

Facility ID: 0857101954 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857101954 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

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>
P901 - 400 TPH Portable Asphalt Plant, drum mix, rotary dryer, controlled with a baghouse	OAC rule 3745-31-05(A)(3) PTI 0804560	The requirements of this rule also include compliance with the requirements of NSPS 40 CFR Part 60, Subpart I and OAC rule 3745-35-07. The carbon monoxide emissions from this emissions unit shall not exceed 52.0 lbs/hr. The sulfur dioxide emissions from this emissions unit shall not exceed 23.2 lbs/hr. The nitrogen dioxide emissions from this emissions unit shall not exceed 22.0 lbs/hr and 16.5 TPY. The organic compound emissions from this emissions unit shall not exceed 17.6 lbs/hr and 18.0 TPY. The particulate emissions from this emissions unit shall not exceed 4.2 TPY. The carbon monoxide emissions from this emissions unit shall not exceed 39.0 TPY. The sulfur dioxide emissions from this emissions unit shall not exceed 17.4 TPY.
	OAC rule 3745-31-05(C) OAC rule 3754-35-07(B) (synthetic minor to avoid Title V)	The ton/yr limitations are based upon a rolling 12-month summation See A. 2.d.
	NSPS 40 CFR Part 60, Subpart I	Particulate emissions shall not exceed 0.04 grain per dry standard cubic foot of exhaust gases. Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, from the stack, except as provided by 40 CFR Part 60.11.
	OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)	The emission limitations specified in these rules are less stringent than the emission limitations specified in 40 CFR Part 60, Subpart I.
	OAC rule 3745-18-06(E)(2)	The emission limitation specified by this rule is less stringent than the emission limitation specified in OAC rule 3745-18-06(H).
	Aggregate Storage Bins, Cold Aggregate Elevators, Plant Silo and Load-out	OAC rule 3745-31-05(A)(3) The OC emissions shall not exceed 6.4 lbs/hr and 4.8 TPY.

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 aggregate loaded into the storage bins shall have a moisture content sufficient to minimize or eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.

Visible particulate emissions from any fugitive dust sources shall not exceed 20% as a three minute average.

OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) See A.2.e.

2. Additional Terms and Conditions

- (a) The 23.2 lbs/hr of SO₂, 17.6 lbs/hr of OC from the plant and 6.4 lbs/hr from the silo and load-out, 22.0 lbs/hr of NO_x, and 52.0 lbs/hr of CO, emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
This emissions unit has been approved for the use of recycled asphalt products.
The particulate matter (PM) emission limitation specified above includes particulate matter (PM₁₀) emissions that are less than 10 microns in diameter.
The permittee has accepted limits in production to avoid Title V for SO₂, PM, and CO.
OAC rules 3745-17-07(B) and 3745-17-08(B) are applicable only when the emissions unit is located in an "Appendix A" area, as specified in OAC rule 3745-17-08.

B. Operational Restrictions

- 1. The maximum annual production rate for this emissions unit shall not exceed 600,000 tons, based upon a rolling 12-month summation. Since this is an existing emissions unit, the applicant has existing production records and shall use them to determine compliance upon startup under this permit.
- 2. The pressure drop across the baghouse shall be maintained within the range of 2.5 to 5.5 inches of water when the emissions unit is in operation.
- 3. Specifications for the Used Oil Burned in the Dryer.

All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property Allowable Specification*
 arsenic 5 ppm, maximum
 cadmium 2 ppm, maximum
 chromium 10 ppm, maximum
 lead 100 ppm, maximum
 PCBs 50 ppm, maximum**
 total halogens 4000 ppm maximum***
 mercury 1 ppm, maximum
 flash point 100 degrees Fahrenheit, minimum
 heat content 135,000 Btu/gallon, minimum

* Some or all of these used oil specifications exceed the Resource Conservation & Recovery Act Standards of 40 CFR Part 266.40 and OAC rule 3745-58-50, thereby, making the used oil off-specification..

** If the permittee is burning used oil with any quantifiable level 2ppm < 50 ppm of PCBs, then the permittee is subject to any applicable requirements found under 40 CFR part 279., subparts G and H and 40 CFR 761.20 (e).

*** Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 279.10(b)(1)(ii) and OAC rule 3745-279- 10(B)(1)(b). Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the used oil supplier has demonstrated the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-63.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. The total quantity of asphalt produced each month; and
 - b. The rolling, 12-month summation of the monthly production rates.
- 2. The permittee shall properly, operate, and maintain equipment to monitor the pressure drop across the baghouse when 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.
- 3. The permittee shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
 - a. The date of shipment or delivery.
 - b. The quantity of used oil received.

- c. The Btu value of the used oil, in BTU/gallon.
- d. The flash point of the used oil, in degrees F.
- e. The arsenic content, in ppm.
- f. The cadmium content, in ppm.
- g. The chromium content, in ppm.
- h. The lead content, in ppm.
- i. The PCB content, in ppm.
- j. The total halogen content, in ppm.
- k. The mercury content, in ppm.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Director (the appropriate Ohio EPS District Office or local air agency) upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by this facility, of any used oil stored at this facility, or of any used oil sampled at the dryer.

- 4. 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 and for any visible fugitive particulate emissions from the hot aggregate elevator, vibrating screens, weigh hopper, aggregate storage bins and cold aggregate elevator 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 location and 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.

- 5. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 6. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Heptane

TLV (ug/m3): 1,639,264

Maximum Hourly Emission Rate (lbs/hr): 3.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.32

MAGLC (ug/m3): 39,030

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)
7. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate District Office or local air agency) which identify all exceedances of the rolling, 12-month production rate limitation. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the USEPA and the Ohio EPA (the appropriate District Office or local air agency) if any of the used oil exceeds the used oil specifications. An identification number from USEPA shall be obtained prior to the combustion of any used oil.

Before the permittee accepts the first shipment of any off-specification used oil from a marketer, the permittee must provide the marketer a one-time, written and signed notice certifying that:

 - a. The company has notified USEPA of its used oil management activities and that the notice included the location and description of those activities; and
 - b. The company will burn the used oil only in an industrial furnace or boiler identified in 40 CFR Part 266.41(b) and OAC rule 3745-279-42.

A copy of each certification notice that the permittee sends to a marketer must be kept on file for a minimum of 5 years from the date it last received off-specification used oil from that marketer.
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports of the production rate and the total PM, OC, NO_x, SO₂ and CO emissions for this emissions units. These reports shall be submitted by January 31 of each year to the Director (District Office or Local Air Agency).
5. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed in excess of the allowable opacity limit specified above from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed in excess of the allowable opacity limit specified above from the hot aggregate elevator, vibrating screens, weigh hopper, aggregate storage bins and cold aggregate elevator serving this emissions unit, and (c) describe any corrective actions taken to minimize the abnormal visible particulate and/or visible fugitive particulate emissions. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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):

Emission Limitation-
PE emissions shall not exceed 0.04 gr/dscf; CO emissions shall not exceed 52.0 lbs/hr; NO_x emissions shall not exceed 22.0 lbs/hr; SO₂ emissions shall not exceed 23.2 lbs/hr; VOC emissions shall not exceed 17.6 lbs/hr.

Applicable Compliance Method-
If required, compliance shall be based on conducting a stack test for this emissions unit in order to demonstrate compliance with the allowable mass emission rate for PM, CO, NO_x, VOC and SO₂.

The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s) for:

PM, USEPA Reference Methods 1-5, of 40 CFR Part 60, Appendix A.

CO, USEPA Reference Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

NO_x, USEPA Reference Methods 1-4 and 7 or 7 E of 40 CFR Part 60, Appendix A.

VOC, USEPA Reference Methods 1-4 and 18 and/or 25 of 40 CFR Part 60, Appendix A.

SO₂, USEPA Reference Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A.

The test shall be conducted while the emissions unit is operating at or near maximum capacity and burning

natural gas, #2 fuel oil or on-spec used oil for PM, CO, NOx, VOC and SO2 and employing RAP to verify VOC emissions, unless otherwise specified or approved by the Ohio EPA District Office or local air agency.
Future emission testing for CO shall be conducted at the frequency specified in Ohio EPA engineering Guide #16 based on the results of the initial emissions testing.

Future emission testing for NOx, PM, VOC and SO2 may be required at the discretion of RAPCA.

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 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 Office or local air agency.

Emission Limitation -
4.2 TPY particulate emissions

Applicable Compliance Method -

Compliance shall be based on the record keeping specified in C.1., multiplying the 12-month production summation by the emission factor of 0.0014 lb PM/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-3, 12/00), and dividing by 2,000 lbs/ton.

Emission Limitation -
23.2 lbs/hr SO2

Applicable Compliance Method -

Compliance with the hourly allowable SO2 emission rate shall be determined by multiplying the maximum hourly production rate of 400 tons/hour by the emission factor of 0.058 lb SO2/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-7, 12/00).

Compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 6, of 40 CFR Part 60, Appendix A.

Emission Limitation -
17.4 TPY SO2

Applicable Compliance Method -

Compliance shall be based on the record keeping specified in C.1., multiplying the 12-month production summation by the emission factor of 0.058 lb SO2/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-7, 12/00) and dividing by 2,000 lbs/ton.

Emission Limitation -
17.6 lbs/hr OC from the plant

Applicable Compliance Method -

Compliance with the hourly allowable OC emission rate shall be determined by multiplying the maximum hourly production rate of 400 tons/hour by the emission factor of 0.044 lb OC/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-8, 12/00).

Compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 25, of 40 CFR Part 60, Appendix A.

Emission Limitation-
6.4 lbs/hr of OC from plant load out and silo filling

Compliance shall be determined by multiplying the maximum hourly production rate of 400 tons/hr by the emission factors of 0.012 lb VOC/ton silo filling and 0.004 lb VOC/ton plant load out, emission factors estimated using default values for silo filling and plant load out and the predictive emission factor equations USEPA reference document AP-42, 11.1-14 (12/00).

Emission Limitation -
13.2 TPY OC from the plant

Applicable Compliance Method -

Compliance shall be based on the record keeping specified in C.1., multiplying the 12-month production summation by the emission factor of 0.044 lb OC/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-8, 12/00), and dividing by 2,000 lbs/ton.

Emission Limitation-
4.8 TPY OC from the plant silo and load-out

Applicable Compliance Method -

Compliance shall be determined by multiplying each 12-month production summation by the emission factors of 0.012 lb VOC/ton silo filling and 0.004 lb VOC/ton plant load out, emission factors estimated using default values for silo filling and plant load out and the predictive emission factor equations USEPA reference document AP-42, 11.1-14 (12/00), and dividing by 2,000 pounds per ton.

Emission Limitation -
22.0 lbs/hr NOx

Applicable Compliance Method -

Compliance with the hourly allowable NOx emission rate shall be determined by multiplying the maximum hourly production rate of 400 tons/hour by the emission factor of 0.055 lb NOx/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-7, 12/00), and dividing by 2,000 lbs/ton.

Compliance shall be based on conducting a stack test in accordance with USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60,

Emission Limitation -
16.5 TPY NOx

Applicable Compliance Method -

Compliance shall be based on the record keeping specified in C.1., multiplying the 12-month production summation by the emission factor of 0.055 lb NOx/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-7, 12/00), and dividing by 2,000 lbs/ton.

Emission Limitation -
52.0 lbs/hr CO

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly production rate of 400 tons/hour by the emission factor of 0.13 lb/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-7, 12/00), and dividing by 2,000 lbs/ton.

Compliance shall be based on conducting a stack test in accordance with USEPA Reference Method 10, of 40 CFR Part 60, Appendix A.

Emission Limitation -
39.0 TPY CO

Applicable Compliance Method -

Compliance shall be based on the record keeping specified in C.2., multiplying the 12-month production summation by the emission factor of 0.13 lb CO/ton of asphalt production (AP-42 Section 11.1: Hot Mix Asphalt Plants, Table 11.1-7, 12/00), and dividing by 2,000 lbs/ton.

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

Applicable Compliance Method -

Compliance with the visible emission limitation above shall determined in accordance with OAC rule 3745-17-03 (B)(1).

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

Applicable Compliance Method -

Compliance with the visible emission limitation above shall determined in accordance with OAC rule 3745-17-03 (B)(3).

F. Miscellaneous Requirements

2. Notice to Relocate a Portable or Mobile Source

Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing the following criteria are met:

- a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
- b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
- c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Director (the appropriate Ohio EPA District Office and/or local air agency having jurisdiction over the new site) within a minimum of thirty days prior to the scheduled relocation; and
- d. in the Director's (the appropriate Ohio EPA District Office and /or local air agency judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

OR

Under OAC rule 3745-31-05(F), portable or mobile emission sources may relocate to sites that have been preapproved by the Director. The permittee may relocate the portable or mobile sources listed in this permit if:

- a. the permittee has applied for and obtained a site approval for the new site from the Director;
- b. the site approval is current and effective;
- c. the permittee has complied with all of the conditions and restrictions contained in the site approval; and
- d. the permittee has provided the appropriate Ohio EPA District Office and/or local air agency having jurisdiction over the new site at least 15 days written notice of the relocation.