



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-04903**

CERTIFIED MAIL

DATE: 5/17/00

Valley Asphalt Corporation
Daniel T Crago
11641 Mosteller Rd
Cincinnati, OH 45241

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, 43266-0149.

A Permit to Install may be issued in proposed or 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.

Very truly yours,

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

CC: USEPA
KY

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OH-KY-IN Reg Coun of Govt



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-04903

Application Number: 14-04903
APS Premise Number: 1431472592
Permit Fee: **To be entered upon final issuance**
Name of Facility: Valley Asphalt Corporation
Person to Contact: Daniel T Crago
Address: 11641 Mosteller Rd
Cincinnati, OH 45241

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5073 Kilby Rd
Cleves, Ohio**

Description of proposed emissions unit(s):

400 ton per hour portable drum mix asphalt plant with fabric filter, 15,000 gallon horizontal storage tank, 35,000 gallon horizontal storage tank.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

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 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.)

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

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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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	15.2
PM-10	10.4
SO2	40.0
NOx	30.0
CO	22.4
VOC	29.1

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Emissions Unit ID: **P909**

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P909 - 400 ton per hour portable drum mix asphalt plant with fabric filter	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(D)
	40 CFR Part 60, Subpart I

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<u>Applicable Emissions Limitations/Control Measures</u>	
22.9 pounds PM/hr (stack), 9.6 pounds PM/hr (fugitive), 7.3 pounds PM ₁₀ /hour (stack), 8.64 pounds PM ₁₀ /hour (fugitive),	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 cold feed bins and recycled material (RAP) bin.
40.0 pounds SO ₂ /hour, 30.0 pounds NO _x /hour, 30.0 tons NO _x /year.**	See term A.2.b
22.4 pounds CO/hr, 22.4 tons CO/year.**	Less stringent *
27.6 pounds OC/hour, 0.004 pound Arsenic/hour, 0.004 TPY Arsenic.** 0.0014 pound Cadmium/hour, 0.0014 TPY Cadmium.**	15.2 tons PM/year (total)** 10.4 tons PM ₁₀ /year (total)** 40.0 tons SO ₂ /year.** 27.6 tons OC/year.**
0.007 pound Chromium/hour, 0.007TPY Chromium.**	See term B.3
0.043 pound Lead/hour, 0.043 TPY Lead.**	0.04 gr/dscf PM
0.007 pound PCB/hour, 0.007 TPY PCB.**	* The emission limitation(s)/opacity restrictions established by these rules are less stringent than those established by Ohio Administrative Code rule 3745-31-05(A)(3) (BAT).
0.001 pound Mercury/hour, 0.001 TPY Mercury.** 3.2 pounds Total Halogens/hour, 3.2 TPY Total Halogens.**	** Based on a rolling, 12-month summation.
See term A.2.a	
Less stringent *	
Visible particulate emissions from any fugitive dust emissions point shall not exceed twenty percent (20%) opacity as a three minute average.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Visible particulate emissions from the fabric filter exhaust stack shall not exceed ten percent (10%) opacity, as a six-minute average, except as provided by rule.
- 2.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.
- 2.c** All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property Allowable Specifications

arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	60 ppm, maximum
PCB's	10 ppm, maximum
total halogens	4000 ppm, maximum
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum
sulfur content	0.5%, maximum

Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR Part 266.40(c) and OAC rule 3745-279-10(B)(1). Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the supplier ["marketer" in 40 Part CFR 266.43(a)] has demonstrated to the Ohio EPA's Division of Solid and Hazardous Waste Management that the used oil does not contain any hazardous waste.

- 2.d** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter, maintaining the aggregate in a moist condition, visible emission limitations, production limitation and compliance with the Air Toxics Policy.

B. Operational Restrictions

1. To ensure the fabric filter is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the fabric filter of not less than 3 or greater than 6 inches of water shall be maintained at all times while the emissions unit is in operation.
2. The maximum asphaltic concrete production rate from this plant shall not exceed 400 tons per hour. This production rate is based on the emissions unit's potential to emit, therefore no hourly records are required.
3. The maximum annual production rate for this emissions unit shall not exceed 800,000 tons per year, 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, compliance with the annual production rate limitation shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production (Tons)</u>
1-1	66,667
1-2	133,333
1-3	200,000
1-4	266,667
1-5	333,333
1-6	400,000
1-7	466,667
1-8	533,333
1-9	600,000
1-10	666,667
1-11	733,333
1-12	800,000

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

4. The permittee may not receive or burn any used oil which does not meet the specifications listed in this permit without first obtaining a permit to install that authorizes the burning of such used

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oil.

5. The permittee may not receive or burn any #2 fuel oil and/or used oil which has a sulfur content greater than 0.5 percent.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while 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 fabric filter on a once per shift basis.
2. 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. Date of shipment or delivery.
 - b. 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 °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.
 - l. The sulfur content (%).

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Hamilton County Department of Environmental Services 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.

3. The permittee shall maintain monthly records of the following information:
 - a. The asphalt production rate for each month.

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the asphalt production rates.

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

4. For each shipment of #2 fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.
5. The permit to install for this emissions unit (P909) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: formaldehyde

TLV (ug/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr): 1.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.73

MAGLC (ug/m3): 5.29

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable pressure drop range specified in Term B.1.
2. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil exceeds the 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 permittee has notified USEPA of its used oil management activities and that the notice included the location and description of those activities; and
 - b. The permittee will burn the used oil only in an industrial furnace or boiler identified in 40 CFR Part 266.41(b) and OAC rule 3745-279-61.

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.

The facility shall also submit a copy of each certification notice to the Hamilton County Department of Environmental Services.

3. The permittee shall submit deviation (excursion) reports that 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. The report shall also identify any exceedances of the sulfur content limits of the oil contained in Term B.5.
4. The permittee shall submit annual reports which specify the total PM, PM-10, SO₂, NO_x, OC and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.

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5. The permittee shall furnish the Administrator written notification as follows:

A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

6. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

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determined in accordance with the following method(s):

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Emission Limitation:

Specified emissions limits for CO, NOX, SO2, OC, PM and PM-10.

Applicable Compliance Method:

The permittee shall calculate the PM10, CO, NOX, and SO2 emission rates using emission factors from AP-42 Table 11.1-6 and 11.1-8.

The OC and PM emission rates will be determined based on the emission testing.

2. Emission Limitation:

20% opacity for fugitive emissions and 10% opacity for stack emissions.

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A

3. Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but no later than 180 days after initial startup of the emissions unit, 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 particulate matter(PM) and organic compounds (OC). The PM test(s) shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A and the OC test(s) shall be conducted in accordance with the test methods and procedures specified in Method 25 (or suitable equivalent) 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 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 Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

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For the purpose of demonstrating initial compliance, opacity observations shall be conducted concurrently with the emissions test unless visibility or other conditions prevent the opacity observations from being conducted concurrently with the emissions test.

In such a case, the permittee shall reschedule the opacity observations as soon after the emissions test as possible, but not later than 30 days thereafter, and shall advise the Administrator of the rescheduled date.

In these cases, the 30-day prior notification to the Administrator required in 40 CFR 60.7(a)(6) shall be waived. The rescheduled opacity observations shall be conducted (to the extent possible) under the same operating conditions that existed during the emissions test. The visible emissions observer shall determine whether visibility or other conditions prevent the opacity observations from being made concurrently with the initial performance test in accordance with procedures contained in Method 9, 40 CFR Part 60, Appendix B. Opacity readings of portions of plumes which contain condensed, uncombined water vapor shall not be used for purposes of determining compliance with opacity standards. The owner or operator of an affected facility shall make available, upon request by the Administrator, such records as may be necessary to determine the conditions under which the visual observations were made and shall provide evidence indicating proof of current visible observer emission certification.

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

4. Compliance with the used oil specifications in Term A.2.c shall be demonstrated by the recordkeeping in Term C.2.
5. Compliance with the annual asphalt production limitations in Term B.3 shall be demonstrated by the recordkeeping in Term C.3.
6. Compliance with the fabric filter pressure drop limitation in Term B.1 shall be demonstrated by the recordkeeping in Term C.1.

F. Miscellaneous Requirements

1. 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 PTI providing the following criteria are met:

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- 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 Department of Environmental Services and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
- d. In the Department of Environmental Services and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

- e. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - f. The portable emissions unit is equipped with best available technology;
 - g. The portable emission unit owner has identified the proposed site to Ohio EPA;
 - h. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - i. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
 - j. The owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and
 - k. The portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.
2. Any site approvals issued by the Ohio EPA, pursuant to F.1. above, shall be valid for no longer than three years and are subject to renewal.

Valle

PTI /

Emissions Unit ID: **P909**

Issued: To be entered upon final issuance

In order for the Department of Environmental Services and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the Department of Environmental Services (250 William Howard Taft Road, Cincinnati, OH 45219) and the appropriate field office having jurisdiction over the new site.

Upon receipt of the notice, the Department of Environmental Services and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

3. The following terms and conditions of this permit are federally enforceable: A.2.a - A.2.e, B.1 - B.5, C.1 - C.4, D.1 - D.3, D.5, E.1-E.6.

Valle

PTI

Emissions Unit ID: T001

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T001 - 35,000 gallon horizontal storage tank	OAC rule 3745-31-05(A)(3)	1.24 TPY OC
	40 CFR Part 60, Subpart Kb	See term C.1
	OAC rule 3745-21-09(L)	Exempt

2. Additional Terms and Conditions

- 2.a The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill and minimal emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records showing the dimensions and storage capacity of this storage vessel.

D. Reporting Requirements

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

E. Testing Requirements

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

Emission Limitation:

1.24 TPY OC

Applicable Compliance Method:

Compliance shall be determined using calculations outlined in AP-42 Section 7.1 (9/97).

F. Miscellaneous Requirements

None

Valle

PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **T001**

Valle

PTI /

Emissions Unit ID: T002

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T002 - 15,000 gallon horizontal storage tank	OAC rule 3745-31-05(A)(3)	0.23 TPY OC
	40 CFR Part 60, Subpart Kb.	See term C.1
	OAC rule 3745-21-09(L)	Exempt

2. Additional Terms and Conditions

- 2.a The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill and minimal emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records showing the dimensions and storage capacity of this storage vessel.

Valle

PTI /

Emissions Unit ID: **T002**

Issued: To be entered upon final issuance

D. Reporting Requirements

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

E. Testing Requirements

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

Emission Limitation:

0.23 TPY OC

Applicable Compliance Method:

Compliance shall be determined using calculations outlined in AP-42 Section 7.1 (9/97).

F. Miscellaneous Requirements

Valley Asphalt Corporation
PTI Application 14-04003
Issue

Facility ID: 1431472592

Emissions Unit ID: T002

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-04903 Facility ID: 1431472592

FACILITY NAME Valley Asphalt Corporation

FACILITY DESCRIPTION 400 ton per hour portable drum mix asphalt plant with fabric filter, 15,000 gallon horizontal storage tank, 35,000 gallon horizontal storage tank. CITY/TWP Cleves

SIC CODE 2591 SCC CODE 3-05-002-42 EMISSIONS UNIT ID P909

EMISSIONS UNIT DESCRIPTION 400 ton per hour portable drum mix asphalt plant with fabric filter

DATE INSTALLED 06/2000

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	15.80	3.86	22.9	15.2
PM ₁₀	attainment	5.04	1.24	7.3	10.4
Sulfur Dioxide	attainment	27.50	12.50	40.0	40.0
Organic Compounds	primary non-attainment	18.98	8.93	27.6	27.6
Nitrogen Oxides	attainment	20.63	9.38	30.0	30.0
Carbon Monoxide	attainment	15.40	7.00	22.4	22.4
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60, subpart I NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of fabric filter to control particulate emissions, production limitation, maintain aggregate material in moist condition, visible emission limitations, compliance with specified emission limits and compliance with the air toxics policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: formaldehyde, SO2, NOx

NEW SOURCE REVIEW FORM B

PTI Number: 14-04903 Facility ID: 1431472592

FACILITY NAME Valley Asphalt Corporation

FACILITY DESCRIPTION 400 ton per hour portable drum mix asphalt CITY/TWP Cleves

Emissions Unit ID: T002

SIC CODE 2951 SCC CODE 3-05-002-12 EMISSIONS UNIT ID T001

EMISSIONS UNIT DESCRIPTION 35,000 gallon horizontal storage tank

DATE INSTALLED 06/2000

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					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	primary non-attainment		0.25		1.24
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60, subpart Kb NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Submerged fill, compliance with specified emission limits.

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:

3 NEW SOURCE REVIEW FORM B

PTI Number: 14-04903

Facility ID: 1431472592

FACILITY NAME Valley Asphalt Corporation

FACILITY DESCRIPTION 400 ton per hour portable drum mix asphalt CITY/TWP Cleves

Emissions Unit ID: **T002**

SIC CODE 2951

SCC CODE 3-05-002-12

EMISSIONS UNIT ID T002

EMISSIONS UNIT DESCRIPTION 15,000 gallon horizontal storage tank

DATE INSTALLED 06/2000

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					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	primary non-attainment		0.05		0.23
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60,

NESHAP?

PSD?

OFFSET POLICY?

subpart Kb

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Submerged fill, compliance with specified emission limits.

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:

NEW SOURCE REVIEW FORM B

PTI Number: 14-04903

Facility ID: 1431472592

FACILITY NAME Valley Asphalt Corporation

FACILITY DESCRIPTION 400 ton per hour portable drum mix asphalt CITY/TWP Cleves

Emissions Unit ID: T002

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

New Source Review and Toxics Modeling

Please provide any additional permit specific notes as you deem necessary:

Permit Review Narrative

PTI 14-04903

Valley Asphalt Corporation
5073 Kilby Road
Cleves, Ohio 45002

PN: 1431400140

Emissions units description:

This permit application is for a 400 ton per hour portable asphalt plant (P909), a 35,000 gallon horizontal asphalt storage tank (T001) and a 15,000 gallon horizontal fuel oil storage tank (T002) to be constructed at the Kilby Road location of Valley Asphalt. This permit will be made a Synthetic Minor by limiting production to 800,000 tons per year.

Applicable rules:

- 40 CFR Part 60, Subpart I (Hot Mix Asphalt Facilities)
- 40 CFR Part 60, Subpart Kb (VOL storage tanks)
- OAC 3745-15-07 (Air pollution nuisance prohibited)
- OAC 3745-17-07 (Visible emissions limitations)
- OAC 3745-17-08 (Emissions of fugitive dust)
- OAC 3745-17-11 (Particulate emissions from stack sources)
- OAC 3745-31-05 (BAT requirements)

Emissions summary:

See attached emissions calculations sheet.

BAT determination:

P909 - Use of fabric filter to control particulate emissions, production limitation, maintain aggregate material in moist condition, visible emission limitations, compliance with specified emission limits, compliance with Air Toxic policy.

T001 - Submerged fill and compliance with specified emission limits.

FACILITY DESCRIPTION

400 ton per hour portable drum mix asphalt plant with fabric filter, 15,000 gallon horizontal storage tank, 35,000 gallon horizontal storage tank.

CITY/TWP

Emissions Unit ID: T002

Cleves

T002 - Submerged fill and compliance with specified emission limits.

Compliance status and permit recommendation:

Emissions units P909, T001 and T002 will comply with all applicable rules and emission limitations and/or control requirements, therefore approval is recommended.

Permit Fee:

P909 > 50,000 lbs/hr \$1,000.00

T001 15,000 gallons \$150.00

T002 15,000 gallons \$100.00

Total \$1250.00

Peter Sturdevant

04/13/00

Permit To Install Synthetic Minor Write-Up

Synthetic Minor Determination

Valley Asphalt Corporation

PTI 14-04903

A. Source Description

Valley Asphalt Corporation has submitted an application for a 400 ton per hour portable drum mix asphalt plant. This equipment will be used for the production of asphaltic concrete.

B. Facility Description

This facility is located in Hamilton County, Ohio and is presently a minor facility. Hamilton County is classified as non-attainment for VOC and attainment for all other criteria pollutants.

C. Source Emissions

Potential emissions from this emissions unit (including fugitive particulate emissions) will be limited, through this PTI, to

PTI Num

FACILITYEmissions Unit ID: **T002** _____

FACILITY DESCRIPTION 400 ton per hour portable drum mix asphalt CITY/TWP Cleves
 plant with fabric filter, 15,000 gallon
 horizontal storage tank, 35,000 gallon
 horizontal storage tank.

15.2 tons per year of particulate matter, 10.4 tons per year of PM-10, 40.0 tons per year of SO₂ and 27.6 tons per year of VOC. Without control equipment and production limitations this emissions unit would have maximum uncontrolled emissions of 7600 tons per year for particulate matter, 1720 tons per year PM-10, 255.79 tons per year SO₂ and 121 tons per year of VOC.

This permit will impose an asphalt production limit of 800,000 tons per year. Compliance with the annual production limit will be based upon a rolling, 12-month summation. This facility shall maintain monthly records and submit excursion reports that identify all exceedances of the rolling, 12-month production rate limitation.

D. Conclusion:

With this permit, the federally enforceable terms and conditions will limit the annual asphalt production and require the use of control equipment so that the facility has a potential to emit less than 100 tons per year of PM, PM-10, SO₂ and VOC. Valley Asphalt Corporation will not be considered a major facility for the purpose of Title V. The PM, PM-10 and SO₂ emissions will be less than 250 tons per year thus PSD will not apply and the VOC emissions will be less than 100 tons per year so the Emission Offset Policy will not apply.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	15.2
PM-10	10.4
SO ₂	40.0
NO _x	30.0
CO	22.4
VOC	29.1