



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-3553**

**CERTIFIED MAIL**

**DATE:** July 14, 1999

Allega Recycled Materials/Supply  
James Allega  
5585 Canal Road  
Valley View, OH 44125

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.



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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA  
CLEVELAND DIVISION OF THE ENVIRONMENT  
Pennsylvania Department of Environmental Resources

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

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**Terms and  
Conditions**

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**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-3553**

Application Number: 13-3553  
APS Premise Number: 1318577441  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Allega Recycled Materials/Supply  
Person to Contact: James Allega  
Address: 5585 Canal Road  
Valley View, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**5585 Canal Road  
Valley View, Ohio**

Description of proposed emissions unit(s):  
**300 TON/HR PORTABLE DRUM ASPHALT PLANT EQUIPPED WITH A 69,000 ACFM  
BAGHOUSE.**

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

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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 are inadequate 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 prove to be inadequate 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**

**Allega Recycled Materials/Supply**

Facility ID: **1318577441**

PTI Application: **13-3553**

**Draft PTI (Date will be entered upon final issuance)**

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.

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

**SUMMARY (for informational purposes only)**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	59.1
NO <sub>x</sub>	98.5
CO	47.3
VOC	90.6
SO <sub>2</sub>	73.5



**Allega**

PTI A<sub>1</sub>

Emissions Unit ID: **P901**

**Draft PTI (Date will be entered upon final issuance)**

Applicable Emissions  
Limitations/Control Measures

22.5 lbs/hr NO<sub>x</sub>, 98.5 TPY  
10.8 lbs/hr CO, 47.3 TPY  
20.7 lbs/hr VOC, 90.6 TPY  
16.8 lbs/hr SO<sub>2</sub>, 73.5 TPY

Compliance with the Air Toxics  
Policy

Limit of 0.04 gr/dcsf of exhaust  
gases from stack.

\*

20 percent opacity as a six-minute  
average except as provided by rule  
from the stack.

No visible emissions of fugitive  
dust from enclosures for hot  
aggregate elevator, vibrating  
screens and weigh hopper.

Less than or equal to 20 percent  
opacity as a three-minute average  
for fugitive dust emissions.

The drop height of the front end  
loader bucket shall be minimized to  
the extent possible in order to  
minimize or eliminate fugitive dust.  
The aggregate loaded into the  
storage bins shall have a moisture  
content sufficient to eliminate the  
visible emissions from elevators and  
transfer points to the dryer.

Air pollution nuisances prohibited

**Draft PTI (Date will be entered upon final issuance)**

\*This emissions limit is less stringent than the limit established through 3745-31-05.

**2. Additional Terms and Conditions**

**2.a** The permittee shall maintain a minimum height of 42 feet for the baghouse stack.

**B. Operational Restrictions**

1. 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 elevator loading area.
2. The aggregate loaded into the storage bins shall have a moisture content sufficient to eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.
3. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 3 or greater than 6 inches of water shall be maintained at all times.
4. Fuel Usage:  
The permittee shall combust, in this emissions unit, only #2 fuel oil with no more than 0.5% sulfur content, by weight.
5. RAP Limitation:  
The permittee may substitute recycled asphalt pavement ("RAP") aggregates in the raw material feed mix in amounts not to exceed 1,000 lb/hr at any given time.
6. SLAG Limitation:  
The permittee may substitute recycled SLAG aggregates in the raw material feed mix in amounts not to exceed 1,800 lb/hr at any given time.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate and maintain a monitoring device capable of accurately measuring the pressure drop across the baghouse.
2. The permittee shall check the pressure drop once per shift and maintain daily records of the pressure drop readings.
3. Fuel Usage:  
This facility shall maintain records of the oil supplier's analysis for each shipment of oil which is

received for burning in this emissions unit. The oil supplier's analysis shall document the sulfur content (percent) of each shipment of oil. These records shall be kept in a central location for a minimum of five (5) years and shall be made available, upon request, to a representative of the Ohio EPA. The permittee shall require the supplier of the oil to perform the analysis for sulfur content in accordance with ASTM method D4294, ASTM method D240, or ASTM method 6010. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

4. RAP Limit:

The permittee shall maintain hourly records of the amount of RAP mixed with the raw material feed mix.

5. SLAG Limit:

The permittee shall maintain hourly records of the amount of SLAG mixed with the raw material feed mix.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range.

2. Sulfur Content in Oil Limitation:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the sulfur content limitation for oil combusted in this emissions unit.

3. RAP Limitation:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitation.

RAP

4. SLAG Limitation:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the SLAG usage limitation.

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**Allega**

PTI A<sub>1</sub>

**Draft PTI (Date will be entered upon final issuance)**

Emissions Unit ID: **P901**

**Draft PTI (Date will be entered upon final issuance)**

5. The permittee shall submit deviation (excursion) reports which identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

1. Within 3 months after issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for particulates, VOC, CO, SO<sub>2</sub> and NO<sub>x</sub>. The test(s) shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for particulates, Method 25 or 25A of 40 CFR Part 60, Appendix A for VOC, Method 10 or 10A of 40 CFR Part 60, Appendix A for CO, Method 6 of 40 CFR Part 60, Appendix A for SO<sub>2</sub> and Method 7 of 40 CFR Part 60, Appendix A for NO<sub>x</sub> while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(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 field office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30 days following completion of the test(s).

2. Emission Limitation -

Limit of 0.04 gr/dcsf of exhaust gases from stack.

Applicable Compliance Method -

See E. 1

3. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

4. Emission Limitation -

22.5 lbs/hr of NO<sub>x</sub> 98.5 TPY

Applicable Compliance Method -

See E. 1

5. Emission Limitation -

10.8 lbs/hr of CO 47.3 TPY

Applicable Compliance Method -

See E.1

6. Emission Limitation -

20.7 lbs/hr of VOC 90.6 TPY

Applicable Compliance Method -

See E.1

7. Emission Limitation -

16.8 lbs/hr of SO<sub>2</sub> 73.5 TPY

Applicable Compliance Method -

See E. 1

## **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the

**Draft PTI (Date will be entered upon final issuance)**

permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant:	Formaldehyde	Acetaldehyde	Acetone
TLV (mg/m3):	0.375	45.75	1,210
Maximum Hourly Emission Rate (lbs/hr):	0.72	0.39	0.24
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	2.476	1.341	0.8254
MAGLC (ug/m3):	8.93	1,089	28,809

2. install OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
  - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

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- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
  - i. **Odor Prevention:**

The emissions from this emissions unit are prohibited from causing a nuisance in violation of OAC rule 3745-15-07. If the Director determines that the emissions from this emissions unit are contributing to a nuisance, the permittee, upon notification by Ohio EPA, shall immediately undertake a program to reduce emissions or the impact of the emissions to achieve compliance with OAC rule 3745-15-07.
5. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), 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 are met:
  - i. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
  - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
  - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Cleveland Bureau of Air Pollution Control and the appropriate field office having

jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and,

- iv. in the Cleveland Bureau of Air Pollution Control's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

6. In the 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:

- i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
- ii. the portable emissions unit is equipped with best available technology;
- iii. the portable emission unit owner has identified the proposed site to Ohio EPA;
- iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;

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- v. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
  - vi. 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 the proposed site; and
  - vii. the portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.
7. Any site approvals issued by the Ohio EPA, pursuant to F.7. above, shall be valid for no longer than three years and are subject to renewal.

In order for the Cleveland Bureau of Air Pollution Control and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator 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 Cleveland Bureau of Air Pollution Control (1925 St. Clair Ave., Cleveland, OH 44114) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the Cleveland Bureau of Air Pollution Control and/or the appropriate field office having jurisdiction over the new site, 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.