

Facility ID: 0285000099 Issuance type: Final State Permit To Operate

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

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

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

Facility ID: 0285000099 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Standard Steel 120 ton per hour asphalt batch plant, equipped with venturi scrubber for primary controls and a Wheelabrator multiclone secondary control system for particulate emissions (PE).	OAC rule 3745-31-05(A)(3) (PTI 02-16897)	Emissions from the asphalt plant and silos shall not exceed the following limits: 48 lbs carbon monoxide (CO) per hour 14.4 lbs nitrogen oxides (NOx) per hour 31.70 lbs volatile organic compounds (VOC) per hour 12.5 lbs particulate emissions (PE) per hour 10.6 lbs sulfur dioxide (SO2) per hour The annual allowable emission limitations required by this applicable rule are equivalent to those established pursuant to OAC rule 3745-35-07(B). The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and 40 CFR, Part 60, Subpart I. Visible particulate emissions from material transfer shall not exceed 20 percent opacity, as a 3-minute average. The permittee shall employ reasonably available control measures consisting of the following: The drop height of the front-end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the elevator loading area. The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize the visible emissions of fugitive dust from conveyors and transfer points to the dryer. See sections A.2.a and A.2.b below. Operating hours shall be limited to 2,000 hours per year as a rolling, 12-month cumulative summation. Emissions from the asphalt drum mixer and silos shall not exceed the following limits: 48 tons CO as a rolling, 12-month, cumulative
	OAC rule 3745-35-07(B)	

	summation
	14.4 tons NOx as a rolling, 12-month, cumulative summation
	31.70 tons VOC as a rolling, 12-month, cumulative summation
	12.5 tons PE as a rolling, 12-month, cumulative summation
	10.6 tons SO2 as a rolling, 12-month, cumulative summation
NSPS (40 CFR, Part 60, Subpart I)	PE shall not exceed 0.04 gr/dscf of exhaust gases.
	Visible particulate emissions from the scrubber stack shall not exceed 20 percent opacity, as a 6-minute average.
OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation required by this applicable rule is less stringent than the emission limitation specified in 40 CFR Part 60, Subpart I.
OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(1)(e).
OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-07(B).
OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-07(B)	See section A.2.c below.
OAC rule 3745-21-08(B)	See section A.2.d below.

2. **Additional Terms and Conditions**

- (a) 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 rules 3745-21-08(B) and 3745-23-06(B) by committing to comply with the BAT requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 02-16897.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded and is no longer part of State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's SIP. Therefore, until the SIP revision occurs and the U.S. EPA approves the revision the SIP, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee shall use only natural gas or #2 fuel oil. Used (waste) oil shall not be used in this unit. The permittee shall ensure that the dust control equipment is operated with sufficient air volume to minimize or eliminate visible particulate emissions of fugitive dust at the point of capture to the extent possible with good engineering design. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 02-16897. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 02-16897.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. **Operational Restrictions**

- 1. The pressure drop across the dust control equipment shall be maintained within the range of 2.0 to 8.0 inches of water while the emissions unit is in operation.

2. The maximum hours of operation for this emissions unit shall not exceed 2,000 hours per year as a rolling, cumulative, 12-month summation of the monthly hours of operation.
 3. The permittee shall combust only natural gas, or #2 fuel oil of no more than 0.5 percent sulfur content, by weight, in this emissions unit. Combustion of any other fuel will constitute a violation of this term.
 4. All aggregate transferred to the elevated storage bins shall contain sufficient moisture so as to minimize or eliminate visible emissions of fugitive dust.
 5. During the loading of the aggregate conveyor or storage bins, the drop height of the front-end loader shall be minimized in order to minimize or eliminate the visible emissions of fugitive dust.
 6. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials introduced at any given time, based on a monthly average.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month;
 - b. the rolling, 12-month, cumulative summation of the operating hours;
 - c. for each month RAP is used, the asphalt production rate for each month;
 - d. the amount of RAP used for each month; and
 - e. the average percentage of RAP used [(d) divided by (c) and then multiplied by 100].
 2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
 3. The permittee shall collect or require the oil supplier to collect a representative grab sample of each shipment of #2 fuel 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 (percent) and heat content (Btu/gallon) 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 Ohio EPA Northeast District Office. For each shipment of 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.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the pressure drop across the dust control system did not comply with the allowable range specified above.
 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the summation of the rolling, cumulative, 12-month operating hours limitation.
 3. The permittee shall submit deviation (excursion) reports that identify any exceedances of the allowable sulfur content (percent) of the #2 fuel oil.
 4. The permittee shall submit deviation reports that identify any exceedances of the RAP usage restriction specified above.
 5. The reports denoted by sections D.1 through D.4 are to be submitted quarterly and are due by the dates and as described in the General Terms and Conditions of this permit under Part 1, section (A)(2).
 6. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or #2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 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:
Emission Limitation:

0.04 grain of PE per dry standard cubic foot

Applicable Compliance Method:

Compliance shall be determined through stack testing as specified in section E.2 below.
Emission Limitation:

12.5 pounds of PE per hour

Applicable Compliance Method:

Compliance shall be determined through stack testing as specified in section E.2 below.
Emission Limitation:

12.5 tons of PE as a rolling, 12-month, cumulative summation
14.4 tons of NOx as a rolling, 12-month, cumulative summation
48 tons of CO as a rolling, 12-month, cumulative summation
10.6 tons of SO2 as a rolling, 12-month, cumulative summation
31.70 tons of VOC as a rolling, 12-month, cumulative summation

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

$$E = A \times B [1 \text{ ton}/2,000 \text{ lbs}]$$

where:

E = appropriate pollutant emission rate in tons per rolling, 12-month period;

A = appropriate pollutant emission rate as determined during the most recent stack test that demonstrated the emission unit to be in compliance, in pounds per hour (lbs/hr); and

B = the rolling, 12-month summation of operating hours.

Emission Limitation:

14.4 pounds of NO_x per hour

Applicable Compliance Method:

Stack testing performed on September 1, 2004 indicated an actual emission rate of 8.22 lbs/hr of NO_x. No additional stack testing for NO_x is required by this permit.

Emission Limitation:

48 pounds of CO per hour

Applicable Compliance Method:

Stack testing performed on September 1, 2004 indicated an actual emission rate of 12.51 lbs/hr of CO. No additional stack testing for CO is required by this permit.

Emission Limitation:

10.6 pounds of SO₂ per hour

Applicable Compliance Method:

Compliance with the hourly SO₂ emission limitation shall be determined by the record keeping specified in section C.3 above.

Emission Limitation:

31.70 pounds of VOC per hour

Applicable Compliance Method:

Stack testing performed on September 1, 2004 indicated an actual emission rate of 21.33 lbs/hr of VOC. No additional stack testing for VOC is required during this permit term.

Emission Limitation:

Visible particulate emissions from the scrubber stack shall not exceed 20 percent opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

Emission Limitation:

Visible particulate emissions from material transfer shall not exceed 20 percent opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, with the modifications listed in OAC rule 3745-17-03(B)(3)(a).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 45 days after startup of the 2007 production season.
 - b. The test shall be performed while burning #2 fuel oil. If there are no plans to use #2 fuel oil during the 2007 season, the test may be conducted while burning natural gas. However, if a switch to #2 oil occurs at any time in the future, stack testing while burning #2 oil must be performed within 30 days of the switch.
 - c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.

If at any time in the future, the permittee chooses to use RAP, the permittee shall test for VOC while burning #2 fuel oil and the maximum quantity of RAP the company wishes to establish.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE - Methods 1 through 5 of 40 CFR Part 60, Appendix A
 - e. The test shall be performed within 10 percent of the 120 tons per hour, which is the plant's maximum design production rate.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test"

notification to Ohio EPA Northeast District Office. 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 Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

g. Personnel from Ohio EPA Northeast District Office 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.

h. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with 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 PTI 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 threshold limit value (TLV) to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.