

TO Air Quality Permit File SOOP # 65-00073
Hanson Aggregates BMC, Inc. / Latrobe Quarry & Asphalt Plant

FROM Sheila A. Shaffer *SAS*
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THROUGH Thomas J. Joseph, P.E. *[Signature]* Mark R. Gorog, P.E. *MRS (sitrml)*
Environmental Manager Regional Program Manager
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DATE February 18, 2016

RE Comment and Response Document
Ligonier Township, Westmoreland County
APS# 691250; AUTH # 789445; PF# 281041

On April 17, 2009, the Department received a State Only Operating Permit (SOOP) renewal application for Hanson Aggregates BMC, Inc. / Latrobe Quarry & Asphalt Plant located in Ligonier Township, Westmoreland County. The application is for the operation of an asphalt plant. Hanson has complied with the municipal notification requirements contained in 25 Pa. Code §127.413 and the application fee requirements contained in 25 Pa. Code §127.703(b)(3). The Department determined the application was administratively complete on April 22, 2009. The facility is operating under SOOP 65-00073 issued on November 17, 2004, and expired on November 17, 2009. Hanson has been operating under 25 Pa Code Section 127.446(c): The terms and conditions of an expired permit are automatically continued pending the issuance of a new permit when the permittee has submitted a timely and complete application and paid the fees required by Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

Hanson owns and operates an underground limestone mine and a Hot Mix Asphalt (HMA) plant. The underground mine has not been mined since approximately 2004. A 500 tph crusher and conveyor are located at the opening of the mine but are out of operation. Hanson did not submit a deactivation plan for these sources and would have to request authorization to operate the crusher and conveyor in the future.

On June 28, 2010, an annual compliance monitoring inspection was performed by Mr. David Yargar, Air Quality Specialist. The Department did not note any violations at the time of the inspection.

The Notice of Intent to Issue was published in the PA Bulletin for a 30-day public comment period on January 16, 2016. The proposed Operating Permit renewal was submitted to Hanson Aggregates for review as well as the Department's Air Quality Specialist and District Supervisor. The District Supervisor, Tom Norris, requested changing the language of Condition #008 in Section E of the proposed operating permit renewal that stated, "*Fuel analysis records shall be used to demonstrate compliance with the sulfur limitation.*" Mr. Norris felt the Department was requiring fuel samples/testing.

The Department typically accepts an invoice from the fuel supplier to demonstrate compliance with such sulfur limitations. Therefore, this condition will be restated as the following; *“Compliance with sulfur content limitation established in this operating permit may be demonstrated using engineering calculations based on fuel purchase records, laboratory analyses, AP-42 emission factors, and/or other applicable methods with written Department approval.”* No further comments were received.

It is my recommendation that the State Only Operating Permit renewal for Hanson Aggregates BMC, Inc. / Latrobe Quarry & Asphalt Plant, SOOP 65-00073, be issued.