



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

07/31/97

**CERTIFIED MAIL**

08-12-70-0174

**RE: Final Chapter 3745-35 Permit To Operate**

A & B Asphalt Corporation  
Mr. Daniel T Crago  
11641 Mosteller Road  
Cincinnati, OH 45241

Dear Daniel T Crago:

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 RAPCA at (937) 225-4435.

Very truly yours,

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

cc: RAPCA

Jim Orlemann, DAPC Engineering  
Becky Castle, DAPC PMU



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 07/31/97

Facility ID: 08-12-70-0174

Expiration Date: 07/31/00

FINAL ISSUE

This document constitutes issuance for: A & B Asphalt Corporation  
1671 Enon Road  
Springfield, OH 45502

of a permit to operate for:

P001 (Asphaltic Concrete Batch Plant)  
Bituminous concrete plant

### 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:

RAPCA  
451 West Third Street  
PO Box 972  
Dayton, OH 45422  
(937) 225-4435

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



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>
Asphaltic concrete batch plant; rotary dryer, hot aggregate elevator, vibrating screens and weigh hopper, 300 tons per hour with baghouse	OAC rule 3745-17-07	less than or equal to 20 percent opacity as a 6-minute average, from the stack, except as provided by rule
	OAC rule 3745-17-11 OAC rule 3745-35-07	63.0 lbs/hr and 52.5 TPY particulates; 1.5 lb/hr and 1.25 TPY SO <sub>2</sub> ; 7.5 lbs/hr and 6.25 TPY NO <sub>x</sub> ; 5.1 lbs/hr and 4.25 TPY OC; 102 lbs/hr and 85.0 TPY CO.
Aggregate storage bins and cold aggregate elevator	OAC rule 3745-35-07	<p>No visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper.</p> <p>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 elevator loading area. The visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.</p> <p>The aggregate loaded into the storage bins shall have a moisture content sufficient to prevent visible emissions in excess of 20 percent opacity (3-minute average) from the transfer point to the dryer.</p>

**2. Additional Terms and Conditions**

None

**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:

Months	Maximum Allowable Cumulative Production (tons)
1	250,000 tons asphalt
1 - 2	250,000 tons asphalt
1 - 3	250,000 tons asphalt
1 - 4	250,000 tons asphalt
1 - 5	250,000 tons asphalt
1 - 6	250,000 tons asphalt
1 - 7	291,667 tons asphalt
1 - 8	333,333 tons asphalt
1 - 9	375,000 tons asphalt
1 - 10	416,667 tons asphalt
1 - 11	458,333 tons asphalt
1 - 12	500,000 tons asphalt

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. Only natural gas shall be burned in P001. No other fuel shall be used for this emissions unit.
3. The use of recycled used oil in this emissions unit is specifically prohibited, unless the requisite air permit to install is first obtained, in accordance with OAC rule 3745-31-02.
4. To ensure the baghouse is operated according to 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 or greater than 6 inches of water shall be maintained at all times.

**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.
  - b. The rolling, 12-month summation of the production rates (beginning the 13th calendar month after the issuance of this permit).
2. The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the fabric filter.
3. The permittee shall check the pressure drop once a day and maintain daily records of the pressure drop readings.

**D. Reporting Requirements**

1. 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 maximum allowable cumulative production levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range for the baghouse.

**E. Testing Requirements**

1. Compliance Methods

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

- 1.a Emissions Limitation -  
63.0 lbs/hour particulates

Applicable Compliance Method -  
Compliance shall be based upon stack testing per OAC rule 3745-17-03(B)(10).

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Facility Name: A & B Asphalt Corporation

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Facility ID: 08-12-70-0174

Emissions Unit: Asphaltic Concrete Batch Plant (P001)

**E. Testing Requirements (continued)**

- 1.b** Emissions Limitation -  
52.5 TPY particulates

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the average hourly emission rate in pounds per ton of asphaltic concrete production from the most recent compliance test by each 12-month production summation and dividing by 2,000 lbs/ton. Until additional emission tests are conducted, the average emission rate of 0.004 lb/ton shall be used in this calculation.

- 1.c** Emissions Limitation -  
1.5 lb/hour SO<sub>2</sub>

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the maximum hourly production rate of (300 tons/hr) by the AP-42 emission factor for SO<sub>2</sub> (0.005 lb/ton). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(E).

- 1.d** Emissions Limitation -  
1.25 TPY SO<sub>2</sub>

**Applicable Compliance Method -**

Compliance shall be based upon the record keeping specified in C.1., multiplying each 12-month production summation by the AP-42 emission factor for SO<sub>2</sub> (0.005 lb/ton), and dividing by 2,000 lbs/ton.

- 1.e** Emissions Limitation -  
7.5 lbs/hour NO<sub>x</sub>

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the maximum hourly production rate of (300 tons/hour) by the AP-42 emission factor for NO<sub>x</sub> (0.025 lb/ton). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.

- 1.f** Emissions Limitation -  
6.25 TPY NO<sub>x</sub>

**Applicable Compliance Method -**

Compliance shall be based on the record keeping specified in C.1., multiplying each 12-month production summation by the AP-42 emission factor for NO<sub>x</sub> (0.025 lb/ton), and dividing by 2,000 lbs/ton.

**Emissions Limitation -**

5.1 lbs/hour Organic compounds

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the maximum hourly production rate of (300 tons/hour) by the AP-42 emission factor for OC (0.017 lb/ton). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 25 or 25A (as appropriate), of 40 CFR Part 60, Appendix A.

**Emissions Limitation -**

4.25 TPY Organic compounds

**Applicable Compliance Method -**

Compliance shall be based on the record keepin specified in C.1., multiplying each 12-month production summation by the AP-42 emission factor for OC (0.017 lb/ton), and dividing by 2,000 lbs/ton.

- 1.i** Emissions Limitation -  
102 lbs/hour CO

**Applicable Compliance Method -**

Compliance shall be based upon stack testing employing USEPA Reference Method 10 of 40 CFR Part 60, Appendix A.

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Facility Name: A & B Asphalt Corporation

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Facility ID: 08-12-70-0174

Emissions Unit: Asphaltic Concrete Batch Plant (P001)

## E. Testing Requirements (continued)

- 1.j Emissions Limitation -  
85.0 TPY CO

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the average hourly emission rate in pounds per ton of asphaltic concrete production from the most recent compliance test by each 12-month production summation, and dividing by 2,000 lbs/ton. Until additional emission tests are conducted, the average emission rate of 0.175 lb/ton shall be used in this calculation.

- 1.k Emissions Limitation -  
20 percent opacity as a 3-minute average

**Applicable Compliance Method -**  
OAC rule 3745-17-03(B)(3)

2. Within 6 months prior to the expiration of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for particulates. The particulates test(s) shall be conducted in accordance with the test methods and procedures specified in "USEPA Reference Method 5, of 40 CFR Part 60, Appendix A" while the emissions unit is operating at or near maximum capacity and using only "virgin aggregate".

Within 6 months prior to the expiration of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for carbon monoxide. The carbon monoxide test(s) shall be conducted in accordance with the test methods and procedures specified in "USEPA Reference Method 10, of 40 CFR Part 60, Appendix A" while the emissions unit is operating at or near maximum capacity and using only "virgin aggregate".

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 field office's refusal to accept the results of the emissions test(s).

Personnel from the 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 regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following the completion of the test(s).

## F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.