



STATE OF DELAWARE
**DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL**

DIVISION OF AIR QUALITY
STATE STREET COMMONS
100 W. WATER STREET, SUITE 6A
DOVER, DELAWARE 19904

ENGINEERING &
COMPLIANCE

PHONE
(302) 739-9402

November 18, 2020

Permit: APC-2020/0180-OPERATION

Chaney Enterprises, LP
125 Cubic Yard Per Hour Ready Mix Concrete Plant
Lincoln RMC Plant
11671 Fleatown Road
Lincoln, DE 19960

ATTENTION: Victor Vilece
Environmental Project Manager

Dear Mr. Vilece:

Pursuant to 7 DE Admin. Code 1102, Section 2, approval of the Department of Natural Resources and Environmental Control (the Department) is hereby granted for the operation of 125 Cubic Yard Per Hour Ready Mix Concrete Plant, consisting of the equipment listed in Attachment A, located at the Lincoln RMC Plant 11671 Fleatown Road, Lincoln, Sussex, Delaware, 19960, in accordance with the application submitted on Form Nos. AQM-1, AQM-2, AQM-3.1, AQM-3.7, AQM-4.6, and AQM-5 dated June 4, 2020 signed by Francis Hall Chaney III, CEO.

This permit is issued subject to the following conditions:

1. General Provisions

- 1.1 Representatives of the Department may, at any reasonable time, inspect this facility.
- 1.2 The owner or operator shall not initiate construction, install, or alter any equipment or facility or air contaminant control device which will emit or prevent the emission of an air contaminant prior to submitting an application to the Department pursuant to 7 DE Admin. Code 1102, and, when applicable 7 DE Admin. Code 1125, and receiving approval of such application from the Department; except as exempted in 7 DE Admin. Code 1102 Section 2.2.
- 1.3 This permit may not be transferred to another location or to another piece of equipment or process.
- 1.4 This permit may not be transferred to another person, owner, or operator unless the transfer has been approved in advance by the Department. Approval (or disapproval) of the permit transfer will be provided by the Department in writing. A request for a permit transfer shall be received by the Department at least thirty (30) days before the date of the requested permit transfer. This request shall include:

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- 1.4.1 Signed letters from each person stating the permit transfer is agreeable to each person; and
- 1.4.2 An Applicant Background Information Questionnaire pursuant to 7 Del C, Chapter 79 if the person receiving the permit has not been issued any permits by the Department in the previous five (5) years.

2. Emission Limitations

- 2.1 Air contaminant emission levels shall not exceed those specified in 7 DE Admin. Code 1100 and the following:
 - 2.1.1 Particulate Matter (PM₁₀) Emissions
PM₁₀ emissions from the cement silo baghouse, fly ash silo baghouse, and central dust collector baghouse shall not exceed 0.97 pounds per hour and 3.03 tons per twelve (12) month rolling period;
 - 2.1.2 Particulate Matter (PM_{2.5}) Emissions
PM_{2.5} emissions from the cement silo baghouse, fly ash silo baghouse, and central dust collector baghouse shall not exceed 0.20 pounds per hour and 0.63 tons per twelve (12) month rolling period;
 - 2.1.3 Particulate Matter (PM) Emissions
PM emissions from the cement silo baghouse, fly ash silo baghouse, and central dust collector baghouse shall not exceed 0.2 grains per standard cubic foot of exhaust air from each baghouse vent.
- 2.2 No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20%) percent opacity for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty-four (24) hour period.
- 2.3 Odors from this source shall not be detectable beyond the plant property line in sufficient quantities such as to cause a condition of air pollution.

3. Operational Limitations

- 3.1 The owner or operator shall comply with the following operational limits:
 - 3.1.1 The concrete plant's hours of operation shall not exceed 6240 hours per rolling twelve (12) month period.
 - 3.1.2 The maximum production rate of the transit mix concrete plant shall not exceed 251 Tons per Hour (125 Cubic Yards per Hour).
 - 3.1.3 The production of concrete shall include only aggregate, sand, cement, fly ash and water as raw materials.
 - 3.1.4 The Company shall operate, on a daily basis, in accordance with the operating procedures of the Department accepted Dust Control Plan. The Plan may include, but is not limited to: paving all traffic areas within the facility, stating methods to

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maintain all traffic areas dust free, using washed stone, and constructing and maintaining permanent and natural barriers around aggregate stockpiles.

- 3.1.5 Fugitive emissions shall not be emitted in such quantities as to cause or create a condition of air pollution from material-handling operations, the stockpiling of material or vehicular traffic entering or leaving the facility. Dust control measures shall be employed on all access roads and driveways to the facility to minimize fugitive emissions from vehicular traffic entering or leaving. Dust control measures shall include methods such as water tanker/sprinkler trucks, water sprinkler systems, dust retardant sprays, etc.
- 3.2 For the process equipment and associated air pollution control equipment, the owner or operator shall comply with the following operational limits:
 - 3.2.1 No process equipment that vents to the atmosphere shall be operated unless the corresponding air pollution control equipment is operating properly.
 - 3.2.2 Proper operation of the baghouses shall include implementation of a Baghouse Preventative Maintenance and Malfunction Plan acceptable to the Department. The plan shall include the following minimum requirements:
 - 3.2.2.1 Specifications for the baghouses including minimum and maximum pressure drop readings that define a proper operating range, with the exception of baghouses utilized as silo/bin vents.
 - 3.2.2.2 Daily monitoring of pressure drop across the baghouses and comparison to the proper operating range.
 - 3.2.2.3 Semi-Annual inspection of the baghouse for leaks, wear, corrosion, dust accumulation, etc. during the first year of filter life, quarterly inspection thereafter.
 - 3.2.2.4 Routine maintenance as recommended by the manufacturer.
 - 3.2.2.5 Troubleshooting procedures.
 - 3.2.2.6 Required recordkeeping.
 - 3.2.2.7 Schedule for review and update of the plan.
 - 3.2.2.8 The baghouses shall utilize filters with an efficiency of at least 99.9 %.
 - 3.2.3 Each baghouse shall be equipped with a properly sized pressure differential gauge for the operating range defined in the Baghouse Preventative Maintenance and Malfunction Plan, with the exception of baghouses utilized as silo/bin vents.
 - 3.2.3.1 The pressure differential gauge in the central dust collector baghouse shall be functioning properly at all times the equipment is operating and in

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accordance with Condition 4.15.1. The pressure differential across the filter cartridges shall be maintained between 3 and 5 inches of water column at all times the equipment is operating.

- 3.2.4 Baghouses operated as silo/bin vents shall be monitored for visible emissions in accordance with Condition 4.15.3 during all loading events.
- 3.2.5 The hopper for the central dust collector baghouse shall be emptied daily in a proper manner.
- 3.3 The water heater shall be fueled only with No. 2 fuel oil or diesel fuel having a sulfur content equal to or less than 0.0015% by weight.
- 3.4 At all times, including periods of startup, shutdown, and malfunction, the owner or operator shall, to the extent practicable, maintain and operate the facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 3.5 All structural and mechanical components of the equipment or process covered by this Permit shall be maintained in proper operating condition.

4. Compliance Methodology, Testing and Monitoring Requirements

- 4.1 Compliance with Conditions 2.1.1 and 2.1.2 shall be demonstrated by recordkeeping of emissions and proper maintenance and use of baghouses to control particulate emissions.
- 4.2 Compliance with Condition 2.3 shall be demonstrated by maintaining documentation of any odor-related complaints received. If odor from the concrete plant is sufficient enough to cause or create a condition of air pollution, the owner or operator shall:
 - 4.2.1 Take immediate action to locate and correct the source of the odor problem;
 - 4.2.2 Document the steps taken to resolve the issue;
 - 4.2.3 Record the name(s) of the complainant(s);
 - 4.2.4 Record the date and time the complaint is received; and
 - 4.2.5 Notify the Department pursuant to Condition 6.1.
- 4.3 Compliance with Condition 3.1.1 shall be demonstrated by monitoring and recording the total production hours each month and rolling twelve (12) month period.
- 4.4 Compliance with Condition 3.1.2 shall be demonstrated by recording the average hourly production rate each day.
- 4.5 Compliance with Condition 3.1.3 shall be demonstrated by recording raw materials used each day.

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- 4.6 Compliance with Condition 3.1.4 and 3.1.5 shall be demonstrated by logging methods of dust control each day.
- 4.7 Compliance with Condition 3.2.1 shall be demonstrated by the proper operation of the air pollution equipment.
- 4.8 Compliance with Condition 3.2.2 shall be demonstrated by adherence to the baghouse Preventative Maintenance and Malfunction Plan.
- 4.9 Compliance with Condition 3.2.3 shall be demonstrated by the presence of a pressure differential gauge on each baghouse, with the exception of baghouses utilized as silo/bin vents.
- 4.10 Compliance with Condition 3.2.5 shall be demonstrated by daily logging that the hopper has been emptied.
- 4.11 Compliance with Condition 3.3 shall be demonstrated by obtaining and maintaining fuel delivery receipts for all fuel received.
- 4.12 Compliance with Condition 3.4 shall be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 4.13 Compliance with Condition 3.5 shall be demonstrated by keeping equipment in good condition as shown by maintenance records.
- 4.14 The Department reserves the right to require that the owner or operator perform emission tests using methods approved in advance by the Department.
- 4.15 For the process equipment and associated air pollution control equipment, the Company shall monitor the following:
 - 4.15.1 The Company shall record the pressure drop across the baghouses at least once during each day and compare the result to the standard set in the Baghouse Preventative Maintenance and Malfunction Plan. If the pressure drop is outside the defined range, then the Company shall institute corrective action as set in the plan. If the pressure drop cannot be restored to the normal operating range within twenty-four (24) hours, the unit shall be shut down and the Department shall be notified of the deviation.
 - 4.15.2 The Company shall inspect each baghouse according to the schedule set in the Baghouse Preventative Maintenance and Malfunction Plan.
 - 4.15.3 Compliance with Condition 2.2 shall be demonstrated by conducting a daily survey during daylight hours when the equipment is in operation to detect the presence or absence of visible emissions according to the following procedure:
 - 4.15.3.1 "Survey of emission point for the presence or absence of visible emissions" shall be defined as a minimum period of five (5) consecutive minutes. The survey of the emission units concurrently is

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acceptable provided all emission points are easily observable from the observer's position.

4.15.3.2 The detection of the presence or absence of visible emissions shall be in accordance with the procedures of EPA Reference Method 22 (40 CFR 60, Appendix A) paragraphs 4 and 5.

4.15.3.3 If visible emissions are observed from an emission point for three (3) consecutive minutes during a survey, the observation shall be stopped and corrective actions per Condition 4.14.4 shall be taken.

4.15.3.4 This procedure does not require that the opacity of the emissions be determined. Since this procedure requires only the determination of whether a visible emission occurs and does not require the determination of opacity levels, observer certification according to the procedures of EPA Reference Method 9 (40 CFR 60, Appendix A) is not required. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor).

4.15.4 If visible emissions are observed, the Company shall initiate troubleshooting procedures as outlined in the Baghouse Preventative Maintenance and Malfunction Plan.

4.16 The Company shall conduct a daily survey of visible emissions to establish compliance with the visible emissions standard of Condition 2.2 for each of the following units:

4.16.1 Cement baghouse exhaust

4.16.2 Fly ash baghouse exhaust

4.16.3 Central dust collector baghouse exhaust

5. Record Keeping Requirements

5.1 The owner or operator shall maintain all records necessary for determining compliance with this permit in a readily accessible location for five (5) years and shall make these records available to the Department upon written or verbal request.

5.2 The following information shall be recorded, initialed and maintained in a log each day:

5.2.1 The Operating Procedures for Dust Control Plan shall include:

5.2.1.1 Statements that proper fugitive dust control measures were properly employed.

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- 5.2.1.2 Dates, name of person doing the inspection, and description of inspections and maintenance performed on the baghouses and other dust control equipment.
- 5.2.1.3 The occurrence and duration of any malfunction of the baghouses.
- 5.2.1.4 The methods to control fugitive dust emissions as detailed in the required plan of Condition 3.1.4 have been followed daily.
- 5.2.1.5 The condition of the high-level alarms on the cement and fly ash bins when filling operations are performed.
- 5.2.1.6 Statement that the mix truck bin of the central dust collector has been emptied.
- 5.2.1.7 The date, time and the nature of any complaints concerning air emissions or odors. The date and method of the corrective action should also be recorded. If necessary, the corrective action should be added to the required plan of Condition 3.1.4.
- 5.2.2 Compliance with Conditions 2.2, 2.3, 3.1.2, 3.1.5, 3.2.3, 4.14.1, and 4.14.2.
- 5.2.3 The daily hours of operation of the concrete plant.
- 5.2.4 Daily yards of concrete produced.
- 5.2.5 Daily tons of aggregate, sand, cement, and fly ash used.
- 5.2.6 Identification of silo raw materials.
- 5.2.7 All observations of visible emissions made according to Conditions 4.14.3 and 4.14.4.
- 5.3 The following information shall be recorded, initialed and maintained in a file:
 - 5.3.1 The Baghouse Preventative Maintenance and Malfunction Plan shall include:
 - 5.3.1.1 Each day, the date, time, and results of the pressure drop across the filters and comparison to the proper operating range.
 - 5.3.1.2 All inspections of the filter structure, including the date of the inspections, person doing the inspections, and the findings.
 - 5.3.1.3 Routine maintenance as recommended by the manufacturer.
 - 5.3.1.4 Troubleshooting procedures.
 - 5.3.1.5 Schedule for review and update of the plan.
 - 5.3.1.6 Cartridge filters efficiency (manufacturer's specification).

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- 5.4 Monthly and cumulative rolling twelve (12) month totals shall be calculated and recorded each month in a log for:
 - 5.4.1 The hours of operation of the concrete plant.
 - 5.4.2 The yards of concrete produced.
 - 5.4.3 The tons of aggregate, sand, cement, and fly ash used.
- 5.5 The rolling twelve (12) month total emissions shall be calculated and recorded each month in a log for each of the following pollutants:
 - 5.5.1 PM₁₀
 - 5.5.2 PM
- 5.6 The Company shall obtain No. 2 fuel oil or diesel fuel supplier certificates for each fuel shipment to the water heater. Such certifications shall indicate:
 - 5.6.1 The name, address and telephone number of the fuel supplier.
 - 5.6.2 The name address and telephone number of the Company, and the address where the fuel oil is delivered.
 - 5.6.3 The volume of fuel being delivered, and the date of sale or delivery.
 - 5.6.4 The type of fuel, and the sulfur content of the fuel as a delivered product, expressed as one of the following:
 - 5.6.4.1 The actual sulfur content in ppm or percent (%) by weight, or
 - 5.6.4.2 A statement that certifies the sulfur content of the shipment is equal to or below the limit in Condition 3.3.

6. Reporting Requirements

- 6.1 Emissions in excess of any permit condition or emissions which create a condition of air pollution shall be reported to the Department immediately upon discovery by calling the Environmental Emergency Notification and Complaint number, (800) 662-8802.
- 6.2 In addition to complying with Condition 6.1 of this permit, any reporting required by 7 DE Admin. Code 1203 "**Reporting of a Discharge of a Pollutant or an Air Contaminant**", and any other reporting requirements mandated by the State of Delaware, the owner or operator shall, for each occurrence of excess emissions, within thirty (30) calendar days of becoming aware of such occurrence, supply the Department in writing with the following information:
 - 6.2.1 The name and location of the facility;
 - 6.2.2 The subject source(s) that caused the excess emissions;

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- 6.2.3 The time and date of the first observation of the excess emissions;
 - 6.2.4 The cause and expected duration of the excess emissions;
 - 6.2.5 For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - 6.2.6 The proposed corrective actions and schedule to correct the conditions causing the excess emissions.
- 6.3 One original and one copy of all required reports shall be sent to the address below:
- Division of Air Quality
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904

7. Administrative Conditions

- 7.1 This permit supersedes **Permit: APC-2020/0180-CONSTRUCTION**.
- 7.2 This permit shall be made available on the premises.
- 7.3 Failure to comply with the provisions of this permit may be grounds for suspension or revocation.

Sincerely,



Angela D. Marconi, P.E., BCEE
Program Manager
Engineering & Compliance Branch

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pc: Dover File
Joanna L. French, P.E.
Eric S. Rowland

Attachment A

Chaney Enterprises, LP – Lincoln RMC Plant

Permitted Equipment

1. One Erie Strayer Model PATT. C-11 two (2) compartment silo with a total storage capacity of 100 tons.
2. One C&W Model CP-230 Silo Dust Collector containing six (6) 8" x 39" filter cartridges with 99.99% efficiency in a single compartment with a maximum recommended airflow of 2000 cfm. This dust collector is mounted to the top of the cement compartment of the Erie Strayer Model PATT. C-11 Silo.
3. One C&W Model CP-230 Silo Dust Collector containing six (6) 8" x 39" filter cartridges with 99.99% efficiency in a single compartment with a maximum recommended airflow of 2000 cfm. This dust collector is mounted to the top of the fly ash compartment of the Erie Strayer Model PATT. C-11 Silo.
4. One C&W Model RA-120 Reverse Air Central Dust Collector containing forty-eight (48) 8" dia. x 114" filter bags with 99.9% efficiency in two (2) compartments with a maximum recommended airflow of 5000 cfm. This dust collector receives air from the shroud.
5. One Pearson Systems, Inc. Model P10-10W Water Heater utilizing a Power Flame Model CR2-OA 1.4 MMBtu/hr (calculated) Burner fueled by No. 2 Fuel Oil.