



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LAKE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-18176

DATE: 8/14/2003

The Brewer Company
John Yoder
1354 US Highway 50
Milford, OH 45150

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/14/2003
Effective Date: 8/14/2003**

FINAL PERMIT TO INSTALL 02-18176

Application Number: 02-18176
APS Premise Number: 0243150001
Permit Fee: **\$3400**
Name of Facility: The Brewer Company
Person to Contact: John Yoder
Address: 1354 US Highway 50
Milford, OH 45150

Location of proposed air contaminant source(s) [emissions unit(s)]:
**30060 Lakeland Blvd.
Wickliffe, Ohio**

Description of proposed emissions unit(s):
Mixers for pavement and roofing material manufacture.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

The Brewer Company
PTI Application: 02-18176
Issued: 8/14/2003

Facility ID: 0243150001

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

The Brewer Company
 PTI Application: 02-18176
 Issued: 8/14/2003

Facility ID: 0243150001

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Mike Hopkins**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0218176c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

See Form B's for BAT discussion. Although the total PE allowable for all 4 sources combined is 12.12 TPY, the PM-10 fraction is only 30 to 50% of this value (3.63 to 6.05 TPY) and therefore modeling for PM-10 was not necessary. Also, modeling would not have been necessary anyway due to the 9 years difference in installation dates between some of the sources covered by this PTI.

P016 is the only controlled source in this PTI. The baghouse is included in the description and the control efficiency is used in the compliance determination. However, this unit would comply with the 17-11 PE allowable without venting to the baghouse and since emissions are so minor no operational restrictions were placed on this baghouse. P016 is not heated and therefore OC emissions from the asphalt are negligible if not zero. Therefore, no OC emission limitation is provided for this unit.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
 Permit To Install ENTER PTI NUMBER HERE

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

The Brewer Company
PTI Application: 02-18176
Issued: 8/14/2003

Facility ID: 0243150001

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.89
PE	12.12

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Pavement Repair Emulsions, consisting of mixers M-16, M-17, and M-27, slurry tank M-18, mixing vessels, and a filling line Mixers M-16, M-17, and M-27 are vented to a baghouse.	OAC rule 3745-31-05(A)(3)	0.10 lb of particulate emissions (PE)/hr and 0.10 TPY Visible emissions from the baghouse stack shall not exceed 5% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation established in this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a none

B. Operational Restrictions

1. Annual production for this emissions unit shall not exceed 6,837 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate. Any increase above this threshold would require a modification of this permit.)

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a. Emission Limitation:
0.10 lb of PE/hr and 0.10 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. A 99% control efficiency shall be used for the baghouse. The maximum hourly and annual solids employment rates are 1,170 lbs/hr and 1,517 TPY, respectively.

- 1.b. Emission Limitation:
Visible emissions from the baghouse stack shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 - Roof Coating Section No. 1, consisting of mixers M-8, M-20, M-24, and M-41, mixing vessels, and a filling line	OAC rule 3745-31-05(A)(3)	<p>0.63 lb of organic compounds (OC) per hour and 0.82 TPY</p> <p>2.07 lbs of particulate emissions (PE)/hr and 2.69 TPY</p> <p>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.2.b.</p> <p>There are no emission limitations from this rule because no photochemically reactive materials are employed and no chemical reaction occurs in the mixers.</p>
	OAC rule 3745-17-07(B)	<p>The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-08(B)	<p>The control measure requirements established by this rule are less stringent than those established</p>

pursuant to OAC rule
3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.
- 2.b** The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:

The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

B. Operational Restrictions

1. Annual production for this emissions unit shall not exceed 5,112 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate. Any increase above this threshold would require a modification of this permit.)

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.63 lb of OC per hour and 0.82 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is considered to be conservatively large for this process. The maximum hourly and annual production rates are 3,932 lbs/hr and 5,112 TPY, respectively.

- 1.b. Emission Limitation:
2.07 lbs of PE/hr and 2.69 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 414 lbs/hr and 537 TPY, respectively.

- 1.c. Emission Limitation:
Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - Roof Coatings Section No. 2, consisting of Mixers M-9 and M-19, mixing vessels, and a filling line	OAC rule 3745-31-05(A)(3)	<p>0.76 lb of organic compounds (OC) per hour and 0.99 TPY</p> <p>3.72 lbs of particulate emissions (PE)/hr and 4.83 TPY</p> <p>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.2.b.</p> <p>There are no emission limitations from this rule because no photochemically reactive materials are employed and no chemical reaction occurs in the mixers.</p>
	OAC rule 3745-17-07(B)	<p>The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-08(B)	<p>The control measure requirements established by this rule are less stringent than those established</p>

The B1
PTI A1

Emissions Unit ID: **P018**

pursuant to OAC rule
3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.

2.b The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:

The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

B. Operational Restrictions

1. Annual production for this emissions unit shall not exceed 6,193 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate. Any increase above this threshold would require a modification of this permit.)

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

0.76 lb of OC per hour and 0.99 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is considered to be conservatively large for this process. The maximum hourly and annual production rates are 4,764 lbs/hr and 6,193 TPY, respectively.

1.b. **Emission Limitation:**

3.72 lbs of PE/hr and 4.83 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 743 lbs/hr and 966 TPY, respectively.

1.c. **Emission Limitation:**

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - Master Cotes Line, consisting of mixing vessels, filling lines, and 8 colorant storage tanks	OAC rule 3745-31-05(A)(3)	<p>0.16 lb of organic compounds (OC) per hour and 0.21 TPY</p> <p>2.00 lbs of particulate emissions (PE)/hr and 2.59 TPY</p> <p>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.2.b.</p> <p>There are no emission limitations from this rule because no photochemically reactive materials are employed and no chemical reaction occurs in the mixers.</p>
	OAC rule 3745-17-07(B)	<p>The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-08(B)	<p>The control measure requirements established by this rule are less stringent than those established</p>

The B1
PTI A1

Emissions Unit ID: **P019**

pursuant to OAC rule
3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.

2.b The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:

The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

B. Operational Restrictions

1. Annual production for this emissions unit shall not exceed 1,328 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate. Any increase above this threshold would require a modification of this permit.)

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Emissions Unit ID: **P019**

0.16 lb of OC per hour and 0.21 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95. This is the largest emission factor for liquid asphalt processes under this chapter and is considered to be conservatively large for this process. The maximum hourly and annual production rates are 1,021 lbs/hr and 1,328 TPY, respectively.

1.b. Emission Limitation:

2.00 lbs of PE/hr and 2.59 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 399 lbs/hr and 518 TPY, respectively.

1.c. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Polymer Modified Bitumen Line, consisting of mixing tanks T-20 and T-21, colloid mill, screw conveyor, hopper, and a filling line	OAC rule 3745-31-05(A)(3)	<p>0.67 lb of organic compounds (OC) per hour and 0.87 TPY</p> <p>1.47 lbs of particulate emissions (PE)/hr and 1.91 TPY</p> <p>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.</p>
	OAC rule 3745-17-07(B)	<p>See A.2.b.</p> <p>The visible emission limitation specified in this rule is less stringent than that the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-08(B)	<p>The control measure requirements established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

2.a The hourly PE and OC emission limitations specified above are based on the potential to emit for this emissions unit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limits.

2.b The permittee shall employ the following best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements:

The permittee shall maintain the three side shields around the openings to the mixers in order to reduce wind currents. The permittee shall also ensure that the lids are closed at all times except when materials are added or removed.

B. Operational Restrictions

1. Annual production for this emissions unit shall not exceed 5,416 TPY based on a rolling, 12-month summation. (The annual emissions limitations specified above are based on this maximum production rate. Any increase above this threshold would require a modification of this permit.)

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the rolling, 12-month summation of total production for this emissions unit. (At the end of each month the permittee shall record the production for the month and add it to the total production for the previous 11 months.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all exceedances of the rolling, 12-month production restriction. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
0.67 lb of OC per hour and 0.87 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual OC emission limitation shall be determined using an agreed upon emission factor of 0.32 lb/ton of product. This emission factor is from Table 11.2-4 of AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 11.2 "Asphalt Roofing," dated 1/95.

Emissions Unit ID: **P020**

This is the largest emission factor for liquid asphalt processes under this chapter and is considered to be conservatively large for this process. The maximum hourly and annual production rates are 4,166 lbs/hr and 5,416 TPY, respectively.

- 1.b. Emission Limitation:
1.47 lbs of PE/hr and 1.91 TPY

Applicable Compliance Method:

Compliance with the above hourly and annual PE limitations shall be determined using an emission factor of 10 lbs of PE/ton of solids from AP-42 "Compilation of Air Pollutant Emission Factors," Chapter 6.4 "Paint & Varnish," dated 5/83. This Chapter states that 0.5 to 1.0% is emitted from pigment handling. The low end of the range (0.5%) is used due to varying particle sizes of solids as compared with paint pigments. The maximum hourly and annual solids employment rates are 294 lbs/hr and 382 TPY, respectively.

- 1.c. Emission Limitation:
Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA's Reference Method 9 of 40 CFR, Part 60, Appendix A, along with the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (b).

F. Miscellaneous Requirements

none

NEW SOURCE REVIEW FORM B

PTI Number: 02-18176 Facility ID: 0243150001

FACILITY NAME The Brewer Company

FACILITY DESCRIPTION Mixers for pavement and roofing material manufacture CITY/TWP Wickliffe

SIC CODE 2952 SCC CODE 3 99 999 99 EMISSIONS UNIT ID P016

EMISSIONS UNIT DESCRIPTION Pavement Repair Emulsions, consisting of mixers M-16, M-17, and M-27, slurry tank M-18, mixing vessels, and a filling line

DATE INSTALLED 1/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.06 lb/hr	0.01	0.1 lb/hr	0.1
PM ₁₀					
Sulfur Dioxide					
Organic Compound					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Appropriate hourly and annual PE limits combined with an annual production restriction to ensure compliance. 5% opacity limitation due to low PE limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: n/a

NEW SOURCE REVIEW FORM B

PTI Number: 02-18176 Facility ID: 0243150001

FACILITY NAME The Brewer Company

FACILITY DESCRIPTION Mixers for pavement and roofing material CITY/TWP Wickliffe

Emissions Unit ID: **P020**

SIC CODE 2952 SCC CODE 3 99 999 99 EMISSIONS UNIT ID P017

EMISSIONS UNIT DESCRIPTION Roof Coating Section No. 1, consisting of mixers M-8, M-20, M-24, and M-41, mixing vessels, and a filling line

DATE INSTALLED 12/91

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	2.07 lbs/hr	0.40	2.07 lbs/hr	2.69
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.63 lb/hr	0.12	0.63 lb/hr	0.82
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Appropriate hourly and annual OC and PE limits combined with an annual production restriction to ensure compliance. 5% opacity limitation due to low PE limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: n/a

NEW SOURCE REVIEW FORM B

PTI Number: 02-18176 Facility ID: 0243150001

FACILITY NAME The Brewer Company

FACILITY DESCRIPTION Mixers for pavement and roofing material CITY/TWP Wickliffe

Emissions Unit ID: **P020**

SIC CODE 2952 SCC CODE 3 99 999 99 EMISSIONS UNIT ID P018

EMISSIONS UNIT DESCRIPTION Roof Coatings Section No. 2, consisting of Mixers M-9 and M-19, mixing vessels, and a filling line

DATE INSTALLED 12/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	3.72 lbs/hr	0.72	3.72 lbs/hr	4.83
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.76 lb/hr	0.15	0.76 lb/hr	0.99
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Appropriate hourly and annual OC and PE limits combined with an annual production restriction to ensure compliance. 5% opacity limitation due to low PE limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: n/a

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **P020**

FACILITY DESCRIPTION Mixers for pavement and roofing material manufacture

CITY/TWP Wickliffe

SIC CODE 2952 SCC CODE 3 99 999 99 EMISSIONS UNIT ID P019

EMISSIONS UNIT DESCRIPTION Master Cotes Line, consisting of mixing vessels, filling lines, and 8 colorant storage tanks

DATE INSTALLED 1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	2.0 lbs/hr	0.05	2.0 lbs/hr	2.59
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.16 lb/hr	0.01	0.16 lbs/hr	0.21
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Appropriate hourly and annual OC and PE limits combined with an annual production restriction to ensure compliance. 5% opacity limitation due to low PE limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: n/a

2 NEW SOURCE REVIEW FORM B

PTI Number: 02-18176

Facility ID: 0243150001

FACILITY NAME The Brewer Company

FACILITY DESCRIPTION Mixers for pavement and roofing material CITY/TWP Wickliffe

Emissions Unit ID: **P020**

SIC CODE 2952

SCC CODE 3 99 999 99

EMISSIONS UNIT ID P020

EMISSIONS UNIT DESCRIPTION Polymer Modified Bitumen Line, consisting of mixing tanks T-20 and T-21, colloid mill, screw conveyor, hopper, and a filling line

DATE INSTALLED not yet installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	1.47 lbs/hr	0.09	1.47 lbs/hr	1.91
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.67 lb/hr	0.04	0.67 lb/hr	0.87
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**Enter Determination** Appropriate hourly and annual OC and PE limits combined with an annual production restriction to ensure compliance. 5% opacity limitation due to low PE limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: n/a