



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 16 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dolores Mohr
H.J. Mohr & Sons Co.
915 South Maple Ave.
Oak Park, Illinois 60304

Re: Administrative Order EPA-5-16-113(a)-IL-13

Dear H.J. Mohr:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at 312-886-3850.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Frank", with a small "for" written below it.

Nathan Frank
Chief Illinois/Indiana Section

Enclosure

cc: S. Tennenbaum /C-14J
Phil Perry, IDEM

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-16-113(a)-IL-13
)	
H.J. Mohr & Sons Co.)	Proceeding Under Section 113(a)(1)
Oak Park, Illinois)	of the Clean Air Act, 42 U.S.C. §7414(a)(1)
)	
_____)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to H.J. Mohr & Sons Co. (H.J. Mohr) under Section 113(a)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1).

Statutory and Regulatory Background

2. Each state must submit to the Administrator of EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410.

3. On May 31, 1972, EPA approved 35 Ill. Admin Code § 201.141 as part of the federally enforceable Illinois State Implementation Plan (SIP). 37 Fed. Reg. 10842 (May 31, 1972).

4. Rule § 201.141 states that no person shall cause or threaten or allow the discharge or emission of any contaminant into the environment so as to cause or tend to cause air pollution in Illinois, or so as to prevent the attainment or maintenance of any applicable ambient air quality standard.

5. On February 21, 1980, EPA approved 35 Ill. Admin Code § 212.301 as part of the federally enforceable SIP for the State of Illinois. 45 Fed. Reg. 11493.

6. Rule § 212.301 states that no person shall cause or allow the emission of fugitive particulate matter from any process, including material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the emission source.

7. On July 14, 1999, EPA approved 35 Ill. Admin Code § 212.302 as part of the federally enforceable SIP for the State of Illinois. 64 Fed. Reg. 37847, 37851.

8. Rule § 212.302 states that sections 212.304 through 212.310 and 212.312 of this Subpart shall apply to manufacturing operations, which include concrete batch plants, located in all townships of Cook County.

9. On February 21, 1980, EPA approved 35 Ill. Admin Code § 212.306 as part of the federally enforceable SIP for the State of Illinois. 45 Fed. Reg. 11493. 35 Ill.

10. Rule § 212.306 states that traffic pattern areas surrounding storage piles, traffic pattern roads, and parking facilities shall be paved or treated with water, oils or chemical dust suppressants. The treatment shall also be applied on a regular basis, as needed, in accordance with the required operating program.

11. On February 21, 1980, EPA approved 35 Ill. Admin Code § 212.308 as part of the federally enforceable SIP for the State of Illinois. 45 Fed. Reg. 11493.

12. Rule § 212.308 states that crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke feeding or be treated by an equivalent method in accordance with an operating program.

13. On July 14, 1999, EPA approved 35 Ill. Admin Code § 212.309 as part of the federally enforceable SIP for the State of Illinois. See 64 Fed. Reg. 37847, 37851.

14. Rule 212.309 states that the emission units described in Sections 212.304 through 212.308 and Section 212.316 of this subpart shall be operated under the provisions of an operating program, consistent with the requirements set forth in Sections 212.310 and 212.312 of this Subpart. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.

15. On February 21, 1980, EPA approved 35 111. Admin Code § 212.310 as part of the federally enforceable SIP for the State of Illinois. 45 Fed. Reg. 11493.

16. Rule 212.310 describes the minimum informational requirements of a fugitive particulate operating program for an affected facility.

17. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413 (a)(1), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

18. H.J. Mohr owns and operates a concrete batch plant at 915 South Maple Avenue, Oak Park, Illinois (Facility).

19. H.J. Mohr produces ready mix cement, a process that mixes raw materials for concrete and has the potential to create fugitive particulate matter emissions at the Facility's storage piles, roads, conveyors, and storage silos. H.J. Mohr is subject to rules governing Visible and Particulate Matter Emissions in Part 201 and Part 212 of the Illinois SIP.

20. On June 20, 2013, EPA representatives performed an inspection of the Facility to determine compliance with the CAA and the Illinois SIP.

21. On September 27, 2013, EPA sent H.J. Mohr a Request for Information, pursuant to the Section 114(a)(1) of the CAA, 42 U.S.C. § 7417(a)(1).

22. On March 28, 2014, EPA issued to H.J. Mohr a Notice of Violation (NOV) alleging that it violated the following provisions Illinois SIP:

- A. Rule 201.141 by causing pollution from its processes;
- B. Rule 212.306 by failing to water the roads at the facility to prevent fugitive dust; and
- C. Rule 212.310 by failing to incorporate all of the required informational items into its Fugitive Particulate Operating Program.

23. On April 28, 2014, representatives of H.J. Mohr and EPA discussed the NOV issued on March 28, 2014.

Compliance Program

24. By the effective date of this Order, H.J. Mohr must achieve, demonstrate and maintain compliance with the SIP at its Facility in Oak Park, Illinois.

25. Within 30 days of the effective date of this Order, H.J. Mohr must comply with the Fugitive Dust Plan, attached as Appendix A of this Order.

26. In order to demonstrate compliance with the Fugitive Dust Plan, on a quarterly basis for a period of one year, H.J. Mohr must submit to EPA copies of the following records under Section 114(a)(1) of the CAA 42 U.S.C. § 7417(a)(1):

- a. Completed Stockpile Inspection Forms;
- b. Completed Baghouse Inspection Forms; and
- c. Driveway Dust Suppression Log.

27. H.J. Mohr must send all reports required by this Order to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

General Provisions

28. This Order does not affect H.J. Mohr's responsibility to comply with other federal, state and local laws.

29. This Order does not restrict EPA's authority to enforce the CAA and its implementing regulations.

30. Failure to comply with this Order may subject H.J. Mohr to penalties of up to \$44,539 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

31. The terms of this Order are binding on H.J. Mohr, its assignees and successors. H.J. Mohr must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.

32. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.

30. H.J. Mohr agrees to the terms of this Order. H.J. Mohr waives any remedies, claims for relief, and otherwise available rights to judicial or administrative review that it may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b) of the CAA, 42 U.S.C. § 7607(b).

31. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate two years from the effective date, provided that H.J. Mohr has complied with all terms of the Order throughout its duration.

8/31/16
Date

Dolores Mohr / President
Dolores Mohr, President
H.J. Mohr & Sons Co.

9/16/16
Date

Edward Nam
Edward Nam
Acting Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Appendix A

Fugitive Dust Plan (attached)

**FUGITIVE DUST OPERATING PROGRAM
H. J. MOHR & SONS
915 SOUTH MAPLE AVENUE
OAK PARK, IL 60304**

August 2, 2016

DAI Project No. 7426

Prepared For:
H. J. Mohr & Sons
915 South Maple Avenue
Oak Park, Illinois 60304

Prepared By:
DAI Environmental, Inc.
27834 North Irma Lee Circle
Lake Forest, Illinois 60045

TABLE OF CONTENTS

LIST OF FIGURES.....	i
LIST OF TABLES	i
APC 391 FORM	ii
1.0 INTRODUCTION.....	1
1.1 Site Description.....	1
1.2 Operating Program.....	1
1.3 Site Plan	2
2.0 ATTACHMENT TO APC 391 PART 7.....	3
2.1 Conveyors and Conveyor Transfer Points	3
2.2 Storage Bins	4
2.3 Fine Product Truck and Trailer Loading Operations	5
2.4 Unloading and Transporting Operations of Materials Collected by Pollution Control Equipment	6
2.5 Paved Normal Traffic Roads/Paved Parking Lots	6

LIST OF FIGURES

Site Location Map.....	Figure 1
Aerial View of Site and Surrounding Property Usage	Figure 2
Site Plan	Figure 3
Site Detail with Material Stockpiles (Southern Property Extent).....	Figure 4

LIST OF APPENDICES

STOCKPILE INSPECTION FORM.....	APPENDIX A
BAGHOUSE INSPECTION FORM	APPENDIX B
DRIVEWAY DUST SUPPRESSION LOG	APPENDIX C



STATE OF ILLINOIS
 ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL
 1021 NORTH GRAND AVENUE, EAST
 SPRINGFIELD, ILLINOIS 62702

OPERATING PROGRAM FOR FUGITIVE PARTICULATE CONTROL	
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1. THIS FORM IS USED TO APPLY FOR A FUGITIVE DUST OPERATING PROGRAM AS REQUIRED BY 35 IAC 212.309. COMPLETE THE FORM, KEEP ONE COPY FOR YOUR RECORDS, AND RETURN TWO COPIES TO THE ATTENTION OF BUREAU OF AIR PERMIT SECTION MANAGER AT THE ADDRESS LISTED ABOVE.

2a. NAME OF OWNER: Dolores Mohr		3a. NAME OF OPERATOR: Same as owner	
2b. STREET ADDRESS OF OWNER: 915 South Maple Avenue		3b. STREET ADDRESS OF OPERATOR:	
2c. CITY OF OWNER: Oak Park		3c. CITY OF OPERATOR:	
2d. STATE OF OWNER: IL	2e. ZIP CODE: 60304	3d. STATE OF OPERATOR:	3e. ZIP CODE:

4a. NAME OF CORPORATE DIVISION OR PLANT: H.J. Mohr & Sons Co		4b. STREET ADDRESS OF EMISSION SOURCE: 915 South Maple Avenue		
4c. CITY OF EMISSION SOURCE: Oak Park	4d. LOCATED WITHIN CITY LIMITS: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	4e. TOWNSHIP: Oak Park	4f. COUNTY: Cook	4g. ZIP CODE: 60304

5. SUBMIT A SCALE MAP SHOWING ALL STORAGE PILES, CONVEYOR LOADING OPERATIONS, STORAGE PILE ACCESS ROADS, NORMAL TRAFFIC ROADS, PARKING FACILITIES, LOCATION OF UNLOADING AND TRANSPORTING OPERATIONS WITH POLLUTION CONTROL EQUIPMENT.

6a. DO STORAGE PILES CONTAIN A TOTAL OF MORE THAN 260,000 TONS OF MATERIAL IN A CALENDER YEAR? YES NO

6b. IF THE ANSWER TO 6a WAS YES, PLEASE SUBMIT THE FOLLOWING INFORMATION.

TOTAL AMOUNT OF MATERIAL IN THE STORAGE PILES: _____ TONS/YEAR

AND SUBMIT AN ATTACHED SHEET DESCRIBING:

I) DETAILED OPERATING PROCEDURES AND CONTROL METHODS BY WHICH FUGITIVE PARTICULATES FROM THESE STORAGE PILES WILL BE MINIMIZED DURING LOADING, UNLOADING, PILE MAINTENANCE, AND WIND EROSION. HOW OFTEN WILL THESE PILES BE TREATED WITH SURFACTING AGENT? NAME THE TYPE AND CONCENTRATION OF SURFACTANT THAT WILL BE USED.

II) TYPE OF CONTROL METHODS USED FOR FUGITIVE PARTICULATE EMISSIONS FROM CONVEYOR LOADING OPERATIONS AND NORMAL TRAFFIC PATTERN ROADS SERVING THESE STORAGE PILES. IF SURFACTING AGENT IS USED STATE TYPE AND CONCENTRATION OF SURFACTING AGENT AND FREQUENCY OF ITS USE.

III) TYPE OF CONTROL METHODS USED FOR FUGITIVE PARTICULATE EMISSIONS FROM ALL PAVED OR UNPAVED PARKING LOTS AND NORMAL TRAFFIC PATTERN ROADS AT THIS FACILITY. IF ROADS ARE PAVED INDICATE FOOTAGE OF ROADS THAT WILL BE PAVED AND HOW FREQUENTLY THESE ROADS WILL BE CLEANED.

7. DOES THIS FACILITY HAVE ANY OF THE FOLLOWING SOURCES?

a.) CRUSHERS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
b.) GRINDING MILLS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
c.) SCREENING OPERATIONS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
d.) BUCKET ELEVATORS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
e.) CONVEYORS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
f.) CONVEYOR TRANSFER POINTS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

g.) BAGGING OPERATIONS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
h.) STORAGE BINS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
i.) FINE PRODUCT TRUCK AND TRAILER LOADING OPERATIONS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
j.) UNLOADING AND TRANSPORTING OPERATIONS OF MATERIAL COLLECTED BY POLLUTION CONTROL EQUIPMENT	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
k.) UNPAVED NORMAL TRAFFIC ROADS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
l.) PAVED NORMAL TRAFFIC ROADS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
m.) UNPAVED PARKING LOTS	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
n.) PAVED PARKING LOTS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

7b. FOR EACH SOURCE MARKED YES, ATTACH AN ADDITIONAL SHEET DESCRIBING THE TYPE OF CONTROL METHODS THAT WILL BE USED TO CONTROL FUGITIVE PARTICULATE EMISSIONS. IF SURFACTANT IS USED, STATE THE TYPE AND CONCENTRATION OF SURFACTANT AND FREQUENCY OF ITS APPLICATION. IF THE ROADS AND PARKING LOTS ARE PAVED, STATE THE FREQUENCY OF CLEANING.

8. VEHICULAR MILES TRAVEL INFORMATION:
THIS INFORMATION IS TO BE DETERMINED BY THE NUMBER OF CARS MULTIPLIED BY THE DISTANCE TRAVELED FOR THE FOLLOWING ROADS.

I) TRAFFIC ON UNPAVED NORMAL TRAFFIC ROADS IN	MILES PER YEAR	0
II) TRAFFIC ON PAVED NORMAL TRAFFIC ROADS IN	MILES PER YEAR	2,100
III) TRAFFIC ON UNPAVED PARKING LOTS IN	MILES PER YEAR	0
IV) TRAFFIC ON PAVED PARKING LOTS IN	MILES PER YEAR	215

9. IS THIS FUGITIVE PARTICULATE CONTROL PROGRAM IMPLEMENTED AT THE PRESENT? YES NO

10.

AUTHORIZED SIGNATURE (S): (m)

BY <u>Karen Mohr</u>	<u>8/3/16</u>	BY _____	_____
SIGNATURE	DATE	SIGNATURE	DATE
<u>Karen Mohr</u>			
TYPED OR PRINTED NAME OF SIGNER		TYPED OR PRINTED NAME OF SIGNER	
<u>General Manager</u>			
TITLE OF SIGNER		TITLE OF SIGNER	

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

1.0 INTRODUCTION

1.1 Site Description

Facility Owner, Address, and Telephone

H. J. Mohr & Sons
915 South Maple Avenue
Oak Park, IL 60304
Contact: Dolores Mohr, President
Telephone: (708) 383-4611

Facility Operator, Address and Telephone

H. J. Mohr & Sons
915 South Maple Avenue
Oak Park, IL 60304
Contact: Marlene Mohr, Manager
Telephone: (708) 383-4611

H. J. Mohr & Sons (Mohr) owns and operates a concrete batch plant facility located at 915 South Maple Avenue in Oak Park, Illinois (facility). Figure 1 provides a topographical Site Location Map. The facility includes four (4) buildings: the office, the warehouse, the south shop, and the batch plant/maintenance garage building, as well as several material stockpiles. The Mohr facility includes a parking lot located across the street, physically separated from the batch plant.

The facility is located in a mixed use commercial/residential area. The facility is bound by a multi-tenant retail building to the north, South Maple Avenue to the east, Lexington Street to the south, and Harlem Avenue/IL-43 to the west. Figure 2 provides an aerial view of the facility and surrounding property use.

1.2 Operating Program

The Mohr facility has been covered by the Illinois Environmental Protection Agency (Illinois EPA) Illinois EPA Registration of Smaller Sources (ROSS) Program since May 2013, identification number 031225AGH. Based upon the location of the concrete manufacturing (SIC 3272) facility within Cook County, an operating program has been completed.

This document is an attachment to the Illinois EPA *Operating Program for Fugitive Emission Control* form (APC 391) and provides information not directly included on the APC 391 form. This *Fugitive Dust Operating Program* (Operating Program) provides physical controls, standard operating procedures, and Best Management Practices (BMPs) implemented at the facility to prevent a release of visible fugitive particulate matter (PM) beyond property boundaries.

This Operating Program is an amendment to the current program in use by the facility dated April 8, 2015. The original program was approved by Illinois EPA on September 28, 1983.

Ms. Karen Mohr, General Manager, has responsibility for the management of this Operating Program, as well as the periodic review and update required by 35 IAC 212.312. Ms. Mohr may delegate various tasks to appropriate personnel as applicable (e.g., inspections and physical dust suppression activities).

1.3 Site Plan

Part 5 of the APC 391 form specifies various items to be included on a scaled map as part of the Operating Program. Figure 1 in is a topographical Site Location Map, and Figure 2 provides an aerial view of the facility and surrounding property usage. Figure 3 provides a Site Plan showing the information including: storage piles, conveyor loading operations, traffic patterns throughout the facility and within the areas of storage piles, and transfer operations (parking facilities are shown in Figure 2). Figure 4 provides a Site Detail of the southern portion of the facility where the storage piles are located and a majority of the material transfer operations occur.

2.0 ATTACHMENT TO APC 391 PART 7

Mohr operates a concrete batch plant, which includes various potential fugitive emission sources including material storage piles, material transfer areas and conveyors, and dirt-covered paved roads. The below information details controls and BMPs in place to prevent fugitive PM emissions.

2.1 Conveyors and Conveyor Transfer Points

Part 7(e) and 7(f) of the APC 391 form indicate that conveyors and conveyor transfer points are present at the facility. The Mohr facility utilizes two (2) conveyors (see Figures 3 and 4).

The first conveyor, located immediately north of the stone stockpiles along the southeastern property wall, is used to transfer aggregate from a hopper into dump trucks for off-site shipment of materials.

The second conveyor transfers aggregate and sand from the gravity feed “raw ingredient” bins into the top of the batch plant building for use in concrete manufacturing. The “raw ingredient” bins are located between the western concrete wall and the South Shop building. The locations of the “raw ingredient” bins, conveyor, and batch plant building are shown in Figure 3. Aggregate and sand gravity feed from the “raw ingredient” bins onto the conveyor, which begins underground below the bins before transferring aboveground and climbing into the top of the batch plant building (i.e., the transfer points are below ground and inside). The conveyor is also equipped with four (4) spring loaded mechanical scrapers (1.5-in wide), one (1) in the subsurface “raw ingredient” bins, one (1) on top of the hopper, one (1) on first incline, and one (1) on 2nd incline.

The stone and sand loaded on both conveyors is first wetted, and all drop down transfer points are enclosed. Nonetheless, if any dust or material is observed coming off any part of the conveyor, facility personnel shall immediately perform additional watering on the associated material storage piles. This additional watering will be recorded on the stockpile inspection log (example included in Appendix A) and will include time, date, and reason the additional watering was performed.

2.2 Storage Bins

Part 7(h) of the APC 391 form indicates that “storage bins” are present at the facility. The Mohr facility stores various materials (e.g., sand, gravel, and stone) in multiple piles, primarily within the southern portion of the facility. The piles include “raw ingredients” utilized in the concrete manufacturing process (i.e., sand and various sized aggregate), as well as material for sale to customers. Figure 4 provides a Site Detail with stockpile types and locations.

To prevent PM emissions beyond the property boundary, Mohr has implemented BMPs in association with the storage piles. Sand and stone are delivered via covered dump truck for distribution into materials stockpiles located within the southern portion of the property. All materials are delivered wet to the facility by the transport vendor. The wet materials are distributed to 3-walled storage bins with concrete block dividers used to establish the three (3) walls and segregate the various materials. A majority of the materials stored are heavy (e.g., stone) and not prone to generating PM except when crushed. No crushing operations are performed at this facility. These heavy materials are placed into the storage bins along the southeastern property boundary. Lighter materials (e.g., sand) that may be more likely to create dust are placed within storage bins that are internally located within the south-central portion of the facility. The lighter materials are not stored adjacent to the property boundaries. An 8-ft high concrete wall surrounds the facility. All material stockpiles remain at a height below the wall per Village of Oak Park (Village) requirement. The stockpile height will be limited to the height of the surrounding wall to reduce the exposure to wind and the possibility of blowing dust (i.e., PM).

All stockpiles are equipped with a manually operated sprinkler system (see Figure 4) that is used to re-wet materials with water. The sprinkler system is to be operated daily on dry days (any day without precipitation or snow cover). Additionally, stockpiles are observed throughout the day by facility personnel. If personnel observe that materials are drying such that the threat of dust generation is likely, the situation is reported to the Manager and the sprinkler system is turned on. If a large dump of water on a stockpile is required, a front end loader can retrieve water from the water pit located in the southwest corner of facility. The batch plant is operational five (5) to 6-days a week. On days of non-operation during dry periods such as a hot summer Sunday, a facility

representative conducts an inspection and stockpile watering (as needed) to prevent the generation of dust.

A stockpile inspection log is completed by facility personnel (see example in Appendix A) on a daily basis. The log includes information including: date, inspector's initials, the pile being inspected, whether or not manual watering was conducted, and any other comments related to potential dust generation. The piles will be checked at least twice on days on which the temperature reaches 85 and there has been no precipitation on the present or preceding day. At least one (1) inspection completed at the end of the business day to ensure that piles are adequately wetted prior to leaving for the evening. The inspection records are maintained for a period of at least 3-yrs.

An annual report shall be submitted to the Illinois EPA summarizing the above control measures that are completed to address fugitive dust opacity limitations. The annual report shall include a cover letter and copies of completed roadway dust suppression logs.

2.3 Fine Product Truck and Trailer Loading Operations

Part 7(i) of the APC 391 form indicates that fine product truck/trailer loading is performed at the facility. Cement and slag are delivered to the facility for use in the concrete manufacturing process. The materials are delivered via bulker truck that transfers the materials into the batch plant at the transfer station located along the northern property boundary to the immediately adjacent north of the batch plant building. An equivalent method of PM emission prevention has been implemented for these fine product loading operations. To prevent PM emissions, a sealed and enclosed connection to the bulker truck is made at the transfer station, and a pump is used to move the fine material up into the appropriate silo located at the top of the batch plant building. This connection ensures that fine materials are not exposed to the environment, eliminating the threat of PM emission. The transfer of the fine material is further protected by the use of the baghouses located on-site.

To prevent PM emissions during loading of mixed materials into the mixer trucks, trucks position directly below a vertical dump that is located at approximately the same height as the top of mixer truck, as is standard for concrete batch plants. The vertical dump consists of a rectangular funnel

connected to a tube, the tube in place to bridge the vertical gap between the funnel and the top of the mixer truck, as well as to prevent off-dusting during the dump. During the dump, the four (4) “dry ingredients” (not actually dry) that make up concrete: sand, aggregate, slag, and cement mix with water and are distributed into the top of the mixer truck. All loading operations are performed inside the batch plant building.

2.4 Unloading and Transporting Operations of Materials Collected by Pollution Control Equipment

Part 7(j) of the APC 391 form indicates that unloading of material collected by pollution control equipment is performed at the facility. Baghouses, a type of pollution control equipment, are in use on-site to control PM emissions from the concrete batch plant. Materials are unloaded from the pollution control equipment via manual removal and replacement of filters inside the baghouse. Therefore, the unloading operations are conducted within an enclosure. Baghouse filters are inspected daily. The daily visual inspections dictate when filter replacement is required. Filters are replaced as needed, approximately four (4) times a year (i.e., quarterly). Records of daily visual inspection results and filter replacement date are recorded on the form included in Appendix B. There are no gauges to monitor as part of the inspections associated with the baghouses.

2.5 Paved Normal Traffic Roads/Paved Parking Lots

Parts 7(l) and 7(n) of the APC 391 form indicate that paved “normal traffic roads” and parking lots, respectively, are present at the facility. The parking lot location is part of the Mohr facility, but is located on a separate parcel of property situated at southeast corner of the intersection of Garfield Street and South Maple Avenue (across the street to the east of the concrete batch plant). The location of the parking lot is provided in Figure 2. The “normal traffic road” is the single internal driveway at the facility. Due to spatial constraints and as a matter of traffic control, all vehicles enter the property at the two (2) gates at the northern end of the facility and exit through the southern gate. Figure 3 shows the internal driveway and traffic patterns through the facility.

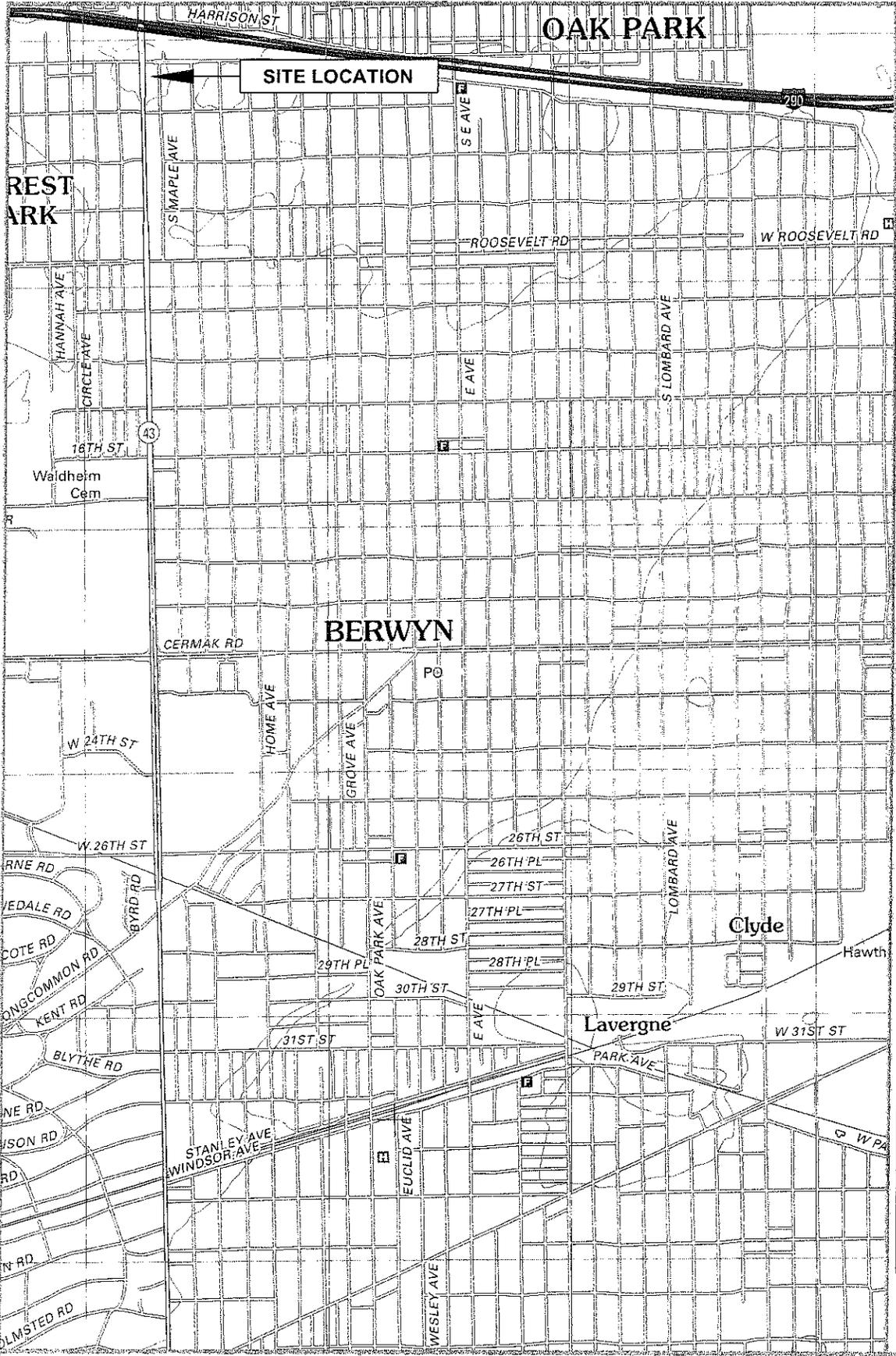
The parking lot is paved. No operations are conducted within or adjacent to the parking lot. Therefore, no additional dust controls are necessary. However, the dry sweeping unit is used periodically on the driveway to perform general cleaning and/or dust removal.

The internal driveway at the facility is concrete paved and is generally in daily use. In June 2016, the facility completed a removal of accumulated fine materials from the paved area surrounding the South Shop, and new cement pads and walls were installed. Sprinkler units have also been added. These improvements, combined with Mohr's continued use of the dry sweeper, promise to enhance the effectiveness of Mohr's dust suppression practices. In general, dry sweeping operations are conducted at the mid-way point of the business day and at the end of the business day. The mid-day dry sweeping is intended to remove materials accumulated during the facility's active operations. Following the termination of material handling and concrete manufacturing at the end of the business day, dry sweeping is conducted. As many passes as necessary to prevent dust from passing over the property boundary are performed. Additional dust suppression is accomplished using the manual sprinkler system and/or Mohr's water truck to wet the internal driveway. No chemical surfactants are utilized, only water. If personnel observe dust generation in any form, including a "cloud" or "haze," additional dry sweeping operations and/or water application are conducted.

A roadway dust suppression log is completed by facility personnel (see example in Appendix C) on a daily basis. The log includes information including: date, inspector's initials, the time of dry sweeping and/or water application, if the water application is from sprinkler or water truck, and any other pertinent comments. If water application is completed with the water truck, the additional information is noted. Records are maintained for a period of at least 3-yrs.

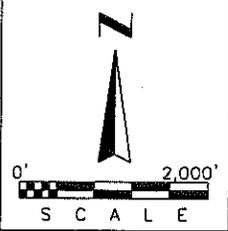
An annual report shall be submitted to the Illinois EPA summarizing the above control measures that are completed to address fugitive dust opacity limitations. The annual report shall include a cover letter and copies of completed roadway dust suppression logs.

FIGURES

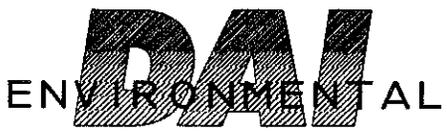


LEGEND

BERWYN
 QUADRANGLE
 ILLINOIS-COOK
 7.5-MINUTE SERIES
 (2012
 TOPOGRAPHIC)



CAD FILE: 7426-03
 REVISED: 05-07-14

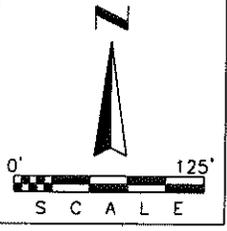


H. J. MOHR & SONS
 915 SOUTH MAPLE AVENUE
 OAK PARK, ILLINOIS

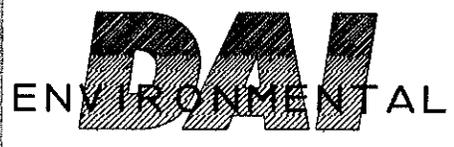
FIGURE 1
SITE LOCATION MAP

LEGEND

PROPERTY
BOUNDARY

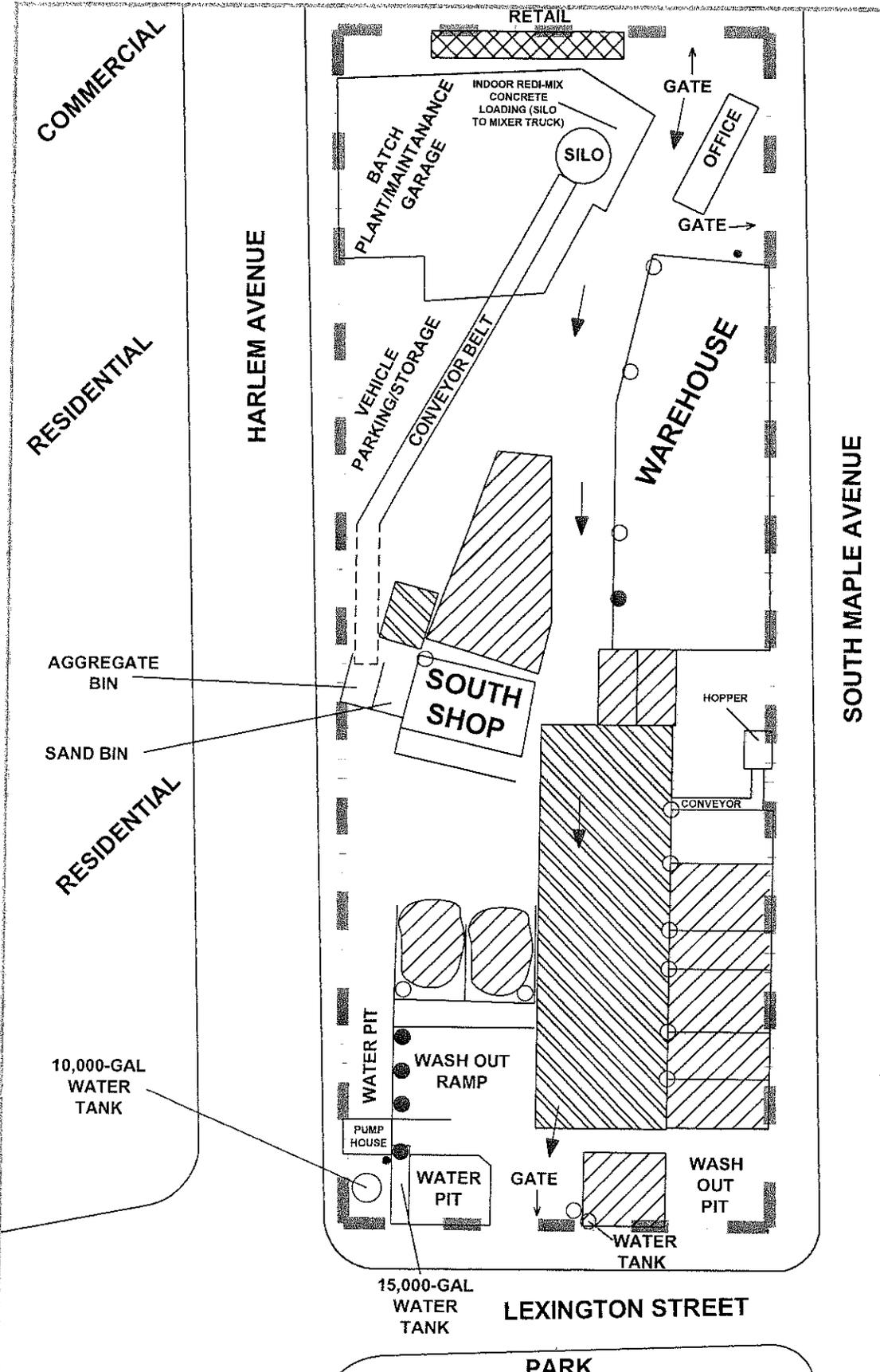


CAD FILE: 7426-01
REVISED: 06/25/14



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OAK PARK, ILLINOIS

FIGURE 2
AERIAL VIEW OF SITE AND
SURROUNDING PROPERTY USAGE
(TAKEN FROM GOOGLE MAPS 2013)



LEGEND

- SITE LOCATION
- ▨ MATERIAL STOCKPILES (SEGREGATED BY CONCRETE BLOCK WALLS)
- SPRINKLER
- LEAN TO SPRINKLER
- WATER SUPPLY
- ↓ TRAFFIC PATTERN
- ▩ BULKER TRUCK TRANSFER AREA CONTROLLED BY BAGHOUSE (CEMENT AND SLAG TO SILO)
- ▨ MATERIAL TRANSFER AREA (DUMP TRUCK, CEMENT MIXER, FRONT END LOADER)
- - - UNDERGROUND CONVEYOR

NOTE: 8-FEET HIGH CONCRETE WALL SURROUNDS A MAJORITY OF THE FACILITY

N

0' 60'

SCALE

CAD FILE: 7426-04A
REVISED: 06/22/16

DAI
ENVIRONMENTAL

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OAK PARK, IL

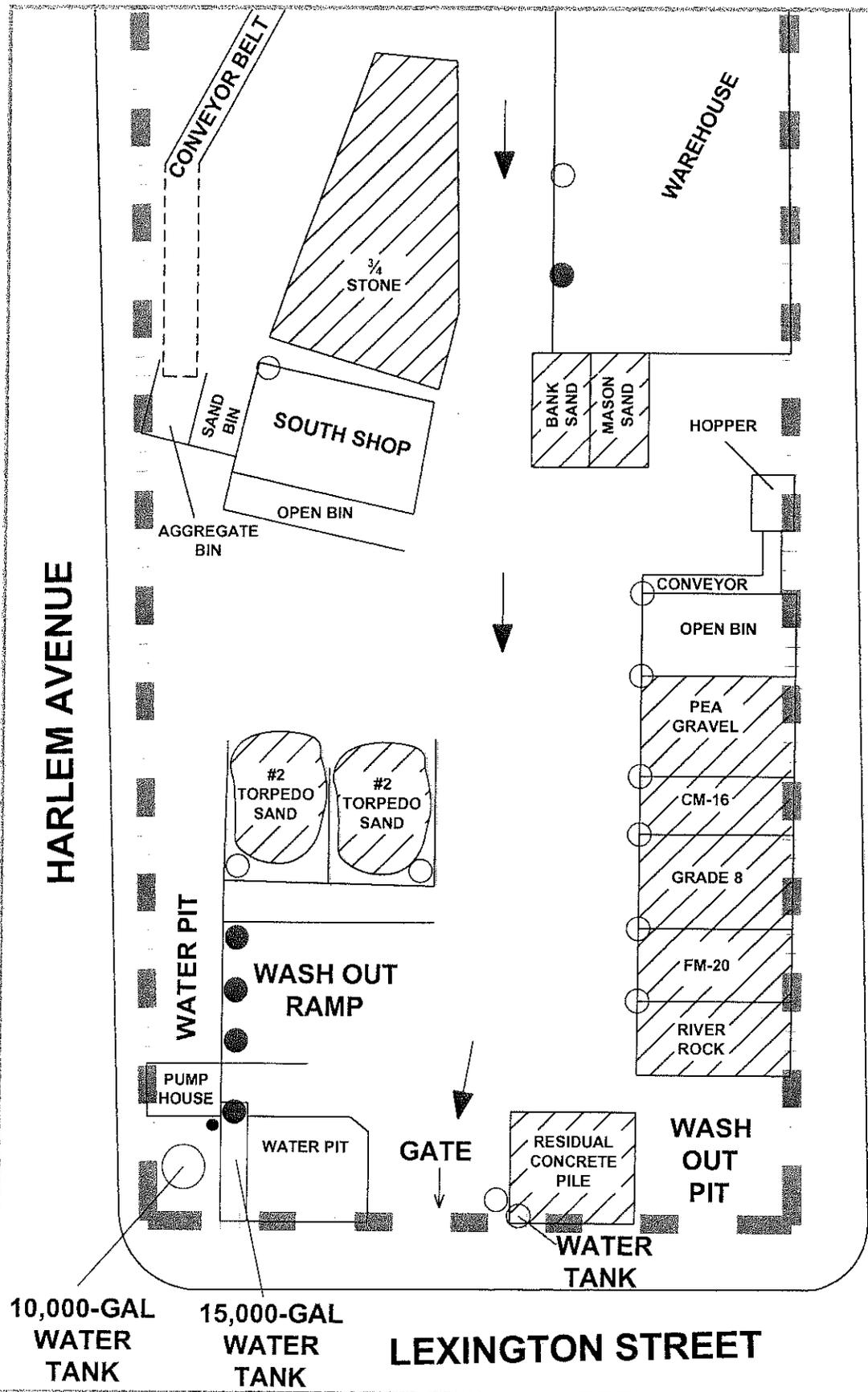
FIGURE 3
SITE PLAN

LEGEND

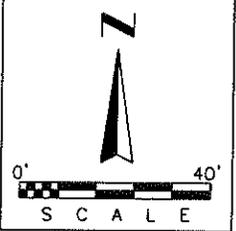
-  SITE LOCATION
-  MATERIAL STOCKPILES (SEGREGATED BY CONCRETE BLOCK WALLS)
-  SPRINKLER
-  LEAN TO SPRINKLER
-  WATER SUPPLY
-  TRAFFIC PATTERN
-  UNDERGROUND CONVEYOR

SOUTH MAPLE AVENUE

HARLEM AVENUE



NOTE: 8-FEET HIGH CONCRETE WALL SURROUNDS A MAJORITY OF THE FACILITY



CAD FILE: 7426-05A
REVISED: 06/22/16



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915 SOUTH MAPLE AVENUE
OAK PARK, IL

FIGURE 4
SITE DETAIL WITH
MATERIAL STOCKPILES
(SOUTHERN PROPERTY EXTENT)

**APPENDIX A
STOCKPILE INSPECTION FORM
(BLANK EXAMPLE)**

Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

STOCKPILE INSPECTION FORM
 Form 1 of 2

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Bank Sand	Visual Observation** Mason Sand	Visual Observation** FM-20	Visual Observation** Pea Gravel	Visual Observation** CM-16	Comments***	Initials of Inspector
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							

*NOTE – On hot dry days, stockpile observations should be conducted more than once, with at least one inspection completed at the end of the business day to ensure that piles are adequately wetted prior to leaving for the evening.

**Observations: Dry – Stockpile dry and capable of creating dust (if noted, initiate sprinkler and note in comments)

Wet – Stockpile material adequately wet to prevent dust

NP – Not performed (provide comments/justification)

***Comments – Add any other pertinent information. For example, if weather dictates that an inspection is not required (i.e., rain effectively wetting piles/suppressing dust), note that.

SEE ATTACHED STOCKPILE DIAGRAM FOR REFERENCE.

Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

STOCKPILE INSPECTION FORM
 Form 1 of 2

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Bank Sand	Visual Observation** Mason Sand	Visual Observation** FM-20	Visual Observation** Pea Gravel	Visual Observation** CM-16	Comments***	Initials of Inspector
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							

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Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

STOCKPILE INSPECTION FORM
 Form 1 of 2

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Bank Sand	Visual Observation** Mason Sand	Visual Observation** FM-20	Visual Observation** Pea Gravel	Visual Observation** CM-16	Comments***	Initials of Inspector
25							
26							
27							
28							
29							
30							
31							

***NOTE – On hot dry days, stockpile observations should be conducted more than once, with at least one inspection completed at the end of the business day to ensure that piles are adequately wetted prior to leaving for the evening.**

****Observations:** Dry – Stockpile dry and capable of creating dust (if noted, initiate sprinkler and note in comments)
 Wet – Stockpile material adequately wet to prevent dust
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 Wet – Stockpile material adequately wet to prevent dust
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*****Comments – Add any other pertinent information. For example, if weather dictates that an inspection is not required (i.e., rain effectively wetting piles/suppressing dust), note that.**

SEE ATTACHED STOCKPILE DIAGRAM FOR REFERENCE.

Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

STOCKPILE INSPECTION FORM

Form 2 of 2

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Grade 8	Visual Observation**	Visual Observation** River Rock	Visual Observation** Torpedo Sand	Visual Observation** ¾-in Stone	Comments***	Initials of Inspector
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							

*NOTE – On hot dry days, stockpile observations should be conducted more than once, with at least one inspection completed at the end of the business day to ensure that piles are adequately wetted prior to leaving for the evening.

**Observations: Dry – Stockpile dry and capable of creating dust (if noted, initiate sprinkler and note in comments)

Wet – Stockpile material adequately wet to prevent dust

NP – Not performed (provide comments/justification)

***Comments – Add any other pertinent information. For example, if weather dictates that an inspection is not required (i.e., rain effectively wetting piles/suppressing dust), note that.

SEE ATTACHED STOCKPILE DIAGRAM FOR REFERENCE.

Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

STOCKPILE INSPECTION FORM
 Form 2 of 2

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Grade 8	Visual Observation**	Visual Observation** River Rock	Visual Observation** Torpedo Sand	Visual Observation** ¾-in Stone	Comments***	Initials of Inspector
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							

*NOTE – On hot dry days, stockpile observations should be conducted more than once, with at least one inspection completed at the end of the business day to ensure that piles are adequately wetted prior to leaving for the evening.

**Observations: Dry – Stockpile dry and capable of creating dust (if noted, initiate sprinkler and note in comments)

Wet – Stockpile material adequately wet to prevent dust

NP – Not performed (provide comments/justification)

***Comments – Add any other pertinent information. For example, if weather dictates that an inspection is not required (i.e., rain effectively wetting piles/suppressing dust), note that.

SEE ATTACHED STOCKPILE DIAGRAM FOR REFERENCE.

Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

STOCKPILE INSPECTION FORM
 Form 2 of 2

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Grade 8	Visual Observation**	Visual Observation** River Rock	Visual Observation** Torpedo Sand	Visual Observation** ¾-in Stone	Comments***	Initials of Inspector
25							
26							
27							
28							
29							
30							
31							

*NOTE – On hot dry days, stockpile observations should be conducted more than once, with at least one inspection completed at the end of the business day to ensure that piles are adequately wetted prior to leaving for the evening.

**Observations: Dry – Stockpile dry and capable of creating dust (if noted, initiate sprinkler and note in comments)
 Wet – Stockpile material adequately wet to prevent dust

NP – Not performed (provide comments/justification)

***Comments – Add any other pertinent information. For example, if weather dictates that an inspection is not required (i.e., rain effectively wetting piles/suppressing dust), note that.

SEE ATTACHED STOCKPILE DIAGRAM FOR REFERENCE.

**APPENDIX B
BAGHOUSE INSPECTION FORM
(BLANK EXAMPLE)**

Owner/Operator

H. J. Mohr & Sons
915 South Maple Avenue
Oak Park, IL 60304

BAGHOUSE INSPECTION FORM

MONTH _____ YEAR _____

Day of Month*	Visual Observation** Baghouse 1 (cement)	Visual Observation** Baghouse 2 (sand)	Visual Observation** Baghouse 3 (aggregate)	Visual Observation** Baghouse 4 (slag)	Comments***	Initials of Inspector
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
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18						
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23						
24						
25						
26						
27						
28						
29						
30						
31						

*NOTE – Inspections required weekly, at a minimum.

**Observations: C – Clear/Functioning

R– Replacement Required (note dated completed in comments)

NP – Not performed (provide comments)

PG - Pressure gauge reading (provide reading).

***Comments –Add other comments as applicable. For example, report any unusual conditions and indicate who was contacted, or report filter replacement date

**APPENDIX C
DRIVEWAY DUST SUPPRESSION LOG
(BLANK EXAMPLE)**

Owner/Operator

H. J. Mohr & Sons

915 South Maple Avenue

Oak Park, IL 60304

DRIVEWAY DUST SUPPRESSION LOG

MONTH _____ YEAR _____

Day of Month	Mid-day Dry Sweeping Completed (Y/N)*	Miles Swept	End of Day Dry Sweeping Completed (Y/N)*	Miles Swept	Additional Dry Sweeping Completed (Y/N)*	Miles Swept	Water application Performed (Y/N)**	Other dust suppression method performed (Y/N)***	Comments****	Initials of Inspector
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										

* – If Yes, note time. If No, provide comment/explanation.

** – If water application is performed, note if sprinkler or truck.

If sprinkler, provide comment on time/location.

If water truck, provide appropriate additional information on next form.

*** – If an alternative dust suppression method is completed or chemical surfactant is utilized, provide appropriate description and ensure all items from 35 IAC 212.216(g) are noted in Comments.

****Comments – Add any other pertinent information. For example, if weather dictates that water application is not required (i.e., rain effectively wetting driveway/suppressing dust), note that. If dust suppression is required but not performed, provide a justification.

Owner/Operator

H. J. Mohr & Sons
915 South Maple Avenue
Oak Park, IL 60304

DRIVEWAY DUST SUPPRESSION LOG

MONTH _____ YEAR _____

Day of Month	Mid-day Dry Sweeping Completed (Y/N)*	Miles Swept	End of Day Dry Sweeping Completed (Y/N)*	Miles Swept	Additional Dry Sweeping Completed (Y/N)*	Miles Swept	Water application Performed (Y/N)**	Other dust suppression method performed (Y/N)***	Comments****	Initials of Inspector
12										
13										
14										
15										
16										
17										
18										
19										
20										
21										
22										
23										

* – If Yes, note time. If No, provide comment/explanation.

** – If water application is performed, note if sprinkler or truck.

If sprinkler, provide comment on time/location.

If water truck, provide appropriate additional information on next form.

*** – If an alternative dust suppression method is completed or chemical surfactant is utilized, provide appropriate description and ensure all items from 35 IAC 212.216(g) are noted in Comments.

****Comments – Add any other pertinent information. For example, if weather dictates that water application is not required (i.e., rain effectively wetting driveway/suppressing dust), note that. If dust suppression is required but not performed, provide a justification.

Owner/Operator

H. J. Mohr & Sons

915 South Maple Avenue

Oak Park, IL 60304

DRIVEWAY DUST SUPPRESSION LOG

MONTH _____ YEAR _____

Day of Month	Mid-day Dry Sweeping Completed (Y/N)*	Miles Swept	End of Day Dry Sweeping Completed (Y/N)*	Miles Swept	Additional Dry Sweeping Completed (Y/N)*	Miles Swept	Water application Performed (Y/N)**	Other dust suppression method performed (Y/N)***	Comments****	Initials of Inspector
24										
25										
26										
27										
28										
29										
30										
31										

* – If Yes, note time. If No, provide comment/explanation.

** – If water application is performed, note if sprinkler or truck.

If sprinkler, provide comment on time/location.

If water truck, provide appropriate additional information on next form.

*** – If an alternative dust suppression method is completed or chemical surfactant is utilized, provide appropriate description and ensure all items from 35 IAC 212.216(g) are noted in Comments.

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Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

DRIVEWAY DUST SUPPRESSION LOG/WATER TRUCK LOG

MONTH _____ YEAR _____

Day of Month	Water application performed using portable water tank (Y/N)'	Water application frequency'	Water application amount (gallons)'	Comments	Initials of Inspector
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					

' - If Yes, the following information is required in Comments: location of driveway controlled, application rate, application width, and truck ID. Application frequency and total quantity of water applied are specifically broken into individual columns.

Owner/Operator
 H. J. Mohr & Sons
 915 South Maple Avenue
 Oak Park, IL 60304

DRIVEWAY DUST SUPPRESSION LOG/WATER TRUCK LOG

MONTH _____ YEAR _____

Day of Month	Water application performed using portable water tank (Y/N) ¹	Water application frequency ¹	Water application amount (gallons) ¹	Comments	Initials of Inspector
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					

¹ – If Yes, the following information is required in Comments: location of driveway controlled, application rate, application width, and truck ID. Application frequency and total quantity of water applied are specifically broken into individual columns.

Owner/Operator
H. J. Mohr & Sons
915 South Maple Avenue
Oak Park, IL 60304

DRIVEWAY DUST SUPPRESSION LOG/WATER TRUCK LOG

MONTH _____ YEAR _____

Day of Month	Water application performed using portable water tank (Y/N)'	Water application frequency'	Water application amount (gallons)'	Comments	Initials of Inspector
28					
29					
30					
31					

' - If Yes, the following information is required in Comments: location of driveway controlled, application rate, application width, and truck ID. Application frequency and total quantity of water applied are specifically broken into individual columns.

CERTIFICATE OF MAILING

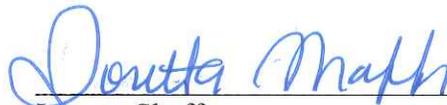
I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA-5-16-113(a)-IL-13, by certified mail, return receipt requested, to:

Dolores Mohr
H.J. Mohr & Sons Co.
915 South Maple Ave.
Oak Park, Illinois 60304

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-IL-13, by E-mail to:

Phil Perry, Chief
Air Compliance and Enforcement Branch
Indiana Department of Environmental Management
PPERRY@idem.IN.gov

On the 19 day of September 2016.



Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT
NUMBER:

7009 1680 0000 7674 0951