

Synthetic Minor Determination and/or Netting Determination

PTI NUMBER 15-01451

Allied Corporation Plant #73

A. Source Description

This source, Allied Corporation Plant #73, has submitted a permit to install application to modify a portable Asphalt plant to burn No. 2 fuel oil and used on-spec oil as alternative fuels. The 360 TPH asphaltic plant is located at 3848 Erie Avenue SW in Perry Township. The burner for the asphaltic plant has a maximum rated capacity of 0.4 MMBTU per hour.

B. Facility Emissions and Attainment Status

The asphaltic concrete plant is located in Stark County. Stark County is attainment for particulate, sulfur dioxide, carbon monoxide, ozone, lead, and oxides of nitrogen. This modified source has the potential to emit (PTE) more than 250 tons of SO₂ (278.4) and CO (709.6) per year when burning used on-spec oil resulting in PSD applicability. This modified source also has the potential to emit more than 100 tons of NO_x (158) per year resulting in Title V applicability. However, the company has requested a Federal Enforceable Permit to Install (Syn Minor) in order to avoid PSD and Title V. The allowable will be 48 TPY of SO₂, 20 TPY of NO_x and 90 TPY of CO when burning used on-spec oil. All other pollutants have PTEs below Title V and/or PSD trigger levels.

C. Source Emissions

Allied Corporation will limit the plant's hot mix asphalt production to 400,000 tons per any rolling, 12-month period and will limit the operating hours to 2,000 hours per any rolling, 12-month period. The total annual CO, NO_x, and SO₂ emissions will be limited to 90, 20 and 48 tons per year, respectively. The PTI requires recordkeeping to ensure compliance with the operational hours and asphalt production restrictions.

D. Conclusion

The emission limits contained in the synthetic minor are adequate to provide federally enforceable limitations for ensuring that the applicable Title V thresholds will not be exceeded and not be subject to PSD review requirements. Limiting the plant's hot mix asphalt production to 400,000 tons per any rolling, 12-month period and limiting the operating hours to 2,000 hours per any rolling, 12-month period will reduce emissions to less than 100 tons/yr for every pollutant. Therefore, Allied Corporation Plant 73 will not be subject to Title V or PSD permitting.



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
STARK COUNTY**

CERTIFIED MAIL

Application No: 15-01451

DATE: 3/29/2001

Allied Corporation Plant 73
Larry Shively
266 8775 Blackbird Lane
Thornville, OH 43076

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 **\$1000** 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 Canton LAA WV PA Stark Cty Area Tans Study



**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 15-01451

Application Number: 15-01451
APS Premise Number: 1576000151
Permit Fee: **To be entered upon final issuance**
Name of Facility: Allied Corporation Plant 73
Person to Contact: Larry Shively
Address: 266 8775 Blackbird Lane
Thornville, OH 43076

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3848 Erie Avenue SW
Perry Twp., Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification burning used oil and no 2 fuel oil.

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

Allied Corporation Plant 73

PTI Application: 15-01451

Issued: To be entered upon final issuance

Facility ID: 1576000151

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

Allied Corporation Plant 73

Facility ID: 1576000151

PTI Application: 15-01451

Issued: To be entered upon final issuance

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

Allied Corporation Plant 73

Facility ID: 1576000151

PTI Application: 15-01451

Issued: To be entered upon final issuance

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

Allied Corporation Plant 73

Facility ID: 1576000151

PTI Application: 15-01451

Issued: To be entered upon final issuance

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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	31.36
PM10	16.9
SO2	48
CO	90
NOx	20
VOC	10
Pb	0.003
HCl	0.042

Allied Corporation Plant 73

PTI Application 15-01451

Issue

Facility ID: 1576000151

Emissions Unit ID: P901

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.

Operations, Property, and/or Equipment

P901 - 360 TPH drum hot mix asphalt plant with fabric filter dust collector (baghouse) burning natural gas, No. 2 fuel oil and used on-spec oil.

This is a modification to include the use of No. 2 fuel oil and used on-spec oil as alternative fuels in this emissions unit.

Chapter 31 Modification

Applicable Rules/Requirements

OAC rule 3745-31-05(A)(3)

Fugitive emissions from aggregate material handling operations including: front end loading into hoppers, aggregate screening and material transfer points

OAC rule 3745-17-07(A)

40 CFR Part 60, Subpart I

OAC rule 3745-17-11(B)

OAC rule 3745-18-06

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-31-05(D)
Synthetic Minor to avoid PSD and
Title V

OAC rule 3745-17-07(B)

When burning used on-spec oil, stack emissions shall not exceed the following:

Nitrogen oxide emissions shall not exceed 36 lbs/hr and 20 tons/yr.
Carbon monoxide emissions shall not exceed 162 lbs/hr and 90 tons/yr.
VOC emissions shall not exceed 18 lbs/hr and 10 tons/yr.
Sulfur dioxide emissions shall not exceed 86.4 lbs/hr and 48 tons/yr.
PM/PM10 emissions shall not exceed 15.36 lbs/hr and 15.36 tons/yr.
Lead emissions shall not exceed 0.0054 lb/hr and 0.003 ton/yr.
HCl emissions shall not exceed 0.076 lb/hr and 0.042 ton/yr.

OAC rule 3745-17-07(A)

OAC rule 3745-31-05(A)(3)

When burning No. 2 fuel oil, stack emissions shall not exceed the following:
Nitrogen oxides emissions shall not exceed 36 lbs/hr and 20 tons/yr.
Carbon monoxide emissions shall not exceed 162 lbs/hr and 90 tons/yr.
VOC emissions shall not exceed 18 lbs/hr and 10 tons/yr.
Sulfur dioxide emissions shall not exceed 36 lbs/hr and 20 tons/yr.
PM/PM10 emissions shall not exceed 15.36 lbs/hr and 15.36 tons/yr.
Lead emissions shall not exceed 0.0054 lb/hr and 0.003 ton/yr.

OAC rule 3745-17-08(B)

When burning natural gas, stack emissions shall not exceed the following:

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PTI

Emissions Unit ID: **P901**

Issued: To be entered upon final issuance

Nitrogen oxides emissions shall not exceed 36 lbs/hr and 20 tons/yr.

Carbon monoxide emissions shall not exceed 162 lbs/hr and 90 tons/yr.

VOC emissions shall not exceed 18 lbs/hr and 10 tons/yr.

Sulfur dioxide emissions shall not exceed 36 lbs/hr and 20 ton/yr.

PM/PM10 emissions shall not exceed 15.36 lbs/hr and 15.36 tons/yr.

Lead emissions shall not exceed 0.0054 lb/hr and 0.003 ton/yr.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and 40 CFR Part 60, Subpart I.

(See sections A.2.a through A.2.e below.)

Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

0.04 gr/dcsf of particulate emissions exhaust gases from stack

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart I and OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

SO₂ emissions shall not exceed 48 TPY as a 12-month, rolling summation.

CO emissions shall not exceed 90 TPY as a 12-month, rolling summation.

VOC emissions shall not exceed 10 TPY as a 12-month, rolling summation.

NO_x emissions shall not exceed 20 TPY as a 12-month, rolling summation.

Visible particulate emissions for the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Fugitive PM emissions shall not exceed 16 tons/yr.

Fugitive PM₁₀ emissions shall not exceed 1.6 tons/yr.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust

(See Sections A.2.f through A.2.i below.)

The requirements of this rule also

include compliance with the requirements of OAC rule 3745-17-07(B)(1).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity, as a three-minute average.

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PTI

Emissions Unit ID: P901

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

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, production limitations, use of a fabric filter and compliance with the Ohio EPA's Air Toxics Policy.
- 2.b** 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.c** The hourly emissions limitations outlined in term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.d** 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 3745-58-50. 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.e** The permittee shall maintain a minimum height of 30 feet for the baghouse stack.
- 2.f** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:
-transfer points of material
-aggregate conveyor screening
-weight hopper loading
- 2.g** The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall minimize the drop height of the front end loader bucket to the extent possible in order to minimize or eliminate fugitive dust. The aggregate loaded into the storage bins shall have a moisture content sufficient to eliminate the visible emissions from elevators, aggregate screening points and transfer points to the dryer. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.h** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.i** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 2 nor greater than 8 inches of water shall be maintained at all times when this emissions unit is being operated.
2. Fuel Usage:
The permittee shall combust, in this emissions unit, only natural gas, #2 fuel oil with no more than 0.5% sulfur content, by weight or used on-spec oil with no more than 0.5% sulfur content, by weight.
3. The maximum annual operating hours for this emissions unit shall not exceed 2,000 hrs, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the calendar year 2001, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	167
1-2	333
1-3	500
1-4	667
1-5	833
1-6	1000
1-7	1167

Allie

PTI

Emissions Unit ID: P901

Issued: To be entered upon final issuance

1-8	1333
1-9	1500
1-10	1667
1-11	1833
1-12	2000

After calendar year 2001, compliance with the annual operating hours' limitation shall be based upon a rolling, 12-month summation of the operating hours.

4. The maximum annual asphalt production for this emissions unit shall not exceed 400,000 tons per year based upon a rolling, 12-month summation of the production rates. To ensure enforceability during the 12 calendar months of the year 2001, the permittee shall not exceed the production rate specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Tons of Hot Mix Asphalt Produced</u>
1	33,000
1-2	67,000
1-3	100,000
1-4	133,000
1-5	167,000
1-6	200,000
1-7	233,000
1-8	267,000
1-9	300,000
1-10	333,000
1-11	367,000
1-12	400,000

After calendar year 2001, compliance with the annual production limitation for this emissions unit shall be based upon a rolling, 12-month summation of the tons of asphalt produced.

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

<u>Contaminant/Property</u>	<u>Allowable Specification</u>
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum

Allied Corporation Plant 73

PTI / 1576000151

Issue**Facility ID: 1576000151**Emissions Unit ID: **P901**

PCBs	10 ppm, maximum*
total halogens	4000 ppm, maximum**
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum

* If the permittee is burning used oil with any quantifiable level (2 ppm) of PCBs, then the permittee is subject to the notification requirements of 40 CFR 279.62.

** 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. 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 Hazardous Waste Management that the used oil does not contain any hazardous waste.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

- a. the operating hours for each month; and
- b. beginning in calendar year 2002, the rolling, 12-month summation of the operating hours.

Also, during calendar year 2001, the permittee shall record the cumulative operating hours for each calendar month.

2. The permittee shall maintain monthly records of the following information:

- a. the tons of asphalt produced for each month; and
- b. beginning in calendar year 2002, the rolling, 12-month summation of the asphalt production in tons.

Also, during calendar year 2001, the permittee shall record the cumulative asphalt production in tons for each calendar month.

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:

Allie**PTI**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

- 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 EPA 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 collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analysis for sulfur content and heat content in accordance with the following ASTM Methods: ASTM Method D4294, ASTM Method D240, or ASTM Method 6010 for sulfur content; and ASTM Method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Canton local air agency.

For each shipment of 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 analysis for sulfur content and heat content.

5. 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 daily basis.
6. Except as otherwise provided in this section, for aggregate handling operations that are not adequately enclosed, the permittee shall perform daily inspections of such operation. The inspections shall be performed during representative, normal operating conditions.

Emissions Unit ID: **P901**

The permittee may, upon receipt of written approval from the Canton local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

7. The permittee shall maintain records of the following information for the inspections of the aggregate handling operations:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 7.d shall be kept separate for each material handling operation identified above and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. The baghouse internal components and bags must be inspected regularly. Intervals between inspections should not exceed two (2) weeks during the asphalt production season. The permittee shall maintain records of such inspections and any repairs made. Such records shall be made available to personnel from the Canton local air agency (or any other agent of the Ohio EPA) upon request during normal working hours.
9. The permittee shall conduct daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack servicing the dryer. These checks shall be conducted under normal operating conditions. The checks shall be conducted for at least six consecutive minutes. The presence or absence of any visible particulate emissions shall be recorded in an operations log and shall be made available to personnel from the Canton local air agency (or any other agent of the Ohio EPA) upon request during normal working hours. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the visible particulate emissions;
 - b. whether the visible particulate emissions are representative of normal operations;

Allied**PTI**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

- c. if the emissions are not representative of normal operations, the cause of the abnormal visible particulate emissions;
- d. the total duration of any visible particulate emission incident; and
- e. any corrective actions taken to eliminate the visible particulate emissions.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours' limitation and, for calendar year 2001, all exceedances of the maximum allowable cumulative operating hours' levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month asphalt production rate limitation and, for calendar year 2001, all exceedances of the maximum allowable cumulative asphalt production rates' levels.
3. Sulfur Content in Oil Limitation:
The permittee shall submit deviation (excursion) reports which identify all exceedances of the sulfur content limitation for oil combusted in this emissions unit.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range.
5. The permittee shall submit deviation (excursion) reports which identify each day when a fuel other than natural gas, number two fuel oil or used on-spec oil was burned in this emissions unit.
6. The permittee shall submit deviation (excursion) reports which identify any day when the material handling operations were not inspected.
7. The permittee shall submit semiannual written reports which identify the following:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. describe any corrective actions taken to eliminate visible particulate emissions from the stack; and
 - c. all days when at least 6-minutes of daily checks for visible particulate emissions were not conducted when the emissions unit was in operation and the weather conditions were

acceptable.

The reports shall be submitted to the Canton local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

8. These reports, as denoted by terms D.1 - D.7, are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
9. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of used oil which is received for burning in this emissions unit. The permittee's or oil supplier's analysis shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (gallons);
 - b. the weighted* average sulfur dioxide emission rate (pounds/mmBtu) for the oil received during the calendar month; and
 - c. the weighted* average heat content (Btu/gallon) of the oil received during the calendar month.

*In proportion to the quantity of oil received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

10. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil exceeds the used oil specifications found in OAC rule 3745-279-11. If the permittee is burning used oil which exceeds the specifications found in OAC rule 3745-279-11, the permittee is subject to that rule and must comply with all provisions of that rule.
11. The permittee shall submit a Preventative Maintenance and Malfunction Abatement Plan (PM&MAP) to the Canton local air agency within thirty days after issuance of this permit to install. This PM&MAP shall comply with the requirements listed in OAC rule 3745-15-06(D)(1). The PM&MAP submitted by the permittee in a letter dated March 13, 2000 was not adequate. The manual titled "Ohio EPA's Operation and Maintenance (O&M) Guidelines For Air Pollution Control Equipment" provides excellent guidance on how to develop an acceptable PM&MAP.

E. Testing Requirements

1. No later than June 30, 2001, the permittee shall conduct, or have conducted, an emission test(s)

Allie

PTI

Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for particulates, VOC, CO, SO₂ and NO_x. The test(s) shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for particulates, Method 25 or 25A of 40 CFR Part 60, Appendix A for VOC, Method 10 or 10A of 40 CFR Part 60, Appendix A for CO, Method 6 of 40 CFR Part 60, Appendix A for SO₂ and Method 7 of 40 CFR Part 60, Appendix A for NO_x while the emissions unit is operating at or near maximum capacity, using only virgin aggregate and used on-spec oil as fuel for the dryer.

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's 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 Canton local air agency shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit's operating parameters.

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

2. Compliance with the emission limitation(s) in sections A.1. and A.2. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation
When burning natural gas, No. 2 fuel oil or used on-spec oil
Limit of 0.04 gr/dscf of particulate emissions in the exhaust gases from stack.

Applicable Compliance Method
Compliance shall be determined by emission testing as specified in section E.1.
 - b. Emissions Limitation
When burning natural gas, No. 2 fuel oil or used on-spec oil
Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method
Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03

(B)(1).

c. Emissions Limitation

When burning used on-spec oil, No. 2 fuel oil or natural gas:

Nitrogen oxide emissions shall not exceed 36 lbs/hr and 20 tons/yr.

Applicable Compliance Method

Compliance shall be determined by emission testing as specified in section E.1.

The TPY emission rate will be based on multiplying the short term lb/hr emission rate by the annual asphalt production of the emissions unit.

d. Emissions Limitation

When burning used on-spec oil, natural gas or No. 2 fuel oil:

Carbon monoxide emissions shall not exceed 162 lbs/hr and 90 tons/yr.

Applicable Compliance Method

Compliance shall be determined by emission testing as specified in section E.1.

The TPY emission rate will be based on multiplying the short term lb/hr emission rate by the annual asphalt production of the emissions unit.

e. Emissions Limitation

When burning natural gas, No. 2 fuel oil or used on-spec oil:

PM/PM10 stack emissions shall not exceed 15.36 lbs/hr and 15.36 tons/yr.

Applicable Compliance Method

Compliance shall be determined by emission testing as specified in section E.1.

Compliance with the annual limit shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

E = PM/PM10 emission rate in tons per year.

A = average emission rate in pounds PM/PM10 per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

f. Emissions Limitation

When burning used on-spec oil, natural gas or No. 2 fuel oil:

VOC emissions shall not exceed 18 lbs/hr and 10 tons/yr.

Applicable Compliance Method

Allie

PTI

Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

Compliance shall be determined by emission testing as specified in section E.1.

Compliance with the annual limit shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

E = VOC emission rate in tons per year.

A = average emission rate in pounds VOC per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

g. Emissions Limitation

When burning natural gas, No.2 fuel oil or used on-spec oil
Lead emissions shall not exceed 0.0054 lb/hr and 0.003 ton/yr.

Applicable Compliance Method

Compliance shall be determined by calculations using the emission factor of 0.000015 lb Pb/ton of asphalt from AP-42, Table 11.1-12, 12/2000 Edition.

The TPY emission rate will be based on multiplying the short term lb/hr emission rate by the annual asphalt production of the emissions unit.

h. Emissions Limitation

When burning natural gas or No. 2 fuel oil
Sulfur dioxide emissions shall not exceed 36 lbs/hr and 20 tons/yr.

Applicable Compliance Method

Compliance shall be determined by calculations using the emission factor of 0.1 lb SO₂/ton of asphalt.

The TPY emission rate will be based on multiplying the short term lb/hr emission rate by the annual asphalt production of the emissions unit.

i. Emissions Limitation

When burning used on-spec oil
Sulfur dioxide emissions shall not exceed 86.4 lbs/hr and 48 tons/yr.

Applicable Compliance Method

Compliance shall be determined by emission testing as specified in section E.1.

Compliance with the annual limit shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

E = SO₂ emission rate in tons per year.

A = average emission rate in pounds SO₂ per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

j. Emissions Limitation

When burning used on-spec oil

HCl emissions shall not exceed 0.076 lb/hr and 0.042 ton/yr.

Applicable Compliance Method

Compliance shall be determined by calculations using the emission factor of 0.00021 lb HCl/ton of asphalt from AP-42, Table 11.1-7, 12/2000 Edition.

The TPY emission rate will be based on multiplying the short term lb/hr emission rate by the annual asphalt production of the emissions unit.

k. Emissions Limitation

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method(s)

Compliance with the visible emission limitation for the aggregate handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

l. Emissions Limitation

Fugitive PM emissions from aggregate material handling shall not exceed 16 tons/yr.

Applicable Compliance Method

Compliance shall be determined by calculations using the emission factor of 0.4 lb PM/ton of asphalt times 0.2 (80% control) times annual asphalt production.

m. Emissions Limitation

Fugitive PM₁₀ emissions from aggregate material handling shall not exceed 1.6 tons/yr.

Applicable Compliance Method

Compliance shall be determined by calculations using the emission factor of 0.04 lb PM₁₀/ton of asphalt from SCC 30500204 Cold Aggregate Handling times 0.2 (80%

Allie

PTI

Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

control) times annual asphalt production.

- n. Emissions Limitation
SO₂ emissions shall not exceed 48 TPY as a 12-month, rolling summation.

Applicable Compliance Method
Monitoring and recordkeeping of asphalt production as required in section C.2.
 - o. Emissions Limitation
CO emissions shall not exceed 90 TPY as a 12-month, rolling summation.

Applicable Compliance Method
Monitoring and recordkeeping of asphalt production as required in section C.2.
 - p. Emissions Limitation
VOC emissions shall not exceed 10 TPY as a 12-month, rolling summation.

Applicable Compliance Method
Monitoring and recordkeeping of asphalt production as required in section C.2.
 - q. Emissions Limitation
NO_x emissions shall not exceed 20 TPY as a 12-month, rolling summation.

Applicable Compliance Method
Monitoring and recordkeeping of asphalt production as required in section C.2.
3. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:
- a. Operational Limitation:
The maximum annual operating hours for this emissions unit shall not exceed 2,000 hrs, based upon a rolling, 12-month summation of the operating hours.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.
 - b. Operational Limitation:
The maximum annual asphalt production for this emissions unit shall not exceed 400,000 tons per year based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.

c. Operational Limitation:

Fuel Usage:

The permittee shall combust, in this emissions unit, only natural gas, #2 fuel oil with no more than 0.5% sulfur content, by weight, or used on-spec oil with no more than 0.5% sulfur content, by weight.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.3.

d. Operational Limitation:

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

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

* If the permittee is burning used oil with any quantifiable level (2 ppm) of PCBs, then the permittee is subject to the notification requirements of 40 CFR 279.62.

** 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. 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 Hazardous Waste Management that the used oil does not contain any hazardous waste.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in

Allied Corporation Plant 73

PTI Application 15-01451

Issue

Facility ID: 1576000151

Emissions Unit ID: P901

section C.3.

F. Miscellaneous Requirements

1. 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 PTI, permit to operate (PTO) or registration;

Allied**PTI**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

- c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Canton local air agency 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 Canton local air agency's and the appropriate field office's judgment, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.
2. 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:
 - a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - b. the portable emissions unit is equipped with best available technology;
 - c. the portable emissions unit owner has identified the proposed site to Ohio EPA;
 - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
 - f. 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 the proposed site; and
 - g. the portable emissions unit owner has provided the Ohio EPA with fifteen days' written notice of the relocation.
3. 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.

In order for the Canton local air agency 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 Canton local air agency and the appropriate office having jurisdiction over the new site. Upon receipt of the

Allie

PTI

Emissions Unit ID: **P901**

Issued: To be entered upon final issuance

notice, the Canton local air agency and/or the 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.

Allied Corporation Plant 73

PTI / Permit ID: 15-01451

Issue

Facility ID: 1576000151

Emissions Unit ID: P901

4. This source is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

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 nor 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 (Required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Permit Management Unit
 Lazarus Government Center
 P.O. Box 1049
 Columbus, OH 43216-1049

and

Canton City Health Department
 Air Pollution Control Division
 420 Market Avenue N.
 Canton, OH 44702-1544

5. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.
6. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01451 Facility ID: 1576000151

FACILITY NAME Allied Corporation Plant 73

FACILITY DESCRIPTION Hot mix asphalt drum plant CITY/TWP Perry Twp.

SIC CODE 2951 SCC CODE 30500201 EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION 360 TPH asphalt drum plant burning used oil and no 2 fuel oil.

DATE INSTALLED Scheduled to be modified
in March 2001.

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	Attainment			Stack 0.04 gr/dscf 15.36 lbs/hr	Stack 15.36 fugitive 16 Total 31.36
PM ₁₀	Attainment			Stack 0.04 gr/dscf 15.36 lbs/hr	stack 15.36 fugitive 1.6 Total 16.96
Sulfur Dioxide	Attainment			used co-spec oil 86.4 lbs/hr No. 2 fuel oil/nat gas 36 lbs/hr	used No. 6 oil 48 No. 2 fuel oil/nat gas 20
Volatile Organic Compounds	Attainment			18 lbs/hr	10
Nitrogen Oxides	Attainment			36 lbs/hr	20
Carbon Monoxide	Attainment			162 lbs/hr	90
Lead	Attainment			0.0054 lb/hr	0.003
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 49 CFR Part 60, PSD? OFFSET POLICY?
Subpart I

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

Enter Determination Fabric filter limits on components of oil, limit of Sulfur content of oil.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ unknown

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH)

NEW SOURCE REVIEW FORM B

PTI Number: 15-01451 Facility ID: 1576000151

FACILITY NAME Allied Corporation Plant 73

FACILITY DESCRIPTION Hot mix asphalt drum plant CITY/TWP Perry Twp.

has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: SO2 and PM10