

Facility ID: 1677010013 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010013 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hot Mix Asphalt Facility -- 275 TPH asphalt batch plant with fabric filter, burning natural gas, on-spec used oil, and refined oil	OAC rule 3745-31-05(A)(3) (PTI 16-02113)	<p>Visible particulate emissions from any stack associated with emissions unit P901 shall not exceed 10% percent opacity, as a 6-minute average.</p> <p>Visible particulate emissions from any fugitive dust emissions point associated with emissions unit P901 shall not exceed 20% percent opacity, as a 3-minute average.</p> <p>The following stack mass emission limits shall apply:</p> <p>11.6 lbs/hr of particulate emissions (PE);                      110 lbs/hr of carbon monoxide (CO);                      46.8 lbs/hr of nitrogen oxides (NOx);                      66.0 lbs/hr of sulfur dioxide (SO2); and                      12.6 lbs/hr of total organic compounds (TOC).</p> <p>The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the cold feed bins and recycled material (RAP) bin.</p> <p>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.</p> <p>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 3745-35-07(B).</p> <p>The following stack mass emission limits shall apply:</p> <p>10.4 tpy of PE;                      99.0 tpy of CO;                      42.1 tpy of NOx;                      59.4 tpy of SO2; and                      11.4 tpy of TOC.</p> <p>The tpy emission limitations are based upon a rolling, 12-month summation of the monthly emissions and the annual asphalt production restriction of Part II, section B.2.</p>
	OAC rule 3745-35-07(B)	<p>The following stack mass emission limits shall apply:</p> <p>10.4 tpy of PE;                      99.0 tpy of CO;                      42.1 tpy of NOx;                      59.4 tpy of SO2; and                      11.4 tpy of TOC.</p> <p>The tpy emission limitations are based upon a rolling, 12-month summation of the monthly emissions and the annual asphalt production restriction of Part II, section B.2.</p>
	40 CFR Part 60, Subpart I	<p>0.04 grain PE/dscf</p>

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

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

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

**2. Additional Terms and Conditions**

- (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. All used oil burned in emissions unit 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 degrees 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.

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.

The permittee reserves the right to burn natural gas, used on-spec oil, and refined oil in this emissions unit.

The permittee is prohibited from burning hazardous waste.

**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 shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.
- 2. The maximum annual asphalt production rate for emissions unit P901 shall not exceed 495,000 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:

. Maximum Allowable  
 Month(s) Cumulative Production (Tons)

1 60,000  
 1-2 120,000  
 1-3 180,000  
 1-4 240,000  
 1-5 300,000  
 1-6 360,000  
 1-7 420,000  
 1-8 480,000  
 1-9 495,000  
 1-10 495,000  
 1-11 495,000  
 1-12 495,000

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 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; and
- k. the mercury content, in ppm.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Director (the Akron RAQMD) 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 emissions unit 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 11 calendar months;
  - d. the monthly emissions (tons) for each of TOC, CO, NOx, PE, and SO<sub>2</sub>; and
  - e. the rolling, 12-month summation of the monthly emissions (tons) for each of TOC, CO, NOx, PE, and SO<sub>2</sub> calculated by adding the current month's emissions to the emissions for the preceding 11 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 that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1.
- 3. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil exceeds the used oil specifications found in OAC rule 3745-279-11 within 5 days. 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 used oil.
- 4. The permittee shall submit annual reports that specify the asphalt production rate (in tons), and the PE, NOx, SO<sub>2</sub>, TOC and CO emissions for emissions unit 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.

#### 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 PE, CO, NOx, TOC, and SO<sub>2</sub> from Compilation of Air Pollution Emission Factors (AP-42), Fifth Edition, and the general emission relationship: (emission rate) = (emission factor)(production rate), as follows:
  - a. hourly stack mass emission limitations:

11.6 lbs/hr of PE = (0.042 pound PE/ton asphalt)(275 tons asphalt/hour);  
 110 lbs/hr of CO = (0.40 pound CO/ton asphalt)(275 tons asphalt/hour);  
 46.8 lbs/hr of NOx = (0.17 pound NOx/ton asphalt)(275 tons asphalt/hour);  
 66.0 lbs/hr of SO<sub>2</sub> = (0.24 pound SO<sub>2</sub>/ton asphalt)(275 tons asphalt/hour); and  
 12.6 lbs/hr of TOC = (0.046 pound TOC/ton asphalt)(275 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 limitations:

10.4 tpy of PE = (0.042 pound PE/ton asphalt)(495,000 tons asphalt/year)(0.0005);  
 99.0 tpy of CO = (0.40 pound CO/ton asphalt)(495,000 tons asphalt/year)(0.0005);  
 42.1 tpy of NOx = (0.17 pound NOx/ton asphalt)(495,000 tons asphalt/year)(0.0005);  
 59.4 tpy of SO<sub>2</sub> = (0.24 pound SO<sub>2</sub>/ton asphalt)(495,000 tons asphalt/year)(0.0005); and  
 11.4 tpy of TOC = (0.046 pound TOC/ton asphalt)(495,000 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.
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 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable PE emission rates of 0.04 grain/dscf and 11.6 lbs/hr.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A.

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

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 Akron RAQMD.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD 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 Akron RAQMD 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 Akron RAQMD.

**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.