



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/07/97

CERTIFIED MAIL

04-48-01-0386

RE: Final Chapter 3745-35 Permit To Operate

H.P. Streicher, Inc.
John L. Streicher
2955 Gradwohl Rd.
Toledo, OH 43617

Dear John L. Streicher:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Toledo Environmental Control at (419) 936-3015.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Toledo Environmental Control
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 08/07/97

Facility ID: 04-48-01-0386

Expiration Date: 08/07/00

FINAL ISSUE

This document constitutes issuance for: H.P. Streicher, Inc.
2345 Dorr St.
Toledo, OH 43607

of a permit to operate for:

P901 (Asphalt Plant)
140 ton/hr hot mix batch asphalt plant with baghouse

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

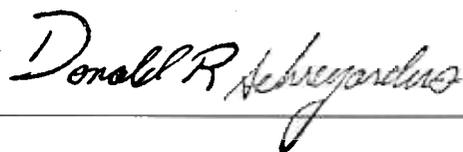
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Toledo Environmental Control
26 Main Street
Toledo, OH 43605
(419) 936-3015

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script that reads "Donald R. Schreyer". The signature is written in black ink and is positioned above a horizontal line.

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotary dryer, hot aggregate elevator, vibrating screens, and weigh hopper	OAC 3745-17-07	See A.2.a below.
	OAC 3745-17-08	See A.2.b below.
	OAC 3745-17-11	54.7 lbs/hr of particulate matter
	OAC 3745-21-08	0.34 lb/ton, 48 lbs/hr, and 85 tpy of carbon monoxide
aggregate storage bins and cold aggregate elevator	OAC 3745-17-07	See A.2.c below.
	OAC 3745-17-08	See A.2.c and A.2.d below.

2. Additional Terms and Conditions

- 2.a The stack opacity limitation shall be less than or equal to 20 percent opacity, as a 6-minute average, except as provided by rule.
- 2.b There shall be no visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper.
- 2.c 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 the aggregate storage bins. The visible emissions of fugitive dust from this operation shall be less than or equal to 20 percent opacity, as a 3-minute average.
- 2.d The aggregate loaded into the storage bins shall have a moisture content sufficient to eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.

B. Operational Restrictions

1. The maximum annual production rate for this emissions unit shall not exceed 500,000 tons based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (tons)
	41,667
1-2	83,333
1-3	125,000
1-4	166,667
1-5	208,333
1-6	250,000
1-7	291,667
1-8	333,333
1-9	375,000
1-10	416,667
1-11	458,337
1-12	500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. This emissions unit shall combust only natural gas.
3. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 2 inches water column or greater than 5 inches water column shall be maintained at all times.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the fabric filter.

The permittee shall check the pressure drop once each day that the process is in operation and maintain daily records of the pressure drop readings.

2. The permittee shall maintain monthly records which document the hours of operation and the amount of asphalt produced in each calendar month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the monthly maximum allowable cumulative production levels.
3. The permittee shall submit annual reports which specify the total production rate and estimated CO emissions for the preceding calendar year. These reports shall be submitted by February 15 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation: 0.34 lb/ton, 48 lbs/hr, and 85 tpy of carbon monoxide

Applicable Compliance Method: Multiply the AP-42 emission factor of 0.34 pound of CO emissions per ton of product by the maximum hourly and annual production rates, respectively. Emission tests, conducted in accordance with USEPA Method 10, may also be required to demonstrate compliance with the lb/ton and hourly emission rates. In accordance with OEPA Engineering Guide #16, testing shall be required if annual CO emissions are estimated to exceed 25 tons per year. To determine compliance with the lb/ton emission limitation, the emissions unit shall be operated at maximum capacity during any required emissions test. The test result, in pounds, shall be divided by the asphalt production level during the test, in tons.

Emission Limitation: 54.7 lbs/hr of particulate matter

Applicable Compliance Method: Emission tests, conducted in accordance with USEPA Method 5, may be required to demonstrate compliance with the hourly emission rate, consistent with OEPA Engineering Guide #16.

2. Compliance with the visible emission limitation for the stack emissions in Section A.2.a of these terms and conditions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1). Compliance with the opacity and "no visible emission" limitations for fugitive dust in Sections A.2.b, A.2.c and A.2.d of these terms and conditions shall be determined in accordance with the test method and procedures of OAC rules 3745-17-03(B)(3) and 3745-17-03(B)(4), respectively.

3. Performance test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or 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 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office 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 Office or local air agency within 30 days following completion of the test(s).

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable requirements: A, B, C, D, E, and F.