



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

3/16/2016

Kevin Steward
 Westfall Aggregate and Materials, Inc.
 6790 Brooks-Miller Road
 Circleville, OH 43113

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0165010135
 Permit Number: P0117257
 Permit Type: Renewal
 County: Pickaway

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Westfall Aggregate and Materials, Inc.**

Facility ID:	0165010135
Permit Number:	P0117257
Permit Type:	Renewal
Issued:	3/16/2016
Effective:	3/16/2016
Expiration:	3/16/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Westfall Aggregate and Materials, Inc.

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Final Permit-to-Install and Operate
Westfall Aggregate and Materials, Inc.
Permit Number: P0117257
Facility ID: 0165010135
Effective Date: 3/16/2016

Authorization

Facility ID: 0165010135
Application Number(s): A0051153
Permit Number: P0117257
Permit Description: Renewal FEPTIO for an asphalt plant, overburden removal, aggregate crushing, material handling, paved and unpaved roadways, and storage piles.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/16/2016
Effective Date: 3/16/2016
Expiration Date: 3/16/2021
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Westfall Aggregate and Materials, Inc.
19522 London Road
Circleville, OH 43113

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117257

Permit Description: Renewal FEPTIO for an asphalt plant, overburden removal, aggregate crushing, material handling, paved and unpaved roadways, and storage piles.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	F002
Company Equipment ID:	F002
Superseded Permit Number:	P0104653
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	F003
Superseded Permit Number:	P0104653
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	Overburden removal
Superseded Permit Number:	P0104653
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F005
Company Equipment ID:	Hammer Mill Crusher
Superseded Permit Number:	P0104653
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F006
Company Equipment ID:	Screening/Handling
Superseded Permit Number:	P0104653
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P901
Company Equipment ID:	Gencor Asphalt Plant
Superseded Permit Number:	P0104653
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Westfall Aggregate and Materials, Inc.
Permit Number: P0117257
Facility ID: 0165010135
Effective Date: 3/16/2016

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Westfall Aggregate and Materials, Inc.
Permit Number: P0117257
Facility ID: 0165010135
Effective Date: 3/16/2016

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



Final Permit-to-Install and Operate
Westfall Aggregate and Materials, Inc.
Permit Number: P0117257
Facility ID: 0165010135
Effective Date: 3/16/2016

C. Emissions Unit Terms and Conditions

1. F002, F002

Operations, Property and/or Equipment Description:

Paved and Unpaved Roadways and Parking Areas

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.6 tons per year.</p> <p>For paved roadways and parking areas, there shall be no visible particulate emissions except for one minute during any 60-minute period.</p> <p>For unpaved roadways and parking areas, there shall be no visible particulate emission except for 3 minutes during any 60-minute period.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a. through b)(2)i. below.</p>

(2) Additional Terms and Conditions

- a. The paved roadways and parking areas are covered by this permit and subject to the above-mentioned requirements.
- b. The unpaved roadways and parking areas are covered by this permit and subject to the above-mentioned requirements.
- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- g. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
 - i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	daily
<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	daily
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or 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.
 - (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement control measures other than periodic watering; and
 - c. the dates that control measures (including periodic watering) were not implemented.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

For paved roadways and parking areas, there shall be no visible particulate emissions except for one minute during any 60-minute period.

For unpaved roadways and parking areas, there shall be no visible particulate emission except for 3 minutes during any 60-minute period.

Applicable Compliance Method:

If required, compliance with these visible emissions limitations shall be determined in accordance with U.S. EPA Method 22.

b. Emissions Limitation:

PE shall not exceed 2.6 tons per year.

Applicable Compliance Method:

The PE limitation was established by the summation of particulate emissions from the paved roadways and unpaved roadways. The particulate emissions from the paved roadways are determined by using equation 1 found in Chapter 13.2.1.3 (10/2002) of AP-42:

Paved roadways:

$$E = k(s/2)^{0.65} (W/3)^{1.5}$$

where:

E = emission factor lbs/VMT

k = particle size multiplier = 0.082

sL = silt loading on road surface = 5.2 g/m²

W = average vehicle weight (tons) = 23.4

E = 3.3219 lbs PM/VMT

Taking into account the natural mitigation of all precipitation, where p = 140,

$$E = 3.3219 \text{ lbs PM/VMT} * ((365-p)/365) = 2.05 \text{ lbs PM/VMT}$$

The maximum miles traveled per year equals 2,500 miles. Therefore, the particulate matter emissions from paved roadways are obtained by multiplying the total vehicle miles traveled per year with the derived emission factor of 2.00 lbs/VMT and dividing by 2,000 pounds per ton. The resulting uncontrolled emissions rate is then multiplied by a fugitive dust control factor of 95% (1 - 0.95), resulting in a controlled emissions rate of 0.128 ton/yr. The 95% fugitive dust control factor is based upon the RACM document and the fugitive dust control measures identified in the application.

The particulate emissions from the unpaved roadways are determined by using equation 2 found in Chapter 13.2.2.2 (09/1998) of AP-42:

Unpaved roadways:

$$E = ((365-p)/365) k(s/12)^a(W/3)^b$$

E = emission factor lbs/VMT

k = particle size multiplier = 4.9

sL = silt loading on road surface = 5.95 g/m²

W = average vehicle weight (tons) = 24.3

a,b = constants from table 13.2.2-2; a= 0.7; b= 0.45;

p = number of days with at least 0.01 inches of precipitation per year (140).

The maximum miles traveled per year equals 20,000 miles. Therefore, the particulate matter emissions from unpaved roadways are obtained by multiplying the total vehicle miles traveled per year with the derived emission factor of 4.65868 lbs/VMT and dividing by 2,000 pounds per ton. The resulting uncontrolled emissions rate is then multiplied by a fugitive dust control factor of 95% (1-0.95), resulting in a controlled emissions rate of 2.33 tons/yr. The 95%

fugitive dust control factor is based upon the RACM document and the fugitive dust control measures identified in the application.

Unpaved Parking:

$$E = ((365-p)/365) k(s/12)^a(W/3)^b$$

E = emission factor lbs/VMT

k = particle size multiplier = 4.9

sL = silt loading on road surface = 4.8 g/m²

W = average vehicle weight (tons) = 5

a,b = constants from table 13.2.2-2; a= 0.7; b= 0.45;

p = number of days with at least 0.01 inches of precipitation per year (140).

The maximum miles traveled per year equals 290 miles. Therefore, the particulate matter emissions from unpaved roadways are obtained by multiplying the total vehicle miles traveled per year with the derived emission factor of 2.05 lbs/VMT and dividing by 2,000 pounds per ton. The resulting uncontrolled emissions rate is then multiplied by a fugitive dust control factor of 95% (1-.95), resulting in a controlled emissions rate of 0.0145 ton/yr. The 95% fugitive dust



control factor is based upon the RACM document and the fugitive dust control measures identified in the application.

Unpaved loadout area:

$$E = (365-p)/365) k(s/12)^a(W/3)^b$$

E = emission factor lbs/VMT

k = particle size multiplier = 4.9

sL = silt loading on road surface = 4.8 g/m²

W = average vehicle weight (tons) = 5

a,b = constants from table 13.2.2-2; a= 0.7; b= 0.45;

p = number of days with at least 0.01 inches of precipitation per year (140).

The maximum miles traveled per year equals 850 miles. Therefore, the particulate matter emissions from unpaved roadways are obtained by multiplying the total vehicle miles traveled per year with the derived emission factor of 2.00 lbs/VMT and dividing by 2,000 pounds per ton. The resulting uncontrolled emissions rate is then multiplied by a fugitive dust control factor of 95% (1-.95), resulting in a controlled emissions rate of 0.125 ton/yr. The 95% fugitive dust control factor is based upon the RACM document and the fugitive dust control measures identified in the application.

The total PE are therefore equal to 2.6 tons per year (the sum of the particulate emissions from paved roadways, unpaved loadout, unpaved parking and unpaved roadways).

g) Miscellaneous Requirements

- (1) None.

2. F003, F003

Operations, Property and/or Equipment Description:

Aggregate, RAP, and sand storage piles

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.11 tons per year. No visible emissions from load-in and load-out of storage piles except for one minute in any hour. No visible emissions from wind erosion from storage piles except for one minute in any hour. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through b)(2)f. below.

(2) Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

Coarse Aggregates;
Recycled brick aggregates;
Fine Aggregates (sand); and
Recycled Asphalt Pavement (RAP)

- b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to minimizing the drop height of the front end loader bucket to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- d. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to minimizing the height of the storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
Coarse Aggregates	daily
Recycled brick aggregates	daily
Fine Aggregates (sand)	daily
RAP	daily

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
Coarse Aggregates	daily
Recycled brick aggregates	daily
Fine Aggregates (sand)	daily
RAP	daily

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
Coarse Aggregates	daily
Recycled brick aggregates	daily
Fine Aggregates (sand)	daily
RAP	daily

- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

- (6) The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, 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:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement any control measures besides minimizing drop height or storage pile height; and
 - c. the dates that any control measures besides minimizing drop height or storage pile height were implemented.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitations:

No visible emissions from load-in and load-out of storage piles except for one minute in any hour.

No visible emissions from wind erosion from storage piles except for one minute in any hour.

Applicable Compliance Method:

If required, compliance with these visible emissions limitations shall be determined in accordance with U.S. EPA Method 22.
 - b. Emissions Limitation:

PE emissions shall not exceed 1.11 ton per year.

Applicable Compliance Method:

The annual PE limitation was established by the summation of emissions from the load in/load out of the storage piles and the emissions from wind erosion.

Sand/aggregate load-in/load-out emissions are determined based upon the following equation as found in AP-42, Fifth edition, Section 13.2.4 (11/06).



$$E = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4} \text{ lbs/ton}$$

where:

E = emission factor for aggregate unloading

k = particle size multiplier = 0.74 for PE

U = mean wind speed (mph) = 8.1

M = material moisture content = 8% for all materials

$$E = 0.74(0.0032)(8.1/5)^{1.3}/(8/2)^{1.4} \text{ lbs/ton} = 0.000063623 \text{ lb PE/ton}$$

The total emissions from the load-in/loadout of the storage piles is determined by use of the above emission factor and the annual total process weight rate of 680,000 tons.

Therefore, the total annual emissions from the load in/loadout activities equals 0.216 ton.

Based upon the following equation, which follows from Section 13.2.4.3 of AP-42, the emissions due to wind erosion are calculated as follows:

$$E = 1.7(s/1.5)((365-p)/235)(f/15)(365)(A/2000)$$

where:

E = the emission factor in lbs/day/acre

s = the silt content of the stored materials

p = the number of days w more than 0.1 inch of precipitation

f = the percentage of time the wind speed exceeds 12 mph

A = the totals surface area of the specific storage pile

For each storage pile type, s = 7 (fine aggregate), 10 (RAP), 2 (course aggregate), 2 (recycled brick aggregates), P equals 140 and f equals 9.9. Based upon the surface area of each storage pile type, the contribution to the total particulate emissions from each storage pile type is as follows:

<u>Storage Pile</u>	<u>Acres</u>	<u>Annual Emissions in Tons</u>
Fine Aggregate (sand)	0.5	0.46
RAP	0.15	0.196
Coarse aggregates	0.45	0.1176
recycled brick aggregates	0.45	0.1176

The total emissions from wind erosion are therefore 0.89 ton per year. Summation of the emissions due to load in/load out and wind erosion results in a total annual particulate emission rate of 1.11 tons.

g) Miscellaneous Requirements

- (1) None.

3. F004, Overburden removal

Operations, Property and/or Equipment Description:

Overburden Removal

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 1.37 tons per year. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>No visible emission except for three minutes in any hour. No person shall cause or permit any fugitive dust source to be operated; or any materials to be handled, transported, or stored; or a building or its appurtenances or a road to be used, constructed, altered, repaired, or demolished without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. See b)(2)a. through b)(2)e. below.</p>

(2) Additional Terms and Conditions

- a. The above annual particulate emission limitations were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- b. The mineral extraction operations covered by this permit and subject to the above-mentioned requirements are listed below:

Overburden removal;
Loading; and
Reclamation

- c. The permittee shall employ best available control measures for the above-identified mineral extraction operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall commit to perform the following control measure(s) to ensure compliance:

<u>mineral extraction operation(s)</u>	<u>control measure(s)</u>
Overburden removal	Precautionary operating practices
Loading	Prevent haul vehicle overloading
Reclamation	Practice as expeditiously as possible

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. For each mineral extraction 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 mineral extraction operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- e. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit are appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, for mineral extraction operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>mineral extraction operation(s)</u>	<u>minimum inspection frequency</u>
Overburden removal and loading employed.	Each day mineral extraction operations are

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (3) The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspection would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation:
No visible emission except for three minutes in any hour.
Applicable Compliance Method:
If required, compliance with this visible emissions limitation shall be determined in accordance with U.S. EPA Method 22.
- b. Emissions Limitation:
Particulate emissions shall not exceed 1.37 tons per year from overburden removal processes.



Final Permit-to-Install and Operate
Westfall Aggregate and Materials, Inc.
Permit Number: P0117257
Facility ID: 0165010135
Effective Date: 3/16/2016

Applicable Compliance Method:

The annual PE limitation was established by multiplying the proposed maximum annual overburden removal AP-42 table 11.9-4 (7/98) 0.07 lb PE/ton removed and replaced [0.058 topsoil removal + 0.012 overburden replacement] * 39,000 TPY displaced and dividing by 2,000 pounds per ton = 1.37 tons per year particulate emissions.

g) Miscellaneous Requirements

- (1) None.

4. F005, Hammer Mill Crusher

Operations, Property and/or Equipment Description:

140 ton per hour Hammermill Crusher

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.7 pound per hour (lb/hr) and 3.33 tons per year.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>There shall be no visible PE from the crusher, except for a period of time not to exceed 6-minutes during any 60-minute observation period.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart OOO.</p> <p>See b)(2)a. through and b)(2)e. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	40 CFR Part 60, Subpart OOO	Visible emissions of fugitive dust shall not exceed 15% opacity except as provided by rule.
c.	40 CFR Part 60, Subpart A	See b)(2)f. below.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures for the above-identified material handling operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure to ensure compliance:

<u>material processing operation</u>	<u>control measure</u>
crusher	water spray

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. For each material handling operation that is not adequately enclosed, the above-identified control measure 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 is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during the operation of the material handling operation until further observation confirms that use of the control measure is unnecessary.
- c. Implementation of the above-mentioned control measure in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- d. Water shall be applied at points necessary to ensure compliance with the visible emission limitations specified above for crushing.
- e. The permittee shall operate the control device (water spray) whenever this emission unit is in operation.
- f. The permittee shall demonstrate compliance with the applicable provisions of 40 CFR Part 60, Subpart OOO in accordance with 40 CFR Part 60, Subpart A.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks when crushing equipment is in operation and when weather conditions allow, for any visible particulate emissions from the crushing operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operation log:
 - a. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal conditions, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident, and
 - d. any corrective action taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

Particulate emissions shall not exceed 0.76 lb/hr.

Applicable compliance method:

The hourly PE limitation was established by multiplying an emission factor of 0.0054 pounds particulate emissions per ton of aggregate processed by the emission unit's maximum hourly throughput (140 tons). This emission factor is specified in USEPA reference document AP-42, fifth Edition Compilation of Air Pollution Emission Factors Section 11.19.2 table 11.19.2-2 (8/04).

 $0.0054 * 140 \text{ tons/hr} = 0.76 \text{ lb/hr.}$
 - b. Emissions Limitation:

Particulate emissions shall not exceed 3.33 tons per year.

Applicable compliance method:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum number of hours in a year (8,760) and then dividing by 2,000 pounds per ton.

$$(0.76 \text{ lb of PE/hour} * 8,760 \text{ hours}) / (2,000 \text{ lbs / ton}) = 3.33 \text{ tons per year of PE.}$$

c. Emissions Limitation:

There shall be no visible PE from the crusher, except for a period of time not to exceed 6-minutes during any 60-minute observation period.

Applicable compliance method:

If required, compliance with this visible emissions limitation shall be determined in accordance with U.S. EPA Method 22.

d. Emissions Limitation:

Visible emissions of fugitive dust shall not exceed 15% opacity.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with the performance testing requirements established in f)(2) below.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the visible emissions limitations established pursuant to 40 CFR Part 60, Subpart OOO.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Method 9

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the

tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information 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.
- g. 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 the appropriate Ohio EPA District Office or local air agency 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 the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.



5. F006, Screening/Handling

Operations, Property and/or Equipment Description:

Material Handling for Aggregate Operations

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.53 pounds per hour (lb/hr) and 11.1 tons per year. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart OOO. See b)(2)a, through b)(2)e. below.
b.	40 CFR Part 60, Subpart OOO	Visible emissions from screening operations, bucket elevators, transfer points on belt conveyors, storage bins, and enclosed truck loading stations shall not exceed 10% opacity.
c.	40 CFR Part 60, Subpart A	See b)(2)f. below.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
load in, load out, and conveying	daily

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or 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.
- (4) The permittee shall maintain records of the following information:
- the date and reason any required inspection was not performed;
 - the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s) other than inherent moisture of the material; and
 - the dates the control measure(s) other than inherent moisture of the material was (were) implemented.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Particulate emissions shall not exceed 2.53 lb/hr. and 11.1 tons per year.

Applicable Compliance Method:

The hourly PE limitation was established by summing the calculated hourly emission rate for each conveying, handling/screening, or loading operation, emission factors specified in USEPA reference document AP-42, 11.19.2-2



(1/95), and using the maximum hourly production rate (200 tons/hr) and the following calculations:

Front end loader load in = $0.001 \text{ lb PE/ton} * 200 \text{ ton/hr} = 0.2 \text{ lb PE/hr}$

Conveyor transfer points = $0.000048 \text{ lb PM}_{10}/\text{ton} * 2.1 \text{ lb TSP/lb PM}_{10} * 200 \text{ ton/hr} * 56 \text{ transfer points} = 1.129 \text{ lb PE/hr}$

Screening = $0.002 \text{ lb PE/ton} * 200 \text{ ton/hr} * 3 \text{ screens} = 1.2 \text{ lb PE/hr}$

Total hourly PE = $0.2 + 1.129 + 1.2 = 2.53 \text{ lb PE/hr}$

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum number of hours in a year (8,760) and then dividing by 2,000 pounds per ton.

$(2.53 \text{ lb of PE/hour} * 8,760 \text{ hours}) / (2,000 \text{ lbs / ton}) = 11.1 \text{ tons per year of PE.}$

b. Emissions Limitation:

Visible emissions from screening operations, bucket elevators, transfer points on belt conveyors, storage bins, and enclosed truck loading stations shall not exceed 10% opacity.

Applicable compliance method:

Compliance with the visible emissions limitation shall be determined in accordance with the performance testing requirements established in f)(2) below.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the visible emissions limitations established pursuant to 40 CFR Part 60, Subpart OOO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Method 9

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information 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.
- g. 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 the appropriate Ohio EPA District Office or local air agency 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 the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.



6. P901, Gencor Asphalt Plant

Operations, Property and/or Equipment Description:

300 TPH counter-flow drum mix asphalt plant (propane) controlled by a knockout box and baghouse

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. See b)(1)f. and d)(9) below.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. See b)(1)b, c)(1), c)(2), d)(4), e)(2), and f)(1)d. through f)(1)f. below.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the stack shall not exceed 0.03 gr/dscf. Emissions of particulate matter less than 10 micrometers in aerodynamic diameter (PM ₁₀) from the stack shall not exceed 0.03 gr/dscf. Carbon monoxide (CO) emissions shall not exceed 51.0 lb/hr. Volatile Organic Compound (VOC) emissions shall not exceed 19.2 lb/hr. Sulfur Dioxide (SO ₂) emissions shall not exceed 1.02 lb/hr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Nitrogen Oxide (NO_x) emissions shall not exceed 9.6 lb/hr.</p> <p>Fugitive particulate emissions shall not exceed 3.1 pounds per hour.</p> <p>Emissions of fugitive PM₁₀ shall not exceed 1.53 pounds per hour.</p> <p>Visible particulate emissions from the stack shall not exceed 10% opacity, as a 3-minute average.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust</p> <p>There shall be no visible emissions of fugitive dust from the enclosures for the rotary drum and the hot mix asphalt elevator.</p> <p>Visible emissions of fugitive dust (from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator) shall be less than or equal to 10% opacity, as a 3-minute average.</p> <p>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.</p> <p>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.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 60, Subpart I.</p> <p>See b)(2)a. below.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V]	<p>PE from the stack shall not exceed 1.54 tons per rolling, 12-month period.</p> <p>PM₁₀ emissions from the stack shall not exceed 1.54 tons per rolling, 12-month period.</p> <p>CO emissions from the stack shall not exceed 15.3 tons per rolling, 12-month period.</p> <p>VOC emissions from the stack shall not exceed 5.76 tons per rolling, 12-month period.</p> <p>SO₂ emissions shall not exceed 0.31 ton per rolling, 12-month period.</p> <p>NO_x emissions shall not exceed 2.88 tons per rolling, 12-month period.</p> <p>Fugitive CO emissions shall not exceed 0.23 tons per rolling 12-month period.</p> <p>Fugitive VOC emissions shall not exceed 1.43 tons per rolling 12-month period.</p> <p>Fugitive PE shall not exceed 0.98 ton per rolling, 12-month period.</p> <p>Fugitive PM₁₀ emissions shall not exceed 0.57 ton per rolling, 12-month period.</p> <p>See c)(1), c)(2), d)(4), e)(2), and f)(1)d. through f)(1)f. below.</p>
c.	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)	The emissions limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart I	<p>The grain loading and visible emissions limitations established by this rule are less stringent than the grain loading and visible emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)b. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 60, Subpart A	See b)(2)c. below.
f.	Air Toxics OAC rule 3745-114 ORC 3704.03(F)	See d)(9) below.

(2) Additional Terms and Conditions

- a. The permittee shall ensure that the baghouse is operated with sufficient air volume to eliminate visible fugitive emissions from the rotary drum.
- b. This emissions unit is determined to be subject to the provisions of 40 CFR Part 60, Subpart I *Standards of Performance for Hot Mix Asphalt Facilities*. As identified above, the applicable outlet grain loading limitation (0.04 gr/dscf) and visible emissions limitation (20% opacity) identified in Subpart I are less stringent than the outlet grain loading limitation and visible emissions limitation established pursuant to OAC rule 3745-31-05(A)(3); however, the assignment of the more stringent outlet grain loading limitation does not relieve the permittee of the requirement to demonstrate compliance with the provisions of Subpart I (including the applicable monitoring, recordkeeping, reporting, and compliance demonstration requirements).
- c. The permittee shall demonstrate compliance with the applicable provisions of 40 CFR Part 60, Subpart I in accordance with 40 CFR Part 60, Subpart A.

c) Operational Restrictions

- (1) The maximum annual asphalt production rate for this emissions unit shall not exceed 180,000 tons per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of asphalt production and the associated emissions upon issuance of this permit.
- (2) The permittee shall burn only propane in this emissions unit.
- (3) The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.
- (4) The exit of the stack serving this emissions unit shall be a minimum of 36 feet above ground.
- (5) The permittee shall restrict the hourly production level (averaged daily) for this emissions unit to 115% or less of the average hourly production level achieved during the most recent stack test that demonstrated compliance with the applicable emissions limitations. [During the most recent stack tests that demonstrated compliance with the applicable emissions limitations, the average hourly production level achieved was 140 tons per hour (July 30 and 31, 2015).]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than propane, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (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 pressure drop across the fabric filter shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.
- (4) The permittee shall maintain monthly records of the following information
 - a. the asphalt production, in tons;
 - b. the asphalt production, in tons, for each fuel type;
 - c. the rolling, 12-month summation of the asphalt production, in tons;
 - d. the rolling, 12-month summations of PE (stack), PM₁₀ (stack), CO, VOC, SO₂, and NO_x emissions, in tons; and
 - e. the maximum percentage of RAP used for each mix.
- (5) The permittee shall maintain daily records of the following information:
 - a. the amount, in tons, of hot-mix asphalt produced;
 - b. the operating hours of the hot mix asphalt plant; and
 - c. the average operating rate, in tons per hour
- (6) 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 rotary drum and the hot mix asphalt elevator. 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 Ohio EPA, Central District Office, 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.

- (7) 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 or from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator 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 Ohio EPA, Central District Office 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.

- (8) While performing each burner tuning, the permittee shall record the results of the burner tuning using the *Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants* form [as found in g)(1)]. An alternative form may be used upon approval of the Ohio EPA, Central District Office.
- (9) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

In addition to the reporting the information as required by the PER instructions, the permittee shall provide the following additional information in the PER:

- a. all periods of time when the pressure drop across the fabric filter was outside of the acceptable range;
 - b. all exceedances of the RAP raw material mix limitations;
 - c. all *Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants* forms produced during the past calendar year;
 - d. all days during which any abnormal visible particulate emissions were observed from the stack or from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator serving this emissions unit;
 - e. all days during which any visible fugitive particulate emissions were observed from the enclosures for the rotary drum and the hot mix asphalt elevator; and
 - f. any corrective actions taken to minimize or eliminate the visible particulate emissions identified in e)(1)d. through e)(1)e.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month asphalt production limitation;
 - ii. all exceedances of the rolling, 12-month total PE, PM₁₀, CO, VOC, SO₂, and NO_x, emission limitations; and
 - iii. all periods of time when the emissions unit burned a fuel other than propane.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviations (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (Ohio EPA, Central District Office).

- (3) The permittee shall notify Ohio EPA, Central District Office, of any record demonstrating that the hot mix asphalt plant's hourly production level (averaged daily) exceeded 115% of the average hourly production level achieved during the most recent stack test that demonstrated compliance with the applicable emissions limitations. The notification shall be made within three business days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

PE shall not exceed 0.03 gr/dscf;
PM₁₀ emissions shall not exceed 0.03 gr/dscf;
CO emissions shall not exceed 51.0 lbs/hr; and
NO_x emissions shall not exceed 9.6 lbs/hr

Applicable Compliance Method:

Compliance with the hourly emissions limitations shall be demonstrated in accordance with f)(2).

b. Emissions Limitation:

VOC emissions shall not exceed 19.2 lbs/hr.

Applicable Compliance Method:

Compliance with the VOC emissions limitation was demonstrated through emission tests performed on July 30 and 31, 2015.

If required, compliance with the VOC limitations shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 18 and/or 25.

c. Emissions Limitation:

SO₂ emissions shall not exceed 1.02lbs/hr.

Applicable Compliance Method:

Compliance with the SO₂ emissions limitation was demonstrated through emission tests performed on July 30 and 31, 2015.

If required, compliance with the SO₂ limitations shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

d. Emissions Limitations:

PE from the stack shall not exceed 1.54 tons per rolling, 12-month period;
PM₁₀ emissions from the stack shall not exceed 1.54 tons per rolling, 12-month period;
CO emissions from the stack shall not exceed 15.3 tons per rolling, 12-month period;
VOC emissions from the stack shall not exceed 5.76 tons per rolling, 12-month period;
SO₂ emissions from the stack shall not exceed 0.31 tons per rolling, 12-month period; and
NO_x emissions from the stack shall not exceed 2.88 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be based upon the results of the most recent emissions testing and the recordkeeping required by d)(3).

e. Emissions Limitation:

Fugitive CO emissions shall not exceed 0.23 tons per rolling 12-month period.

Applicable Compliance Method:

The rolling, 12-month fugitive CO emissions limitation was established to reflect the emission unit's potential to emit taking into consideration the maximum annual asphalt production limitation established by c)(1) above. The rolling, 12-month fugitive CO emissions limitation was established by a sum of the following calculations:

- i. for the emissions from asphalt loadout, 0.12 ton per rolling 12-month period derived from 180,000 tons of asphalt produced per rolling 12-month period multiplied by 0.00135 lb of CO per ton of asphalt produced divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004); and
- ii. for the emissions from asphalt silo filling, 0.11 tons per rolling 12-month period derived from 180,000 tons of asphalt produced per rolling 12-month period multiplied by 0.00118 lb of CO per ton of asphalt produced divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004).

f. Emissions Limitation:

Fugitive VOC emissions shall not exceed 1.43 tons per rolling 12-month period.

Applicable Compliance Method:

The rolling, 12-month fugitive VOC emissions limitation was established to reflect the emission unit's potential to emit taking into consideration the maximum

annual asphalt production limitation established by c)(1) above. The rolling, 12-month fugitive VOC emissions limitation was established by a sum of the following calculations:

- i. for the emissions from asphalt loadout, 0.35 tons per rolling 12-month period derived from 180,000 tons of asphalt produced per rolling 12-month period multiplied by 0.00386 lb of VOC per ton of asphalt produced divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004); and
- ii. for the emissions from asphalt silo filling, 1.08 tons per rolling 12-month period derived from 180,000 tons of asphalt produced per rolling 12-month period multiplied by 0.0120 lb of VOC per ton asphalt produced divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004).

g. Emissions Limitation:

Fugitive PE emissions shall not exceed 0.98 tons per rolling 12-month period.

Applicable Compliance Method:

The rolling, 12-month fugitive PE limitation was established to reflect the emission unit's potential to emit taking into consideration the maximum annual asphalt production limitation established by c)(1) above. The rolling, 12-month fugitive PE limitation was established by a sum of the following calculations:

Total fugitive emissions equal the summation of the fugitives from the cold end and the hot end of the plant operations.

Fugitive particulate emissions from the cold end are calculated as follows:

- i. for the emissions from raw material loaded in the weigh hopper, 0.43 tons of PE per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by the emission factor of 0.0048 lb of PE per ton of raw material divided by 2,000 pounds per ton (AP-42, Table 11.12-2 dated 06/2006);
- ii. for the emissions from aggregate handling, 0.37 tons of PE per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by 0.60 ton of aggregate used per ton of raw material multiplied by the emission factor of 0.0069 lb of PE per ton of aggregate throughput divided by 2,000 pounds per ton (AP-42, Table 11.12-2 dated 06/2006);
- iii. for the emissions from sand handling, 0.08 tons of PE per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by 0.40 ton of sand used per ton of raw material multiplied the emission factor of 0.0021 lb of PE per ton of sand throughput divided by 2,000 pounds per ton (AP-42, Table, 11.12-2 dated 06/2006);

Fugitive particulate emissions from the hot end are calculated as follows:

- iv. for the emissions from silo filling, 0.05 ton of PE per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by the emission factor of 0.000586 lb of PE per ton of asphalt produced for silo filling divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004); and
- v. for the emissions from asphalt loadout, 0.05 ton of PE per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by the emission factor of 0.000522 lb of PE per ton of asphalt produced for loadout divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004).

h. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.57 tons per rolling 12-month period.

Applicable Compliance Method:

The rolling, 12-month fugitive PM₁₀ limitation was established to reflect the emission unit's potential to emit taking into consideration the maximum annual asphalt production limitation established by c)(1) above. The rolling, 12-month fugitive PM₁₀ limitation was established by a sum of the following calculations:

Total fugitive emissions equal the summation of the fugitives from the cold end and the hot end of the plant operations.

Fugitive PM₁₀ emissions from the cold end are calculated as follows:

- i. for the emissions from raw material loaded in the weigh hopper, 0.25 tons of PM₁₀ per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by the emission factor of 0.0028 lb of PM₁₀ per ton of raw material divided by 2,000 pounds per ton (AP-42, Table 11.12-2 dated 06/2006);
- ii. for the emissions from aggregate handling, 0.18 tons of PM₁₀ per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by 0.60 ton of aggregate used per ton of raw material multiplied by the emission factor of 0.0033 lb of PM₁₀ per ton of aggregate throughput divided by 2,000 pounds per ton (AP-42, Table 11.12-2 dated 06/2006);
- iii. for the emissions from sand handling, 0.04 tons of PM₁₀ per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by 0.40 ton of sand used per ton of raw material multiplied the emission factor of 0.00099 lb of PM₁₀ per ton of sand throughput divided by 2,000 pounds per ton (AP-42, Table, 11.12-2 dated 06/2006);

Fugitive PM₁₀ emissions from the hot end are calculated as follows:

- iv. for the emissions from silo filling, 0.05 ton of PM₁₀ per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by the emission factor of 0.000586 lb of PM₁₀ per ton of asphalt produced for silo filling divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004); and
- v. for the emissions from asphalt loadout, 0.05 ton of PM₁₀ per rolling 12-month period derived from 180,000 tons of asphalt produced multiplied by the emission factor of 0.000522 lb of PM₁₀ per ton of asphalt produced for loadout divided by 2,000 pounds per ton (AP-42, Table 11.1-14 dated 03/2004).

i. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 10% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

j. Emissions Limitation:

There shall be no visible emissions of fugitive dust from the enclosures for the rotary drum and the hot mix asphalt elevator.

Applicable Compliance Method:

If required, compliance with this fugitive visible emissions limitation shall be determined in accordance with U.S. EPA Method 22.

k. Emissions Limitation:

Visible emissions of fugitive dust (from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator) shall be less than or equal to 10 per cent opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with this fugitive visible emissions limitation shall be determined in accordance with U.S. EPA Method 22.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, PM₁₀, CO, and NO_x;

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

PE, Methods 1-5 of 40 CFR Part 60, Appendix A

PM₁₀ (use PE as a surrogate for PM₁₀), Methods 1-5 of 40 CFR Part 60, Appendix A

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

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

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

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity for PE/PM₁₀, CO, and NO_x emissions unless otherwise specified or approved by the Ohio EPA, Central District Office.

- c. Additionally and in accordance with the NOV issued on October 18, 2015, and subsequent compliance plan submitted by the permittee, emissions testing for PE/PM₁₀ emissions shall be conducted within 60 days of beginning the 2016 production season;

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

PE, Methods 1-5 of 40 CFR Part 60, Appendix A

PM₁₀ (use PE as a surrogate for PM₁₀), Methods 1-5 of 40 CFR Part 60, Appendix A

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

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity for PE/PM₁₀ emissions, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 the Ohio EPA, Central District Office 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 the Ohio EPA, Central District Office.

(3) Burner Evaluation/Tuning

a. Introduction

The permittee is required to conduct periodic evaluation/tuning of the asphalt plant burner as set forth below. The purpose of this evaluation/tuning is to ensure that the burner is adjusted and maintained in order to make the burner as fuel efficient as possible.

b. Qualifications for Burner Evaluation/Tuning

Technicians who conduct the burner evaluation/tuning must be qualified to perform the expected burner evaluation/tuning tasks. In order to be qualified, the technician must have passed manufacturer's training concerning burner evaluation/tuning, or must have been trained by someone who has completed the manufacturer's training concerning burner evaluation/tuning. Burner evaluation/tuning technicians can be either permittee employees or outside parties.

c. Portable Monitor Requirements

Portable monitors used for burner evaluation/tuning shall be properly operated and maintained to monitor the concentration of NO_x, O₂ and CO in the stack exhaust gases from this emissions unit. The monitor(s) shall be capable of measuring the expected concentrations of the measured gases. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The owner or operator of the portable monitor shall maintain records of each portable monitoring device's calibration.

d. Burner Evaluation/Tuning Procedure

An alternative form may be used as long as it contains the same data elements as the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants form.

The burner shall be evaluated and, if necessary, tuned based on the frequency described in f)(3)e.

The general procedure for evaluating and, if necessary, tuning the burner involves the following steps:

- i. Review the plant operations to ensure the plant is operating normally based on weather conditions and production.
- ii. Confirm that the portable monitor is calibrated per the manufacturer's specifications.
- iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for NO_x, O₂, and CO. These measurements shall be taken at a location representative of stack emissions. Record the values in the "Pre-Tuning" results column on the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants form [as found in g)]. An alternative form may be used as long as it contains the same data elements as the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants form.
- iv. Make any necessary adjustments and repairs to the burner in order to make the burner as fuel efficient as possible.
- v. If adjustments or repairs are made to the burner, then the technician shall re-measure the stack exhaust gas values for NO_x, O₂, and CO. This procedure shall be repeated until the technician is satisfied that the burner has been appropriately tuned. Once he/she is satisfied, then the technician shall record the post tune NO_x, O₂, and CO values in the "Post Tuning" results column on the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants (or equivalent) form.

Note that the Ohio EPA reserves the right to require permittees to conduct additional emissions tests to verify compliance. Operators who choose not to keep their burners in tune are more likely to be required by Ohio EPA to conduct additional emissions tests to verify compliance. Therefore, it is recommended that permittees make necessary adjustments and repairs to burners as soon as possible and verify that the burner is operating as designed.

- vi. Submit a copy of all Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants forms produced during the past calendar year to the Ohio EPA Central District Office with the PER. Note: These forms are required to be submitted even if the burner is not actually adjusted.

e. Burner Evaluation/Tuning Frequency

The permittee shall conduct the burner evaluation/tuning procedure within 30 production days after commencement of the production season in the State of Ohio. The permittee shall conduct another burner evaluation/tuning procedure



Final Permit-to-Install and Operate
Westfall Aggregate and Materials, Inc.
Permit Number: P0117257
Facility ID: 0165010135
Effective Date: 3/16/2016

within 15 production days before or after June 1st of each year and within 15 production days before or after September 1st of each year. For purposes of this permit, the production season is defined as the time period between the date the first ton of asphalt is produced and the date that the last ton of asphalt is produced during the same calendar year. A burner evaluation/tuning is not required if the production season ends prior to the associated evaluation/tuning due date. If the initial season evaluation/tuning is done within 30 days prior to June 1 or September 1, the evaluation/tuning associated with that due date is not required.

- g) Miscellaneous Requirements
 - (1) Burner Evaluation/Tuning Form (See next page)

BURNER EVALUATION/TUNING REPORTING FORM FOR ASPHALT CONCRETE PLANTS

Facility ID:	Evaluation/Tuning Date:
Legal Name:	Other Company Name (if different than legal name):
Mailing Address:	Other Company Site Address: (if different than mailing address):
City, State, Zip Code:	Other Company City, County, Zip Code:
Site Contact Person:	Site Contact Telephone Number:
Site Contact Title:	Site Contact Fax Number:
Name of company performing evaluation/tuning:	Name of company performing emission monitoring:
Type of plant (ie: batch, drum mix, etc.):	Calibration date for analyzers:

Reason for Evaluation/Tuning: Season Initial Tuning June Tuning September Tuning
 Fuel Switch Other (describe)

Fuel employed during evaluation/tuning: Natural Gas Propane # 2 Fuel Oil # 4 Fuel Oil
 Used Oil Other (describe)

Evaluation/Tuning Results:

Parameter	Results	
	Pre Tuning	Post Tuning ²
Fuel flow to the burner (gallon/hr) (for fuel oil and on-spec used oil)		
Fuel pressure (psi)		
For burners that require compressed air for proper operation, pressure at the burner (psi)		
Carbon Monoxide (CO) concentrations (ppm) ¹		
NOx concentrations (ppm) ²		
Oxygen concentrations (per cent) ²		
Asphalt Production (tons/hr)		

¹ Specify whether on a dry or wet basis.

² If the burner did not require adjusting, please record N/A in the post tuning column.

Describe in detail a list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturer's specifications. Use additional paper if necessary.

Authorized Signature: This signature shall constitute personal affirmation that all statements or assertions of fact made in this form are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

Name of Official (Printed or Typed):	Title of Official and Phone Number:
Signature of Official:	Date:
