



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01398

Fac ID: 0448980001

DATE: 7/12/2005

Smalls Equipment Leasing, LLC
Michael Small
10229 Killduff Road
Gambier, OH 43022

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

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

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

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

Sincerely,

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

CC: USEPA

TDES



**Permit To Install
Terms and Conditions**

**Issue Date: 7/12/2005
Effective Date: 7/12/2005**

FINAL PERMIT TO INSTALL 04-01398

Application Number: 04-01398
Facility ID: 0448980001
Permit Fee: **\$1650**
Name of Facility: Smalls Equipment Leasing, LLC
Person to Contact: Michael Small
Address: 10229 Killduff Road
Gambier, OH 43022

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4052 Holland-Sylvania Road
Toledo, Ohio**

Description of proposed emissions unit(s):
Installation of ADM Milemaker MM225 portable counterflow drum hot mix asphalt plant.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

Smalls Equipment Leasing, LLC
PTI Application: 04-01398
Issued: 7/12/2005

Facility ID: 044898000

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)

Smalls Equipment Leasing, LLC
PTI Application: 04-01398
Issued: 7/12/2005

Facility ID: 044898000

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.

Smalls Equipment Leasing, LLC
PTI Application: 04-01398
Issued: 7/12/2005

Facility ID: 044898000

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

Smalls Equipment Leasing, LLC
PTI Application: 04-01398
Issued: 7/12/2005

Facility ID: 044898000

CO	23.1
NOx	12.4
PE	20.2
PM10	9.14
SO2	14.9
VOC	26.1

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-17-07(B)(1), (B)(5)		eliminate visible emissions of fugitive dust (see A.2.b through A.2.g).
OAC rule 3745-17-08(B), (B)(2), (B)(7), (B)(9)		There shall be no visible particulate emissions except for 1 minute during any 60-minute period.
OAC rule 3745-31-05 (A)(3)	The permittee shall utilize best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.a and A.2.c through A.2.g).	The emissions of fugitive dust shall not exceed 6.38 tons of particulate emissions (PE) per year.
	There shall be no visible particulate emissions except for 3 minutes during any 60-minute period.	The emissions of fugitive dust equal to or less than 10 microns in diameter (PM10) shall not exceed 1.25 tons per year.
OAC rule 3745-31-05(C)	The emissions of fugitive dust shall not exceed 7.41 tons of particulate emissions (PE) per year.	see section A.2.h
	The emissions of fugitive dust equal to or less than 10 microns in diameter (PM10) shall not exceed 2.19 tons per year.	see section A.2.i and A.2.j
	see section A.2.h	see section A.2.i and A.2.j
OAC rule 3745-17-07(B)(1), (B)(4)	see section A.2.i and A.2.j	
OAC rule 3745-17-08(B), (B)(7), (B)(8), (B)(9)	see section A.2.i and A.2.j	
	The permittee shall utilize best available control measures that are sufficient to minimize or	

2. Additional Terms and Conditions

- 2.a** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.b** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to sweeping, speed management, good housekeeping and treating the paved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.e** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which

such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- 2.f Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.g Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- 2.h These roadways and parking areas are associated with the portable asphalt plant P901, permitted under facility ID 0448980001, at the enforceable maximum throughput of 450,000 tons of asphalt per rolling, 12-month period . The emissions limitations of 13.8 tons of PE and 3.44 tons of PM10 per year represent the maximum combined fugitive emissions which will be emitted from all paved and all unpaved roadways and parking areas for any proposed site for relocation of the portable asphalt plant.
- 2.i The roadways and parking areas are associated with a portable source and are applicable to the requirements of OAC rule 3745-17-07 (B) and 3745-17-08 (B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08.
- 2.j The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of all roadways and parking areas.
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.

3. The permittee may, upon receipt of written approval from the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site), 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.
4. 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; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports, in accordance with the reporting requirements of the General Terms and Conditions of this permit, that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit

Emissions Unit ID: F001

may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable emissions unit shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

- a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - i. the portable emissions unit is equipped with the best available technology for such portable emissions unit;
 - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO) or registration status;
 - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
 - iv. in the City of Toledo, Division of Environmental Services and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
- b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
 - i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - ii. the portable emissions unit is equipped with best available technology;
 - iii. the portable emissions unit owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and

- vii. the portable emissions unit owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the City of Toledo, Division of Environmental Services, and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation Method:

There shall be no visible particulate emissions from any unpaved roadway or parking area except for 3 minutes during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 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, 1996, and the

modifications listed in paragraphs (B)(4)(a) through (B)(4)(C) of OAC rule 3745-17-03.

b. Emission Limitation

7.41 tons fugitive PE/yr from the unpaved roadways and parking areas

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual miles traveled (50,000), 95% control efficiency for adequate moisture and the emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.2, Equation 1a, dated 12/03 as follows:

$$5.93 \text{ lb PE/vmt } (1-0.95)(50,000 \text{ vmt/yr})(1 \text{ t}/2000 \text{ lb}) = 7.41 \text{ tons PE/yr}$$

with:

$$E = [k(s/12)^a (W/3)^b ((365-P)/365)] = 5.93 \text{ lb PE/vmt}$$

where:

E = emission factor, pounds per vehicle mile traveled (lb/vmt)

k = 4.9 for PE

a = 0.7 for PE

b = 0.45

p = number of days in a year with at least 0.01 inch of precipitation = 166.5 days

s = surface material silt content, % = 10

W = average vehicle weight (26 tons)

c. Emission Limitation

2.19 tons fugitive PM10/yr from the unpaved roadways and parking areas

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual miles traveled (50,000), 95% control efficiency for adequate moisture and the emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.2, Equation 1a, dated 12/03 as follows:

$$1.75 \text{ lb PM10/vmt } (1-0.95)(50,000 \text{ vmt/yr})(1 \text{ t}/2000 \text{ lb}) = 2.19 \text{ tons PM10/yr}$$

with:

$$E = [k(s/12)^a (W/3)^b ((365-P)/365)] = 1.75 \text{ lb PM}_{10}/\text{VMT}$$

where:

E = emission factor, pounds per vehicle mile traveled (lb/VMT)

k = 1.5 for PM₁₀

a = 0.9 for PM₁₀

b = 0.45

p = number of days in a year with at least 0.01 inch of precipitation = 166.5 days

s = surface material silt content, % = 10

W = average vehicle weight (26 tons)

d. Emission Limitation Method:

There shall be no visible particulate emissions from any paved roadway or parking area except for one minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 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, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(C) of OAC rule 3745-17-03.

f. Emission Limitation

6.38 tons fugitive PE/yr from the paved roadways and parking areas

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual miles traveled (50,000), 95% control efficiency for adequate moisture and the emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.2, Equation 2, dated 12/03 as follows:

$$5.10 \text{ lb PE/vmt} (1-0.95)(50,000 \text{ vmt/yr})(1 \text{ t}/2000 \text{ lb}) = 6.38 \text{ tons PE/yr}$$

with:

$$EF = 5.10 \text{ lb PE/vmt}$$

where:

$$EF = k(sL/2)^{0.65}(W/3)^{1.5}/(1-p/4N)-C \text{ lb/VMT};$$

k = Base emission factor = 0.082 for PE

sL = Road surface silt loading=12

W = Average weight of the vehicles traveling the road=23.5 tons

p = Number of days in a year with at least 0.01 inch of precipitation=166.5 days

N = Number of days in the averaging period = 365

C = Emission factor for 1980's vehicle fleet exhaust, break wear and tire wear = 0.00047

g. Emission Limitation

1.25 tons fugitive PM10/yr from the paved roadways and parking areas

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual miles traveled (50,000), 95% control efficiency for adequate moisture and the emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.2, Equation 2, dated 12/03 as follows:

$$0.966 \text{ lb PM10/vmt} (1-0.95)(50,000 \text{ vmt/yr})(1 \text{ t}/2000 \text{ lb}) = 1.25 \text{ tons PM10/yr}$$

with:

$$EF = 0.966 \text{ lb PM10}$$

where:

From AP-42 Chapter 13.2.1 dated 12/2003, equation (2) of section 13.2.1.3,

Smalls Equipment Leasing, LLC
PTI Application: 04-01200
Issue

Facility ID: 044898000

Emissions Unit ID: F001

titled "Predictive Emission factor Equations":

$$EF = k(sL/2)^{0.65}(W/3)^{1.5}/(1-p/4N) - C \quad \text{lb/VMT};$$

k = Base emission factor = 0.016 for PM10

sL = Road surface silt loading = 12

W = Average weight of the vehicles traveling the road = 23.5 tons

p = Number of days in a year with at least 0.01 inch of precipitation = 166.5 days

N = Number of days in the averaging period = 365

C = Emission factor for 1980's vehicle fleet exhaust, break wear and tire wear = 0.00047 for PE and PM10

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, <u>and/or Equipment</u>	load-out of storage piles	wind erosion from storage piles
F002 - Milemaker MM225, portable asphalt plant:		
load-in of storage piles		

Applicable Rules/Requirements

OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(C)

OAC rule 3745-17-07(B)(1), (B)(6)

OAC rule 3745-17-08(B), (B)(2),
(B)(6)

OAC rule 3745-31-05(C)

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B), (B)(6),
(B)(7)

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B),
(B)(6), (B)(7)

OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(C)

Applicable Emissions
Limitations/Control Measures

There shall be no visible emissions of fugitive dust except for a period of time not to exceed 1 minute in any 60-minute observation period.

The permittee shall utilize best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a, A.2.b and A.2.e).

The emissions of fugitive dust shall not exceed 0.15 ton of particulate emissions (PE) per year.

The emissions of fugitive dust equal to or less than 10 microns in diameter (PM10) shall not exceed 0.07 ton per year.

see section A.2.f

see sections A.2.g and A.2.h

see sections A.2.g and A.2.h

There shall be no visible emissions of fugitive dust

except for a period of time not to exceed 1 minute in any 60-minute observation period.

The permittee shall utilize best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a, A.2.b and A.2.e).

The emissions of fugitive dust shall not exceed 0.15 ton of particulate emissions (PE) per year.

The emissions of fugitive dust equal to or less than 10 microns in diameter (PM10) shall not exceed 0.07 ton per year.

see section A.2.f

see sections A.2.g and A.2.h

see sections A.2.g and A.2.h
.2.i

There shall be no visible emissions of fugitive dust except for a period of time not to exceed 1 minute in any 60-minute observation period.

The permittee shall utilize best available control measures that are sufficient to minimize or eliminate visible emissions of

fugitive dust (see sections A.2.c through A.2.e).

The emissions of fugitive dust shall not exceed 0.01 ton of particulate emissions (PE) per year.

The emissions of fugitive dust equal to or less than 10 microns in diameter (PM10) shall not exceed 0.01 ton per year.

see section A.2.f

see sections A.2.g and A.2.h

see sections A.2.g and A.2.h

2. Additional Terms and Conditions

- 2.a** The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for purposes of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the load-in and load-out materials with minimized drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.b** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.c** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the propose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain minimal storage pile heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice if the precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.e** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.f** The storage piles are associated with the portable asphalt plant P901 permitted under facility ID 0448980001 at the enforceable maximum throughput of 450,000

tons of asphalt per rolling, 12-month period. The emissions limitations of 0.31 ton PE and 0.15 ton PM10 per year fugitive emissions represent the maximum emissions which will be emitted from the storage piles for any proposed site for relocation of the portable asphalt plant.

- 2.g The storage pile operations are associated with a portable source and are applicable to the requirements of OAC rule 3745-17-07 (B) and 3745-17-08 (B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08.
- 2.h The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of each load-in operation at each storage pile.
2. Except as otherwise provided in this section, the permittee shall perform daily inspections of each load-out operation at each storage pile.
3. Except as otherwise provided in this section, the permittee shall perform daily inspections of the wind erosion from the all pile surfaces associated with each storage pile.
4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for the load-in and load-out of a storage pile and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may upon receipt of written approval from the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the

new site), 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.

7. 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.
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the storage pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports, in accordance with the reporting requirements of the General Terms and Conditions of this permit, that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation.
 - b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable emissions unit shall meet one of the

two following scenarios in order to qualify for this PTI exemption for the new location:

- a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - i. the portable emissions unit is equipped with the best available technology for such portable emissions unit;
 - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO) or registration status;
 - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
 - iv. in the City of Toledo, Division of Environmental Services and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
- b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
 - i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - ii. the portable emissions unit is equipped with best available technology;
 - iii. the portable emissions unit owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the

site owner to move the portable emissions unit to this proposed site; and

- vii. the portable emissions unit owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the City of Toledo, Division of Environmental Services, and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

No visible emissions except for one minute during any 60-minute period.

Applicable Compliance Method

If required, compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 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, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(C) of

OAC rule 3745-17-03.

b. Emission Limitation

0.15 ton of particulate emissions (PE) per year from load-in or load-out operations

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons), 95% control efficiency for minimized drop heights and the emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.4, Equation 1, dated 1/95 as follows:

$$0.01330 \text{ lb/ton}(1-0.95)(450,000 \text{ ton/yr})(1 \text{ t}/2000 \text{ lb}) = 0.15 \text{ tpy PE}$$

with

$$k(0.0032)((U/5)^{1.3}/(M/2)^{1.4}) = 0.01330 \text{ lb PE/ton}$$

where

U (mean wind speed) = 8.94 mph

M (moisture content) = 1.0 %

k (particle size multiplier) = 0.74

c. Emission Limitation

PM10 shall not exceed 0.07 ton per year from load-in or load-out operations

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons), 95% control efficiency for minimized drop heights and the emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.4, Equation 1, dated 1/95 as follows:

$$0.00629 \text{ lb/ton}(1-0.95)(450,000 \text{ ton/yr})(1 \text{ t}/2000 \text{ lb}) = 0.07 \text{ tpy PM10}$$

with

$$k(0.0032)((U/5)^{1.3}/(M/2)^{1.4}) = 0.00629 \text{ lb PM}_{10}/\text{ton}$$

where

U (mean wind speed) = 8.94 mph

M (moisture content) = 1.0 %

k (particle size multiplier) = 0.35

d. Emission Limitation

PE shall not exceed 0.01 ton per year due to wind erosion of the storage piles

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing a combined storage area of 1.03 acre, a maximum throughput rate of 450,000 tons year, 95% control efficiency for minimized storage pile heights and the emissions factor calculated by USEPA RACM Guide, Section 2.2.1, dated 9/80, as follows:

$$(1-0.95)(0.0156 \text{ lb/t stored})(450,000 \text{ cuft stored})(90 \text{ lb/cuft})(1 \text{ t}/2000 \text{ lb})^2 = 0.01 \text{ tPE/yr}$$

with

$$E = 0.05 (S/1.5)(D/90)(d/235)(f/15) = 0.0156 \text{ lb PE/ton stored}$$

where:

s = silt content of the stored material, % = 10

D = duration of storage, days = 3.75

d = dry days = 365 - number of days with >0.01 inch of precipitation per year = 365 - 166.5 = 198.5

f = percentage of time wind speed exceeds 12 mph = 19.9

The storage piles are estimated at an maximum 1.03 acre x 10 feet in height = 450,000 cuft. At a density of 90 lb /cuft for limestone, and formula weight of 95% aggregate in asphaltic cement:

usage = 225 tph (2000 lb/t)(1 cuft/90 lb aggregate) = 5000 cuft aggregate/hr

D = 450,000 cuft (1 hr/5000 cuft)(1 d/24 hr) = 3.75 days

e. Emission Limitation

PM10 shall not exceed 0.01 ton per year due to wind erosion of the storage piles

Applicable Compliance Method

Smalls Equipment Leasing, LLC
PTI Application: 04-01200
Issue:

Facility ID: 044898000

Emissions Unit ID: F002

Compliance shall be demonstrated by a one-time emissions calculation utilizing USEPA RACM Guide, Section 2.2.1, Table 2.1.2-6, dated 9/80, which gives a characteristic size distribution for storage pile fugitives of PM10 as 40% of PE by weight.

0.01 ton of PE (0.40) = 0.01 ton of PM10

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	
P901- Milemaker MM225, portable asphalt plant: counterflow drum mix with a maximum design capacity of 225 tons per hour, controlled by a baghouse and low NOx burners	
Baghouse emissions	

Applicable Rules/Requirements

OAC rule 3745-31-05(A)(3)

Asphalt truck load-out

Load-in of aggregates, RAP,
sand and other adjuncts to the
elevated bins

Asphalt silo filling

	OAC rule 3745-31-05(C)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B), (B)(3)
	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
OAC rule 3745-31-05(C)	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B), (B)(3)
	OAC rule 3745-18-06(E)
	OAC rule 3745-21-07(B)
	OAC rule 3745-21-08(B)
	OAC rule 3745-23-06(B)
	40 CFR Part 60, Subpart I
	OAC rule 3745-31-05(A)(3)

Small

PTI A

Issued: 7/12/2005

Emissions Unit ID: P901

		Applicable Emissions <u>Limitations/Control Measures</u>
	OAC rule 3745-17-08(B), (B)(3)	
	OAC rule 3745-21-07(B)	
OAC rule 3745-17-07(B)(1)	OAC rule 3745-21-08(B)	
OAC rule 3745-17-08(B), (B)(3)		Carbon monoxide (CO) emissions from burning any approved fuel shall not exceed 22.5 pounds per hour or 0.10 pound per ton of asphalt produced.
OAC rule 3745-21-07(B)		
OAC rule 3745-21-08(B)		Nitrogen oxides (NO _x) emissions from burning natural gas shall not exceed 5.85 pounds per hour or 0.026 pound per ton of asphalt produced.
40 CFR Part 60, Subpart I		
OAC rule 3745-31-05(A)(3)		
OAC rule 3745-31-05(C)		Nitrogen oxides (NO _x) emissions from burning any approved fuel shall not exceed 12.4 pounds per hour or 0.055 pound per ton of asphalt produced.
		Particulate emissions (PE) from burning any approved fuel shall not exceed 5.54 pounds per hour or 0.030 grains per dry standard cubic foot (gr/dscf).
		The emissions of particulate matter equal to or less than 10 microns in diameter (PM10) from burning any approved fuel shall not exceed 5.18 pounds per hour or 0.023 pound per ton of asphalt produced.
		Sulfur dioxide (SO ₂) emissions from burning natural gas shall not exceed 2.48 pounds per hour or 0.011 pound per ton of asphalt
OAC rule 3745-17-07(B)(1)		

Small**PTI A****Issued: 7/12/2005**Emissions Unit ID: **P901**

produced.

SO₂ emissions from burning #2 fuel oil or on-spec used oil shall not exceed 14.9 pounds per hour or 0.066 pound per ton of asphalt produced.

Volatile organic compound (VOC) emissions from burning any approved fuel shall not exceed 22.5 pounds per hour or 0.10 pound per ton of asphalt produced.

The permittee shall utilize best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a, A.2.b and A.2.d).

Arsenic, cadmium, chromium, and lead emissions are limited by the fuel specifications in section A.2.e.

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

see sections A.2.c and A.2.f through A.2.h

CO emissions shall not exceed 22.5 tons per rolling, 12-month period.

NO_x emissions shall not exceed 12.4 tons per rolling, 12-month period.

PE emissions shall not exceed 5.54 tons per rolling, 12-month period.

PM10 emissions shall not exceed 5.18 tons per rolling, 12-month period.

SO₂ emissions shall not exceed 29.7 tons per rolling, 12-month period.

VOC emissions shall not exceed 22.5 tons per rolling, 12-month period.

see section A.2.i

see section A.2.j

see sections A.2.j and A.2.k

see sections A.2.j and A.2.k

see section A.2.j

see section A.2.l

see section A.2.m

see section A.2.n

see section A.2.o

see sections A.2.d, A.2.p and A.2.q

Emissions of fugitive dust associated with the cold end transfer operations shall not exceed 0.38 ton of PE per rolling, 12-month period.

Emissions of fugitive dust associated with the cold end transfer operations shall not exceed 0.12 ton of PM10 per rolling, 12-month period.

see section A.2.i

see sections A.2.j and A.2.k

see sections A.2.j and A.2.k

see sections A.2.d

The emissions of CO from the silo filling operations shall not exceed 0.27 ton per rolling, 12-month period.

The emissions of PE from the silo filling operations shall not exceed 0.08 ton per rolling, 12-month period.

The emissions of PM10 from the silo filling operations shall not exceed 0.13 ton per rolling, 12-month period.

The emissions of VOC from the

silo filling operations shall not exceed 2.74 tons per rolling, 12-month period.

see sections A.2.j and A.2.k

see section A.2.i

see section A.2.l

see sections A.2.j and A.2.k

see section A.2.m

see sections A.2.j and A.2.k

see section A.2.l

see section A.2.m

see section A.2.o

see section A.2.d

The emissions of CO from the truck loading operations shall not exceed 0.32 ton per rolling, 12-month period.

The emissions of PE from the truck loading operations shall not exceed 0.04 ton per rolling, 12-month period.

The emissions of PM10 from the truck loading operations shall not exceed 0.12 ton per rolling, 12-month period.

The emissions of VOC from the truck loading operations shall not exceed 0.90 ton per rolling, 12-month period.

see section A.2.i

see sections A.2.j and A.2.k

2. Additional Terms and Conditions

- 2.a** The permittee shall ensure that the baghouse is operated with sufficient air volume to eliminate visible fugitive emissions from the rotary drum.
- 2.b** There shall be no visible emissions of fugitive dust from the rotary drum except for a period of time not to exceed 3 minutes in any 60-minute observation period.
- 2.c** Visible particulate emissions from the baghouse stack shall not exceed 10% opacity, as a 6-minute average.
- 2.d** Visible emissions of fugitive dust shall not exceed 10% opacity, as a 3-minute average.
- 2.e** All on-spec used oil burned in this emissions unit shall meet the following specifications:

<u>Contaminant/Property</u>	<u>Allowable Specifications</u>
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

- 2.f** Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR Part 266.40(c) and OAC rule 3745-279. Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the supplier ["marketer" in 40 Part CFR 266.43(a)] has demonstrated to the Ohio EPA's Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.
- 2.g** All number 2 and on-spec used oil burned in this emission unit shall have a sulfur content equal to or less than 0.5%, by weight.

Emissions Unit ID: P901

- 2.h The hourly emission limitations specified above are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limitations.
- 2.i The annual emission limitations specified above are based upon the emissions unit's potential to emit at an annual throughput restriction of 450,000 tons of asphaltic concrete.
- 2.j 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.k The fugitive dust sources are associated with a portable source and are applicable to the requirements of OAC rule 3745-17-07 (B) and 3745-17-08 (B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08.
- 2.l The permittee has satisfied the "best available control techniques and operating practices" and "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.
- 2.m The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all applicable rules.

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.

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

On February 14, 2005, OAC rule 3745-23-06 was rescinded; 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 U.S. EPA approves the revision

to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.o** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.p** The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the aggregate storage bins.
- 2.q** The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize the visible emissions of fugitive dust from conveyors and all transfer points to the dryer.

B. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.
2. The permittee may not receive or burn any used oil which does not meet the specifications listed in A.2.e of this permit without first obtaining a permit to install that authorizes the burning of off-specification used oil. The burning of off-specification used oil is subject to OAC rule 3745-279-60 through 67.
3. The maximum annual asphalt production rate for this emissions unit shall not exceed 450,000 tons per year, based upon a rolling, 12-month summation of the asphalt production.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Tons of Hot Mix Asphalt Produced</u>
1	153,000
1-2	230,000
1-3	307,000
1-4	384,000
1-5	450,000
1-6	450,000
1-7	450,000
1-8	450,000
1-9	450,000
1-10	450,000
1-11	450,000
1-12	450,000

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

4. The permittee shall operate and maintain the fuel burner in accordance with the manufacturer's recommendations to ensure efficient combustion of the fuel(s) and to ensure compliance with the applicable emission limitations for VOC, CO and NOx.

5. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 per cent of all aggregate materials.
6. The permittee shall utilize shingles containing no asbestos in this emissions unit.
7. The permittee shall be restricted to the combustion of natural gas, propane, #2 fuel oil and/or on-spec used oil in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall receive a chemical analysis with each shipment of on-spec used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's U.S. EPA's identification number, and the following information:
 - a. date of shipment or delivery;
 - b. quantity of on-spec used oil received;
 - c. the Btu value of the on-spec used oil;
 - d. the flash point of the on-spec used oil;
 - 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; and
 - 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 analyses through an independent laboratory of 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.

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 daily basis.
3. The permittee shall maintain monthly records of the following information:

- a. the asphalt production for each month;
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the asphalt production;
 - c. during the first 12 calendar months of operation, the permittee shall record the cumulative asphalt production for each calendar month; and
 - d. the maximum percentage of RAP used for any mix.
4. The permittee shall maintain annual records of the following information:
 - a. the asphalt production for each calendar year; and
 - b. the total CO, NO_x, PM₁₀, SO₂ and VOC emissions from this emissions unit for the previous calendar year.
5. For each shipment of number 2 fuel oil, number 4 fuel oil, number 6 fuel oil, and on-spec used oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittees or oil supplier's analyses for sulfur content and heat content.
6. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
7. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the operations comprising this emissions unit, including but not limited to, the rotary drum, hot aggregate elevator, aggregate storage bins, scalping screens, conveyors and the conveyor transfer points. If visible emissions are observed, the permittee shall note the following in the operation log:
 - a. the location and color of the visible emissions;

- b. the cause of the visible particulate emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
8. The permittee shall properly operate and maintain portable devices to monitor the concentration of CO, NO_x, and oxygen (O₂) in the stack exhaust gases from this emissions unit at the frequency specified under section E.3. - Burner Tuning. The permittee is not required to purchase these monitoring devices and may either hire a contractor to perform the monitoring or the permittee may rent this monitoring equipment. 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 each burner tuning, the permittee shall record the results of the burner tuning using the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form (as found in term F.2). An alternative form may be used upon approval of the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).
10. The permit to install for this emissions unit (P901) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Heptane

TLV (ug/m³): 1640

Maximum Hourly Emission Rate (lb/hr): 2.12

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): less than 39,000

MAGLC (ug/m³): 39,000

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

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
11. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the

change.

12. The permittee shall maintain records demonstrating that the shingles received for utilization in this emissions unit contain no asbestos. These records may consist of the permittee's test results or of statements from the waste supplier adequate to demonstrate that the materials received have no asbestos content.
13. For each day during which the permittee burns a fuel other than natural gas, propane, number two fuel oil and/or on-spec used oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports are due by the dates described in Part I - General Terms and Condition of this permit under section (A)(2).
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling 12-month asphalt production limitation. These reports are due by the dates described in Part I - General Terms and Conditions of this permit under section (A)(2).
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the RAP limitation specified above. These reports are due by the dates described in Part I - General Terms and Condition of this permit under section (A)(2).
4. The permittee shall submit annual reports which specify the total CO, NO_x, PM₁₀, SO₂ and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
5. The permittee shall notify the U.S. EPA and the Ohio EPA if any of the used oil exceeds the on-spec used oil specifications found in OAC rule 3745-279-11. If the permittee is burning used oil which exceeds the specifications found in OAC rule 3745-279-11, the permittee is subject to that rule and must comply with all provisions of that rule. The required notification shall be submitted within 30 days of the date in which the exceedance occurred.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limit specified above. These reports are due by the

dates described in Part I - General Terms and Condition of this permit under section (A)(2).

7. The permittee shall submit semiannual written deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site) by January 31 and July 31 of each year and shall cover the previous 6-month period.
8. The permittee shall submit semiannual written deviation (excursion) reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the operations comprising this emissions unit, including but not limited to, the rotary drum, hot aggregate elevator, aggregate storage bins, scalping screens, conveyors and the conveyor transfer points, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA district office or local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.
9. 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 City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site) by January 31 of each year and shall cover the previous calendar year.
10. The permittee shall submit deviation (excursion) reports that identify each day when a material containing asbestos was received for utilization in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

11. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, propane, number two fuel oil and/or on-spec used oil, was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
12. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable emissions unit shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:
 - a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - i. the portable emissions unit is equipped with the best available technology for such portable emissions unit;
 - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO) or registration status;
 - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
 - iv. in the City of Toledo, Division of Environmental Services and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
 - b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
 - i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - ii. the portable emissions unit is equipped with best available technology;
 - iii. the portable emissions unit owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and

- vii. the portable emissions unit owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the City of Toledo, Division of Environmental Services and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the City of Toledo, Division of Environmental Services, and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

E. Testing Requirements

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

- a. Emission Limitation

There shall be no visible emissions of fugitive dust from the rotary drum except for a period of time not to exceed 3 minutes in any 60-minute observation period.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 22 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, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

Smalls Equipment Leasing, LLC
PTI Application: 01-01200
Issue

Facility ID: 044898000

Emissions Unit ID: P901

b. Emission Limitation

Visible emissions of fugitive dust shall be less than or equal to 10% opacity, as a 3-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 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, 1996, and the modifications listed in paragraphs (B)(3)(a) through (B)(3)(d) of OAC rule 3745-17-03.

c. Emission Limitation

Visible particulate emissions from the baghouse stack shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 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, 1996, and the modifications listed OAC rule 3745-17-03(B)(1).

d. Emission Limitation

CO emissions from burning any approved fuel shall not exceed 22.5 pounds per hour or 0.10 pound per ton of asphalt produced.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

e. Emission Limitation

NO_x emissions from burning natural gas shall not exceed 5.85 pounds per hour or 0.026 pound per ton of asphalt produced, or
NO_x emissions from burning any approved fuel shall not exceed 12.4 pounds per

hour or 0.055 pound per ton of asphalt produced.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

f. Emission Limitation

Particulate emissions (PE) from burning any approved fuel shall not exceed 5.54 pounds per hour or 0.030 grain per dry standard cubic foot (gr/dscf).

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

g. Emission Limitation

The emissions of PM10 from burning any approved fuel shall not exceed 5.18 pounds per hour or 0.023 pound per ton of asphalt produced.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

h. Emission Limitation

SO₂ emissions from burning natural gas shall not exceed 2.48 pounds per hour

Emissions Unit ID: P901

or 0.011 pound per ton of asphalt produced, or
 SO₂ emissions from burning on-spec used oil or #2 fuel oil shall not exceed 14.9
 pounds per hour or 0.066 pound per ton of asphalt produced.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

i. Emission Limitation

Volatile organic compound (VOC) emissions from burning any approved fuel shall not exceed 22.5 pounds per hour or 0.10 pound per ton of asphalt produced.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

j. Emission Limitation

CO emissions shall not exceed 22.5 tons per rolling, 12-month period, or
 NO_x emissions shall not exceed 12.4 tons per rolling, 12-month period, or
 PE emissions shall not exceed 5.54 tons per rolling, 12-month period, or
 PM₁₀ emissions shall not exceed 5.18 tons per rolling, 12-month period, or
 SO₂ emissions shall not exceed 29.7 tons per rolling 12-month period, or
 VOC emissions shall not exceed 22.5 tons per rolling 12-month period.

Applicable Compliance Method

These emissions limitations were established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of determined during the most recent stack test which demonstrated compliance (in pounds of

emissions per ton of asphalt produced) by the maximum annual production of asphalt (450,000 tons per year) and divide by 2,000 pounds per ton.

k. Emission Limitation

Emissions of fugitive dust associated with the transfer operations shall not exceed 0.38 ton of PE per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons), an maximum of 12 transfer points and an emissions factor from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 11.19, Table 11.19.2-2, dated 3/04 (0.00014 lb PE/ton-transfer for a process controlled by adequate moisture) as follows:

450,000 tons/yr (12 transfers)(0.00014 lb/ton-transfer)(1 ton/2,000 lb) = 0.38 ton PE/year

I. Emission Limitation

Emissions of fugitive dust associated with the transfer operations shall not exceed 0.12 ton of PM10 per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons), an maximum of 12 transfer points and an emissions factor from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 11.19, Table 11.19.2-2, dated 3/04 (0.000046 lb PE/ton-transfer for a process controlled by adequate moisture) as follows:

450,000 tons/yr (12 transfers)(0.000046 lb/ton-transfer)(1 ton/2,000 lb) = 0.12 ton PM10/year

m. Emission Limitation

The emissions of CO from the silo filling operations shall not exceed 0.27 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 as follows:

450,000 tons/yr (1.18 x 10⁻³ lb/ton)(1 ton/2,000 lb) = 0.27 ton CO/yr

with

$$EF = 0.00488(-V)e^{((0.0251)(T+460)-20.43)} = 1.18 \times 10^{-3} \text{ lb/ton}$$

where

V = asphalt volatility = -0.5

T = HMA mix temperature in F = 325

Smalls Equipment Leasing, LLC
PTI Application: 04-01200
Issue

Facility ID: 044898000

Emissions Unit ID: P901

n. Emission Limitation

The emissions of PE from the silo filling operations shall not exceed 0.08 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 as follows:

$$450,000 \text{ tons/yr} (0.000332 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 0.08 \text{ ton PE/yr}$$

o. Emission Limitation

The emissions of PM10 from the silo filling operations shall not exceed 0.13 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 as follows:

$$450,000 \text{ tons/yr} (0.000586 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 0.13 \text{ ton PE/yr}$$

p. Emission Limitation

The emissions of VOC from the silo filling operations shall not exceed 2.74 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 as follows:

$$450,000 \text{ tons/yr} (0.0122 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 2.74 \text{ ton VOC/yr}$$

with

$$EF = 0.0504(-V)e^{((0.0251)(T+460)-20.43)} = 0.0122 \text{ lb/ton}$$

where

57

Small

PTI A

Issued: 7/12/2005

Emissions Unit ID: **P901**

V = asphalt volatility = -0.5

T = HMA mix temperature in F = 325

q. Emission Limitation

The emissions of CO from truck loading operations shall not exceed 0.32 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 as follows:

$$450,000 \text{ tons/yr} (0.00142 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 0.32 \text{ ton CO/yr}$$

with

$$EF = 0.00588(-V)e^{((0.0251)(T+460)-20.43)} = 0.00142 \text{ lb/ton}$$

where

$$V = \text{asphalt volatility} = -0.5$$

$$T = \text{HMA mix temperature in F} = 325$$

r. Emission Limitation

The emissions of PE from the truck loading operations shall not exceed 0.04 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04, (0.000181 lb/ton) as follows:

$$450,000 \text{ tons/yr} (0.000181 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 0.04 \text{ ton PE/yr}$$

s. Emission Limitation

The emissions of PM10 from the truck loading operations shall not exceed 0.12 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 (0.000523 lb/ton) as follows:

$$450,000 \text{ tons/yr} (0.000523 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 0.12 \text{ ton PM}_{10}/\text{yr}$$

t. Emission Limitation

The emissions of VOC from the truck loading operations shall not exceed 0.90 ton per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated by a one-time emissions calculation utilizing the maximum annual throughput rate (450,000 tons) and an emissions factor calculated by AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 11.1-14, dated 3/04 as follows:

$$94\% (450,000 \text{ tons/yr})(0.00416 \text{ lb/ton})(1 \text{ ton}/2,000 \text{ lb}) = 0.88 \text{ ton VOC/yr}$$

with

$$EF = 0.0172(-V)e^{((0.0251)(T+460)-20.43)} = 0.00416 \text{ lb TOC/ton}$$

where

$$V = \text{asphalt volatility} = -0.5$$

$$T = \text{HMA mix temperature in F} = 325$$

$$\text{VOC} = 94\% \text{ TOC (AP-42, Table 11.1-16)}$$

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 but no later than 120 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the baghouse allowable mass emission rates for CO, NO_x, PE, SO₂, VOC and opacity.
 - c. The following test method(s) shall be employed to demonstrate compliance with

the allowable mass emission rate(s):

For CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

For NO_x, Methods 1-4 and 7 or 7E of 40 CFR Part 60, Appendix A.

For PE, Methods 1-5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in 40 CFR 60.93.

For SO₂, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

For VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

For opacity, Method 9 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in 40 CFR 60.93.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).
- e. The test(s) shall be conducted while the emissions unit is operating burning natural gas or number 2 fuel oil or on-spec used oil for PM, VOC, CO, NO_x and SO₂ and employing RAP to verify VOC emissions.
- f. Additional test(s) shall be conducted within 60 days of the emissions unit first utilization of number 2 fuel oil or on spec used oil for PM, VOC, CO, NO_x and SO₂, unless otherwise specified or approved by the City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).
- g. The permittee shall establish pollutant baseline levels (concentrations) during this initial emissions testing. The baselines shall be determined for CO, NO_x, and O₂ as specified in section E.3. below.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the City of Toledo, Division of Environmental Services

and the appropriate field office (having jurisdiction over the new site). 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 the Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA District Office or local air agency 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 City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site) 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 City of Toledo, Division of Environmental Services and the appropriate field office (having jurisdiction over the new site).

3. Burner Tuning

a. Introduction

This facility is required to conduct periodic tuning of the asphalt plant burner. The purpose of this tuning is to ensure that the burner is adjusted properly so that air pollution emissions remain in compliance with allowable emissions rates and are minimized.

b. Qualifications for Burner Tuning

Technicians who conduct the burner tuning must be qualified to perform the expected tasks. The owner or operator of the facility is required to assure that the technicians who perform the burner tuning procedure are properly trained. Technicians who are qualified shall, at a minimum, have passed manufacturer's training concerning burner tuning, or have been trained by someone who has passed the manufacturer's training concerning burner tuning.

c. Burner Tuning Procedure

The first steps concerning burner tuning involve setting the pollutant baseline levels (concentrations). These baselines shall be set during the initial U.S. EPA approved emissions testing that demonstrated the emissions unit was in compliance with all applicable emissions limitations as described in term E.2. The baselines shall be determined for CO, NO_x, and O₂. Record these values on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form (as found in term F.2.) in the "Recent Stack Test Basis Values" column.

Once the pollutant baseline levels are set, the burner shall be next tuned based on the frequency described in paragraph E.3.d. The general procedure for tuning the burner involves the following steps:

- i. Review the plant operations to ensure the plant is operating normally.
- ii. Confirm that the portable monitor is calibrated per the manufacturer's specifications.
- iii. Using the calibrated monitor, measure the stack exhaust gas values for CO, NO_x, and O₂. Record the values in the "Pre Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.
- iv. Compare the measured stack exhaust gas values with the pollutant baseline values. If all of the measured stack exhaust gas values are equal to or less than 110 percent of the pollutant baseline values, then you do not need to tune the burner. Go on to step v below. If any of the measured stack exhaust gas values are greater than 110 percent of the baseline values, then within two calendar weeks of the measurement, have the burners tuned following the burner manufacturer's recommendations. Make any necessary adjustments and repairs. Repeat steps iii. and iv. until the measured stack exhaust gas values are equal to or less than 110 percent of the pollutant baseline values.
- v. Once all of the measured stack exhaust gas values are within the 110 percent of the pollutant baseline values, record the measured stack exhaust gas values in the "Post Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.
- vi. Within 30 days of completion of the burner tuning, submit a copy of the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form to the City of Toledo, Division of Environmental Services and the appropriate

Smalls Equipment Leasing, LLC
PTI Application: 04-01398
Issued: 7/12/2005

Facility ID: 044898000

field office (having jurisdiction over the new site).

d. Burner Tuning Frequency

The permittee shall conduct the burner tuning procedure within 20 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 that the last ton of asphalt is produced during the same calendar year.

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.

F. Miscellaneous Requirements

1. The following source is subject to the applicable provision of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P901	225 Ton/Hr asphalt plant	Subpart I

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to NSPS, the source owner/operator 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. Actual start-up date (within 15 days after such date); and
- c. Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to the City of Toledo, Division of Environmental Services, and/or appropriate field office having jurisdiction over the new site.

Smalls Equipment Leasing, LLC
PTI Application: 01-01200
Issue

Facility ID: 044898000

Emissions Unit ID: P901

Toledo Division of Environmental Services
 348 South Erie Street
 Toledo, Ohio 43602

2. Burner Tuning Form (see next page)

BURNER TUNING REPORTING FORM FOR ASPHALT CONCRETE PLANTS	
Facility ID:	Tuning Date:
Legal Name:	Other Company Name (if different than legal name):
Mailing Address:	Other Company Site Address: (if different than mailing address):
City, State, Zip Code:	Other Company City, County, Zip Code:
Site Contact Person:	Site Contact Telephone Number:
Site Contact Title:	Site Contact Fax Number:
Name of company performing tuning:	Name of company performing emission monitoring:
Type of plant (ie: batch, drum mix, etc.):	Calibration date for analyzers:

Reason for Tuning: Season Initial Tuning June Tuning September Tuning Fuel Switch Other
 (describe)

Fuel employed during tuning: Natural Gas #2 Fuel Oil #4 Fuel Oil Used Oil Other (describe)

Tuning Results:

Parameter	Recent Stack Test Pollutant Baseline Levels ¹	Results	
		Pre Tuning	Post Tuning ³
Fuel flow to the burner (gallon/hr) (for fuel oil and on-spec used oil)			
Differential pressure of the baghouse (in water)			
Fuel pressure (psi)			

Smalls Equipment Leasing, LLC
PTI Application: 04-01398
Issued: 7/12/2005

Facility ID: 044898000

Emissions Unit ID: P901

For burners that require compressed air for proper operation, pressure at the burner (psi)			
Carbon Monoxide (CO) concentrations (ppm) ²			
NOx concentrations (ppm) ²			
Oxygen concentrations (%) ²			
Asphalt Production (tons/hr)			

¹These values are based on the results of the most recent Ohio EPA approved emissions test.

² Specify whether on a dry or wet basis.

³ If the burner did not require adjusting, please record N/A in the post tuning column.

Describe in detail a list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturers specifications.

Authorized Signature: This signature shall constitute personal affirmation that all statements or assertions of fact made in this form are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

Name of Official (Printed or Typed):	Title of Official and Phone Number:
Signature of Official:	Date: