State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
SUMMIT COUNTY

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: 16-02255

DATE: 10/17/2002

Kenmore Asphalt Products Inc Plant 5
Gregg Mercier
700 Home Ave
Akron, OH 443104104

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

CC: USEPA **ARAQMD**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 10/17/2002**
Terms and Conditions	**Effective Date: 10/17/2002**

FINAL PERMIT TO INSTALL 16-02255

Application Number:	16-02255
APS Premise Number:	1677011122
Permit Fee:	**$1400**
Name of Facility:	Kenmore Asphalt Products Inc Plant 5
Person to Contact:	Gregg Mercier
Address:	700 Home Ave Akron, OH 443104104

Location of proposed air contaminant source(s) [emissions unit(s)]:
700 Home Ave
Akron, **Ohio**

Description of proposed emissions unit(s):
Installation of a 145 ton/hour portable RAP and concrete crusher with associated roadways and storage piles.

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.

Emissions Unit ID: **F003**

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

Pollutant	Tons Per Year
PM-10	3.8
PM	19.6
NOx	23.32
CO	5.02
SO2	1.53
VOCs	1.85

Emissions Unit ID: **F003**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-07(B)
F003 (Portable Crusher #1) portable, 145 tons/hour design capacity, recycled asphalt pavement (RAP) & concrete crushing/screening plant (Simplicity 80x20 Horizontal), including (1) crusher, (1) screener, and (9) belt conveyors, entire plant optionally driven by the electric power grid or a diesel-fired electric generator set (CAT 3406B, 527 Bhp rated shaft power, 3.53 mmBtu/hr rated heat input, diesel internal combustion engine driver), fugitive emissions of 10-micrometer particulate matter (PM-10) controlled with water spray system, stack emissions uncontrolled	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11(B)(5)(a)	
	OAC rule 3745-18-06	

Applicable Emissions
Limitations/Control Measures

Fugitive Emissions:
15% opacity as a 3-minute average
0.5 lb/hr & 2.2 tpy PM-10

Best available control measures shall include, but not be limited to, water sprays at conveyor loading/unloading points and limiting material drop heights sufficient to minimize visible emissions of fugitive dust to the extent possible with good engineering design.

Stack Emissions:
5% opacity as a 6-minute average
15.55 lbs/hr & 23.32 tpy* NOx
3.35 lbs/hr & 5.02 tpy* CO
1.02 lbs/hr & 1.53 tpy* SO2
1.09 lbs/hr & 1.64 tpy* PM-10
1.23 lbs/hr & 1.85 tpy* VOCs

* The tpy limits are based on an operating schedule of 3000 hrs/yr. [See section B.1 below.]

0.310 lb PM/mmBtu heat input

Exempt pursuant to OAC rule 3745-18-06(B).

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

2. Additional Terms and Conditions

2.a The 0.5 lb/hr & 2.2 tpy PM-10 fugitive emissions limits and the hourly stack emissions limits for NOx, CO, SO2, PM-10, and VOCs regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures. Therefore, no associated record keeping and reporting are required to demonstrate compliance with these emissions limitations.

However, if any proposed change(s), such as with production capacity, operational procedures, or any of the dust containment equipment or control methods, or anything else that increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust from F003. If the inherent moisture in the aggregate is not sufficient to comply with the opacity restrictions of this permit, the permittee shall install equipment to apply water, or any other suitable dust suppressant, at appropriate locations in the production line.

2.c The permittee shall have the option to operate this emissions unit with either the electric power grid or a diesel-fired electric generator set. If the latter electric power supply is chosen, then a diesel internal combustion engine driver shall be used as specified in the application or, with prior approval by the Akron Regional AQMD, an alternative power driven electric generator set can be used provided none of the hourly stack emissions limits of this permit are exceeded.

B. Operational Restrictions

1. If a diesel-fired electric generator set (as specified in the application) is used, the permittee shall operate the emissions unit no more than 3000 hours per calendar year. This operating hours restriction was requested by the facility to limit annual stack emissions below all "OHIO MODELING SIGNIFICANT EMISSION RATE" thresholds to avoid air dispersion computer modeling requirements.

2. If a diesel-fired electric generator set is used, the permittee shall only use diesel fuel (or number 2 fuel oil) with a maximum sulfur content of 0.5% by weight for combustion in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **F003**

1. For each day this emissions unit is not operated from the electric power grid, the permittee shall maintain a record of the operating hours of the emissions unit, and the power source(s) used to operate the emissions unit, including manufacturer, model number, rated shaft power output, rated

heat input, rated hourly equipment fuel burn capacity, fuel identification and quality, including heat content and sulfur content, of all fuels burned, and the actual quantity of fuel burned.

2. For each day a fuel other than the diesel fuel specified above is burned in a diesel-fired electric generator set, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

3. From the above daily records, the permittee shall maintain annual records of the operating hours of this emissions unit each calendar year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time a power source other than the electric power grid or the diesel-fired electric generator set, as specified in this application, was used to operate this emissions unit. The reports should specifically and completely include a description of the power source.

2. The permittee shall submit deviation (excursion) reports that identify each day during which a fuel other than the diesel fuel specified above was burned in this emissions unit.

3. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

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

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods using applicable emission factors, as noted:

   a. Emission Limitation: 15% opacity as a 3-minute average (fugitive emissions)

      Applicable Compliance Method: OAC rule 3745-17-03(B)(3)

   b. Emission Limitations: 0.5 lb/hr & 2.2 tpy PM-10 (fugitive emissions)

      Applicable Compliance Method: The above emission limitations were established based upon the potential to emit as demonstrated in the equations below:

H = P© + S + TN);
Y = H(8760 hours/year)(1 ton/2000 lbs);

Where,

H = 0.5 lb/hr PM-10 [hourly potential to emit];
Y = 2.2 tpy PM-10 [restricted yearly emissions];
P = 145 tons/hr [plant production design capacity];
C = 0.00059 lb PM-10/ton production [AP-42, 1/95, Table 11.19.2-2 crushing emission factor (controlled)];
S = 0.0021 lb PM-10/ton production [AP-42, 1/95, Table 11.19.2-2 screening emission factor (controlled)];
T = 0.000048 lb PM-10/ton production [AP-42, 1/95, Table 11.19.2-2 conveyor transfer emission factor (controlled), for each transfer point]; and
N = 12 [number of conveyor transfer points].

c. Emission Limitation: 5% opacity as a 6-minute average (stack emissions)

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

d. Emission Limitation: 0.310 lb PM/mmBtu actual heat input (stack emissions)

Applicable Compliance Method: The above particulates emission limitation is equal to the emissions unit's potential to emit, as demonstrated below:

Use the AP-42, 10/96, Table 3.3-1 emission factor of 0.31 lb PM/mmBtu of heat input.

e. Emission Limitations: 15.55 lbs/hr & 23.32 tpy NOx (stack emissions)

Applicable Compliance Method: The above emission limitations were established based upon the potential to emit as demonstrated in the equations below:

H = ND;
Y = HT(1 ton/2000 lbs);

Where,

H = 15.55 lbs/hr NOx [hourly potential to emit];
Y = 23.32 tpy NOx [restricted yearly potential to emit];

N = 4.41 lbs/mmBtu [AP-42, 10/96, Table 3.3-1 nitrogen oxides emission factor];
D = 3.53 mmBtu/hr [rated heat input]; and
T = 3000 hours/year [facility-requested restricted operating schedule].

f. Emission Limitations: 3.35 lbs/hr & 5.02 tpy CO (stack emissions)

Applicable Compliance Method: The above emission limitations were established based upon the potential to emit as demonstrated in the equations below:

H = CD;
Y = HT(1 ton/2000 lbs);

Where,

H = 3.35 lbs/hr CO [hourly potential to emit];
Y = 5.02 tpy CO [restricted yearly potential to emit];
C = 0.95 lb/mmBtu [AP-42, 10/96, Table 3.3-1 carbon monoxide emission factor];
D = 3.53 mmBtu/hr [rated heat input]; and
T = 3000 hours/year [facility-requested restricted operating schedule].

g. Emission Limitations: 1.02 lbs/hr & 1.53 tpy SO2 (stack emissions)

Applicable Compliance Method: The above emission limitations were established based upon the potential to emit as demonstrated in the equations below:

H = SD;
Y = HT(1 ton/2000 lbs);

Where,

H = 1.02 lbs/hr SO2 [hourly potential to emit];
Y = 1.53 tpy SO2 [restricted yearly potential to emit];
S = 0.29 lb/mmBtu [AP-42, 10/96, Table 3.3-1 SO2 emission factor];
D = 3.53 mmBtu/hr [rated heat input]; and
T = 3000 hours/year [facility-requested restricted operating schedule].

h. Emission Limitations: 1.09 lbs/hr & 1.64 tpy PM-10 (stack emissions)

Applicable Compliance Method: The above emission limitations were established based upon the potential to emit as demonstrated in the equations below:

H = PD;
Y = HT(1 ton/2000 lbs);

Where,

H = 1.09 lbs/hr PM-10 [hourly potential to emit];
Y = 1.64 tpy PM-10 [restricted yearly potential to emit];
P = 0.31 lb/mmBtu [AP-42, 10/96, Table 3.3-1 PM-10 emission factor];
D = 3.53 mmBtu/hr [rated heat input]; and
T = 3000 hours/year [facility-requested restricted operating schedule].

i. Emission Limitations: 1.23 lbs/hr & 1.85 tpy VOCs (stack emissions)

Applicable Compliance Method: The above emission limitations were established based upon the potential to emit as demonstrated in the equations below:

H = VD;
Y = HT(1 ton/2000 lbs);

Where,

H = 1.23 lbs/hr VOCs [hourly potential to emit];
Y = 1.85 tpy VOCs [restricted yearly potential to emit];
V = 0.35 lb/mmBtu [AP-42, 10/96, Table 3.3-1 VOC emission factor];
D = 3.53 mmBtu/hr [rated heat input]; and
T = 3000 hours/year [facility-requested restricted operating schedule].

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of the portable or mobile emissions unit identified within this Permit to Install (PTI) may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

   a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;

   b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);

   c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Akron Regional Air Quality Management District (ARAQMD) within a minimum of thirty days prior to the scheduled relocation; and

   d. in the ARAQMD's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

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

   a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;

   b. the portable emissions unit is equipped with best available technology;

   c. the portable emissions unit owner has identified the proposed site to Ohio EPA;

d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;

e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;

f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and

g. the portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.

3. Any site approvals issued by the Ohio EPA shall be valid for no longer than three years and are subject to renewal.

4. In order for the ARAQMD to determine compliance with all of the above criteria, the permittee of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the ARAQMD, 146 South High Street, Suite 904, Akron, OH 44308. Upon receipt of the notice, the ARAQMD, or the ARAQMD authorized representative, will evaluate the request in accordance with the above criteria. Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

5. 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.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F004 (Roadway "A") unpaved roadway associated with Portable Crusher #1	OAC rule 3745-31-05(A)(3)	no visible particulate emissions except for 3 minutes during any 60-minute period 4.3 tons/year of particulate matter best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)
	OAC rule 3745-17-07 (B)(5) OAC rule 3745-17-08 (B), (B)(2)	The emissions limitations and control measure requirements specified by these rules are less stringent than the emissions limitations and control measure requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures on all roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to treat the roadways and parking areas with ample water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other

control measures to ensure compliance.

2.b 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 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.

2.c 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 using appropriate dust control measures 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 a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.

2.d 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.

2.e 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.

2.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 best available technology requirements of OAC rule 3745-31-05 (A)(3).

2.g The 4.3 tons/year particulate matter limitation was established (based on application data) for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. A maximum speed limit of 10 miles per hour shall be posted and enforced on the property.

2. Waste or used oil shall not be used for controlling fugitive dust emissions from any roadways/parking areas at this facility.

C. 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:

roadways/parking areas	minimum inspection frequency
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 the control measures;

   c. the dates the control measures were implemented; and

   d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

   The information required in 4.d. shall be updated on a calendar quarter basis within 30

days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit annual deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The above deviation reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year, in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible particulate emission limitations for the roadways/parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

2. Compliance with the above mass particulate emission limitation for this emissions unit shall be based upon the potential to emit:

   E = (EF)(VMT)(1 ton/2000 pounds)

   where:

   E = 4.3 tons/year of particulate matter [potential to emit];

   EF = 8.52 pounds of particulate matter/vehicle mile traveled [derived emission factor (AP-42, 10/01, Chapter 13.2.2, Equation 1a)]; and

   VMT = 1,000 vehicle miles traveled/year [maximum rate].

   The above emission factor was developed without considering implementation of dust control measures.

F. Miscellaneous Requirements

NONE

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F005 (Recycled/Processed Product Piles) Storage Piles Associated With Portable Crusher #1, including loadin-loadout and wind erosion (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	no visible emissions except for one minute in any hour 15.3 tons/year of particulate matter best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.f)
	OAC rule 3745-17-07 (B)(6) OAC rule 3745-17-08 (B), (B)(6)	The emissions limitations and control measure requirements specified by these rules are less stringent than the emissions limitations and control measure requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

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

Recycled Asphalt (RAP) Pile
Processed Grindings Pile
Recycled Concrete Pile

Processed Concrete Pile

2.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 application, the permittee has committed to perform the following control measure(s) to ensure compliance:

storage pile operation	control measure(s)
loadin	reducing drop height of front-end loader buckets
loadout	reducing drop height of front-end loader buckets

The operator shall avoid dragging the front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The above-mentioned control measure(s) shall be employed for each loadin and loadout 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.

2.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 application, the permittee has committed to maintain each storage pile height as low as possible to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.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.

2.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 (A)(3).

2.g The 15.3 tons/year particulate matter limitation was established (based on application data) for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

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

storage pile identification	minimum loadin inspection frequency
all	daily

2. Except as otherwise provided in this section, the permittee shall perform inspections of each loadout operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum loadout inspection frequency
all	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:

storage pile identification	minimum wind erosion inspection frequency
all	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 loadin and loadout 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 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.

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 the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the loadin operations, (ii) the loadout operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

E. Testing Requirements

1. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

2. Compliance with the above mass particulate emission limitation for this emissions unit shall be based upon the potential to emit:

E = [LP + WAT](1 ton/2000 pounds)

where:

E = 15.3 tons/year of particulate matter [annual potential to emit];
L = 0.014 lb PM/ton loadin-loadout [derived emission factor, AP-42, 1/95, Chapter 13.2.4 equation 1];
P = 1,817,000 tons loadin-loadout/year [annual potential product loadin-loadout];
W = 13.889 lbs PM/day/acre [derived emission factor, USEPA Reference Document, "Control of Open Fugitive Dust Sources", 9/88];
A = 1 acre [total exposed storage pile surface area]; and
T = 365 days [storage pile surface area exposure time].

The above emission factors were developed without considering implementation of fugitive dust control measures.

F. Miscellaneous Requirements

NONE