. Process flow diagram;
- 15. The type and manufacturer of the control equipment, if any;
- 16. The control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test. Note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- 17. How quality assurance and accuracy of the data will be maintained, including;
  - Sample identification and chain-of-custody procedures
  - If audit samples are required for this test method, audit sample provider and number of audit samples to be used
- 18. Pipe, duct, stack, or flue diameter to be tested;
- 19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- 20. Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
  - Method 1 if stack diameter is >12"
  - Method 1a if stack diameter is greater than or equal to 4" and less than 12"
  - Alternate method of determination for <4"
  - If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability of a measurement location. This procedure described in Method 1, Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.
- 21. The Stack Test Review fee shall be submitted with each stack test protocol.