



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PORTAGE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02103

DATE: 7/17/2001

Allied Corporation Plant 72
Larry Shively
PO Box 266 8775 Blackbird Lane
Thornville, OH 43076

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 7/17/2001
Effective Date: 7/17/2001**

FINAL PERMIT TO INSTALL 16-02103

Application Number: 16-02103
APS Premise Number: 1667080013
Permit Fee: **\$1000**
Name of Facility: Allied Corporation Plant 72
Person to Contact: Larry Shively
Address: PO Box 266 8775 Blackbird Lane
Thornville, OH 43076

Location of proposed air contaminant source(s) [emissions unit(s)]:
**8505 SR 14
Streetsboro, Ohio**

Description of proposed emissions unit(s):
Modification to Burn Used Oil, No Previous PTI.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Allied Corporation Plant 72
PTI Application: 16-02103
Issued: 7/17/2001

Facility ID: 1667080013

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
TOC	9.2
PM	8.0
SO ₂	48.0
NO _x	34.0
CO	68.0

Applicable Emissions
Limitations/Control Measures

Visible particulate emissions from any stack associated with P901 shall not exceed 10% percent opacity, as a six-minute average.

Visible particulate emissions from any fugitive dust emissions point associated with P901 shall not exceed 20% percent opacity, as a three-minute average.

The following stack mass emission limits shall apply:
14.0 pounds PM/hour;
119 pounds CO/hour;
59.5 pounds NO_x/hour;
84.0 pounds SO₂/hour; and
16.1 pounds TOC/hour.

The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the cold feed bins and recycled material (RAP) bin.

The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize or eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.

The requirements of OAC rule 3745-31-05(A)(3) also include

compliance with the requirements of 40 CFR Part 60 Subpart I and OAC rule 3745-31-05(D).

The following stack mass emission limits shall apply:
8.0 TPY PM*;
68.0 TPY CO*;
34.0 TPY NO_x*;
48.0 TPY SO₂*; and
9.2 TPY TOC*.

The TPY emissions limits are based upon the annual asphalt production restriction of Part II, section B.2.

0.04 grain PM/dscf

The visible particulate emissions limitation required by 40 CFR Part 60, Subpart I is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

*based upon rolling, 12-month summation of the monthly emissions

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, production limitations, and use of a fabric filter.
- 2.b** All used oil burned in P901 shall meet the following specifications:

Contaminant/Property Allowable Specifications

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

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

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

- 2.c** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.d** The burning of hazardous waste is prohibited.

B. Operational Restrictions

1. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, the pressure drop across the baghouse

Emissions Unit ID: **P901**

shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.

2. The maximum annual asphalt production rate for P901 shall not exceed 400,000 tons per year based upon a rolling, 12-month summation of the production rates. To ensure enforceability during the first 12 calendar months of operation following the startup of the modified emissions unit, the permittee shall not exceed the production levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production (Tons)</u>
1	33,333
1-2	66,666
1-3	99,999
1-4	133,333
1-5	166,666
1-6	200,000
1-7	233,333
1-8	266,666
1-9	300,000
1-10	333,333
1-11	366,666
1-12	400,000

After the first 12 calendar months of operation following the startup of the modified emissions unit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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 baghouse on a once per shift basis.
2. The permittee shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
 - a. The date of shipment or delivery.
 - b. The quantity of used oil received.
 - c. The Btu value of the used oil, in BTU/gallon.
 - d. The flash point of the used oil in degrees F.
 - e. The arsenic content, in ppm.
 - f. The cadmium content, in ppm.
 - g. The chromium content, in ppm.

- h. The lead content, in ppm.
- i. The PCB content, in ppm.
- j. The total halogen content, in ppm.
- k. The mercury content, in ppm.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by this facility, of any used oil stored at this facility, or of any used oil sampled at the dryer.

- 3. The permittee shall maintain monthly records of the following information for P901:
 - a. The monthly asphalt production, in tons.
 - b. For the first 12 calendar months following the startup of the modified emissions unit, the cumulative asphalt production calculated by adding the current month's asphalt production to the asphalt production for each calendar month since the startup of the modified emissions unit.
 - c. Beginning after the first 12 calendar months following the startup of the modified emissions unit, the rolling, 12-month summation of asphalt production calculated by adding the current month's asphalt production to the asphalt production for the preceding eleven calendar months.

D. Reporting Requirements

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

A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Term B.1.

Emissions Unit ID: **P901**

3. The permittee shall notify USEPA and Ohio EPA if any of the used oil exceeds the used oil specifications found in OAC rule 3745-279-11 within 5 days of occurrence. If the permittee is burning used oil which exceeds the specifications found in OAC rule 3745-279-11, the permittee is subject to that rule and must comply with all provisions of that rule and all applicable regulations pertaining to the burning of waste oil .
4. The permittee shall submit annual reports which specify the asphalt production rate (in tons), and the PM, NO_x, SO₂, OC and CO emissions for P901 for the previous calendar year. For the first 12 calendar months following the startup of the modified emissions unit, these reports shall include the cumulative asphalt production rate for each calendar month in the reporting period. Beginning after the first 12 calendar months following the startup of the modified emissions unit, these reports shall include the rolling, 12-month summation of asphalt production rate for each calendar month in the reporting period. These reports shall be submitted by January 31 of each year.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
6. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

and

Akron Regional Air Quality Management District (ARAQMD)
146 S High Street -- Room 904
Akron, OH 44308

E. Testing Requirements

1. The hourly and yearly mass emission limitations of these special terms and conditions were established, using the specified emission factors for PM, CO, NO_x, TOC, and SO₂ from Compilation of Air Pollution Emission Factors (AP-42), Tables 11.1-2 and 11.1-7, Fifth Edition, and the general emission relationship: (emission rate) = (emission factor)(production rate), as follows:

- a. hourly stack mass emission limits:

14.0 pounds PM/hour = (0.040 pound PM/ton asphalt)(350 tons asphalt/hour);
119 pounds CO/hour = (0.34 pound CO/ton asphalt)(350 tons asphalt/hour);
59.5 pounds NO_x/hour = (0.17 pound NO_x/ton asphalt)(350 tons asphalt/hour);
84.0 pounds SO₂/hour = (0.24 pound SO₂/ton asphalt)(350 tons asphalt/hour); and
16.1 pounds TOC/hour = (0.046 pound TOC/ton asphalt)(350 tons asphalt/hour).

The above hourly stack mass emission limitations are based upon the maximum hourly production rate capacity. Therefore, no compliance Record keeping or reporting requirements are necessary with these emission limits.

- b. yearly stack mass emission limits:

8.0 tons PM/year = (0.040 pound PM/ton asphalt)(400,000 tons asphalt/year)(0.0005);
68.0 tons CO/year = (0.34 pound CO/ton asphalt)(400,000 tons asphalt/year)(0.0005);
34.0 tons NO_x/year = (0.17 pound NO_x/ton asphalt)(400,000 tons asphalt/year)(0.0005);
48.0 tons SO₂/year = (0.24 pound SO₂/ton asphalt)(400,000 tons asphalt/year)(0.0005);
and
9.2 tons TOC/year = (0.046 pound TOC/ton asphalt)(400,000 tons asphalt/year)(0.0005).

Compliance demonstration of the above yearly stack mass emission limitations shall be based upon the Record keeping requirements of Part II, section C.3 of these special terms and conditions.

2. Compliance demonstration of the 0.04 grain PM/dscf limit shall be based upon the results of the emission testing required below in Part II, section E.6 of these special terms and conditions.
3. Compliance with the used oil specifications in Part II, section A.2 shall be demonstrated by the record keeping in Part II, section C.2 of these special terms and conditions.
4. Compliance with the annual asphalt production limitations in Part II, section B.2 shall be demonstrated by the record keeping in Part II, section C.3 of these special terms and conditions.

Emissions Unit ID: **P901**

5. Compliance with the visible emissions limitations in Part II, section A.1 of these special terms and conditions shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.
6. 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 60 days after final issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable PM emission rate of 0.04 grain PM/dscf.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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).

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.

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.

F. Miscellaneous Requirements

1. If probable cause exists indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
3. The following terms and conditions of this permit are federally enforceable: A.2.a - A.2.c, B.1 - B.2, C.1 - C.3., D.1 - D.6 and E.1 - E.6.

