Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install: 08-04887

A. Source Description

Valley Asphalt Walls Phillipsburg is installing a new portable parallel flow drum asphalt plant replacing the batch mix plant currently located there. The facility has proposed restricting the maximum annual asphalt production tonnage for emissions unit P902 to 450,000 tons/yr as a rolling 12-month summation, therefore avoiding Title V permitting requirements for carbon monoxide (CO) and sulfur dioxide (SO2).

B. Facility Emissions and Attainment Status

Without federally enforceable restrictions, the potential CO and SO2 emissions would be 227.76 tons/yr and 101.62 tons/yr respectively, which are above the major threshold of 100 tons/yr for Title V. The portable emissions unit is located in Montgomery County which is currently designated as non-attainment for PM2.5, and attainment for all other criteria pollutants.

C. Source Emissions

With a restriction on the maximum annual asphalt production tonnage of 450,000, as a rolling 12-month summation, CO and SO2 emissions are 29.25 tons/yr and 13.25 tons/yr respectively. This is below the major source threshold of 100 tons/yr for CO and SO2 which would have required the facility to obtain a Title V permit. The permittee requested federally enforceable PTE be established (based on the production restriction) for PE at 7.43 tons/yr; NOx at 12.38 tons/yr; SO2 at 13.05 tons/yr; and VOC at 7.20 tons/yr. The emissions unit is subject to NSPS 40 CFR Part 60, Subpart I - Standards of Performance for Hot Mix Asphalt Facilities.

D. Conclusion

With the federally enforceable asphalt production rate, based on a rolling 12-month basis, the emission rate of CO and SO2 are below major source thresholds, and federally enforceable PTE is established for PE, NOx, SO2, and VOC. The corresponding monitoring and/or record keeping and reporting requirements, will ensure compliance with these federally enforceable restrictions on the production rate.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
MONTGOMERY COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 08-04887
Fac ID: 0857711455

DATE: 11/8/2007

Valley Asphalt--Walls Phillipsburg
Daniel Crago
11641 Mosteller Rd
Cincinnati, OH 452411570

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1250** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **RAPCA** **MIAMI VALLEY REG PLANNING COMM** **IN** **KY**

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04887** FOR AN AIR CONTAMINANT SOURCE
FOR **Valley Asphalt--Walls Phillipsburg**

On 11/8/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Valley Asphalt--Walls Phillipsburg**, located at **9843 Dayton Greenville Pike, Brookville**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04887:

New drum plant.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280 [(937)225-4435]

DRAFT PERMIT TO INSTALL 08-04887

Application Number:	08-04887
Facility ID:	0857711455
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Valley Asphalt--Walls Phillipsburg
Person to Contact:	Daniel Crago
Address:	11641 Mosteller Rd Cincinnati, OH 452411570

Location of proposed air contaminant source(s) [emissions unit(s)]:
9843 Dayton Greenville Pike
Brookville, Ohio

Description of proposed emissions unit(s):
New drum plant.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Chris Korleski
Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
particulate emissions	7.43
sulfur dioxide	13.05
nitrogen oxides	12.38
carbon monoxide	29.25
volatile organic compounds	7.20

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P902) - 400 TPH portable drum mix parallel flow asphalt plant with baghouse control installed Post Aug 3rd, 2006.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of NSPS 40 CFR Part 60, Subpart I, OAC rule OAC rule 3745-31-05(C), OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B). The nitrogen oxide (NOx) emissions from this emission unit shall not exceed 22.0 lbs/hour. The sulfur dioxide (SO2) emissions from this emissions unit shall not exceed 23.2 lbs/hour. The carbon monoxide (CO) emissions from this emissions unit shall not exceed 52.0 lbs/hour.
NSPS 40 CFR Part 60, Subpart I	Particulate emissions from the stack shall not exceed 0.04 grains per dry standard cubic foot of exhaust gases Visible particulate emissions (VE) from the stack shall not exceed 20 percent opacity, as a 6-minute average, from the stack, except as provided by 40 CFR Part 60.11.

Emissions Unit ID: **P902**

OAC rule 3754-31-05(C) (synthetic minor to avoid Title V)	The CO emissions from this emissions unit shall not exceed 29.25 tons/yr based on a rolling 12-month summation. The NOx emissions from this emissions unit shall not exceed 12.38 tons/year based on a rolling 12-month summation. The SO2 emissions from this emissions unit shall not exceed 13.05 tons/yr based on a rolling 12-month summation.
OAC rule 3745-31-05(C) (synthetic minor to avoid BAT)	The PE from this emissions unit shall not exceed 7.43 tons/yr based on a rolling 12-month summation. The VOC emissions from this emissions unit shall not exceed 7.20 tons/yr based on a rolling 12-month summation. See A.2.b.
OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	The emission limitation specified in these rules are less stringent than the emission limitation specified in 40 CFR Part 60, Subpart I.
OAC rule 3745-17-07(B) (applicable only if this emission unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper shall not exceed 20 percent opacity, as a 3-minute average.
OAC rule 3745-17-08(B) (applicable only if this emission unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The installation and use of adequate enclosures and sufficient draft to minimize or eliminate visible emissions of fugitive dust from the hot aggregate elevator, vibrating screens, and weigh hopper.

2. Additional Terms and Conditions

2.a The hourly emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source taking into account the federally enforceable limit of 450,000 tons asphalt based on a rolling 12 month summation under OAC rule 3745-31-05(C).

2.c The PE emissions limitation specified above includes particulate matter (PM-10) emissions that are less than 10 microns in diameter.

2.d This emissions unit has been approved for the use of recycled asphalt products.

2.e All used oil burned in this emissions unit shall be "on-specification" (on-spec) oil and must meet the used oil fuel specifications contained in OAC 3745-279-11, which restricts the used oil to the following limitations:

Contaminant/Property	Allowable Specifications
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
total halogens	4,000 ppm maximum*
flash point	100°F, minimum

The used oil burned in this emissions unit shall contain less than the quantifiable levels of PCBs as defined in 40 CFR 761.3; and shall also not exceed the following mercury limitation nor fall below the following heating value:

PCB's	less than 2 ppm
heat content	135,000 Btu/gallon, minimum
mercury	1 ppm, maximum

* Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-279-10 of the Administrative Code. The permittee may receive and burn used oil exceeding 1,000 ppm total halogens (but less than 4,000 ppm maximum) only if the permittee has demonstrated that the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-10(B).

The burning of used oil not meeting the above limitations is prohibited in this emissions unit. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter.

B. Operational Restrictions

Emissions Unit ID: **P902**

1. The maximum annual asphalt production rate for this emissions unit shall not exceed 450,000 tons per year based upon a rolling, 12-month summation of the production rates.

   To ensure enforceability during the first 12 months of operation, the permittee shall not exceed the production levels specified in the following table:

Months	Maximum Allowable Cumulative Asphalt Production
1	37,500
1-2	75,000
1-3	112,500
1-4	150,000
1-5	187,500
1-6	225,000
1-7	262,500
1-8	300,000
1-9	337,500

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1-10	375,000
1-11	412,500
1-12	450,000

After the first 12 months of operation, compliance with the annual production rate limitation shall be based on a rolling 12-month summation of the production rates.

2. The permittee may substitute recycled asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.

3. The permittee shall only burn No.2 , No.4 fuel oil and/or on-spec used oil in this emissions unit.

4. 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 NOx.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. the production rate for each month; and

   b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the production rates; and

   c. the rolling, 12-month summation of the PE, SO2, NOx, CO and VOC emissions.

   Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

2. The permittee shall receive and maintain the chemical analyses from the supplier/marketer for each shipment of used oil burned in this emissions unit, which shall contain the following information:

   a. the date the used oil was received at the facility;

   b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/re-finer, supplier, and/or marketer;

c. the results of the chemical analyses demonstrating that the used oil meets the standards in OAC rule 3745-279-11 for the following and does not contain quantifiable levels of PCBs:

   i. the arsenic content, in ppm;
   ii. the cadmium content, in ppm;
   iii. the chromium content, in ppm;
   iv. the lead content, in ppm;
   v. total halogens, in ppm;
   vi. the PCB content, in ppm; and
   vii. the flash point

d. the analysis demonstrating that the used oil has a total halogen content below 1,000 ppm, or below 4,000 ppm with the demonstration for the rebuttal of the presumption that the oil is hazardous waste or has been mixed with hazardous waste, as described in OAC rule 3745-279-10(B); and

e. the results of the analyses demonstrating that the used oil meets the heating value and mercury limitation contained in this permit per term and condition A.2.e.

The metal contents for arsenic, cadmium, chromium, lead, and mercury shall be analyzed using a "Totals Analysis" or Total Metals" testing methodology, Chapter Two of "Testing Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846)" should be referenced to for selecting appropriate test methods for the used oil analyses. Under no circumstances shall the metal contents of the used oil be analyzed using "TCLP", "EP-TOC", or other similar testing procedures, since these tests were developed to gauge leachate mobility from a landfill, of which is an irrelevant property of the used oil burned for energy recovery.

Each analysis shall be kept in a readily accessible location for a period of not less than 5 years following the receipt of each shipment of used oil and shall be made available to the Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses, through an independent laboratory.

3. For each shipment of number 2 , 4 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 and heat content.

4. The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. 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, in inches of water, across the baghouse on a daily basis.

6. Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

   a. the date and time the deviation began;
   b. the magnitude of the deviation at that time;
   c. the date the investigation was conducted;

   d. the name(s) of the personnel who conducted the investigation; and
   e. the findings and recommendations.

   In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

   f. a description of the corrective action;
   g. the date corrective action was completed;
   h. the date and time the deviation ended;
   i. the total period of time (in minutes) during which there was a deviation;
   j. the pressure drop readings immediately after the corrective action was implemented; and
   k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

7. The permittee shall perform burner tuning in accordance term E.2. below. While performing each burner tuning, the permittee shall record the results of the burner tuning using the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form (as found in term F.1 below). An alternative form may be used upon approval of the appropriate Ohio EPA District Office or local air agency.

   Each record of burner tuning shall be kept in a readily accessible location and shall be made available to the Ohio EPA Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month asphalt production rate and/or emissions limitations contained in this permit and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):

   a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

   b. an identification of each incident of deviation described in "a" (above) where a

prompt investigation was not conducted;

c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

3. The permittee shall submit quarterly reports that identify the following information:

a. All exceedances of the RAP limitation.

b. an identification of each incident when burner tuning was not preformed.

4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year, and each report shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

5. The permittee shall notify the U.S. EPA and the Ohio EPA Division of Hazardous Waste Management and the RAPCA, in writing and within 30 days, of burning any used oil exceeding the limitations found in OAC rule 3745-279-11 and/or any incident or occurrence of non-compliance with any other applicable requirement of OAC Chapter 3745-279 and/or 40 CFR part 761 (as specified in term A.2.e); and shall also notify the appropriate Ohio EPA District Office or local air agency, within the same amount of time, if any oil is/was burned which exceeds the mercury limitation of 1 ppm and/or is documented as having a heating value of less than 135,000 Btu/gallon.

6. The permittee shall submit annual reports that specify the actual production rate and the total PE, VOC, NOx, SO2 and CO emissions for this emissions units. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Issued: To be entered upon final issuance

a. Emission Limitation-
0.04 gr/dscf of exhaust gas
23.2 lbs/hr SO2;
22.0 lbs/hr NOx;
52.0 lbs/hr CO;
12.8 lbs/hr VOC

Applicable Compliance Method-
The permittee shall conduct, or have conducted, emissions testing to determine the PE, VOC, CO, NOx and SO2 emissions from this emissions unit in accordance with the following requirements:

The emissions testing shall be conducted within 90 days after achieving the maximum production rate but no later than 120 days after initial startup of the emissions unit.

The following test method(s) of 40 CFR Part 60, Appendix A ("Standard of Performance for New Stationary Sources") shall be employed to demonstrate compliance with the allowable emissions limitation(s) for:

PE: Reference Test Methods 1-5
NOx: Reference Test Methods 1-4 and 7 or 7E
SO2: Reference Test Methods 1-4 and 6 or 6C

CO: Reference Test Methods 1-4 and 10
VOC: Reference Test Methods 1-4, 25, 25A and/or 18
VE: Reference Test Method 9

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA or Appropriate Ohio EPA District or local air agency.

The test(s) shall be conducted while this emissions unit is using on-spec used oil and employing RAP, unless otherwise specified or approved by the Appropriate Ohio EPA District or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or 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 Appropriate Ohio EPA District or local air agency's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA or Appropriate Ohio EPA District or 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 Appropriate Ohio EPA District or 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 Appropriate Ohio EPA District or local air agency.

b. Emissions Limitation:
The PE emissions from this emissions unit shall not exceed 7.43 tons/year based on a rolling, 12-month summation.

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 by the

actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term C.1. above) and dividing by 2000 lbs/ton. Until emissions tests are conducted, the emission factor of 0.033 lb-PE/ton USEPA reference document AP-42, 11.1-3 (03/04) shall be used in this calculation.

c. Emissions Limitation:
The SO2 emissions from this emission unit shall not exceed 13.05 tons/year based on a rolling, 12-month summation.

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 by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term C.1. above) and dividing by 2000 lbs/ton. Until additional emissions tests are conducted, the emission factor of 0.058 lb-SO2/ton USEPA reference document AP-42 11.1-7 (03/04) shall be used in this calculation.

d. Emissions Limitation:
The NOx emissions from this emission unit shall not exceed 12.38 tons/year based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of NOx per ton of asphalt produced by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term C.1. above) and dividing by 2000 lbs/ton. Until emissions tests are conducted, the emission factor of 0.055 lb-NOx/ton USEPA reference document AP-42 11.1-7 (03/04) shall be used in this calculation.

e. Emissions Limitation:
The CO emissions from this emissions unit shall not exceed 29.25 tons based on a rolling, 12-month summation.

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, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term C.1. above) and dividing by 2000 lbs/ton. Until emissions tests are conducted, the emission factor of 0.13 lb-CO/ton USEPA reference document AP-42, 11.1-7 (03/04) shall be used in this calculation.

f. The VOC emissions from this emissions unit shall not exceed 7.20 tons/year based on a rolling, 12-month summation.

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 by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term C.1. above) and dividing by 2000 lbs/ton. Until emissions tests are conducted, the emission factor of 0.032 lb-VOC/ton USEPA reference document, AP-42, 11.1-8 (03/04) shall be used in this calculation.

g. Emission Limitation -
20% opacity visible emissions as a 6-minute average (for stack emissions)

Applicable Compliance Method -
Compliance shall be determined through visible emission evaluations performed using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A, and 40 CFR 60.675(c).

h. Emission Limitation -
20% opacity visible emissions as a 3-minute average (for fugitive emissions)

Applicable Compliance Method -
Compliance shall be determined through visible emission evaluations performed using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A, and 40 CFR 60.675(c).

i. Emission Limitation:
Arsenic, cadmium, chromium, and lead emissions are limited by the fuel specifications in Section A.2.e.

Applicable Compliance Method:
Compliance with the emissions limitation for arsenic, cadmium and lead shall be demonstrated by the monitoring and record keeping in Section C.2. of this permit.

2. 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 CO, NOx, and O_2 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. The baselines shall be determined for CO, NOx, and O_2. 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 Section F.1) in the "Recent Stack Test Pollutant Baseline Levels" column.

Once the pollutant baseline levels are set, the burner shall be next tuned based on the frequency described in Section E.2.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 manufacturer's specifications.

iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for CO, NOx and O_2. 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 and 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.

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.

F. Miscellaneous Requirements

Issued: To be entered upon final issuance

1. All the terms and conditions of this permit are federally enforceable.

2. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met and following the approval of the director. The director may issue a "Notice of Site Approval" if the portable source meets the following criteria pursuant to OAC rule 3745-31-03(A)(1)(p)(I):

   a. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination and state and/or federal rules;

   b. the portable source is operating pursuant to a currently effective PTI and/or any applicable permit to operate (PTO) and continues to comply with the requirements of the permit;

   c. 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*;

   d. 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 in violation of OAC rule 3745-15-07; 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; and

   e. the director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source.

   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.

   * Even if notification of the proposed relocation is submitted 30 days prior to the scheduled relocation date, the emissions unit shall not be moved prior to receiving the "Notice of Site Approval".

3. Burner Tuning Reporting Form for Asphalt Concrete Plants (see next page)

Emissions Unit ID: **P902**

BURNER TUNING REPORTING FORM FOR ASPHALT CONCRETE PLANTS	
Facility ID:	Tuning Date:
Legal Name:	Other Company Name (if different than legal
Mailing Address:	Other Company Site Address: (if different than
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
Type of plant (i.e.: 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 pressure (psi)			
For burners that require compressed air			
Carbon Monoxide (CO) concentrations			
NOx concentrations (ppm)[2]			
Oxygen concentrations (per cent)[2]			
Asphalt Production (tons/hr)			

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

Emissions Unit ID: **P902**

[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 manufacturers specifications. Use additional paper if necessary.

_____

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.

Emissions Unit ID: **P902**

Issued: To be entered upon final issuance

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

Valley Asphalt--Walls Phillipsburg **Facility ID: 0857711455**
PTI Application: 08-04887
Issued: To be entered upon final issuance

Emissions Unit ID: **P902**

SIC CODE	2951	SCC CODE	3-05-002-61	EMISSIONS UNIT ID	P902
EMISSIONS UNIT DESCRIPTION	400 TPH portable drum mix asphalt plant				
DATE INSTALLED	after PTI installation				

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter				0.04 gr/dscf	7.43
PM_{10}					
Sulfur Dioxide				23.2 lbs/hr	13.05
Organic Compounds				12.8 lbs/hr	7.2
Nitrogen Oxides				22.0 lbs/hr	12.38
Carbon Monoxide				52.0 lbs/hr	29.25
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Subpart I NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with BAT, OAC rules, emissions limitation, NSPS, operating restriction, and monitoring, recordkeeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____