Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

1/18/2011

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

Mr. Ralph Kyanko
Kokosing Materials Inc Plant 522
P.O Box 334
Fredericktown, OH 43019

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318008747
Permit Number: P0106806
Permit Type: Initial Installation
County: Cuyahoga

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 EPA Weekly Review and the local newspaper, The Plain Dealer. 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 "Issued Air Pollution Control Permits" link. 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
122 South Front Street
Columbus, Ohio 43215

and

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

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 in writing 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 Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

Permit Strategy Write-Up

1. Check all that apply:

   _x_ Synthetic Minor Determination
   ___ Netting Determination

2. Source Description:

   650 TPH drum mix counter flow asphalt plant with roadways and storage piles.

3. Facility Emissions and Attainment Status:

	Allowable Emissions (tons/yr)					
Emissions Unit	**NO_x**	**CO**	**VOC**	**PE**	**PM10**	**SO_2**
P901	40.0	96.0	56.0	15.2	-	48.0
F001	-	-	-	3.77	1.88	-
F002	-	-	-	11.36	2.48	-
Total	**40.0**	**96.0**	**56.0**	**30.33**	**4.36**	**48.0**

   The facility is in Cuyahoga County which is in attainment for all pollutants except $PM_{2.5}$.

4. Source Emissions:

   Same as above.

5. Conclusion:

   The emissions will be limited by regulating the amount of slag employed in the asphalt mix and limiting the TPY of asphalt produced by the plant.

6. Please provide additional notes or comments as necessary: None

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

Pollutant	Tons Per Year
NOx	40.0
CO	96.0
SO_2	48.0
PE	30.33
PM10	4.36
VOC	56.0

Cuyahoga County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Kokosing Materials Inc Plant 522

Issue Date: 1/18/2011
Permit Number: P0106806
Permit Type: Initial Installation
Permit Description: Initial permit to install and operate, 650 TPH asphalt plant (P901), storage piles(F001), and roadways and parking areas (F002). The plant is not portable.
Facility ID: 1318008747
Facility Location: Kokosing Materials Inc Plant 522
3000 Independence Rd,
Cleveland, OH 44115
Facility Description: Asphalt Paving Mixture and Block Manufacturing

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Kokosing Materials Inc Plant 522

Facility ID:	1318008747
Permit Number:	P0106806
Permit Type:	Initial Installation
Issued:	1/18/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Kokosing Materials Inc Plant 522

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Authorization

Facility ID: 1318008747
Application Number(s): A0040162, A0040482
Permit Number: P0106806
Permit Description: Initial permit to install and operate, 650 TPH asphalt plant (P901), storage piles(F001), and roadways and parking areas (F002). The plant is not portable.
Permit Type: Initial Installation
Permit Fee: $1,650.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/18/2011
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:

Kokosing Materials Inc Plant 522
3000 Independence Rd
Cleveland, OH 44115

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0106806
Permit Description: Initial permit to install and operate, 650 TPH asphalt plant (P901), storage piles(F001), and roadways and parking areas (F002). The plant is not portable.

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

Emissions Unit ID:	**F001**
Company Equipment ID:	Storage Piles
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F002**
Company Equipment ID:	Roadways
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P901**
Company Equipment ID:	Asphalt Plant
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 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 Cleveland Division of Air Quality 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[1] 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 emissions 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

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. F001, Storage Piles

Operations, Property and/or Equipment Description:

Aggregate storage piles totalling up to 4.5 acres

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. 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.

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)(a), as effective 11/30/2001	Fugitive particulate matter shall not exceed 1.08 lbs/hr and 3.77 tons/year Fugitive particulate matter of 10 microns or less in size (PM10) shall not exceed 0.54 lbs/hr and 1.88 tons/year See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b(2)b.
c.	OAC rule 3745-17-07(B)(6)	See b(2)g.
d.	OAC rule 3745-17-08(B)	See b)(2)c.-f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. Permit to Install P0106806 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

   i. The permittee has committed to use chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure fugitive emissions are maintained below 10 tons per year.

c. The permittee shall employ reasonably 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 permittee's application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

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

d. The above-mentioned control measure(s) shall be employed for each load-in and load-out 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.

e. The permittee shall employ reasonably 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 perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the

storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

f. 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 if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

g. There shall be no visible emissions of fugitive dust from the material storage piles except for a period of time not to exceed 13 minutes during any 60-minute observation period.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

storage pile identification	minimum load-in inspection frequency
all	daily

(2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
all	daily

(3) Except as otherwise provided in this section, the permittee shall perform inspection 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 inspection is to determine the need for implementing the control measures specified in this permit for load-in and load-out 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 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 d)(6)d. shall be kept separately for (i) the load-in operations, (ii) the load-out 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.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(6) above:

a. all days during which any visible emissions of fugitive dust was observed; and

b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

1.08 lbs/hr and 3.77 tons fugitive PM/year

0.54 lbs/hr and 1.88 tons fugitive PM10/year

Applicable Compliance Method:

Compliance with fugitive PM limitations shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/95), for load-in operations, load-out operations, and wind erosion.

b. Emission Limitation

There shall be no visible emissions of fugitive dust from material storage piles except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method

Compliance with the visible emissions limitation for fugitive dust from the material storage piles areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.

2. F002, Roadways

Operations, Property and/or Equipment Description:

Roadways and parking areas. Unpaved roadways totalling 120,000 sf. Surface composition of asphalt and gavel.

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. 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.

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.	ORC 3704.03(T)	<u>Paved Roadways and Parking</u> no visible emissions of fugitive dust except for a period of time not to exceed one minute during any 60-minute observation period <u>Unpaved Roadways and Parking</u> no visible emissions of fugitive dust except for a period of time not to exceed three minutes during any 60-minute observation period
b.	OAC rule 3745-17-07(B)(5)	This rule is less stringent than OAC rule 3745-31-05(A)(3)
c.	OAC rule 3745-17-08(B)	See b)(2)a. – f.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas with water and sweep as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways with water and chemical stabilization as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. 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 paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for the day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may e suspended if unsafe or hazardous driving conditions would be created by its use.

d. 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 with the control measure(s) specified above 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 areas that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

e. 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.

f. 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.

c) Operational Restrictions

(1) None.

d) 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:

paved roadways and parking areas	minimum inspection frequency
all paved roadways and parking areas	once during each day of operation
unpaved roadways and parking areas	**minimum inspection frequency**
all unpaved roadways and parking areas	once during each day of operation

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspection 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 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.

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 d)(3)d. shall be kept separately for the paved roadways and parking areas and for the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:

a. all days during which any visible emissions of fugitive dust were observed; and

b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

f) Testing Requirements

(1) Compliance with the emissions limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible emissions of fugitive dust from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emissions limitation for fugitive dust from the paved roadways and/or parking areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

Emission Limitation:

There shall be no visible emissions of fugitive dust from the unpaved roadways and/or parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period. If any unpaved roadway and/or parking area (or any portion of them) is or becomes paved, such paved areas shall be subject to a limitation of no visible emissions except for a period of time not to exceed one minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emissions limitation for fugitive dust from the unpaved roadways and/or parking areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.

3. P901, Asphalt Plant

Operations, Property and/or Equipment Description:

650 TPH drum mix counter flow hot mix asphalt plant employing slag, controlled with baghouse.

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. 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. b)(1)c., c)(2), d)(2), f)(1)d.-h.

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.	ORC 3704.03(T)	Stack Emissions Nitrogen Oxides (NO_x) emissions while burning any approved fuel shall not exceed 0.10 pounds per ton of asphalt produced. Sulfur Dioxide (SO_2) emissions while burning on-spec used oil, #2 oil or #4 oil shall not exceed 0.12 pounds per ton of asphalt produced. SO_2 emissions while burning natural gas shall not exceed 0.12 pounds per ton of asphalt produced. SO_2 emissions while burning #6 oil shall not exceed 0.17 pounds per ton of asphalt produced. SO_2 emissions while employing slag in

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the mix shall not exceed 0.53 pounds per ton of asphalt produced while burning Natural Gas. Carbon Monoxide (CO) emissions shall not exceed 0.24 pounds per ton of asphalt produced while burning any approved fuel. CO emissions while employing slag in the mix shall not exceed 0.30 pounds per ton of asphalt produced while burning any approved fuel. Volatile organic compound (VOC) emissions while burning any approved fuel shall not exceed 0.14 pounds per ton of asphalt produced. Particulate emissions (PE) while burning any approved fuel shall not exceed 0.040 gr/dscf. Arsenic, cadmium, chromium, and lead emissions are limited by the fuel specifications in b)(2)f. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 60, Subpart I. See b)(2)c.
b.	NSPS, 40 CFR, Part 60, Subpart I	PE shall not exceed 0.04 gr/dscf of exhaust gases. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average.
c.	OAC rule 3745-31-05(D)	Stack Emissions NO_x emissions shall not exceed 40.0 tons per rolling, 12-month period. SO_2 emissions shall not exceed 48.0 tons per rolling, 12-month period. CO emissions shall not exceed 96.0 tons per rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions shall not exceed 56.0 tons per rolling, 12-month period. PE shall not exceed 15.2 tons per rolling, 12-month period.
d.	OAC rule 3745-31-05(E)	SO_2 emissions shall not exceed 78.0 lbs/hr The permittee shall only burn Natural gas when utilizing slag in this emissions unit.
e.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions limitation from the stack, as specified by this rule, is equivalent to the emission limitation established pursuant to 40 CFR Part 60, Subpart I.
f.	OAC rule 3745-17-07(B)	The visible particulate emissions limitation for fugitive dust, as specified by this rule, is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-17-08(B)	See b)(2)a. and b)(2)b.
h.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. 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 aggregate storage bins.

b. The aggregate loaded into the cold aggregate bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from conveyors and all transfer points to the dryer.

c. Visible emissions of fugitive dust shall be less than or equal to 10 percent opacity, as a three-minute average for the following operations:

i. Aggregate handling, load into hopper;

ii. Asphalt load out emissions;

iii. asphalt silo filling emissions; and

iv. cold end fugitive dust emissions.

d. All number 2 and on-spec used oil burned in this emission unit shall have a sulfur content equal to or less than 0.5 percent, by weight.

e. All number 4 fuel oil burned in this emission unit shall have a sulfur content equal to or less than 0.8 percent, by weight.

f. All used oil burned in this emissions unit shall be "on-specification" (on-spec) oil and must meet the used oil fuel specifications contained in OAC rule 3745-279-11, which restricts the used oil to the following limitations:

Contaminant/Property	**Allowable Specifications**
Arsenic	5 ppm, maximum
Cadmium	2 ppm, maximum
Chromium	10 ppm, maximum
total halogens	*4,000 ppm maximum
Lead	100 ppm, maximum
flash point	100°F, minimum

and shall also not exceed the following maximum PCB and mercury limitations nor fall below the following heating value:

heat content	135,000 Btu/gallon, minimum
PCB's	Less than 2 ppm
Mercury	1 ppm, maximum

* Used oil containing 1,000 ppm or greater total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-279-10 of the Administrative Code. The permittee may receive and burn used oil equaling or exceeding 1,000 ppm total halogens, but less than 4,000 ppm, only if the permittee has successfully demonstrated,

pursuant to OAC rule 3745-279-63, that the used oil does not contain a listed hazardous waste, by either acquiring and maintaining source process information which demonstrates that the used oil was contaminated by halogenated constituents that would not be listed hazardous waste or by demonstrating that the used oil does not contain significant concentrations of halogens by acquiring and maintaining representative analytical data. Acceptable analytical test protocols that can be used to analyze used oil for halogenated hazardous constituents include SW-846 Test Methods 9075, 9076, and 9077.*

If analytical results demonstrate that used oil containing 1,000 ppm or more total halogens, but less than 4,000 total halogens, does not contain greater than 100 ppm of any individual halogenated hazardous constituent found in the F001 and F002 listings in OAC rule 3745-51-31 and there is no information suggesting that any other halogenated hazardous constituent (e.g., chlorinated pesticides) has come in contact with the oil, then the presumption that the oil contains hazardous waste has been successfully rebutted.** The rebuttable presumption does not apply to either metal working oils/fluids containing chlorinated paraffins, if processed through a tolling arrangement as described in OAC rule 3745-279-24(C), or used oils contaminated with chlorofluorocarbons removed from refrigeration units.

The burning of used oil not meeting the above limitations is prohibited in this emissions unit and the fuel oil analyses shall document compliance with each limitation before it is burned. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter. If the used oil analyses shows total halogens of 1,000 ppm or greater, the permittee shall obtain and maintain all the necessary records to successfully rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste in accordance with this permit.

g. In accordance with 40 CFR Part 60 Subpart I 60.90(a) and (b), this emissions unit is a hot mix asphalt plant that has commenced construction or modification after June 11, 1973, and is subject to the emissions limitations/control measures specified in 40 CFR Part 60 Subpart I.

c) Operational Restrictions

(1) The permittee may not receive or burn any used oil which does not meet the specifications listed in b)(2)f of this permit without first obtaining a permit-to-install or permit-to-install and operate that authorizes the burning of off-specification used oil. The burning of off-specification used oil is subject to OAC rules 3745-279-60 through 67.

(2) The permittee has requested a federally enforceable limitation on asphalt produced in order to restrict the federally enforceable potential to emit. The amount of asphalt produced is restricted by the following:

a. The amount of asphalt produced and the SO_2 emissions are restricted by the following equation:

48.0 tons per 12-month period ≥ ((0.12)*(a) + (0.12)*(b) + (0.12)*(c) + (0.17)*(d) + (0.53)*(e))/2000

where:

a = tons asphalt produced with natural gas per rolling, 12-month period;

b = tons asphalt produced with #2 fuel oil and/or used oil per rolling, 12-month period;

c = tons asphalt produced with #4 fuel oil per rolling, 12-month period;

d = tons asphalt produced with #6 fuel oil per rolling, 12-month period; and

e = tons of asphalt produced while employing a slag mix with any approved fuel per rolling, 12-month period.

* = factors may be revised based upon Ohio EPA validated emissions testing and shall be revised if emissions testing results in higher emissions

(3) The permittee shall operate and maintain the fuel burner in accordance with the manufacturer's recommendations to ensure efficient combustion of the fuel(s) and to ensure compliance with the applicable emission limitations for CO and NOx. The permittee shall submit a copy of all *Burner Tuning Reporting Form for Asphalt Concrete Plants* forms produced during the past calendar year to the Cleveland Division of Air Quality (CDAQ) with the PER.

(4) The permittee may substitute reclaimed asphalt pavement (RAP) and/or asphalt shingles in amounts not to exceed 50 percent of each asphalt mix produced. The permittee may not substitute other raw materials not specifically identified in the PTIO application without prior approval from CDAQ.

The permittee may substitute slag or sand slag produced from blast, basic oxygen, and open hearth furnaces into the asphalt mix, as described in OAC rule 3745-51-04(B)(7). Slag produced from other sources, such as electric arc furnaces, must be evaluated in accordance with OAC rule 3745-52-11. If determined to be hazardous waste, the slag must be managed in accordance with applicable regulations in OAC chapter 3745-266, recyclable materials used in a manner constituting disposal.

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 in the feed mix consistent with the language requirements in the standard terms and conditions.

(5) The permittee shall only burn natural gas, number 2 fuel oil, number 4 fuel oil, number 6 fuel oil, and/or on-spec used oil in this emissions unit. In order to use a fuel on an ongoing basis, the permittee shall complete the emissions testing for that fuel per f)(1).

(6) The sulfur content in the slag used in the aggregate mix shall not exceed 1.75% sulfur, by weight. The permittee may use slag with a higher sulfur content than 1.75% if prior approval is granted by CDAQ and stack testing is performed to demonstrate the sulfur dioxide emission limits in b)(1) are not exceeded.

(7) The amount of slag employed in the mix shall not exceed, at anytime 3,500 tons per day.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall receive and maintain the chemical analyses from the supplier/marketer for each shipment of used oil burned in this emissions unit (or if the oil is generated on site, the permittee shall conduct the chemical analyses), which shall contain the following information:

a. the date the used oil was received at the facility;

b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/refiner, supplier, and/or marketer;

c. the results of the chemical analyses demonstrating the used oil meets the standards in OAC rule 3745-279-11, including:

i. arsenic content, in ppm;

ii. the cadmium content, in ppm;

iii. the chromium content, in ppm;

iv. the lead content, in ppm;

v. total halogens, in ppm; and

vi. the flash point;

d. where the chemical analysis shows a total halogen content between 1,000 ppm, and below 4,000 ppm, the successful demonstration for the rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste, as described in OAC rule 3745-279-63(C); and

e. the results of the analyses demonstrating that the used oil meets the heating value and mercury and PCB limitations contained in this permit.

Each analysis shall be kept in a readily accessible location for a period of not less than 5 years following the receipt of each shipment of used oil and shall be made available to the Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the Cleveland Division of Air Quality of Ohio EPA) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses, through an independent laboratory.

(2) The permittee shall maintain monthly records of the following information:

a. the total asphalt production, in tons, for each month;

b. the total asphalt produced for each fuel type for each month;

c. the amount, in percent, of RAP and/or asphalt shingles applied in each mix type;

d. the amount, in tons, and type of slag employed in each mix;

e. the rolling, 12 month summation of the total slag employed in the mix;

f. the rolling, 12 month summation of the total asphalt production and the asphalt production by fuel type, calculated by adding the current month's asphalt production to the asphalt production for the preceding eleven calendar months;

g. the rolling, 12-month summation of the PE, SO_2*, NOx, VOC, and CO emissions;

h. the amount of slag employed in the mix for each day;

i. the raw material composition for each mix type; and

j. the maximum amount of asphalt produced for each hour.

* The rolling, 12-month summation of SO_2 shall be calculated by using the equation in c)(2)a.

(3) For each shipment of # 2 fuel oil, # 4 fuel oil, # 6 fuel oil, and on-spec used oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.

The permittee shall submit and receive approval from CDAQ for a slag sampling and testing plan prior to applying slag in the asphalt mix. In the slag sampling plan, the permittee shall commit to demonstrating that the sulfur content of the slag does not exceed the limit in c)(6).

(4) 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 stack 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 visible emissions;

b. the cause of the visible particulate emissions;

c. the total duration of any visible emissions incident; and

d. any corrective actions taken eliminate the visible emissions.

(5) The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust. If visible emissions are observed, the permittee shall note the following in the operation log:

a. the location and color of the visible emissions;

b. the cause of the visible particulate emissions;

c. the total duration of any visible emissions incident; and

d. any corrective actions taken eliminate the visible emissions.

(6) While performing each burner tuning, the permittee shall record the results of the burner tuning using the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form [as found in g)(2)]. An alternative form may be used upon approval of CDAQ.

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the equation in c)(2)a.;

ii. all exceedances of the slag employed in the mix restrictions in c)(6) and c)(7).

iii. all exceedances of the rolling 12-month total PE, SO_2, NOx, VOC, and CO emission limitations; and

iv. all exceedances of the sulfur content limitations in b)(2)d. and b)(2)e.

b. probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. 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 Ohio EPA, Central District Office.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) and d)(5) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director 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.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

NO_x emissions while burning any approved fuel shall not exceed 0.10 pounds per ton of asphalt produced.

SO_2 emissions while burning on-spec used oil, # 2 oil, or # 4 oil, shall not exceed 0.12 pounds per ton of asphalt produced.

SO_2 emissions while burning natural gas shall not exceed 0.12 pounds per ton of asphalt produced.

SO_2 emissions while burning # 6 fuel oil shall not exceed 0.17 pounds per ton of asphalt produced.

SO_2 emissions while employing slag in the mix shall not exceed 0.53 pound per ton of asphalt produced while burning Natural Gas.

SO_2 emissions shall not exceed 78.0 lbs/hr.

CO emissions while burning any approved fuel shall not exceed 0.24 pounds per ton of asphalt produced.

CO emissions while employing slag in the mix shall not exceed 0.30 pounds per ton of asphalt produced while burning any approved fuel.

VOC emissions while burning any approved fuel shall not exceed 0.14 pounds per ton of asphalt produced.

PE while burning any approved fuel shall not exceed 0.04 gr/dscf.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 120 days after the issuance of this permit or after beginning operation whichever date is later. Emissions testing for secondary fuels shall be conducted within 60 days after the switch to the secondary fuel. Emissions testing shall be necessary for each fuel type used only once per permitting cycle. Emissions testing for slag use in the mix shall be conducted within 60 days after initially employing slag. If sand slag is used, emissions testing for sand slag use in the mix shall be conducted within 60 days after the initially employing sand slag.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, VOC, CO, NOx and SO_2 for the primary fuel and slag use, if applicable. Prior to secondary fuel or slag use emissions testing, the permittee shall consult CDAQ to determine which pollutants should be tested.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

PE, Methods 1-5 of 40 CFR Part 60, Appendix A.

NOx, Methods 1-4 and 7 or 7E of 40 CFR Part 60, Appendix A.

SO_2, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A

CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

The VOC pounds per hour emission rate observed during the emissions test shall be calculated in accordance with OAC paragraph 3745-21-10(C)(7) where the average molecular weight of the VOC emissions equals 16, i.e., the VOC as carbon emission rate observed during testing shall be converted to the appropriate units by multiplying the VOC as carbon emission rate observed during testing by 16 and dividing by 12.

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

iv. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, maximum slag usage rate, and burning natural gas, # 2 fuel oil, # 4 fuel oil, or on-spec used oil for PE, VOC, CO, NOx and SO_2 and employing RAP to verify VOC emissions, unless otherwise specified or approved by CDAQ.

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

vi. Personnel from CDAQ 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.

vii. 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 CDAQ 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 CDAQ.

b. Emission Limitation:

Visible emissions of fugitive dust shall be less than or equal to 10 percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

NO_x emissions shall not exceed 40.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of NOx per ton of asphalt produced for each fuel, by the actual rolling 12-month summation of asphalt produced for each fuel, in tons per rolling 12-month period (as derived from the records required by d)(2)), summing the results for all fuels, and dividing by 2000.

e. Emission Limitation:

SO_2 emissions shall not exceed 48.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by calculating the emissions using the equation in c)(2)b (as derived from the records required by d)(2)).

f. Emission Limitation:

CO emissions shall not exceed 96.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of CO per ton of asphalt produced for each fuel, and/or slag usage by the actual rolling 12-month summation of asphalt produced for each fuel, and/or slag usage in tons per rolling 12-month period (as derived from the records required by term and condition d)(2)), summing the results for all fuels, and/or slag usage and dividing by 2000.

g. Emission Limitation:

VOC emissions shall not exceed 56.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of VOC per ton of asphalt produced for each fuel, by the actual rolling 12-month summation of asphalt produced for each fuel, in tons per rolling 12-month period (as derived from the records required by d)(2)), summing the results for all fuels, and dividing by 2000.

h. Emission Limitation:

PE shall not exceed 15.2 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of PE per ton of asphalt produced for each fuel, by the actual rolling 12-month summation of asphalt produced for each fuel, in tons per rolling 12-month period (as derived from the records required by d)(2)), summing the results for all fuels, and dividing by 2000.

(2) Burner Tuning

a. Introduction

The permittee is required to conduct periodic tuning of the asphalt plant burner. The purpose of this tuning is to ensure that the burner is adjusted properly so

that air pollution emissions remain in compliance with allowable emissions rates and are minimized.

b. Qualifications for Burner Tuning

Technicians who conduct the burner tuning must be qualified to perform the expected tasks. The permittee is required to provide training to the technicians who perform the burner tuning procedure. Technicians who are qualified shall, at a minimum, have passed manufacturer's training concerning burner tuning, or have been trained by someone who has completed the manufacturer's training concerning burner tuning.

c. Portable Monitor Requirements

The permittee shall properly operate and maintain portable device(s) to monitor the concentration of NOx, O_2 and CO in the stack exhaust gases from this emissions unit. The monitor(s) shall be capable of measuring the expected concentrations of the measured gases. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall maintain records of each portable monitoring device's calibration.

d. Burner Tuning Procedure

The first steps concerning burner tuning involve setting the pollutant baseline levels (concentrations) utilizing the portable monitor. These baselines shall be set during the initial U.S. EPA approved emissions testing that demonstrated the emissions unit was in compliance with all applicable emissions limitations as described in f)(2)a. The baselines shall be determined for NOx, and CO. Sampling should measure the exhaust gas values exiting the dryer or the baghouse. The duration of each sample shall follow the portable monitor manufacture's recommendations. Record these values on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form [as found in g)(2)] in the "Recent Stack Test Basis Values" column.

Once the pollutant baseline levels are set, the burner shall be next tuned based on the frequency described in f)(2)e. The general procedure for tuning the burner involves the following steps:

i. Review the plant operations to ensure the plant is operating normally.

ii. Confirm that the portable monitor is calibrated per the manufacture's specifications.

iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for O_2, NOx, and CO. These measurements shall be taken at the same location as the location where the baseline samples were taken. Record the values in the "Pre Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.

iv. Compare the measured stack exhaust gas values with the pollutant baseline values. If all of the measured stack exhaust gas values are equal to or less than 115 percent of the pollutant baseline values, then it is not necessary to tune the burner. Go on to v. below.

The permittee shall have the burners tuned within two calendar weeks of any measured stack exhaust values greater than 115 percent of the baseline values. Make any necessary adjustments and repairs. Repeat iii. and iv. until the measured stack exhaust gas values are equal to or less than 115 percent of the pollutant baseline values.

v. Once all of the measured stack exhaust gas values are within the 115 percent of the pollutant baseline values, record the measured stack exhaust gas values in the "Post Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.

vi. Submit a copy of all *Burner Tuning Reporting Form for Asphalt Concrete Plants* forms produced during the past calendar year to CDAQ with your annual PER.

e. Burner Tuning Frequency

The permittee shall conduct the burner tuning procedure within 20 production days after commencement of the production season in the State of Ohio. The permittee shall conduct another burner tuning procedure within 10 production days before or after June 1st of each year and within 10 production days before or after September 1st of each year. For purposes of this permit, the production season is defined as the time period between the date the first ton of asphalt is produced and the date that the last ton of asphalt is produced during the same calendar year. A burner tuning is not required if the production season ends prior to the associated tuning due date. If the baseline level testing or the initial season tuning is done within 30 days prior to June 1 or September 1, the tuning associated with that due date is not required.

f. Burner Tuning When Using Other Fuels

In addition to the burner tuning procedure required above, the permittee shall conduct the burner tuning procedure within 20 production days from the date the facility switches to a fuel that is different than the fuel burned during the initial emissions tests that establish the pollutant baseline levels or the fuel burned during the most recent burner tuning procedure, whichever is later.

g) Miscellaneous Requirements

(1) 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.

(2) Burner Tuning Form (see next page)

Ohio Environmental Protection Agency

Draft Permit-to-Install and Operate
Kokosing Materials Inc Plant 522
Permit Number: P0106806
Facility ID: 1318008747

BURNER TUNING REPORTING FORM FOR ASPHALT CONCRETE PLANTS	
Facility ID:	Tuning Date:
Legal Name:	Other Company Name (if different than legal name):
Mailing Address:	Other Company Site Address: (if different than mailing address):
City, State, Zip Code:	Other Company City, County, Zip Code:
Site Contact Person:	Site Contact Telephone Number:
Site Contact Title:	Site Contact Fax Number:
Name of company performing tuning:	Name of company performing emission monitoring:
Type of plant (ie: batch, drum mix, etc.):	Calibration date for analyzers:

Reason for Tuning: ☐ Season Initial Tuning ☐ June Tuning ☐ September Tuning ☐ Fuel Switch ☐ Other (describe)

_____

Fuel employed during tuning: ☐ Natural Gas ☐ Propane ☐ # 2 Fuel Oil ☐ # 4 Fuel Oil ☐ Used Oil ☐ Other (describe)

_____

Tuning Results:

Parameter	Recent Stack Test Pollutant Baseline Levels[1]	Results	
		Pre Tuning	Post Tuning[3]
Fuel flow to the burner (gallon/hr) (for fuel oil and on-spec used oil)			
Fuel pressure (psi)			
For burners that require compressed air for proper operation, pressure at the burner (psi)			
Carbon Monoxide (CO) concentrations			
NOx concentrations (ppm)[2]			
Oxygen concentrations (percent)[2]			
Asphalt Production (tons/hr)			

[1] These values are based on the results of the most recent Ohio EPA approved emissions test.
[2] Specify whether on a dry or wet basis.
[3] If the burner did not require adjusting, please record N/A in the post tuning column.

Describe in detail a list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturer's specifications. Use additional paper if necessary.

Authorized Signature: This signature shall constitute personal affirmation that all statements or assertions of fact made in this form are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

Name of Official (Printed or Typed):	Title of Official and Phone Number:
Signature of Official:	Date: