☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **03-16220**

A. Source Description

This permit encompasses the equipment used for a drum-mix asphalt plant of 300 tons per hour maximum rated capacity.

B. Facility Emissions and Attainment Status

This facility has requested a synthetic minor because potential emissions of carbon monoxide exceed 250 tons per year (TPY), potential emissions of sulfur dioxide, and nitrogen oxide exceed 100 TPY. Federally enforceable restrictions will lower potential emissions of the above mentioned pollutants to less than 100 TPY. These restrictions will keep the company from the requirements of PSD review and Title V applicability.

C. Source Emissions

Shelley Materials has requested federally enforceable restrictions of varying monthly production limits and 400,000 production tons for the annual restriction. The annual production restriction will result in allowable emission of: 6.60 TPY PE (stack), 2.00 TPY (fugitive), 24.00 TPY SO2, 54.80 TPY CO, 15.00 TPY NOx, and 40.00 TPY VOC.

D. Conclusion

This facility will have federally enforceable limitations that will keep permit allowable emissions below the trigger levels for PSD review or Title V applicability.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
OTTAWA COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 03-16220
Fac ID: 0362000133

DATE: 2/22/2005

Shelley Materials
Susanne Hanf
1700 Fostoria Avenue, Suite 200
Findlay, OH 45840

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the 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 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 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 a fee of **$2500** 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 NWDO Toledo Metropolitan Area Council of Governments MI

OTTAWA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-16220** FOR AN AIR CONTAMINANT SOURCE FOR
Shelley Materials

On 2/22/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Shelley Materials**, located at **3997 Genoa-Clay Center Road, Clay Center**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16220:

Modification to 300 TPH fixed asphalt plant to allow use of alternate fuels.

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.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-16220

Application Number:	03-16220
Facility ID:	0362000133
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Shelley Materials
Person to Contact:	Susanne Hanf
Address:	1700 Fostoria Avenue, Suite 200 Findlay, OH 45840

Location of proposed air contaminant source(s) [emissions unit(s)]:
3997 Genoa-Clay Center Road
Clay Center, Ohio

Description of proposed emissions unit(s):
Modification to 300 TPH fixed asphalt plant to allow use of alternate fuels.

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

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
PE	6.60
fugitive PE	2.00
SO2	24.00
CO	54.80
NOx	15.00
VOC	40.00

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
P901 - 300 ton per hour drum mix asphalt plant with baghouse [modification to existing emissions unit (previously permitted as P001) to allow the use of alternate fuels]

Emissions Unit ID: **P901**

Applicable Rules/Requirements		Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	40 CFR Part 60, Subpart I OAC rule 3745-17-11 (B) OAC rule 3745-17-07(A) OAC rule 3745-17-07 (B) OAC rule 3745-17-08 (B) OAC rule 3745-18-06(E)(2) OAC rule 3745-23-06(B) OAC rule 3745-21-07(B) OAC rule 3745-21-08(B)	Stack Emissions: 9.90 pounds particulate emissions (PE) per hour; when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil or natural gas. 36.00 pounds sulfur dioxide (SO2) per hour; when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil. 10.20 pounds sulfur dioxide (SO2) per hour; when burning natural gas. 22.50 pounds nitrogen oxide (NOx) per hour; when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil. 7.80 pounds nitrogen oxide (NOx) per hour; when burning natural gas. 82.20 pounds carbon monoxide (CO) per hour; when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil. or natural gas. 60.00 pounds volatile organic compounds (VOC) per hour when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil or natural gas. see A.2.a see A.2.g.
OAC rule 3745-31-05 (C)		6.60 tons PE (stack) per rolling 12-month period (see A.2.b)

2.00 tons fugitive PE per rolling 12-month period (see A.2.b)

24.00 tons SO2 per rolling 12-month period (see A.2.b)

15.00 tons NOx per rolling 12-month period (see A.2.b)

54.80 tons CO per rolling 12-month period (see A.2.b)

40.00 tons VOC per rolling 12-month period (see A.2.b)

0.04 gr PE/dscf of exhaust gas

Emissions from the baghouse stack shall not exhibit 20% opacity, or greater.

see A.2.e

see A.2.i

see A.2.f

see A.2.g

see A.2.e

see A.2.j

see A.2.j

see A.2.j

2. Additional Terms and Conditions

2.a "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the following:

i. Use of baghouse for PE control of drum mix operations. The baghouse control system exhaust shall meet the requirements of 40 CFR Part 60, Subpart I (0.04 gr PE/dscf of exhaust gas). The permittee shall ensure that the baghouse is operated with sufficient air volume to eliminate visible fugitive emissions from the rotary drum;

ii. Use of best available control measures (see A.2.c)

2.b Annual emissions shall not exceed the following, based upon a rolling, 12-month summation of the monthly emissions:

i. 24.00 tons SO_2 per rolling 12-month period

ii. 54.80 tons CO per rolling 12-month period

iii. 15.00 tons NOx per rolling 12-month period

iv. 40.00 tons VOC per rolling 12-month period

v. 6.60 tons PE (stack) per rolling 12-month period

vi. 2.00 tons PE (fugitive) per rolling 12-month period

The emission limitations are based on production restrictions (see B.1) for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) and Title V applicability.

2.c The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust from the material handling operations (see A.2.d) associated with emissions unit P901. In accordance with the permit application, the permittee maintains that the inherent moisture content of the material handled is more than sufficient to comply with all applicable requirements. If the inherent moisture content of the material is not sufficient to comply with all applicable requirements the permittee shall install equipment to apply water or any other suitable dust suppressant, at appropriate locations on the material handling system.

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

2.d Visible fugitive particulate emissions from material handling operations for emissions unit P901 shall not exceed the following opacity restrictions:

Emission Point (company ID)	**Equipment Type**	**Opacity Limit as a three-Minute Average**	**Regulatory Basis for Limit**
material unloading into feeder bins	transfer point	20%	OAC Rule 3745-31-05(A)
material transfer from feeder bin conveyor to dryer feed conveyor	transfer point	20%	OAC Rule 3745-31-05(A)
material transfer from dryer feed conveyor to dryer	transfer point	20%	OAC Rule 3745-31-05(A)

2.e 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.f 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)(11)(e).

2.g The facility 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 3745-17-08 (B).

2.h The requirements of this rule also include compliance with 40 CFR Part 60, Subpart I and OAC rule 3745-31-05(C).

2.i The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart I.

2.j The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and 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 this Permit to Install.

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. Annual asphalt production from emissions unit P901 shall not exceed 400,000 tons per year, based on a rolling, 12 month summation of the monthly production rates.

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

MONTH(s)	MAXIMUM ALLOWABLE CUMULATIVE ASPHALT PRODUCTION (TONS)
1	100,000
1-2	150,000
1-3	200,000
1-4	250,000
1-5	300,000
1-6	350,000
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 under the provisions of this permit, compliance with the annual production limitation shall be based upon a rolling, 12 month summation of the monthly production rates.

2. The permittee may substitute recycled asphalt aggregates in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials introduce at any given time.

3. The permittee shall only employ materials/fuels listed in the permit to install application. Any changes in the materials employed/combusted may be deemed a "modification" to the emissions unit and, as such will require prior notification to and approval from the Ohio EPA, Division of Air Pollution Control, Northwest District Office.

4. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation

5. All on-spec used oil burned in emissions unit P901 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	50 ppm, maximum*
total halogens	4000 ppm maximum**
mercury	1 ppm, maximum
flash point	100 F, minimum
heat content	135,000 Btu/gallon, minimum

* If the permittee is burning used oil with any quantifiable level >2 ppm <50 ppm of PCB's, then the permittee is subject to any applicable requirements found under 40 CFR part 279, subparts G and H and 40 CFR 761.20 (e).

** Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 279.10 (b)(1)(ii) and OAC rule 3745-279-10 (B)(1)(b). Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the used oil burner has demonstrated the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-63.

6. The permittee may not burn any used oil which does not meet the specifications listed in OAC rule 3745-279-11 without first obtaining an air permit to install that authorizes the burning of such used oil. The burning of used oil that does not meet specifications listed in OAC rule 3745-279-11 is subject to OAC rule 3745-279-60 through 67 and the applicable portions of 40 CFR part 761. In addition, if the permittee is burning used oil which exceed the mercury limitation and falls below the heat content limitation listed in term B.f, then this may trigger the requirement to apply for and obtain an air permit to install.

7. The burning of hazardous waste is prohibited without first complying with all applicable state and federal hazardous waste and air regulations and permits.

8. The permittee shall conduct burner performance tuning for purposes of minimizing emissions. Burner performance tuning shall contain at a minimum the evaluation of and adjustment to manufacturer's specifications of the following:

   i. Fuel flow to the burner (for fuel oil and on spec used oil);

ii. Differential pressure of the baghouse to ensure proper air flow through the plant;

iii. Flue gas analysis (of gases present in the drum and or stack) for CO, O2, CO2, and NOx;

iv. Fuel pressure; and

v. For burners that require compressed air for proper operation, correct pressure at the burner

9. The permittee shall conduct the burner tuning procedure within 15 production days after commencement of the production season in the State of Ohio. The permittee shall conduct another burner tuning procedure within 10 production days before or after June 1st of each year and within 10 production days before or after September 1st of each year. For purposes of this permit, the production season is defined as the time period between the date the first ton of asphalt is produced and the date the last ton of asphalt is produced during the same calendar year.

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

11. The on-spec used oil, #2 fuel oil, #4 fuel oil, and #6 fuel oil shall meet the following requirements:

a. for on-spec used oil:

i. The sulfur content shall not exceed 0.5 weight percent;

ii. The on-spec used oil shall have a minimum heat content of 135,000 Btu/gal.

b. for #2 fuel oil:

i. The sulfur content shall not exceed 0.5 weight percent;

ii. The #2 fuel oil shall have a minimum heat content of 135,000 Btu/gal.

c. for #4 fuel oil:

i. The sulfur content shall not exceed 0.8 weight percent;

ii. The #2 fuel oil shall have a minimum heat content of 135,000 Btu/gal.

d. for #6 fuel oil:

i. The sulfur content shall not exceed 1.0 weight percent;

ii. The #6 fuel oil shall have a minimum heat content of 135,000 Btu/gal.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall 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.

2. Except as otherwise provided in this section, the permittee shall perform inspections of the fugitive material handling operations in accordance with the following frequencies:

material handling operation(s)	minimum inspection frequency
all material unloading into feeder bins	once during each day of operation
all material transfer from feeder bin conveyor to dryer feed conveyor	once during each day of operation
all material transfer from dryer feed conveyor to dryer	once during each day of operation

3. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during times of asphaltic concrete production.

4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

5. The permittee shall maintain records of the following information:

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented.

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

   a. Asphalt production rate in tons per month.

b. Beginning after the first 12 calendar months of operation under the provisions of this permit, the rolling, 12-month summation of the monthly asphalt production rate.

Also, during the first 12 calendar months of operation under the provisions of this permit, the permittee shall record the cumulative asphalt production rate for each calendar month.

7. The permittee shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:

a. The date of the shipment or delivery.

b. The quantity of used oil received.

c. The Btu value of the used oil, in Btu/gallon.

d. The flash point of the used oil, in Btu/gallon.

e. The arsenic content, in ppm.

f. The cadmium content, in ppm.

g. The chromium content, in ppm.

h. The lead content, in ppm.

i. The PCB content, in ppm.

j. The total halogen content, in ppm.

k. The mercury content, in ppm.

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 analysis through an independent laboratory or any used oil shipment received by this facility, of any used oil stored at this facility, or of any used oil sampled at the dryer.

8. The permittee shall properly operate and maintain portable devices to monitor the concentration

of NOx, CO, O2, and CO2 present in the flue gases generated within the drum and/or stack during the burner performance tuning. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall maintain records of each portable monitoring device's calibration.

9. While performing the required burner tuning, the permittee shall record the following information:

   a. Date of the burner tuning;

   b. Results of the evaluation of the operating parameters listed above in B.8;

   c. Detail list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturer's specifications; and

   d. Type of fuel(s) employed during the burner tuning.

10. For each shipment of on-spec used oil, #2 fuel oil, #4 fuel oil, and #6 fuel oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content (in weight percent), heat content (Btu/gal). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month asphalt production limitation and for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative asphalt production levels.

3. The permittee shall submit deviation reports that identify any of the following occurrence:

   a. each day during which an inspection was not performed by the required frequency; and

   b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

4. Deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil exceeds the used oil specifications found in OAC rule 3745-279-11 and the applicable portions of 40 CFR part 761 and shall also notify Ohio EPA if any used oil exceed the mercury limitation and falls below the heat content limitation listed in term B.4 within thirty days after the exceedance occurs. If the permittee is burning used oil which exceeds the specifications found in OAC rule 3745-279-11 and the applicable portions of 40 CFR part 761, the permittee is subject to that rule and must comply with all applicable provisions of that rule(s).

6. The permittee shall submit a copy of the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form to the appropriate Ohio EPA district office or local air agency to summarize the results of each burner tuning procedure. These reports shall be submitted to the Ohio EPA district office or local air agency by January 31 of each year and shall cover the previous calendar year.

7. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:

   a. the sulfur content restriction for:

      i. on-spec used oil
      ii. #2 fuel oil
      iii. #4 fuel oil
      iv. #6 fuel oil

   b. the heat content restriction:

      i. on-spec used oil
      ii. #2 fuel oil
      iii. #4 fuel oil
      iv. #6 fuel oil

   These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.1 of these terms and conditions shall be

determined in accordance with the following method(s):

a. Emission Limitation:
0.04 gr PE/dscf of exhaust gas, 9.90 pounds particulate emissions (PE) per hour (when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil, or natural gas)

Applicable Compliance Method:
Compliance shall be determined by testing requirements specified in section E.2.

b. Emission Limitation:
6.60 tons PE per rolling 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying a maximum rolling 12-month asphalt production rate of 400,000 tons by the AP-42 emission factor of 0.033 lb PE/ton of product, in Table 11.1-12 (3/04) and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual asphalt production rate, compliance with the emission limitation per rolling 12-month period will be assumed. Compliance with the rolling 12-month asphalt production rate shall be demonstrated by the monitoring and recordkeeping in Section C.6.

c. Emission Limitation:
2.00 tons fugitive PE per rolling 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying an AP-42 emission factor of 0.01 lb PE/ton of material loaded, in section 13.2.4.3 (1/95) by a maximum annual material handling operations throughput of 400,000 tons and dividing by 2000 lbs/ton. The maximum annual material handling throughput is based on the annual asphalt production restrictions of 400,000 tons per rolling 12-month period. Therefore, provided compliance is shown with this annual asphalt production rate, compliance with the emission limitation per rolling 12-month period will be assumed. Compliance with the rolling 12-month asphalt production rate shall be demonstrated by the monitoring and recordkeeping in Section C.6.

d. Emission Limitation:
36.00 sulfur dioxide (SO2) per hour when burning #2, #4, #6, and on-spec used oil

Applicable Compliance Method:
Compliance shall be determined by testing requirements specified in section E.2.

e. Emission Limitation:
24.00 tons SO2 per rolling 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying a maximum rolling 12-month asphalt production rate of 400,000 tons by a company supplied emission factor of 0.12 lb SO2/ton of product (verified by testing in Section E.2) and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual asphalt production rate, compliance with the emission limitation per rolling 12-month period will be assumed. Compliance with the rolling 12-month asphalt production rate shall be demonstrated by the monitoring and recordkeeping in Section C.6.

f. Emission Limitation:
10.20 pounds SO2 per hour when burning natural gas

Applicable Compliance Method:
The emission limitation was established by multiplying a maximum hourly production rate of 300 tons by the AP-42 emission factor of 0.0034 lb SO2/ton of product, in Table 11.1-7 (3/04). If required the permittee shall demonstrate compliance with the lb/hr limitation in accordance with Method 6 of 40 CFR Part 60, Appendix A.

g. Emissions Limitation:
22.50 pounds NOx per hour when burning #2, #4, #6, and on-spec used oil

Applicable Compliance Method:
Compliance shall be determined by testing requirements specified in section E.2.

Emissions Limitation:
15.00 tons NOx per rolling 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying a maximum rolling 12-month asphalt production rate of 400,000 tons by a company supplied emission factor of 0.075 lb NOx/ton of product (verified by testing in Section E.2) and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual asphalt production rate, compliance with the emission limitation per rolling 12-month period will be assumed. Compliance with the rolling 12-month asphalt production rate shall be demonstrated by the monitoring and recordkeeping in Section C.6.

h. Emissions Limitation:
7.80 pounds NOx) per hour when burning natural gas

The emission limitation was established by multiplying a maximum hourly production rate of 300 tons by the AP-42 emission factor of 0.026 lb NOx/ton of product, in Table 11.1-7 (3/04) and dividing by 2000 lbs/ton. If required the permittee shall demonstrate compliance with the lb/hr limitation in accordance with Method 7 of 40 CFR Part 60, Appendix A.

i. Emissions Limitation:
82.20 pounds CO per hour when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil, or natural gas

Applicable Compliance Method:
Compliance shall be determined by testing requirements specified in section E.2

j. Emissions Limitation:
54.80 tons CO per rolling 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying a maximum rolling 12-month asphalt production rate of 400,000 tons by a company supplied emission factor of 0.274 lb CO/ton of product (verified by testing in Section E.2) and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual asphalt production rate, compliance with the emission limitation per rolling 12-month period will be assumed. Compliance with the rolling 12-month asphalt production rate shall be demonstrated by the monitoring and recordkeeping in Section C.6.

k. Emissions Limitation:
60.00 pounds VOC per hour when burning on-spec used oil, #2 fuel oil, #4 fuel oil, #6 fuel oil, or natural gas

Applicable Compliance Method:
Compliance shall be determined by testing requirements specified in section E.2.

l. Emissions Limitation:
40.00 tons VOC per rolling 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying a maximum rolling 12-month asphalt production rate of 400,000 tons by a company supplied emission factor of 0.20 lb VOC/ton of product (verified by testing in Section E.2) and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual asphalt production rate, compliance with the emission limitation per rolling 12-month period will be assumed. Compliance with the rolling 12-month asphalt production rate shall be demonstrated by the monitoring and recordkeeping in Section C.6.

m. Emissions Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a three-minute average

Applicable Compliance Method:
If required, compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

n. Emission Limitation:
Emissions from the baghouse stack shall not exhibit 20% opacity, or greater.

Applicable Compliance Method:
If required, compliance with the visible emission limitation for the baghouse stack shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

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 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the following:

i. 9.90 lbs/hr PE

ii. 0.04 gr PE/dscf

iii. 36.00 lbs/hr SO2

iv. 82.20 lbs/hr CO

v. 60.00 lbs/hr VOC

vi. 22.50 lbs/hr NOx

c. The emission testing shall also be conducted to verify the following company supplied emission factors:

i. 0.12 lbs SO2/ton of product

ii. 0.075 lbs NOx/ton of product

iii. 0.274 lbs CO/ton of product

iv. 0.20 lbs VOC/ton of product

d. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations and verify company supplied emission factors:

i. Methods 1 - 4 of 40 CFR Part 60, Appendix A

ii. for PE & gr/dscf- Method 5, of 40 CFR Part 60, Appendix A.

iii. for SO2- Method 6, of CFR Part 60, Appendix A.

iv. for CO- Method 10, of CFR Part 60, Appendix A.

v. for NOx- Method 7, of CFR Part 60, Appendix A.

vi. for VOC- Method 18, 25, or 25A of CFR Part 60, Appendix A.

The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the appropriate Ohio EPA District or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The company shall demonstrate in the "Intent to Test" what is "Worst Case" for particulate emissions. (e.g. "Virgin aggregate"/slag.) This "Worst Case" scenario shall be pre-approved by the Ohio EPA, Division of Air Pollution Control, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission 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 the field office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA, Northwest 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.

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 the Ohio EPA, Northwest 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 the Ohio EPA, Northwest District Office.

F. Miscellaneous Requirements

1. The terms and conditions contained in Part II, A.1 through E.2 are federally enforceable.

Emissions Unit ID: **P901**