



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

5/21/2013

Gerry Hamilton  
THE BREWER CO  
30060 LAKELAND BLVD  
WICKLIFFE, OH 44092

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0243150001  
Permit Number: P0111465  
Permit Type: Renewal  
County: Lake

Certified Mail

|    |                                    |
|----|------------------------------------|
| No | TOXIC REVIEW                       |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS                               |
| No | MACT/GACT                          |
| No | NSPS                               |
| No | NESHAPS                            |
| No | NETTING                            |
| No | MODELING SUBMITTED                 |
| No | SYNTHETIC MINOR TO AVOID TITLE V   |
| No | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
THE BREWER CO**

|                |            |
|----------------|------------|
| Facility ID:   | 0243150001 |
| Permit Number: | P0111465   |
| Permit Type:   | Renewal    |
| Issued:        | 5/21/2013  |
| Effective:     | 5/21/2013  |
| Expiration:    | 5/21/2023  |





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
THE BREWER CO

**Table of Contents**

|   |    |
|---|----|
| Authorization .....   | 1  |
| A. Standard Terms and Conditions .....  | 3  |
| 1. What does this permit-to-install and operate ("PTIO") allow me to do?.....   | 4  |
| 2. Who is responsible for complying with this permit? .....   | 4  |
| 3. What records must I keep under this permit? .....  | 4  |
| 4. What are my permit fees and when do I pay them?.....   | 4  |
| 5. When does my PTIO expire, and when do I need to submit my renewal application? .....   | 4  |
| 6. What happens to this permit if my project is delayed or I do not install or modify my source? .....  | 5  |
| 7. What reports must I submit under this permit? .....  | 5  |
| 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... | 5  |
| 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...   | 5  |
| 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....                                   | 6  |
| 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....   | 6  |
| 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....  | 6  |
| 13. Can I transfer this permit to a new owner or operator?.....   | 7  |
| 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....  | 7  |
| 15. What happens if a portion of this permit is determined to be invalid? .....   | 7  |
| B. Facility-Wide Terms and Conditions.....  | 8  |
| C. Emissions Unit Terms and Conditions .....  | 10 |
| 1. P003, Roofing Machinery Saturator #1.....  | 11 |
| 2. P004, Roofing Machinery Saturator #2.....  | 14 |
| 3. P016, Pavement Repair Emulsions.....   | 17 |
| 4. P017, Roof Coating Section #1 .....  | 20 |
| 5. P018, Roof Coating Section #2 .....  | 24 |
| 6. P019, Master Cotes Line (colorant line) .....  | 28 |
| 7. P020, Polymer Modified Bitumen Line .....  | 32 |





## Authorization

Facility ID: 0243150001  
Application Number(s): A0045803  
Permit Number: P0111465  
Permit Description: PTIO renewal for emissions units utilized in the production of asphalt pavement, roofing and industrial coatings and sealants.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/21/2013  
Effective Date: 5/21/2013  
Expiration Date: 5/21/2023  
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

THE BREWER CO  
30060 LAKELAND BLVD  
Wickliffe, OH 44092

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0111465  
Permit Description: PTIO renewal for emissions units utilized in the production of asphalt pavement, roofing and industrial coatings and sealants.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

|                                   |                                   |
|-----------------------------------|-----------------------------------|
| <b>Emissions Unit ID:</b>         | <b>P003</b>                       |
| Company Equipment ID:             | Roofing Machinery Saturator #1    |
| Superseded Permit Number:         |                                   |
| General Permit Category and Type: | Not Applicable                    |
| <b>Emissions Unit ID:</b>         | <b>P004</b>                       |
| Company Equipment ID:             | Roofing Machinery Saturator #2    |
| Superseded Permit Number:         |                                   |
| General Permit Category and Type: | Not Applicable                    |
| <b>Emissions Unit ID:</b>         | <b>P016</b>                       |
| Company Equipment ID:             | Pavement Repair Emulsions         |
| Superseded Permit Number:         | 02-18176                          |
| General Permit Category and Type: | Not Applicable                    |
| <b>Emissions Unit ID:</b>         | <b>P017</b>                       |
| Company Equipment ID:             | Roof Coating Section #1           |
| Superseded Permit Number:         | 02-18176                          |
| General Permit Category and Type: | Not Applicable                    |
| <b>Emissions Unit ID:</b>         | <b>P018</b>                       |
| Company Equipment ID:             | Roof Coating Section #2           |
| Superseded Permit Number:         | 02-18176                          |
| General Permit Category and Type: | Not Applicable                    |
| <b>Emissions Unit ID:</b>         | <b>P019</b>                       |
| Company Equipment ID:             | Master Cotes Line (colorant line) |
| Superseded Permit Number:         | 02-18176                          |
| General Permit Category and Type: | Not Applicable                    |
| <b>Emissions Unit ID:</b>         | <b>P020</b>                       |
| Company Equipment ID:             | Polymer Modified Bitumen Line     |
| Superseded Permit Number:         | 02-18176                          |
| General Permit Category and Type: | Not Applicable                    |



**Final Permit-to-Install and Operate**  
THE BREWER CO  
**Permit Number:** P0111465  
**Facility ID:** 0243150001  
**Effective Date:** 5/21/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

---

<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
THE BREWER CO  
**Permit Number:** P0111465  
**Facility ID:** 0243150001  
**Effective Date:** 5/21/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

THE BREWER CO

**Permit Number:** P0111465

**Facility ID:** 0243150001

**Effective Date:** 5/21/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
THE BREWER CO  
**Permit Number:** P0111465  
**Facility ID:** 0243150001  
**Effective Date:** 5/21/2013

## **C. Emissions Unit Terms and Conditions**



**1. P003, Roofing Machinery Saturator #1**

**Operations, Property and/or Equipment Description:**

1 Ton/hr Roofing Machinery Saturator #1 - Asphalt Treated Roofing Fabric Inorganic

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| a. | OAC rule 3745-17-11(B)(1)     | Particulate emissions from the stack serving this emissions unit shall not exceed 4.10 pounds per hour based on a maximum process weight rate (asphalt saturator and glass fabric) of 2,000 pounds per hour.<br><br>See b)(2)a. below. |
| b. | OAC rule 3745-17-07(A)(1)     | Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.   |

(2) Additional Terms and Conditions

a. The hourly emission limitation above is greater than the potential to emit for this emissions unit. Therefore, no hourly record keeping is required to demonstrate compliance with this limit.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:

- a. the day(s) during which visible particulate emissions were observed from the stack and the corrective action(s) taken to eliminate the visible emissions.



f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions from the stack serving this emissions unit shall not exceed 4.10 pounds per hour based on a maximum process weight rate (asphalt saturator and glass fabric) of 2,000 pounds per hour.

Applicable Compliance Method:

Compliance with the above emission limitation shall be determined using the following equation:

$$E = P \times EF$$

where:

E = maximum hourly particulate emission rate;

P = maximum hourly processing rate (1.0 ton/hr); and

EF = emission factor of 1.2 lbs/ton from AP-42, Chapter 11.2 "Asphalt Roofing," Table 11.2-2, 1/95 Edition.

b. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



**2. P004, Roofing Machinery Saturator #2**

**Operations, Property and/or Equipment Description:**

0.9 Ton/hr Roofing Machinery Saturator #2 - Glass Asphalt Saturator.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| a. | OAC rule 3745-17-11(B)(1)     | Particulate emissions from the stack serving this emissions unit shall not exceed 3.93 pounds per hour based on a maximum process weight rate (asphalt saturator and glass fabric) of 1,875 pounds per hour.<br><br>See b)(2)a. below. |
| b. | OAC rule 3745-17-07(A)(1)     | Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.   |

(2) Additional Terms and Conditions

a. The hourly emission limitation above is greater than the potential to emit for this emissions unit. Therefore, no hourly record keeping is required to demonstrate compliance with this limit.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:

- a. the day(s) during which visible particulate emissions were observed from the stack and the corrective action(s) taken to eliminate the visible emissions.



f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions from the stack serving this emissions unit shall not exceed 3.93 pounds per hour based on a maximum process weight rate (asphalt saturator and glass fabric) of 1,875 pounds per hour.

Applicable Compliance Method:

Compliance with the above emission limitation shall be determined using the following equation:

$$E = P \times EF$$

where:

E = maximum hourly particulate emission rate;

P = maximum hourly processing rate (0.9 ton/hr); and

EF = emission factor of 1.2 lbs/ton from AP-42, Chapter 11.2 "Asphalt Roofing," Table 11.2-2, 1/95 Edition.

b. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



**3. P016, Pavement Repair Emulsions**

**Operations, Property and/or Equipment Description:**

Pavement Repair Emulsions, consisting of mixers M-16, M-17, and M-27, slurry tank M-18, mixing vessels, and filler line. Mixers M-16, M-17, and M-27 are vented to a baghouse. M-18 is only used for storage.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements               | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-18176) | Particulate emissions (PE) from the baghouse shall not exceed 0.10 pound per hour and 0.10 ton per year.<br><br>Visible emissions from the baghouse stack shall not exceed 5% opacity, as a six-minute average. |
| b. | OAC rule 3745-17-07(A)(1)                   | The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).  |
| c. | OAC rule 3745-17-11(B)                      | The emission limitation established in this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).   |



- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) Annual production for this emissions unit shall not exceed 6,837 tons per year, based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate.)
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)
  - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e) Reporting Requirements
  - (1) The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.



(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:

- a. the day(s) during which visible particulate emissions were observed from the afterburner stack and the corrective action(s) taken to eliminate the visible emissions.
- b. alleceedances of the rolling, 12-month production restriction.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions (PE) from the baghouses shall not exceed 0.10 pound per hour and 0.10 ton per year.

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. A 99% control efficiency shall be used for the baghouse. The maximum hourly and annual solids employment rates are 1,170 lbs/hr and 1,517 TPY, respectively.

b. Emission Limitation:

Visible emissions from the baghouse stack shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



4. P017, Roof Coating Section #1

Operations, Property and/or Equipment Description:

Roof Coating Section No. 1, consisting of mixers M-8, M-20, M-24, and M-41, mixing vessels, and filling line

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements               | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-18176) | Organic compounds (OC) emissions shall not exceed 0.63 pound per hour and 0.82 ton per year.<br><br>Fugitive particulate emissions (PE) shall not exceed 2.07 pounds per hour and 2.69 tons per year.<br><br>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.<br><br>See A.2.a.-b. |
| b. | OAC rule 3745-17-07(B)                      | The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).  |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| c. | OAC rule 3745-17-08(B)        | The control measure requirements established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.
- b. The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:
  - i. The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents.
  - ii. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

c) Operational Restrictions

- (1) Annual production for this emissions unit shall not exceed 5,112 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate.)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. any corrective actions taken eliminate the visible emissions.

These reports shall be submitted to the Director (the Ohio EPA's Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:
  - a. all exceedances of the rolling, 12-month production restriction;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compounds (OC) emissions shall not exceed 0.63 pound per hour and 0.82 ton per year.

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is



considered to be conservatively large for this process. The maximum hourly and annual production rates are 3,932 lbs/hr and 5,112 TPY, respectively.

b. Emission Limitation:

Fugitive particulate emissions (PE) shall not exceed 2.07 pounds per hour and 2.69 tons per year.

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 414 lbs/hr and 537 TPY, respectively.

c. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

g) Miscellaneous Requirements

- (1) None.



5. P018, Roof Coating Section #2

Operations, Property and/or Equipment Description:

Roof Coatings Section No. 2, consisting of Mixers M-9 and M-19, mixing vessels, and filler line

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements               | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-18176) | Organic compounds (OC) emissions shall not exceed 0.76 pound per hour and 0.99 ton per year.<br><br>Fugitive particulate emissions shall not exceed 3.72 pounds per hour and 4.83 tons per year.<br><br>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.<br><br>See A.2.a.-b. |
| b. | OAC rule 3745-17-07(B)                      | The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).   |
| c. | OAC rule 3745-17-08(B)                      | The control measure requirements   |



|  | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures   |
|--|-------------------------------|---|
|  |                               | established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.
- b. The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:
  - i. The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents.
  - ii. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

c) Operational Restrictions

- (1) Annual production for this emissions unit shall not exceed 6,193 tons per year, based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate.)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. any corrective actions taken eliminate the visible emissions.

These reports shall be submitted to the Director (the Ohio EPA's Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:
  - a. all exceedances of the rolling, 12-month production restriction;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compounds (OC) emissions shall not exceed 0.76 pound per hour and 0.99 ton per year.

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is



considered to be conservatively large for this process. The maximum hourly and annual production rates are 4,764 lbs/hr and 6,193 TPY, respectively.

b. Emission Limitation:

Fugitive particulate emissions (PE) shall not exceed 3.72 pounds per hour and 4.83 tons per year.

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 743 lbs/hr and 966 TPY, respectively.

c. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

g) Miscellaneous Requirements

- (1) None.



**6. P019, Master Cotes Line (colorant line)**

**Operations, Property and/or Equipment Description:**

Master Cotes Line, consisting of mixing vessels, filling lines, and 8 colorant storage tanks

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements               | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-18176) | Organic compounds (OC) emissions shall not exceed 0.16 pound per hour and 0.21 ton per year.<br><br>Fugitive particulate emissions shall not exceed 2.0 pounds per hour and 2.59 tons per year.<br><br>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.<br><br>See A.2.a.-b. |
| b. | OAC rule 3745-17-07(B)                      | The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).  |
| c. | OAC rule 3745-17-08(B)                      | The control measure requirements  |



|  | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures   |
|--|-------------------------------|---|
|  |                               | established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.
- b. The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:
  - i. The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents.
  - ii. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

c) Operational Restrictions

- (1) Annual production for this emissions unit shall not exceed 1,328 tons per year based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate.)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. any corrective actions taken eliminate the visible emissions.

These reports shall be submitted to the Director (the Ohio EPA's Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:
  - a. all exceedances of the rolling, 12-month production restriction;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compounds (OC) emissions shall not exceed 0.16 pound per hour and 0.21 ton per year.

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is



considered to be conservatively large for this process. The maximum hourly and annual production rates are 1,021 lbs/hr and 1,328 TPY, respectively.

b. Emission Limitation:

Fugitive particulate emissions (PE) shall not exceed 2.0 pounds per hour and 2.59 tons per year.

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 399 lbs/hr and 518 TPY, respectively.

c. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

g) Miscellaneous Requirements

- (1) None.



**7. P020, Polymer Modified Bitumen Line**

**Operations, Property and/or Equipment Description:**

Polymer Modified Bitumen Line, consisting of mixing tanks T-20 and T-21, colloid mill, screw conveyor, hopper, and filler line

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements               | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-18176) | Organic compounds (OC) emissions shall not exceed 0.67 pound per hour and 0.87 ton per year.<br><br>Fugitive particulate emissions shall not exceed 1.47 pounds per hour and 1.91 tons per year.<br><br>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.<br><br>See A.2.a.-b. |
| b. | OAC rule 3745-17-07(B)                      | The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).   |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| c. | OAC rule 3745-17-08(B)        | The control measure requirements established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.
- b. The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:
  - i. The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents.
  - ii. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

c) Operational Restrictions

- (1) Annual production for this emissions unit shall not exceed 5,416 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate.)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. any corrective actions taken eliminate the visible emissions.

These reports shall be submitted to the Director (the Ohio EPA's Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:
  - a. all exceedances of the rolling, 12-month production restriction;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compounds (OC) emissions shall not exceed 0.67 pound per hour and 0.87 ton per year.

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is



considered to be conservatively large for this process. The maximum hourly and annual production rates are 4,166 lbs/hr and 5,416 TPY, respectively.

b. Emission Limitation:

Fugitive particulate emissions (PE) shall not exceed 1.47 pounds per hour and 1.91 tons per year.

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 294 lbs/hr and 382 TPY, respectively.

c. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

g) Miscellaneous Requirements

- (1) None.