

Facility ID: 0857700172 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: 0857700172 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 - 275 TPH Portable drum mix asphalt plant with baghouse.	OAC rule 3745-31-05(A)(3) PTI 08-03785	<p>The requirements of this rule also include compliance with the requirements of NSPS 40 CFR Part 60, Subpart I, and OAC 3745-35-07(B).</p> <p>The particulate emissions (PE) from this emissions unit when burning #2 fuel oil shall not exceed 5.16 tons/yr.</p> <p>The carbon monoxide (CO) emissions from this emissions unit when burning #2 fuel oil shall not exceed 43.6 lbs/hr.</p> <p>The volatile organic compound (VOC) emissions from this emissions unit when burning #2 fuel oil shall not exceed 12.9 lbs/hr and 8.05 tons/yr.</p> <p>The nitrogen oxide (NOx) emissions from this emissions unit when burning #2 fuel oil shall not exceed 10.5 lbs/hr and 6.54 tons/yr.</p> <p>The sulfur dioxide (SO2) emissions from this emissions unit when burning #2 fuel oil shall not exceed 1.84 lbs/hr and 1.15 tons/yr.</p>
	OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V)	<p>The carbon monoxide CO emissions from this emissions unit when burning #2 oil shall not exceed 27.2 tons/yr.</p> <p>The ton/yr limitations are based upon a rolling 12-month summation.</p>

OAC rule 3745-17-07(A) and 3745-17-11(B)

aggregate storage bins, cold aggregate elevator, load-out and silo filling operations	OAC rule 3745-18-06(E)(2)	Particulate emissions from the stack 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, Subpart I.
	NSPS 40 CFR Part 60, Subpart I OAC rule 3745-17-07(A) and 3745-17-11(B)	
aggregate storage bins, cold aggregate elevator, load-out and silo filling operations	OAC rule 3745-18-06(E)(2)	The emission limitations specified in these rules are less stringent than the emission limitations specified in 40 CFR Part 60, Subpart I. The emission limitation specified by this rule is less stringent than the emission limitation specified in OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3)	The fugitive particulate emissions from silo filling and plant load out (hot end) shall not exceed 0.19 ton/yr.
	OAC rule 3745-17-07(B)	The fugitive VOC emissions from silo filling and plant load out (hot end) shall not exceed 2.75 tons/yr. Visible particulate emissions from any fugitive source shall not exceed 20 percent opacity, as a 3-minute average.
	OAC rule 3745-17-08(B)	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.
	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	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.

See A.2.c.

2. Additional Terms and Conditions

- (a) The lbs/hr of CO, NOx, SO2 and VOC 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.
The particulate emission limitation specified above includes particulate matter (PM10) emissions that are less than 10 microns in diameter.
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.
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 100oF, 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

- 1. The maximum annual production rate for this emissions unit shall not exceed 343,750 tons, based upon a rolling 12-month summation. Since this is an existing source it has existing records and therefore does not need to be limited to first year monthly amounts of production.
- 2. The pressure drop across the baghouse shall be maintained within the range of 3-5 inches of water when the emissions unit is in operation.

3. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.
 4. The permittee shall burn only #2 fuel oil in this emissions unit.
- C. **Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly records of the following information:
 - a. The total quantity of asphalt products produced each month;
 - b. The rolling, 12-month summation of the monthly production rates; and
 - c. The maximum percentage RAP used for any mix.
 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 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 3745-279-11 and does not contain quantifiable levels of PCBs:
 - i. 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.

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.
 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 rotary dryer, aggregate storage bins and cold aggregate elevator, load out and silo filling operations 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 abnormal 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. For each day during which the permittee burns a fuel other than #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in the emissions unit.

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.
2. The permittee shall submit pressure drop quarterly 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.
3. The permittee shall notify the U.S. EPA and the Ohio EPA Division of Hazardous Waste Management and the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency), 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; and shall also notify the Ohio EPA Division of Air Pollution Control, 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.
4. The permittee shall submit annual reports of the production rate and the total PM, OC, NOx, SO2 and CO emissions for this emissions units. These reports shall be submitted by April 15th 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 abnormal visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any abnormal visible fugitive particulate emissions were observed from the rotary dryer, aggregate storage bins and cold aggregate elevator, load out and silo filling operations serving this emissions unit, and (c) describe any corrective actions taken to minimize the abnormal visible particulate and/or abnormal visible fugitive particulate emissions.
6. 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 RAP limitation specified above.
7. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate District Office or local air agency) which identify each day when a fuel other than #2 fuel oil was burned in the emissions unit.
8. These quarterly deviation (excursion) reports shall be submitted to the Director (appropriate District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and 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.
9. The permittee shall submit annual reports of the production rate and the total PM, 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 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 when burning #2 oil shall not exceed 0.04 gr/dscf;
CO emissions when burning #2 fuel oil shall not exceed 43.6 lbs/hr;
NOx emissions when burning #2 fuel oil shall not exceed 10.5 lbs/hr;
SO2 emissions when burning #2 fuel oil shall not exceed 1.84 lbs/hr;
VOC emissions when burning #2 fuel oil shall not exceed 12.9 lbs/hr.

Applicable Compliance Method-

Within 24 months after issuance of this permit, the permittee shall conduct or shall have conducted emissions testing for this emissions unit in order to demonstrate compliance with the allowable mass emission rate for PM, CO, NOx, VOC and SO2. Future testing may be required based on Engineering Guide #16 and/or the discretion of RAPCA.

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.

NOx, 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 only #2 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.

Not later than 60 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 dates(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 -

Particulate emissions from the stack shall not exceed 5.16 tons/yr

Applicable Compliance Method -

Compliance with the annual emissions limitation 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 (as derived from the records required by term and condition C.1 above), and dividing by 2000 lbs/ton.

Emissions Limitation -

CO emissions when burning #2 fuel oil shall not exceed 27.2 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method -

Compliance with the annual emissions limitation 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 and condition C.1 above), and dividing by 2000 lbs/ton.

Emissions Limitation -

NOx emissions when burning #2 oil shall not exceed 6.54 tons/yr

Applicable Compliance Method -

Compliance with the annual emissions limitation 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 and condition C.1 above), and dividing by 2000 lbs/ton.

Emissions Limitation -

SO2 emissions when burning #2 oil shall not exceed 1.15 tons/yr

Applicable Compliance Method -

Compliance with the annual emissions limitation 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 and condition C.1 above), and dividing by 2000 lbs/ton.

Emission Limitation-

VOC emissions from this emissions unit when burning #2 fuel oil shall not exceed 8.05 tons/yr

Applicable Compliance Method -

Compliance with the annual emissions limitation 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 and condition C.1 above), and dividing by 2000 lbs/ton

Emission Limitation -

Fugitive particulate emissions shall not exceed 0.19 ton/yr

Applicable Compliance Method -

Compliance with the annual fugitive particulate emissions shall be assumed based upon the following worst case calculations:

Fugitive particulate emissions from the hot end are calculated as follows

Silo filling (343,750 tons/yr of material/yr x 0.00058 lb PM/ton x ton/2000 lbs) +
Plant Load Out (343,750 tons/yr of asphalt produced/yr x 0.00052 lb PM/ton x ton/2000 lbs)
= 0.19 ton/yr particulate

The emission factors in the above equations are derived from AP-42, Fifth Edition, Table 11.1-14 (3/04).

Emission Limitation -

Fugitive VOC emissions shall not exceed 2.75 tons/yr

Applicable Compliance Method -

Compliance with the annual fugitive VOC emissions shall be assumed based upon the following worst case calculations:

Fugitive VOC emissions from the hot end are calculated as follows
Silo filling (343,750 tons/yr of material/yr x 0.012 lb VOC/ton x ton/2000 lbs) +
Plant Load Out (343,750 tons/yr of asphalt produced/yr x 0.004 lb VOC/ton x ton/2000 lbs)
= 2.75 tons VOC

The emission factors in the above equations are derived from AP-42, Fifth Edition, Table 11.1-14 (3/04).

Emissions Limitation-

20 percent opacity as a 6-minute average, from the stack

Applicable Compliance Method-

Compliance shall be demonstrated through visible emissions observations in accordance with OAC rule 3745-17-03(B)(1).

Emission Limitation-

20 percent opacity as a 3-minute average, from fugitives

Applicable Compliance Method-

Compliance shall be demonstrated through visible emissions observations in accordance with OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

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.

The portable source can be relocated upon receipt of the director's "Notice of Site Approval" for the site.
3. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

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

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