Street Address:
Lazarus Gov. Center

State of Ohio Environmental Protection Agency
TELEPHONE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
WAYNE COUNTY
Application No: 02-16897
Fac ID: 0285000099
DATE: 2/1/2005

D and R Supply Inc
Gary Radabaugh
18228 Fulton Rd
Marshallville, OH 44645

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 0** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

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

WAYNE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-16897** FOR AN AIR CONTAMINANT SOURCE FOR
D and R Supply Inc

On 2/1/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **D and R Supply Inc**, located at **18228 Fulton Rd, Marshallville**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-16897:

Administrative modification to PTI 02-16897 to correct the VOC emission limit.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]

DRAFT MODIFICATION OF PERMIT TO INSTALL 02-16897

Application Number:	02-16897
Facility ID:	0285000099
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	D and R Supply Inc
Person to Contact:	Gary Radabaugh
Address:	18228 Fulton Rd Marshallville, OH 44645

Location of proposed air contaminant source(s) [emissions unit(s)]:
18228 Fulton Rd
Marshallville, **Ohio**

Description of proposed emissions unit(s):
Administrative modification to PTI 02-16897 to correct the VOC emission limit.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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	48
NOx	14.4
VOC	31.70
PE	12.5
SO2	10.6

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 - Standard Steel 120 ton per hour asphalt batch plant, equipped with venturi scrubber for secondary controls and a Wheelabrator multiclone primary control system for particulate emissions	OAC rule 3745-31-05 (A)(3)
	OAC rule 3745-35-07(B)
	OAC rule 3745-17-07(A)(1)
	NSPS (40 CFR Part 60, Subpart I)

		Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-11(B) OAC rule 3745-21-08(B) OAC rule 3745-21-07(B) OAC rule 3745-23-06(B) OAC rule 3745-18-06 OAC rule 3745-17-08(B) OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-07(B)	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 (NO_x) per hour 31.70 lbs volatile organic compounds (VOC) per hour 12.5 lbs particulate emissions (PE) per hour 10.6 lbs sulfur dioxide (SO_2) per hour The annual allowable emissions limitations required by this 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 40 CFR 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% opacity. Operating hours shall be limited to 2,000 hours 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 summation

14.4 tons NO_x 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 SO_2 as a rolling 12-month cumulative summation

The visible particulate emissions limitation for the stack, as specified by this rule, is less stringent than the emission limitation established pursuant to 40 CFR 60, Subpart I.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See A.2.a.

See A.2.a.

See A.2.a.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).

Minimize visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper. Opacity shall not exceed 20%.

Visible particulate emissions from material transfer shall not exceed 20% opacity.

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.

The visible particulate emissions limitation for fugitive dust, as specified by this rule, is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Compliance with emission limits used in this permit shall be demonstrated through performance testing. If testing reveals emission factors are inaccurate compliance then the emissions limits may be adjusted.

2.b 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 this permit to install.

2.c The permittee shall use only natural gas or #2 fuel oil. Used (waste) oil shall not be used in this unit.

2.d 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.

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. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual.

2. The maximum hours of operation for this emissions unit shall not exceed 2,000 hours as a rolling cumulative 12-month summation of the monthly hours of operation.

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

Month	Maximum Allowable Cumulative Operation, hours/yr
1	360
1-2	720
1-3	1,080
1-4	1,440
1-5	1,800
1-6	2,000
1-7	2,000
1-8	2,000
1-9	2,000
1-10	2,000

1-11	2,000
1-12	2,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual hours of operation limitation shall be based upon a rolling 12 month cumulative summation of the operating hours.

3. The source comprising this PTI shall combust only natural gas, or #2 fuel oil of no more than 0.5% sulfur content by weight. 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 recycled asphalt aggregates (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials introduce at any given time, based on a monthly average.

C. Monitoring and/or Recordkeeping Requirements

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

a. The operating hours for each month;

b. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of operation; and

c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month cumulative summation of the operating hours.

d. Each month RAP is used the asphalt production rate for each month.

e. The amount of recycle asphalt used for each month.

f. The average percentage of recycle asphalt used (e. divided by d. multiplied by 100).

2. The permittee shall record the pressure drop across the dust control equipment while the emissions unit is in operation, 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 which identify all exceedances of the summation of the rolling cumulative 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels, as per Section B.2.

3. The permittee shall submit deviation (excursion) reports which 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 limitation in term B.6.

5. The reports denoted by terms 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.

7. Except as otherwise provided in the terms and conditions of this permit, the permittee shall submit 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations and, (c) any corrective actions or preventative measures that have been or will be taken, shall be submitted to the Ohio EPA's Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that

no deviations occurred during that quarter.

8. This emissions unit is subject to the applicable provisions of Subpart I of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

a. Construction date (no later than 30 days after such date);

b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

c. Actual start-up date (within 15 days after such date); and

d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC- Air Quality Modeling and Planning
Lazarus Government Center
122 S. Front St.
Columbus, OH 43215

and

Ohio Environmental Protection Agency
Northeast District Office
Division of Air Pollution Control
2110 E. Aurora Rd.
Twinsburg, OH 44087

E. Testing Requirements

1. Emission Limitation:

0.04 grain of particulate emissions per dry standard cubic foot

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.15.

2. Emission Limitation:

12.5 pounds of particulate emissions per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.15.

3. Emission Limitation:

12.5 tons of PE as a rolling 12-month cumulative summation

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

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

Where:

E = PE emission rate in tons per rolling 12-month period
A = 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)
B = rolling 12-month summation of operating hours

4. Emission Limitation:

14.4 pounds of NO_x per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.15.

5. Emission Limitation:

14.4 tons of NO_x as a rolling 12-month cumulative summation

Compliance shall be determined based upon the following formula:

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

Where:

E = NO_x emission rate in tons per rolling 12-month period
A = 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)
B = rolling 12-month summation of operating hours

6. Emission Limitation:

48 pounds of CO per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.15.

7. Emission Limitation:

48 tons of CO as a rolling 12-month cumulative summation

Compliance shall be determined based upon the following formula:

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

Where:

E = CO emission rate in tons per rolling 12-month period
A = 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)
B = rolling 12-month summation of operating hours

8. Emission Limitation:

10.6 pounds of SO_2 per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.15.

9. Emission Limitation:

10.6 tons of SO_2 as a rolling 12-month cumulative summation

Compliance shall be determined based upon the following formula:

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

Where:

E = SO_2 emission rate in tons per rolling 12-month period
A = 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)
B = rolling 12-month summation of operating hours

10. Emission Limitation:

31.70 pounds of VOC per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.15.

11. Emission Limitation:

31.70 tons of VOC as a rolling 12-month cumulative summation

Compliance shall be determined based upon the following formula:

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

Where:

E = VOC emission rate in tons per rolling 12-month period
A = 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)
B = rolling 12-month summation of operating hours

12. Emission Limitation:

Visible particulate emissions from the scrubber stack shall not exceed 20% opacity.

Applicable Compliance Method:

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

13. Emission Limitation:

Visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper shall not exceed 20 percent opacity.

Applicable Compliance Method:

Compliance shall be demonstrated by use of good engineering practices for the operations of this equipment. If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

14. Emission Limitation:

Visible emissions of fugitive dust from material transfer shall not exceed 20 percent opacity.

Applicable Compliance Method:

Compliance shall be demonstrated by use of good engineering practices for the operations of aggregate transfer equipment and storage bins. If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

15. 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 2005 production season.

b. The test shall be performed while burning #2 fuel oil.

c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.

Emissions testing for NOx, CO, VOC, and SO2 was performed on September 1, 2004. The results of this testing demonstrate compliance with the respective emission limits in this permit; therefore, no additional emissions testing is required at this time for these pollutants, but may be required in the future.

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):

Particulates	-	Method 5 of 40 CFR Part 60, Appendix A
NO_x	-	Method 7, 7E of 40 CFR Part 60, Appendix A
CO	-	Method 10 of 40 CFR Part 60, Appendix A
VOC	-	Method 18 and/or 25, of 40 CFR Part 60, Appendix A, as appropriate
SO_2	-	Method 6 of 40 CFR Part 60, Appendix A

Visible emissions Method 9 of 40 CFR Part 60, Appendix A

e. The test shall be performed within 10% 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's 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's Northeast District Office's refusal to accept the results of the emission test(s).

g. Personnel from Ohio EPA's 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's 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's 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.