

SIGNIFICANT CHANGES TO RMCGP

Changes to Permit MSG11 from the previous general permit include clarification of existing language, requirements and conditions; removal of provisions for construction storm water coverage; and addition of requirements for sources that may otherwise be major air emissions sources. The proposed general permit has the following significant changes:

- Construction storm water coverage for disturbance of one (1) acre or more was removed from this permit. Now facilities that conduct land disturbing activities have to obtain coverage and comply with the Small Construction Storm Water General Permit (SCSWGP) or the Large Construction Storm Water General Permit (LCSWGP), as applicable.

ACT2 (Coverage, Recoverage, and Termination)

- Contiguous Landowner Notification (Condition S-2, Page 5) – revised.
- Public Participation Requirements for Air Synthetic Minor Facilities (Conditions S-3, Page 6) and Air True Minor Facilities (Condition T-1, Page 7) – added to the proposed permit.
- Electronic Submittal of RMCNOI (Condition T-2, Page 7) – website created specifically for RMCGP with a link for electronic submittals.

ACT3 (Air Emissions Requirements)

- Moderate Stationary Source and Synthetic Minor Operating Source (Condition L-1, Page 8) – Facilities designed with a maximum concrete production rate exceeding 150 cubic yards per hour (yd^3/hr) shall be considered both a moderate stationary source and a synthetic minor operating source. This condition has been added to the permit.
- Air Siting Criteria (Condition L-2(1), Page 8) – Light commercial area was removed from this condition. The “light commercial area” definition was also removed in ACT7.
- Limitation Requirement (Condition L-3(2), Page 9) – Facilities designed with a maximum concrete production rate exceeding 150 yd^3/hr shall not produce more than 1,000,000 yd^3/yr , as determined for each calendar year. This condition has been added to the permit.
- Limitation Requirement (Condition L-3(3), Page 9) – The State standard for particulate matter emissions from fuel burning sources less than 10 MMBTU/hr was added.
- Baghouse/Fabric Filter Control Equipment Requirements (Condition L-4, Page 9) – A monthly check for visible emissions of dust from the pollution control equipment must be performed while material is being transferred to the silo(s).

- Rock Crusher Requirements (Condition L-5, Page 10) – This condition has been added to the permit to prohibit operating a rock crusher that would be subject to federal New Source Performance Standards not addressed under the RMCGP. Also, third parties that would own and operate a portable rock crusher at the ready-mix concrete facility are responsible for obtaining any necessary air permits from MDEQ. Thus, the coverage recipient is not responsible for modifying their coverage to allow a third party to bring a rock crusher on site.
- Emergency Stationary Internal Combustion Engine Requirements (Condition L-6, Page 11) – This condition has been added to address requirements for emergency stationary internal combustion engines, such as those used to power emergency generators.
- Non-Emergency Stationary Internal Combustion Engine Requirements (Condition L-7, Page 11) – This condition has been added to allow for operation of diesel-fired non-emergency stationary internal combustion engines. Such engines may be used to power a generator to operate equipment and remain onsite for 12 months or longer. Since the applicable federal regulations can vary based on engine manufacture date and size, the permit requires submittal of a Compliance Plan outlining the applicable regulations.
- Air Recordkeeping and Submittals (Condition S-1(4), Page 12) – If the designed maximum concrete production rate of the facility exceeds 150 cubic yards per hour, the permittee shall maintain a record of the daily amount of concrete manufactured in cubic yards and shall report the annual total in cubic yards on the Monthly Air Records Form provided by MDEQ in the Ready-Mix Concrete Forms Package. The permittee shall submit a copy of the completed Monthly Air Records Form to MDEQ at the address below by January 31st for the preceding calendar year.
- Air Recordkeeping and Submittals (Condition S-1(5), Page 12) - Records required under ACT 3, (Ready-Mix Concrete) Air Emissions Requirements, shall be maintained for at least five (5) years. Note: All other records required by the permit are still required to be maintained for at least three (3) years as required by ACT6, Condition R-2 on page 21.

ACT 4 (Process Wastewater Requirements)

- Reporting Requirements (Condition S-1(2), Page 14) – For each quantitative sample value that is not detected, the test method used and the minimum level for that method for that parameter shall be reported on or attached to the DMR. The covered facility shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement. These two sentences have been added to the end of this condition.
- Effluent Limitations and Monitoring Requirements (Condition S-2, Page 14) – Language has been added to the proposed permit to comply with the NPDES e-reporting rule.

ACT 5 (Industrial Storm Water Requirements)

- Minimum SWPPP Components (Condition T-2(4), Page 16) – A requirement to document spills and leaks on the Monthly Spill and Leak Log Sheet has been added to the proposed permit.
- Monthly Visual Site Inspections (Condition T-6, Page 21) – A Monthly Visual Site Inspection Form has been created for use in conducting monthly inspections.
- Annual SWPPP Evaluation (Condition T-7, Page 21) – An Annual SWPPP Evaluation Form has been created, and the requirement to submit the annual form has been removed.
- Personnel Training Program Requirements (Condition T-9, Page 22) – A Personnel Training Form has been created for use in complying with these requirements.

ACT 6 (Standard Requirements Applicable to All ACTs)

- Maintaining Electronic Documents (Condition R-3, Page 23) – Any documents required by this permit may be kept electronically but must be readily available during site inspection or upon request.
- Notifications (Conditions S-2 and S-3, Page 24, and Condition S-5, Page 24) – Language has been added to the proposed permit to comply with the NPDES e-reporting rule, which will require the referenced notifications be submitted electronically.
- Continuation of Expired General Permit (Condition T-26, Page 31) – The last sentence of this condition has been added to the proposed permit.

ACT 7 (Definitions)

Added the following definitions:

- T-9 Major Modification
- T-15 Quarterly Maximum
- T-17 Regulated Air Pollutant
- T-25 Submitted
- T-26 Synthetic Minor Source
- T-27 Title V Major Source

Revised the following definitions:

- T-2 Baghouse or Fabric Filter

Removed the following definitions:

- Construction Activity
- Final Stabilization
- Larger Common Plan of Development or Sale
- Light Commercial Area

- Operator
- Owner or Operator
- Qualified Personnel
- Regulated Air Emissions

Some other unnecessary definitions were removed.