State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL** **CERTIFIED MAIL**
**MAHONING COUNTY**

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: 02-17346**

**DATE: 7/15/2003**

Northern Ohio Paving
Gary Cobb
PO Box 266 8775 Blackbird Lane
Thornville, OH 43076

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

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

**CC: USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

| | |
|---|---|
| **Permit To Install** | **Issue Date: 7/15/2003** |
| **Terms and Conditions** | **Effective Date: 7/15/2003** |

**FINAL PERMIT TO INSTALL 02-17346**

| | |
|---|---|
| Application Number: | 02-17346 |
| APS Premise Number: | 0250001000 |
| Permit Fee: | **$200** |
| Name of Facility: | Northern Ohio Paving |
| Person to Contact: | Gary Cobb |
| Address: | PO Box 266 8775 Blackbird Lane<br>Thornville, OH 43076 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1661 Bailey Rd**
**North Jackson**, **Ohio**

Description of proposed emissions unit(s):
**Chapter 31 modification to raise VOC and CO emission limits, derate production, and restrict annual emissions.**

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.

**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 |
|---|---|
| CO | 63.4 |
| VOC | 21.2 |
| NOx | 18.8 |
| SO2 | 12.5 |
| PE | 9.2 |

Emissions Unit ID: **P901**

**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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements |
|---|---|
| P901 - 325 TPH standard Havens Asphalt Plant, Drum Mix. This unit has been designated as unit 74 by the facility. | OAC rule 3745-31-05 (A)(3) |
| | 40 CFR 60 subpart I |
| | OAC rule 3745-35-07(B) |

| | Applicable Emissions Limitations/Control Measures | |
|---|---|---|
| | | Production shall be limited to 400,000 tons as a rolling 12-month cumulative summation. |
| OAC rule 3745-17-07(A)(1) | Emissions from the asphalt plant and silos shall not exceed the following limits: | Production shall be limited to 325 tons per hour. |
| OAC rule 3745-17-11 | 103.0 lbs carbon monoxide (CO) per hour | Emissions from the asphalt drum mixer and silos shall not exceed the following limits: |
| OAC rule 3745-18-06(E) | 35.0 lbs nitrogen oxides ($NO_x$) per hour | 63.4 tons CO as a rolling 12-month cumulative summation |
| OAC rule 3745-21-07(B) | 39.4 lbs volatile organic compounds (VOC) per hour | 18.8 tons $NO_x$ as a rolling 12-month cumulative summation |
| OAC rule 3745-23-06(B) | 15.0 lbs particulate emissions (PE) per hour | 21.2 tons VOC as a rolling 12-month cumulative summation |
| OAC rule 3745-17-07(B)(1) | 20.3 lbs sulfur dioxide ($SO_2$) per hour | 9.2 tons PE as a rolling 12-month cumulative summation |
| OAC rule 3745-17-08(B) | The annual allowable emissions limitations required by this rule are equivalent to those established pursuant to OAC rule 3745-35-07(B). | 12.5 tons $SO_2$ as a rolling 12-month cumulative summation. |
| | The requirements of this rule also include compliance with the requirements of 40 CFR 60 subpart I. | The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to 40 CFR Part 60, Subpart I. |
| | | See A.2.e below. |
| | PE shall not exceed 0.04 gr/dscf of exhaust gases. | See A.2.f below. |
| | | See A.2.g below. |
| | Visible particulate emissions from this source shall not exceed 20% opacity. | See A.2.g below. |
| | | See A.2.h below. |

See A.2.i and A.2.j below.

**2. Additional Terms and Conditions**

**2.a** The permittee shall use only natural gas, #2 fuel oil, or 'on-spec' used oil as a fuel in this unit; 'off-spec' used oil (used oil that exceeds any of the limits established in A.2.b. of these terms and conditions) shall not be used in this unit.

**2.b** All 'on-spec' used oil burned in this emissions unit shall meet the following specifications:

| Contaminant/Property | Allowable Specifications |
|---|---|
| arsenic | 5 ppm, maximum |
| cadmium | 2 ppm, maximum |
| chromium | 10 ppm, maximum |
| lead | 100 ppm, maximum |
| PCB's | 2 ppm, maximum |
| total halogens | 4,000 ppm maximum |
| mercury | 1 ppm, maximum |
| flash point | 100°F, minimum |
| heat content | 135,000 Btu/gallon, minimum |

**2.c** If the permittee is burning used oil with any quantifiable level (above 2 ppm) of PCB's, then the permittee is subject to the notification requirements of 40 CFR 279.62.

**2.d** 'On-spec' waste oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR Part 266.40(c) and OAC rule 3745-58-50. Therefore, the permittee may receive and burn used oil exceeding 1,000 ppm of total halogens (but less than 4,000 ppm, maximum) only if the supplier ["marketer" in 40 Part CFR 266.43(a)] has demonstrated to the Ohio EPA's Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.

**2.e** The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart I and OAC rule 3745-31-05(A)(3).

**2.f** 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.g** The permittee has satisfied the "best available control techniques and operating practices"

required pursuant to OAC rule 3745-21-07(B) and the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

**2.h** Visible emissions of fugitive dust from the aggregate storage bin and conveyor loading areas shall not exceed 20% opacity, as a 3-minute average.

**2.i** 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 bin and conveyor loading areas.

**2.j** The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize the visible emissions of fugitive dust from the conveyors and transfer point to the dryer.

## B. Operational Restrictions

1. To ensure the baghouse is operated according to the manufacturer's specifications and to ensure ongoing compliance with the allowable particulate emission rate, a pressure drop across the baghouse of 2 to 8 inches of water column shall be maintained at all times.

2. The maximum annual asphalt production for this emissions unit shall not exceed 400,000 tons, based upon a rolling, 12-month summation of the monthly production.

   To ensure enforceability during the first 12 calendar months of operation, following the issuance of this permit, the permittee shall not exceed the asphalt production specified in the following table:

| Months(s) | Maximum Allowable Cumulative Asphalt Production (tons) |
|---|---|
| 1 | 97,500 |
| 1-2 | 195,000 |
| 1-3 | 292,500 |
| 1-4 | 390,000 |
| 1-5 | 400,000 |
| 1-6 | 400,000 |
| 1-7 | 400,000 |
| 1-8 | 400,000 |
| 1-9 | 400,000 |

| | |
|---|---|
| 1-10 | 400,000 |
| 1-11 | 400,000 |
| 1-12 | 400,000 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the asphalt production limitation shall be based upon a rolling, 12-month summation of the monthly asphalt production.

3. The permittee may substitute recycled asphalt pavement (RAP) aggregates in the raw material feed.

4. The permittee may burn 'on-spec' used oil or #2 fuel oil with a maximum sulfur content of 0.5% by weight.

5. The maximum hourly production rate shall not exceed 325 tons per hour.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The total production of asphalt for each month.

   b. The rolling, 12-month cumulative summation of asphalt produced

2. The permittee shall maintain records of the hourly asphalt production rate.

3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

4. The permittee shall maintain daily records of the percentage of RAP mixed with the raw material feed mix.

5. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of #2 fuel oil and 'on-spec' used oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analysis for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

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

7. The permittee shall receive a chemical analysis with each shipment of 'on-spec' used oil from the supplier or the permittee may perform their own analysis. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number (if available), and the following information:

   a. date of shipment or delivery,
   b. quantity of used oil received,
   c. the Btu value of the used oil,
   d. the flash point of the used oil,
   e. the arsenic content,
   f. the cadmium content,
   g. the chromium content,
   h. the lead content,
   i. the PCB content,
   j. the total halogen content, and
   k. the mercury content.

   Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of and 'on-spec' used oil shipment received by this facility, of any 'on-spec' used oil stored at this facility, or of any 'on-spec' used oil sampled at the dryer.

8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the aggregate storage bin and conveyor loading areas. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

   d. the total duration of any visible emission incident; and

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

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

9. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the conveyors and the transfer point to the dryer and for any visible particulate emissions from the baghouse. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

   d. the total duration of any visible emission incident; and

   e. any corrective actions taken to eliminate the visible emissions.

10. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

    Pollutant: Heptane

    TLV ($mg/m^3$): 1,639

Maximum Hourly Emission Rate (lbs/hr): 2

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 6.3

MAGLC ($\mu g/m^3$): 39,031

11. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

    a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

    b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

    c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

12. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

13. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

    a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. By June 30 and December 31 of each calendar year, the permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure dropacross the baghouse did not comply with the allowable range specified above, while the emissions unit was in operation.

2. By June 30 and December 31 of each calendar year, the permittee shall submit written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the aggregate storage bin and/or conveyor loading areas, and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

3. By June 30 and December 31 of each calendar year, the permittee shall submit written reports that (a) identify all days during which any visible particulate emissions were observed from the conveyors, the transfer point to the dryer, and/or the baghouse, and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

5. The permittee shall submit deviation (excursion) reports which identify any exceedence of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedences of the maximum allowable cumulative production rate limitation.

6. By June 30 and December 31 of each calendar year, the permittee shall submit copies of the permittee's or oil supplier's analyses for each shipment of 'on-spec' used oil which is received for burning in this emissions unit, or a letter stating no 'on-spec' used oil was received that quarter, as appropriate. The permittee's or oil supplier's analysis shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

   a. the total quantity of oil received in each shipment (gallons);

   b. the weighted* average sulfur dioxide emission rate (pounds/mmBtu) for the oil received during the calendar month; and,

   c. the weighted* average heat content (Btu/gallon) of the oil received during the calendar month.

   *In proportion to the quantity of oil received in each shipment during the calendar month.

7. The June 30 reports required by paragraphs D.1 through D.6 shall include the information obtained since December 31; and the December 31 reports required by paragraphs D.1 through D.6 shall include the information obtained since June 30.

8. The permittee shall notify the USEPA and the Ohio EPA if any of the 'on-spec' used oil exceeds the 'on-spec' used oil specifications. An identification number from USEPA shall be obtained prior to the combustion of any used oil in exceedence of the limitations established in this permit for 'on-spec' used oil.

10. By April 15 of each calendar year, the permittee shall submit a report that summarizes the total emissions, in tons/year, of particulates, CO, NOx, SO2, and VOC from this emissions unit for the previous calendar year.

11. The permittee shall report each exceedance of the percent RAP usage limitation within 30 days of the exceedance.

12. The permittee shall report each exceedance of the percent sulfur usage limitation within 30 days of the exceedance.

13. The permittee shall report each exceedance of the 325 ton per hour production limitation.

**E. Testing Requirements**

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

   a. Emission testing for PE, CO, NOx, VOC, and SO2 shall be conducted upon request of Ohio EPA.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, CO, NOx, SO2 and VOC.

   c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

| Pollutant | Test Method | Location |
|---|---|---|
| PE | Methods 1- 5 | 40 CFR Part 60, Appendix A |
| | Method 17 | " (if appropriate) |
| SO2 | Methods 1-4 and 6 | 40 CFR Part 60, Appendix A |
| NOX | Methods 1-4 and 7 | 40 CFR Part 60, Appendix A |
| CO | Methods 1-4 and 10 | 40 CFR Part 60, Appendix A |
| VOC | Methods 1-4 and 25 | " |
| | or 25A | " |

   d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity and using RAP at 50% of the feed mix, or at whatever percent RAP the facility wishes to establish as their maximum allowable RAP, and firing on-spec used oil, unless otherwise specified or approved by NEDO.

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

Personnel from NEDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission tests shall be signed by the persons or person responsible for the test and submitted to NEDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from NEDO.

2. Emission Limitation:

0.04 grain of particulate matter per dry standard cubic foot

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods specified in section E.1. above.

3. Emission Limitation:

15.0 pounds of particulate matter per hour

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods specified in section E.1. above.

4. Emission Limitation:

9.2 tons of particulate matter as 12-month rolling cumulative summation

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

E = [A / B] * C * [1 ton / 2,000 lbs]

Where:
E = PE rate as 12-month rolling cumulative summation.
A = emission rate in pounds PE per hour, based on the most recent performance stack test.
B = the maximum allowable hourly production rate (325 tons/hr)
C= the 12-month rolling cumulative summation of tons of asphalt produced.

5. Emission Limitation:

35.0 pounds of $NO_X$ per hour

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods specified in section E.1. above.

6. Emission Limitation:

18.8 tons of $NO_X$ as 12-month rolling cumulative summation

Compliance shall be determined based upon the following formula:

E = [A / B] * C * [1 ton / 2,000 lbs]

Where:
E = PE rate as 12-month rolling cumulative summation.
A = emission rate in pounds PE per hour, based on the most recent performance stack test.
B = the maximum allowable hourly production rate (325 tons/hr)
C= the 12-month rolling cumulative summation of tons of asphalt produced.

7. Emission Limitation:

103.0 pounds of CO per hour

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods specified in section E.1. above.

8. Emission Limitation:

63.4 tons of CO as 12-month rolling cumulative summation

Compliance shall be determined based upon the following formula:

E = [A / B] * C * [1 ton / 2,000 lbs]

Where:
E = PE rate as 12-month rolling cumulative summation.
A = emission rate in pounds PE per hour, based on the most recent performance stack test.
B = the maximum allowable hourly production rate (325 tons/hr)
C= the 12-month rolling cumulative summation of tons of asphalt produced.

9. Emission Limitation:

20.3 pounds of $SO_2$ per hour

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods specified in section E.1. above.

10. Emission Limitation:

12.5 tons of SO2 as 12-month rolling cumulative summation

Compliance shall be determined based upon the following formula:

E = [A / B] * C * [1 ton / 2,000 lbs]

Where:
E = PE rate as 12-month rolling cumulative summation.
A = emission rate in pounds PE per hour, based on the most recent performance stack test.
B = the maximum allowable hourly production rate (325 tons/hr)
C= the 12-month rolling cumulative summation of tons of asphalt produced.

11. Emission Limitation:

39.4 pounds of OC per hour

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods specified in section E.1. above.

12. Emission Limitation:

21.2 tons of OC as 12-month rolling cumulative summation

Compliance shall be determined based upon the following formula:

E = [A / B] * C * [1 ton / 2,000 lbs]

Where:
E = PE rate as 12-month rolling cumulative summation.
A = emission rate in pounds PE per hour, based on the most recent performance stack test.
B = the maximum allowable hourly production rate (325 tons/hr)
C= the 12-month rolling cumulative summation of tons of asphalt produced.

13. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

USEPA Method 9 of 40 CFR Part 60, Appendix A

**F. Miscellaneous Requirements**

1. This PTI replaces PTI number 02-14896, issued for this emissions unit on July 24, 2001.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the emissions unit.

3. The permittee is hereby notified that this permit and all Agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.