



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

10/15/2013

Certified Mail

THOMAS SAWYERS
BROWN COUNTY ASPHALT
11254 HAMER RD
GEORGETOWN, OH 45121

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0708000069
Permit Number: P0113871
Permit Type: OAC Chapter 3745-31 Modification
County: Brown

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 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: Portsmouth



Response to Comments

Facility ID:	0708000069
Facility Name:	BROWN COUNTY ASPHALT
Facility Description:	
Facility Address:	11254 HAMER RD GEORGETOWN, OH 45121 Brown County
Permit:	P0113871, Permit-To-Install and Operate - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The News Democrat on 09/05/2013. The comment period ended on 10/05/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: None
- b. Response: No comments received.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
BROWN COUNTY ASPHALT**

Facility ID:	0708000069
Permit Number:	P0113871
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/15/2013
Effective:	10/15/2013
Expiration:	1/3/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
BROWN COUNTY ASPHALT

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Final Permit-to-Install and Operate
BROWN COUNTY ASPHALT
Permit Number: P0113871
Facility ID: 0708000069
Effective Date: 10/15/2013

Authorization

Facility ID: 0708000069
Application Number(s): M0002167
Permit Number: P0113871
Permit Description: Chapter 31 modification to add propane as an additional fuel and the use of RAP up to 50%.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,250.00
Issue Date: 10/15/2013
Effective Date: 10/15/2013
Expiration Date: 1/3/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BROWN COUNTY ASPHALT
11254 HAMER RD
GEORGETOWN, OH 45121

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

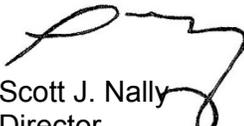
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

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



Final Permit-to-Install and Operate
BROWN COUNTY ASPHALT
Permit Number: P0113871
Facility ID: 0708000069
Effective Date: 10/15/2013

Authorization (continued)

Permit Number: P0113871
Permit Description: Chapter 31 modification to add propane as an additional fuel and the use of RAP up to 50%.

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

Emissions Unit ID:	P901
Company Equipment ID:	P901
Superseded Permit Number:	P0091249
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
BROWN COUNTY ASPHALT
Permit Number: P0113871
Facility ID: 0708000069
Effective Date: 10/15/2013

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 Portsmouth City Health Dept., Air Pollution Unit 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 submitting¹ 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.

¹ 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
BROWN COUNTY ASPHALT
Permit Number: P0113871
Facility ID: 0708000069
Effective Date: 10/15/2013

B. Facility-Wide Terms and Conditions



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
BROWN COUNTY ASPHALT
Permit Number: P0113871
Facility ID: 0708000069
Effective Date: 10/15/2013

C. Emissions Unit Terms and Conditions



1. P901,

Operations, Property and/or Equipment Description:

250 TPH Portable propane or oil fired double barrel drum mix asphalt plant controlled with a baghouse. Chapter 31 modification to add propane as an additional fuel and to allow the use of RAP up to 50%.

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. b)(1)d. thru f., c)(1) thru (5), d)(1), d)(2) and (5), e)(1)a.i.-iv., f)(1)b., d. thru h.

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 paragraph 3745-31-05(A)(3), (PTI 07-00485, issued 4/5/2000)	<p>Stack Emissions:</p> <p>Particulate emissions (PE) shall not exceed 8.25 pounds per hour.</p> <p>Particulate matter emissions less than 10 microns in diameter (PM₁₀) shall not exceed 5.75 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 32.5 pounds per hour.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 13.75 pounds per hour.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 2.75 pounds per hour.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b(2)a. - b(2)e.
b.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compounds (VOC) emissions while burning propane or number 2 fuel oil shall not exceed 0.10 pound per ton asphalt produced. See b)(2)f.
c.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)g.
d.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V permitting] (PTI 07-00485, issued 4/5/2000)	Stack Emissions: PE shall not exceed 1.65 tons per rolling, 12-month period. PM10 emissions shall not exceed 1.15 tons per rolling, 12-month period. SO2 emissions shall not exceed 0.55 tons per rolling, 12-month period. NOx emission shall not exceed 2.75 tons per rolling, 12-month period. CO emissions shall not exceed 6.5 tons per rolling, 12-month period.
e.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V permitting]	VOC emissions shall not exceed 5.0 tons per rolling, 12-month period.
f.	40 CFR Part 60, Subpart I	PE from the stack shall not exceed 0.04 grain/dscf. The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-17-07(A) OAC rule 3745-17-11 OAC rule 3745-18-06(E)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, production limitations, and use of baghouse.



- b. Visible particulate emissions from any stack associated with emissions unit P901 shall be less than or equal to 10% opacity as a 6-minute average.
- c. There shall be no visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens and weigh hopper.
- d. The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from elevator loading area.
- e. The aggregate loaded into the storage bins shall have moisture content sufficient to eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.
- f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- g. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install or Permit to Install and Operate P0113871 for this contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3):

- i. Limiting the annual asphalt production rate to 100,000 tons, based upon a rolling 12-month summation of the production rates.
 - ii. VOC emissions of 5 tons per year, all as a rolling 12-month summation.
- c) Operational Restrictions
- (1) The pressure drop across the baghouse shall be maintained within a range of 3.0 to 5.0 inches of water while the emissions unit is in operation
 - (2) The maximum annual asphalt production rate for this emissions unit shall not exceed 100,000 tons, based upon a rolling, 12 month summation of the production rates.



- (3) The permittee shall only burn propane and no. 2 fuel oil in this emissions unit.
 - (4) All number 2 fuel oil burned in this emissions unit shall have a sulfur content equal to or less than 0.5% sulfur, by weight.
 - (5) The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 per cent of all aggregate materials on an hourly basis. The permittee may not substitute raw materials for the aggregate such as shingles, slag, rubber, etc. without prior approval from Ohio EPA.
 - (6) The permittee shall operate and maintain the fuel burner in accordance with the manufacturer's recommendations to ensure efficient combustion of the fuel(s) and to ensure compliance with the applicable emission limitations for VOC, CO and NO_x. The permittee shall submit a copy of all *Burner Tuning Reporting Form for Asphalt Concrete Plants* forms produced during the past calendar year to the Portsmouth Local Air Agency with the PER.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
 - (2) The permittee shall maintain monthly records of the following information:
 - a. the total asphalt production for each month;
 - b. the rolling, 12 month summation of the total asphalt production and the asphalt production by fuel type, calculated by adding the current month's asphalt production to the asphalt production for the preceding eleven calendar months;
 - c. the rolling, 12 month summation of the PE, PM₁₀, NO_x, CO, SO₂, and CO emissions, calculated by adding the current month's PE, PM₁₀, NO_x, CO, SO₂, and CO emissions to the emissions for the preceding eleven calendar months; and
 - d. the maximum percentage of RAP used for any mix type.
 - (3) 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.

- (4) The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the aggregate storage bins and cold aggregate elevator associated with this emissions unit. If visible emissions are observed, the permittee shall note the following in the operation log:
 - a. the location and color of the visible emissions;
 - b. the cause of the visible particulate emissions;
 - c. the total duration of any visible emissions incident; and
 - d. any corrective actions taken to 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.

- (5) For each shipment of number 2 fuel oil and on-spec used oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittees or oil supplier's analyses for sulfur content.
- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month asphalt production limitation;
 - ii. all exceedances of the rolling, 12-month total PE, SO₂, NO_x, VOC, and CO emission limitations;
 - iii. all exceedances of the fuel sulfur content limitations in c)(4);
 - iv. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - v. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - vi. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - vii. all days during which any visible particulate emissions of fugitive dust were observed from the aggregate storage bins and cold aggregate elevator associated with this emissions unit the stack serving this emissions unit; and
- b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- c. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted as hardcopy or electronically through Ohio EPA Air Services, each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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 12-months for each air contaminant source identified in this permit.

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 Limitations:

Stack Emissions:

PE shall not exceed 8.25 pounds per hour.

CO emissions shall not exceed 32.5 pounds per hour.

NO_xemissions shall not exceed 13.75 pounds per hour.

SO₂emissions shall not exceed 2.75 pounds per hour.

VOC emissions while burning propane or number 2 fuel oil shall not exceed 0.10 pound per ton asphalt produced.

Applicable Compliance Method:

Compliance shall be demonstrated by emissions testing as required in section f)(2) below.

b. Emission Limitation:

PE shall not exceed 1.65 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of PE per ton of asphalt produced for each fuel, by the actual rolling, 12-month summation of asphalt produced for each fuel, in tons per rolling, 12-month period (as derived from the records required by d)(2), summing the results for all fuels, and then dividing by 2000 lbs/ton.

c. Emission Limitation:

PM₁₀emissions shall not exceed 5.75 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202.



d. Emission Limitation:

PM₁₀ shall not exceed 1.15 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of PM₁₀ per ton of asphalt produced for each fuel, by the actual rolling, 12-month summation of asphalt produced for each fuel, in tons per rolling, 12-month period (as derived from the records required by d)(2), summing the results for all fuels, and then dividing by 2000 lbs/ton.

e. Emission Limitation:

VOC emissions shall not exceed 5.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of VOC per ton of asphalt produced for each fuel, by the actual rolling, 12-month summation of asphalt produced for each fuel, in tons per rolling, 12-month period (as derived from the records required by d)(2), summing the results for all fuels, and then dividing by 2000 lbs/ton.

f. Emission Limitation:

NO_x emissions shall not exceed 2.75 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of NO_x per ton of asphalt produced for each fuel, by the actual rolling, 12-month summation of asphalt produced for each fuel, in tons per rolling, 12-month period (as derived from the records required by d)(2), summing the results for all fuels, and then dividing by 2000 lbs/ton.

g. Emission Limitation:

CO emissions shall not exceed 6.5 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of CO per ton of asphalt produced for each fuel, by the actual rolling, 12-month summation of asphalt produced for each fuel, in tons per rolling, 12-month period (as derived from the records required by term and condition d)(2), summing the results for all fuels, and then dividing by 2000 lbs./ton.



h. Emission Limitation:

SO₂ emissions shall not exceed 0.55 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of SO₂ per ton of asphalt produced for each fuel, by the actual rolling, 12-month summation of asphalt produced for each fuel, in tons per rolling, 12-month period (as derived from the records required by d)(2), summing the results for all fuels, and then dividing by 2000 lbs/ton.

i. Emission Limitation:

Visible particulate emissions from any stack associated with emissions unit P901 shall be less than or equal to 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

j. Emission Limitation:

There shall be no visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens and weigh hopper.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

(2) Emission Testing Requirements

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal. Emissions testing for secondary fuels shall be conducted within 60 days after the switch to the secondary fuel.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NO_x, SO₂, CO, and VOC for the primary fuel (currently propane). Prior to secondary fuel emissions testing, the permittee shall consult the appropriate Ohio EPA District Office or local air agency to determine which pollutants should be tested.



- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for:
- i. PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A;
 - ii. NO_x: Methods 1 through 4 and 7 or 7E of 40 CFR Part 60, Appendix A;
 - iii. SO₂: Methods 1 through 4 and 6 or 6C of 40 CFR Part 60, Appendix A;
 - iv. CO: Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; and
 - v. VOC: Methods 1 through 4 and 25, 25A, and/or 18 of 40 CFR Part 60, Appendix A.

The VOC pounds per hour emission rate observed during the emissions test shall be calculated in accordance with OAC paragraph 3745-21-10(C)(7). In lieu of this the permittee shall convert the mass emission value from VOC as carbon to VOC using the molecular weight of propane, i.e., the VOC as carbon emission rate observed during testing shall be converted to the appropriate units by multiplying the VOC emission rate observed during testing (in lbs./hr.) by 44 (propane) and divided by 36 (3 atoms of carbon).

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity and burning propane or number 2 fuel oil for PE, NO_x, SO₂, CO and VOC to verify emissions, unless otherwise specified or approved by the Portsmouth Local Air Agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Portsmouth Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Portsmouth Local Air Agency's refusal to accept the results of the emission test(s).

Personnel from the Portsmouth Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Portsmouth Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Portsmouth Local Air Agency.



(3) Burner Tuning

a. Introduction

The permittee is required to conduct periodic tuning of the asphalt plant burner. The purpose of this tuning is to ensure that the burner is adjusted properly so that air pollution emissions remain in compliance with allowable emissions rates and are minimized.

b. Qualifications for Burner Tuning

Technicians who conduct the burner tuning must be qualified to perform the expected tasks. The permittee is required to provide training to the technicians who perform the burner tuning procedure. Technicians who are qualified shall, at a minimum, have passed manufacturer's training concerning burner tuning, or have been trained by someone who has completed the manufacturer's training concerning burner tuning.

c. Portable Monitor Requirements

The permittee shall properly operate and maintain portable device(s) to monitor the concentration of NO_x, O₂ and CO in the stack exhaust gases from this emissions unit. The monitor(s) shall be capable of measuring the expected concentrations of the measured gases. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall maintain records of each portable monitoring device's calibration.

d. Burner Tuning Procedure

The first steps concerning burner tuning involve setting the pollutant baseline levels (concentrations) utilizing the portable monitor. These baselines shall be set during the initial U.S. EPA approved emissions testing that demonstrated the emissions unit was in compliance with all applicable emissions limitations as described in f)(1). The baselines shall be determined for NO_x and CO. Sampling should measure the exhaust gas values exiting the dryer or the baghouse. The duration of each sample shall follow the portable monitor manufacture's recommendations. Record these values on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form (as found in g)(3)) in the "Recent Stack Test Basis Values" column.

Once the pollutant baseline levels are set, the burner shall be next tuned based on the frequency described in f)(3)e. The general procedure for tuning the burner involves the following steps:

- i. Review the plant operations to ensure the plant is operating normally.
- ii. Confirm that the portable monitor is calibrated per the manufacture's specifications.



iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for O₂, NO_x and CO. These measurements shall be taken at the same location as the location where the baseline samples were taken. Record the values in the "Pre Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.

iv. Compare the measured stack exhaust gas values with the pollutant baseline values. If all of the measured stack exhaust gas values are equal to or less than 115 per cent of the pollutant baseline values, then it is not necessary to tune the burner. Go on to Section v. below.

The permittee shall have the burners tuned within two calendar weeks of any measured stack exhaust values greater than 115 per cent of the baseline values. Make any necessary adjustments and repairs. Repeat Sections iii. and iv. until the measured stack exhaust gas values are equal to or less than 115 per cent of the pollutant baseline values.

v. Once all of the measured stack exhaust gas values are within the 115 per cent of the pollutant baseline values, record the measured stack exhaust gas values in the "Post Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.

vi. By January 31 of each year, submit a copy of all *Burner Tuning Reporting Form for Asphalt Concrete Plants* forms produced during the past calendar year to the appropriate Ohio EPA District Office or local air agency responsible for the permitting of the facility.

e. Burner Tuning Frequency

The permittee shall conduct the burner tuning procedure within 20 production days after commencement of the production season in the State of Ohio. The permittee shall conduct another burner tuning procedure within 10 production days before or after June 1st of each year and within 10 production days before or after September 1st of each year. For purposes of this permit, the production season is defined as the time period between the date the first ton of asphalt is produced and the date that the last ton of asphalt is produced during the same calendar year. A burner tuning is not required if the production season ends prior to the associated tuning due date. If the baseline level testing or the initial season tuning is done within 30 days prior to June 1 or September 1, the tuning associated with that due date is not required.

In addition to the burner tuning procedure required above, the permittee shall conduct the burner tuning procedure within 20 production days from the date the facility switches to a fuel that is different than the fuel burned during the initial emissions tests that establish the pollutant baseline levels or the fuel burned during the most recent burner tuning procedure, whichever is later.



g) Miscellaneous Requirements

(1) Relocation of Portable Sources

- a. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
- b. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
- c. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
- d. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
- e. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
- f. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- (2) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.



Final Permit-to-Install and Operate

BROWN COUNTY ASPHALT

Permit Number: P0113871

Facility ID: 0708000069

Effective Date: 10/15/2013

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

- (3) Burner Tuning Form (see next page)



BURNER TUNING REPORTING FORM FOR ASPHALT CONCRETE PLANTS	
Facility ID:	Tuning Date:
Legal Name:	Other Company Name (if different than legal name):
Mailing Address:	Other Company Site Address: (if different than mailing address):
City, State, Zip Code:	Other Company City, County, Zip Code:
Site Contact Person:	Site Contact Telephone Number:
Site Contact Title:	Site Contact Fax Number:
Name of company performing tuning:	Name of company performing emission monitoring:
Type of plant (ie: batch, drum mix, etc.):	Calibration date for analyzers:

Reason for Tuning: Season Initial Tuning June Tuning September Tuning Fuel Switch Other (describe)

Fuel employed during tuning: Natural Gas Propane # 2 Fuel Oil # 4 Fuel Oil Used Oil Other (describe)

Tuning Results:

Parameter	Recent Stack Test Pollutant Baseline Levels ¹	Results	
		Pre Tuning	Post Tuning ³
Fuel flow to the burner (gallon/hr) (for fuel oil and on-spec used oil)			
Fuel pressure (psi)			
For burners that require compressed air for proper operation, pressure at the burner (psi)			
Carbon Monoxide (CO) concentrations (ppm) ²			
NO _x concentrations (ppm) ²			
Oxygen concentrations (per cent) ²			
Asphalt Production (tons/hr)			

¹These values are based on the results of the most recent Ohio EPA approved emissions test.

² Specify whether on a dry or wet basis.

³ If the burner did not require adjusting, please record N/A in the post tuning column.

Describe in detail a list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturer's specifications. Use additional paper if necessary.



Final Permit-to-Install and Operate
BROWN COUNTY ASPHALT
Permit Number: P0113871
Facility ID: 0708000069

Authorized Signature: This signature shall constitute personal affirmation that all statements or assertions of fact made in this form are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

Name of Official (Printed or Typed):	Title of Official and Phone Number:
Signature of Official:	Date: