

Synthetic Minor Determination and/or Netting Determination

Permit To Install 16-02343

A. Source Description

J & J Asphalt, LLC, in Medina County, has made a permit to install application for a new hot mix asphalt batch plant (P901). J & J Asphalt, LLC desires to limit their facility's overall CO, SO_x and VOC emissions to less than Title V and/or PSD thresholds, and wants this permit to install to restrict the potential to emit for the asphalt batch plant by restricting asphalt production on a facility wide basis. By avoiding Title V and PSD applicability, this facility will be classified as an minor stationary source.

B. Facility Emissions and Attainment Status

If J & J Asphalt, LLC were to produce asphalt at their maximum production capacity, 250 tons per hour, for 8760 hours per year, then the PTE of CO would be 240.90 TPY, SO_x 131.40 TPY, and VOC 131.40 TPY. NO_x, lead, and PM, however, even at maximum capacity none of these emissions approach Title V thresholds. J & J Asphalt, LLC will restrict the production of asphalt to reduce total CO emissions to 33.00 TPY, SO_x to 18.00 TPY, and VOC to 18.00 TPY.

C. Source Emissions

J & J Asphalt, LLC has proposed to restrict their annual asphalt production to 300,000 tons per rolling year period for the asphalt batch plant (P901). This restriction will allow the facility to emit only 33.00 TPY of CO, 18.00 TPY of SO_x, 10.50 TPY of NO_x, 18.00 TPY of VOC, 12.35 TPY of PE, and 7.94 TPY of PM-10. The permit to install will contain terms and conditions to limit J & J Asphalt, LLC to the above restrictions identified.

D. Conclusion

The operation of emissions units in accordance with the terms and conditions of the proposed PTI will result in maximum annual facility emissions below those levels which trigger Title V permitting requirements or Major New Source Review. The proposed PTI includes federally enforceable limits, record keeping, reporting and production limitations to ensure continued compliance with the PTI's requirements.



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
MEDINA COUNTY**

CERTIFIED MAIL

Application No: 16-02343

DATE: 6/24/2004

J and J Asphalt LLC
James Lytle
1941 Millersburg Rd
Wooster, OH 44691-0082

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 **\$2500** 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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD

MEDINA COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02343 FOR AN AIR CONTAMINANT SOURCE FOR
J AND J ASPHALT LLC**

On 6/24/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **J and J Asphalt LLC**, located at **8215 Seville Rd, Lodi, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02343:

Hot Mix Asphalt Batch Plant.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**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 16-02343

Application Number: 16-02343
APS Premise Number: 1652000061
Permit Fee: **To be entered upon final issuance**
Name of Facility: J and J Asphalt LLC
Person to Contact: James Lytle
Address: 1941 Millersburg Rd
Wooster, OH 44691-0082

Location of proposed air contaminant source(s) [emissions unit(s)]:
**8215 Seville Rd
Lodi, Ohio**

Description of proposed emissions unit(s):
Hot Mix Asphalt Batch Plant.

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

J and J Asphalt LLC

Facility ID: 1652000061

PTI Application: 16-02343

Issued: To be entered upon final issuance

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

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

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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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

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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 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 ninety (90) 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>
SO ₂	18.00
VOC	18.00
NO _x	10.50
CO	33.00
PE (stack)	12.35
PM-10 (stack)	7.94
PE (fugitive)	4.99
PM-10 (fugitive)	2.41

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Emissions Unit ID: P901

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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.

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

<p>P901 - 250 TPH hot mix Custom Built Job Number 69-543 asphaltic concrete batch plant controlled by a 60,000 ACFM baghouse</p>	<p>OAC rule 3745-31-05 (A)(3)</p>
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Applicable Emissions
Limitations/Control Measures

Carbon monoxide (CO) emissions from burning of natural gas, on-spec used oil, #2 fuel oil, #4 fuel oil, and #6 fuel oil shall not exceed 55.00 lbs/hr.

Nitrogen Oxide (NO_x) emissions from burning on-spec used oil, #2 fuel oil, #4 fuel oil, and #6 fuel oil shall not exceed 17.50 lbs/hr.

NO_x emissions from burning natural gas shall not exceed 6.25 lbs/hr.

Sulfur Dioxide (SO₂) emissions from burning on-spec used oil and #2 fuel oil shall not exceed 30.00 lbs/hr.

Sulfur Dioxide (SO₂) emissions from burning #4 fuel oil and #6 fuel oil shall not exceed 10.75 lbs/hr.

SO₂ emissions from burning natural gas shall not exceed 1.15 lbs/hr.

Volatile Organic Compound (VOC) emissions from burning of natural gas, on-spec used and #2 fuel oil shall not exceed 25.00 lbs/hr.

Volatile Organic Compound (VOC) emissions from burning #4 fuel oil and #6 fuel oil shall not exceed 30.00 lbs/hr.

PM-10 from the stack shall not exceed 0.04 gr/dscf when burning on-spec used oil, number 2 fuel oil, #4 fuel oil,

OAC rule 3745-17-07(A)(1)
OAC rule 3745-17-11(B)(1)
OAC rule 3745-18-06(E)

40 CFR Part 60, Subpart I

OAC rule 3745-35-07(B)
(synthetic minor to avoid Title V)

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#6 fuel oil or natural gas.

Emissions of fugitive PM-10 shall not exceed 10.8 pounds per hour.

Emissions of fugitive particulate emissions shall not exceed 22.5 pounds per hour.

Arsenic, cadmium, chromium, and lead emissions are limited by the fuel specifications in A.2.b below.

Visible particulate emissions from the stack shall not exceed 20% opacity, as a 3-minute average.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section A.2.a).

No visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper.

Visible emissions of fugitive dust (from areas other than the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper) shall be less than or equal to 10% opacity, as a 3-minute average.

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 aggregate storage bins.

The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize the visible emissions of fugitive dust from conveyors and all transfer points to the dryer.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and 40CFR Part 60, Subpart I.

See A.I.2.b-f below

Particulate emissions (PE) from the stack shall not exceed 12.35 tons per rolling 12-month period.

PM-10 emissions from the stack shall not exceed 7.94 tons per rolling 12-month period.

Fugitive PE shall not exceed 4.99 tons per rolling 12-month period.

Fugitive PM-10 emissions shall not exceed 2.41 tons per rolling 12-month period.

CO emissions shall not exceed 33.00 tons per rolling 12-month period.

VOC emissions shall not exceed 18.00 tons per rolling 12-month period.

SO₂ emissions shall not exceed 18.00 tons per rolling 12-month period.

NO_x emissions shall not exceed 10.50 tons per rolling 12-month period.

The emissions limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

PE from the stack shall not exceed 0.04 gr/dscf.

2. Additional Terms and Conditions

2.a The permittee shall ensure that the baghouse is operated with sufficient air volume to minimize or eliminate visible fugitive emissions from the rotary drum.

2.b All on spec 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	100 ppm, maximum
PCB's	50 ppm, maximum
total halogens	4000 ppm maximum
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum

2.c 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.

2.d All number 2 and on-spec used oil burned in this emission unit shall have a sulfur content equal to or less than 0.5%, by weight.

2.e All number 4 fuel oil burned in this emission unit shall have a sulfur content equal to or less than 0.8%, by weight.

2.f All number 6 fuel oil burned in this emission unit shall have a sulfur content equal to or less than 1%, by weight.

B. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within 1-8 inches of water while the emissions unit is in operation.

2. The permittee may not receive or burn any on spec used oil which does not meet the specifications listed in A.2.b of this permit without first obtaining a permit to install that authorizes the burning of such off-specification used oil. The burning of off-specification used oil

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is subject to OAC rule 3745-279-60 through 67.

- 3. The maximum annual asphalt production rate for this emissions unit shall not exceed 300,000 tons per year, based upon a rolling, 12-month summation of the asphalt production.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Tons of Hot Mix Asphalt Produced</u>
1	75,000
1-2	150,000
1-3	300,000
1-4	300,000
1-5	300,000
1-6	300,000
1-7	300,000
1-8	300,000
1-9	300,000
1-10	300,000
1-11	300,000
1-12	300,000

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 asphalt production.

- 4. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall receive a chemical analysis with each shipment of on spec 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 on spec used oil received;

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- c. the Btu value of the on spec used oil;
- d. the flash point of the on spec used oil;
- 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;; and
- 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.

- 2. 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 daily basis.
- 3. The permittee shall maintain monthly records of the following information:
 - a. the asphalt production 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;

also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative asphalt production for each calendar month; and

- c. the maximum percentage RAP used for any mix.
4. For each shipment of number 2 fuel oil, number 4 fuel oil, number 6 fuel oil and on-spec used oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittees or oil supplier's analyses for sulfur content and heat content.
5. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the enclosures for the hot aggregate elevator, vibrating screens and weigh hopper servicing this emissions unit. If visible particulate emissions are observed, the permittee shall note the following in the operation log:
 - a. the color of the visible particulate emissions;
 - b. the cause of the visible particulate emissions;
 - c. the total duration of the visible particulate emission incident; and
 - d. corrective actions taken to eliminate the visible particulate emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the visible particulate emissions requirements.

6. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any abnormal visible particulate emissions from the stack, aggregate storage bins and cold aggregate elevator/conveyor serving this emissions unit. If abnormal visible emissions are observed, the permittee shall note the following in the operation log:
 - a. the color of the abnormal visible particulate emissions;
 - b. the cause of the abnormal visible particulate emissions;
 - c. the total duration of any abnormal visible particulate emissions incident; and
 - d. any corrective actions taken to eliminate the abnormal visible particulate emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure

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compliance with the visible particulate emissions requirements.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports are due by the date described in Part I- General Terms and Condition of this permit under section (A)(2).
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month asphalt production limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative production levels. These reports are due by the date described in Part I- General Terms and Conditions of this permit under section (A)(2).
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the RAP limitation specified above. These reports are due by the date described in Part I- General Terms and Condition of this permit under section (A)(2).
4. The permittee shall submit annual reports which specify the total PM, SO₂, NO_x, VOC and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
5. The permittee shall notify the USEPA and the Ohio EPA if any of the on spec used oil exceeds the on spec used oil specifications found in OAC rule 3745-279-11. If the permittee is burning on spec 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. The required notification shall be submitted within 30 days of the date in which the exceedance occurred.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limit specified above. These reports are due by the date described in Part I- General Terms and Condition of this permit under section (A)(2).
7. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
 - a. identify all days during which any abnormal visible particulate emissions were observed from the stack, aggregate storage bins and cold aggregate elevator/conveyors serving this emissions unit;
 - b. identify all days during which any visible fugitive particulate emissions were observed from

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the enclosures for the hot aggregate elevator, vibrating screens, weigh hopper;

- c. describe any corrective actions taken to eliminate the abnormal visible particulate emissions.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).

8. The permittee shall submit a "Notice of Intent to Relocate a Portable or Mobile Source" from 30 days prior to any planned relocation of this emission unit, in accordance with OAC rule 3745-31-03(A)(6). (A copy of the form is attached to this permit). Approval of the planned relocation must be obtained from the appropriate Ohio EPA district office or local air agency prior to the relocation.

Issued: To be entered upon final issuance**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations: PE shall not exceed 0.04 gr/dscf; VOC emissions from the burning of natural gas, number 2 fuel or on-spec used oil shall not exceed 25.00 lbs/hr, VOC emissions from the burning of number 4 and 6 fuel oil shall not exceed 30.00 lbs/hr; CO emissions from the burning of natural gas, number 2, 4, 6 fuel or on-spec used oil shall not exceed 55.00 lbs/hr; SO₂ emissions from the burning of natural gas shall not exceed 1.15 lbs/hr; SO₂ emissions from the burning of number 4 and 6 fuel oil shall not exceed 10.75 lbs/hr, SO₂ emissions from burning number 2 fuel or on-spec used oil shall not exceed 30.00 lbs/hr; NO_x emissions from burning natural gas shall not exceed 6.25 lbs/hr and NO_x emissions from burning number 2, 4, 6 fuel or on-spec used oil shall not exceed 17.50 lbs/hr.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after initial startup of the emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM, VOC, CO, NO_x and SO₂.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

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

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

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

For CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

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

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity and burning natural gas, numbers 2, 4, or 6 fuel oil or on spec used oil for PM, VOC, CO, NO_x and SO₂ and employing the maximum percentage of RAP listed in the permit to verify VOC emissions, unless otherwise specified or approved by the Ohio EPA, ARAQMD.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District (ARAQMD.) The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in ARAQMD's refusal to accept the results of the emission test(s).

Personnel from ARAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to ARAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from ARAQMD.

- b. Emissions Limitation: PE emissions shall not exceed 12.35 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of PE per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- c. Emission Limitation: VOC emissions shall not exceed 18.00 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of VOC per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

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- d. Emission Limitation: CO emissions shall not exceed 33.00 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of CO per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- e. Emission Limitation: SO₂ emissions shall not exceed 18.00 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of SO₂ per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- f. Emission Limitation: NO_x emissions shall not exceed 10.50 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of NO_x per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- g. Emission Limitations: Arsenic, cadmium, chromium and lead emissions are limited by the fuel specifications in A.2.b.

Applicable Compliance Method: Compliance with the emissions limitation for arsenic, cadmium and lead shall be demonstrated by the monitoring and recordkeeping in Section C.1 of this permit.

- h. Emission Limitation: Visible particulate emissions from the stack shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, 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.

- i. Emission Limitation: No visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens and weigh hopper.

Applicable Compliance Method: Compliance with the limitations on visible emissions of fugitive dust found in Section A.1 of this permit shall be demonstrated by the monitoring and recordkeeping in Section C.5.

- j. Emission Limitation: Visible emissions of fugitive dust (from areas other than the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper) shall be less than or equal to 10% opacity, as a 3-minute average.

Applicable Compliance Method: Compliance 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.

- k. Emissions Limitation: PM-10 emissions from the stack shall not exceed 7.94 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be assumed as long as compliance is maintained with the rolling 12-month emissions limitation for particulate emissions.

- l. Emissions Limitation: Fugitive PM-10 emissions shall not exceed 2.41 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be assumed based upon the following worst case calculations:

Total fugitive emissions equal the summation of HMA loadout operations, conveying operations, and aggregate material loading operations. Fugitives emissions are calculated as follows:

HMA Loadout Operations: $(0.0003 \text{ lb of PM}_{10}/\text{ton of asphalt loaded})(300,000 \text{ tons asphalt loaded per year})(\text{ton}/2000 \text{ lbs}) = 0.05 \text{ ton of PM}_{10}/\text{year}$

Conveying Operations: $(0.0033 \text{ lb of PM}_{10}/\text{ton of aggregate material})(110,000 \text{ tons of total raw aggregates per year})(9 \text{ conveyor transfer points})(\text{ton}/2000 \text{ lbs}) = 1.63 \text{ tons of PM}_{10}/\text{year}$

Loading Operations: $(0.0033 \text{ lb of PM}_{10}/\text{ton of aggregate material})(110,000 \text{ tons of total raw aggregates per year})(4 \text{ loading transfer points})(\text{ton}/2000 \text{ lbs}) = 0.73 \text{ tons of PM}_{10}/\text{year}$

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Total fugitive PM10 emissions are therefore 2.41 tons.

Emissions factor for HMA loadout was obtained from USEPA reference document "AP-42" Chapter 11.1 (Hot Mix Asphalt Plants) Section 11.1.2.5. Using data from Tables 11.1-14 through 11.1-16, version dated (12/00).

Emissions factor for conveying and loading*operations was obtained from USEPA reference document "AP-42" Chapter 11.12 (Concrete Batching) Table 11.12-2, version dated (10/01).

*for purposes of this permit, the emission factor for conveying operations are considered the same for loading operations.

- m. Emissions Limitation: Fugitive PM emissions shall not exceed 4.98 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be assumed based upon the following worst case calculations:

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Total fugitive emissions equal the summation of HMA loadout operations, conveying operations, and aggregate material loading operations. Fugitives emissions are calculated as follows:

HMA Loadout Operations: $(0.0003 \text{ lb of PM/ton of asphalt loaded})(300,000 \text{ tons asphalt loaded per year})(\text{ton}/2000 \text{ lbs}) = 0.05 \text{ ton of PM/year}$

Conveying Operations: $(0.0069 \text{ lb of PM/ton of aggregate material})(110,000 \text{ tons of total raw aggregates per year})(9 \text{ conveyor transfer points})(\text{ton}/2000 \text{ lbs}) = 3.42 \text{ tons of PM/year}$

Loading Operations: $(0.0069 \text{ lb of PM/ton of aggregate material})(110,000 \text{ tons of total raw aggregates per year})(4 \text{ loading transfer points})(\text{ton}/2000 \text{ lbs}) = 1.52 \text{ tons of PM/year}$

Total fugitive PM emissions are therefore 4.99 tons.

Emissions factor for HMA loadout was obtained from USEPA reference document "AP-42" Chapter 11.1 (Hot Mix Asphalt Plants) Section 11.1.2.5, Using data from Tables 11.1-14 through 11.1-16, version dated (12/00).

Emissions factor for conveying and loading*operations was obtained from USEPA reference document "AP-42" Chapter 11.12 (Concrete Batching) Table 11.12-2, version dated (10/01).

*for purposes of this permit, the emission factor for conveying operations are considered the same for loading operations.

- n. Emission Limitations: Emissions of fugitive PM-10 shall not exceed 10.8 pounds per hour.

Applicable Compliance Method: Compliance with this emissions limitation shall be assumed as long as compliance is maintained with the rolling 12-month operational restriction.

Fugitive PM-10 emissions are calculated as follows:

$(250 \text{ tons of hot mix asphalt/hour} \times 0.0003 \text{ lb PM-10/ton of hot mix asphalt loadout}) + (250 \text{ tons of raw aggregate conveying/hour} \times 0.0033 \text{ lb PM-10/ton of raw aggregate conveyed} \times 9 \text{ conveyor transfer points}) + (250 \text{ tons of raw aggregate, RAP, and sand/hour} \times 0.0033 \text{ lb PM-10/ton of raw aggregate, RAP, and sand} \times 4 \text{ loading transfer points}) = 10.8 \text{ pounds per hour of PM-10.}$

- o. Emission Limitations: Emissions of fugitive PM shall not exceed 22.5 pounds per hour.

Applicable Compliance Method: Compliance with this emissions limitation shall be

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assumed as long as compliance is maintained with the rolling 12-month operational restriction.

Fugitive PM emissions are calculated as follows:

$(250 \text{ tons of hot mix asphalt/hour} \times 0.0003 \text{ lb PM/ton of hot mix asphalt loadout}) + (250 \text{ tons of raw aggregate conveying/hour} \times 0.0069 \text{ lb PM/ton of raw aggregate conveyed} \times 9 \text{ conveyor transfer points}) + (250 \text{ tons of raw aggregate, RAP, and sand/hour} \times 0.0069 \text{ lb PM/ton of raw aggregate, RAP, and sand} \times 4 \text{ conveyor transfer points}) = 22.5 \text{ pounds per hour of PM}$

F. Miscellaneous Requirements

1. The following source is subject to the applicable provision of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P901	250 tph asphalt batch plant	Subpart I

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

- i. Construction date (no later than 30 days after such date);
- ii. Actual start-up date (within 15 days after such date); and
- iii. Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC- Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Akron Regional Air Quality Management District
146 South High Street

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Suite 904

Akron, OH 44308

Emissions Unit ID: P901