



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

9/20/2016

Certified Mail

Brian Riedmaier
 The Lash Asphalt Materials Company - Plant #4
 1331 Broad Avenue, Suite 100
 Findlay, OH 45840

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0607005023
 Permit Number: P0120366
 Permit Type: Initial Installation
 County: Guernsey

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Daily Jeffersonian. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office
 2195 Front Street
 Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
 Ohio EPA-SEDO; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Lash Asphalt Materials Company – Plant #4 is an existing portable drum mix counter-flow asphalt plant with a design capacity of 400 tons per hour, controlled with a baghouse (P901), unpaved and paved roadways and parking areas (F001), storage piles (F002), and RAP/shingles crushing and screening (F003). This permit is an after the fact initial installation FEPTIO for F003.

3. Facility Emissions and Attainment Status:

The Lash Asphalt Materials Company – Plant #4 is a portable plant headquartered in Belmont County, Ohio which is currently in attainment for all criteria pollutants. This facility has requested a synthetic minor permit to limit the maximum potential to emit, for emissions unit F003 to avoid Title V requirements when co-locating. Federally enforceable restrictions will lower the potential PE and PM₁₀ emissions and will keep the company from the requirements of Title V permitting when co-locating.

4. Source Emissions:

The Lash Asphalt Materials Company – Plant #4 has requested a limit on the RAP/shingle throughput of F003 in order to restrict the federally enforceable potential to emit. The RAP/shingle throughput will be limited to 400,000 tons per rolling, 12-month period. With the proposed production PE, PM₁₀ and PM_{2.5} fugitive emissions will be limited to 1.54 tons per rolling, 12-month period, 0.54 ton per rolling, 12-month period and 0.08 ton per rolling, 12-month period respectively.

5. Conclusion:

The operational restrictions, emission limits, record keeping, and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit from F003.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.54
PM ₁₀	0.54
PM _{2.5}	0.08

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation

The Lash Asphalt Materials Company - Plant #4

61145 Shaw Road,, Cambridge, OH 43725

ID#:P0120366

Date of Action: 9/20/2016

Permit Desc:Initial PTIO for RAP crushing and screening operations with a restricted throughput of 400,000 tons per rolling, 12-month period to match P901. This unit is exempt from 40 CFR Part 60, Subpart OOO pursuant to 60.670(c)(2)..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Racheal Davies, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
The Lash Asphalt Materials Company - Plant #4**

Facility ID:	0607005023
Permit Number:	P0120366
Permit Type:	Initial Installation
Issued:	9/20/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
The Lash Asphalt Materials Company - Plant #4

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Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
Permit Number: P0120366
Facility ID: 0607005023
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0607005023
Application Number(s): A0055433, A0055523
Permit Number: P0120366
Permit Description: Initial PTIO for RAP crushing and screening operations with a restricted throughput of 400,000 tons per rolling, 12-month period to match P901. This unit is exempt from 40 CFR Part 60, Subpart OOO pursuant to 60.670(c)(2).
Permit Type: Initial Installation
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/20/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

The Lash Asphalt Materials Company - Plant #4
61145 Shaw Road
Cambridge, OH 43725

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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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



Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
Permit Number: P0120366
Facility ID: 0607005023
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120366

Permit Description: Initial PTIO for RAP crushing and screening operations with a restricted throughput of 400,000 tons per rolling, 12-month period to match P901. This unit is exempt from 40 CFR Part 60, Subpart OOO pursuant to 60.670(c)(2).

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

Emissions Unit ID:	F003
Company Equipment ID:	RAP Crushing/Screening
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
Permit Number: P0120366
Facility ID: 0607005023
Effective Date: To be entered upon final issuance

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 Ohio EPA DAPC, Southeast District Office 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.



Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
Permit Number: P0120366
Facility ID: 0607005023
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
Permit Number: P0120366
Facility ID: 0607005023
Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
Permit Number: P0120366
Facility ID: 0607005023
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F003, RAP and Shingle Screening and Crushing

Operations, Property and/or Equipment Description:

Portable RAP and shingle screening rated at 400 tons/hour and crushing rated at 100 tons/hour controlled by wet suppression, consisting of 2 RAP hoppers, 1 shingle hopper, 10 conveyers, one crusher, two screens, with a federally enforceable restriction of 400,000 tons per year.

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. b)(1)b.

(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. b)(1)c., c)(1), d)(2), and e)(4).

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) June 30, 2008	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the calculated annual emission rate is less than 10 tons per year taking into account the federally enforceable restriction from OAC rule 3745-31-05(D). See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) (Federally enforceable restriction to avoid Title V requirements when co-locating)	PE shall not exceed 1.54 tons per year as a rolling, 12-month summation. Particulate matter less than 10 microns in diameter (PM ₁₀) shall not exceed 0.54 ton per year as a rolling, 12-month summation. Particulate matter less than 2.5 microns in diameter (PM ₁₀) shall not exceed 0.08 ton per year as a rolling, 12-month summation.
d.	OAC rule 3745-17-07(B)(1) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Visible PE from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	See b)(2)c. through b)(2)d.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The permittee shall employ reasonably available control measures on all material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treating the crushing and screening operations 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 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 storage piles that are 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.

- e. This unit is defined as a portable nonmetallic mineral processing plant with a capacity of 150 tons per hour or less and is therefore exempt from 40 CFR Part 60, Subpart OOO pursuant to 60.670(c)(2).

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the recycled asphalt pavement (RAP)/shingle throughput of this emissions unit in order to restrict the federally enforceable potential-to-emit. The total amount of RAP/shingle throughput is limited to 400,000 tons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit following the startup of the emissions unit, the permittee shall not exceed the following throughput levels.

Month(s)	Maximum Allowable Cumulative Production (tons)
1	240,000
1-2	400,000
1-3	400,000
1-4	400,000
1-5	400,000
1-6	400,000
1-7	400,000
1-8	400,000
1-9	400,000
1-10	400,000
1-11	400,000
1-12	400,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit following the startup of the emissions unit, compliance with the annual RAP/shingle throughput limitation shall be based upon a rolling, 12-month summation of the RAP/shingle throughput.

- (2) Asphalt shingles removed from buildings (tear-off material) may be used but only if it has been determined that they do not contain asbestos. Verification that the shingles do not

contain asbestos can either be done by actual testing of a representative sample of the shingles, or by verification from the shingle supplier that the shingles do not contain asbestos. Records shall be kept documenting the asbestos verification of any shingles used with the language requirements in the standard terms and conditions.

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

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the RAP crusher, screeners, conveyors and hoppers serving this emissions unit. 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 operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions event; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions event has occurred. The observer does not have to document the exact start and end times for the visible emissions event under item (d) above or continue the daily check until the event has ended. The observer may indicate that the visible emissions event was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. The RAP/shingle throughput, in tons;
 - b. For the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit following the startup of the emissions unit, the cumulative RAP/shingle throughput calculated by adding the current month's RAP throughput to the RAP/shingle throughput for each calendar month since the startup of the emissions unit;
 - c. Beginning after the first 12 calendar months or the first 12 calendar months following the issuance of this permit operation following the startup of the emissions unit, the rolling, 12-month summation of total RAP/shingle throughput



calculated by adding the current month's RAP/shingle throughput to the asphalt production for the preceding eleven calendar months; and

d. The rolling, 12-month summation of PE, PM₁₀ and PM_{2.5} emissions, in tons.

e) Reporting Requirements

(1) 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.

(2) 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.

(3) Annual Permit Evaluation

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.

a. All days during which any visible particulate emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc., serving this emissions unit;

b. Any corrective actions taken to minimize or eliminate the visible particulate emissions from visible emissions of fugitive dust;

(4) Quarterly Deviation (Excursion) Reports

The permittee shall submit quarterly deviation (excursion) reports that identify;

a. All exceedances of the rolling, 12-month RAP/shingle throughput limitation and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit operation following the startup of the



emissions unit, all exceedances of the maximum allowable cumulative RAP/shingle throughput levels;

- b. All exceedances of the tons per rolling, 12-month period of PE, PM₁₀ and PM_{2.5} emissions limitations;
- c. The probable cause of each deviation (excursion);
- d. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. The magnitude and duration of each deviation (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 (the appropriate District Office or Local air agency).

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:

PE shall not exceed 1.54 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Limitation was establish using controlled emission factors from AP-42, Table 19.2-2, using the assumption that asphalt production was equivalent to RAP processed.

Compliance with this emissions limitation shall be determined by the recordkeeping required in d)(2) above.

- b. Emissions Limitation:

Limitation was establish using controlled emission factors from AP-42, Table 19.2-2, using the assumption that asphalt production was equivalent to RAP processed.

PM₁₀ emissions shall not exceed 0.54 ton per year as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the recordkeeping required in d)(2) above.

c. Emissions Limitation:

Limitation was establish using controlled emission factors from AP-42, Table 19.2-2, using the assumption that asphalt production was equivalent to RAP processed.

PM_{2.5} emissions shall not exceed 0.08 ton per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the recordkeeping required in d)(2) above.

d. Emissions Limitation:

Visible PE from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.

(Applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

(1) Relocation Requirements

a. At the discretion and following the approval of the director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install (PTI) or permit-to-install and operate (PTIO) provided that the appropriate exemption requirements have been met. The director may issue a relocation approval for either of the following situations: the permittee notifies the director a minimum of 21 days prior to a one-time relocation pursuant to OAC rule 3745-31-03(B)(1)(p)(i); or the permittee identifies pre-disclosed location(s) to repeatedly relocate to during the approval effective period that meet the criteria found in OAC rule 3745-31-03(B)(1)(p)(ii).

b. Pursuant to OAC rules 3745-31-03(B)(1)(p)(i) and 3745-31-03(B)(1)(p)(ii) the following criteria must be met for all portable facilities seeking approval for relocation:

i. the portable source must have been installed after January 1, 1974;

- ii. the portable source must possess an issued permit to install (PTI) or permit to install and operate (PTIO), and demonstrate continuing compliance with any applicable best available technology (BAT) determination and state and/or federal air pollution rule or law;
 - iii. the portable source is operating pursuant to a currently effective PTI, PTIO, and/or any applicable permit to operate (PTO) or registration status and demonstrates continuing compliance with the requirements of the permit(s);
 - iv. the permittee has provided proper notice of intent to relocate the portable source to the permitting District Office/Local air agency;
 - v. the permitting District Office/Local air agency and the District Office/Local air agency having jurisdiction over the new site have determined that the portable source at the proposed site will have an acceptable environmental impact, and that the relocation of the portable source would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and,
 - vi. the director has issued a public notice, consistent with OAC Chapter 3745-49, in the county where the proposed site is located, stating that in the director's judgment the portable source at the proposed site will have an acceptable environmental impact.
- c. In order to relocate a portable source in accordance with OAC rule 3745-31-03(B)(1)(p)(i) (i.e. the one-time approval option), the following additional criteria must be met:
- i. the permittee must submit the required notice of intent to relocate the portable source to the permitting District Office/Local air agency a minimum of twenty-one days prior to the scheduled relocation; and
 - ii. following the approval of the site by the director, the portable source may relocate to the site one time within 365 days of approval issuance.
- d. A portable source relocating to a site pre-approved by the director in accordance with OAC rule 3745-31-03(B)(1)(p)(ii) (site pre-approval option) may relocate to the pre-approved site at any time on or before the expiration date. Pre-approvals expire within three years of approval issuance.
- e. Within 21 days after relocation to any approved site, the permittee shall provide proper confirmation of the relocation to the permitting District Office/Local air agency.
- f. Failure to receive approval prior to relocation of the portable source or failure to submit relocation confirmation is a violation of this permit and OAC rule 3745-31-05(B)(1)(p), and may result in fines and civil penalties.



Draft Permit-to-Install and Operate
The Lash Asphalt Materials Company - Plant #4
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Effective Date: To be entered upon final issuance

- g. When a portable source is co-located at a stationary source, or is co-located with multiple portable or stationary sources, potential emissions from the portable source may be required to be combined for facility potential to emit calculations for Title V and PSD applicability. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01 (NNN) and (LLL), the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC Chapter 3745-77, which may include the requirement to apply for a Title V permit.