



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 02-2852

DATE: June 16, 1999

Hardrives Asphalt
Edward J Pannutti
3550 Union Street
Mineral Ridge, OH 44440

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, buy 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, NEDO
Mahoning-Trumbull APC

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

**Terms and
Conditions**

Issue Date: June 16, 1999
Effective Date: June 16, 1999

PERMIT TO INSTALL 02-2852

Application Number: 02-2852
APS Premise Number: 0250110985
Permit Fee: **\$3450.00**
Name of Facility: Hardrives Asphalt
Person to Contact: Edward J Pannutti
Address: 3550 Union Street
Mineral Ridge, OH 44440

Location of proposed air contaminant source(s) [emissions unit(s)]:
Center Street and Poland Avenue
Youngstown, OHIO

Description of proposed emissions unit(s):
**ASPHALT DRUM MIXER, MATERIAL HANDLING, STORAGE PILES, UNPAVED ROADWAYS,
20,000 GAL & 30,000 GAL ASPHALT STORAGE TANKS.**

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 Related to Monitoring and Recordkeeping 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

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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)

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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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of

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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 thirty (30) 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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	72.6
PM ₁₀	67.45
CO	109.15
NO _x	58.47
SO ₂	6.44
VOC	101.40

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Facility ID: 0250110985

Emissions Unit ID: P901

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
445 TPH asphaltic plant fired with natural gas (counterflow drum mixer vented to cyclone and fabric filter and with stack discharge)	NSPS (40 CFR 60, Subpart I)	0.04 grain of particulate emission per dry standard cubic foot of exhaust gases Less than or equal to 20 percent opacity, as a 6-minute average, except as provided in Part 60.
	OAC rule 3745-31-05	NO _x : 13.35 lbs/hr, 58.47 tpy CO: 24.92 lbs/hr, 109.15 tpy OC: 22.70 lbs/hr, 99.40 tpy SO ₂ : 1.47 lbs/hr, 6.44 tpy PM/PM ₁₀ : 14.56 lbs/hr; 63.77 tpy
	OAC rule 3745-17-11	This rule is less stringent than NSPS limit
	OAC rule 3745-17-07(A)(1)	Less than or equal to 20 percent opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-18-06	This rule is less stringent than OAC rule 3745-31-05

2. Additional Terms and Conditions

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- 2.a** All emissions from the drum mixer shall be routed to the cyclone separator, and all emissions from the cyclone separator shall be vented to the fabric filter baghouse.

B. Operational Restrictions

1. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 2 or greater than 6 shall be maintained at all times.
2. The permittee shall only employ natural gas to heat the counterflow drum mixer.
3. The permittee may substitute recycled asphalt pavement (RAP) aggregates in the raw material feed mix in amounts not to exceed 30% of all aggregate materials introduced at any given time.
4. The stack height for this emissions unit shall be at least 40 feet.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall record the asphalt production in tons per hour.
2. The permittee shall record the annual 12-month summation of asphalt produced (in tons).
3. The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the fabric filter.
4. The permittee shall check the pressure drop once a day and maintain daily records of the pressure drop readings.
5. The permittee shall maintain hourly records of the percentage of RAP mixed with the raw material feed mix.
6. 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 limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

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RAP percent limitation.

3. 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 emissions limitations, operational restriction, 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 the 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.)

E. Testing Requirements

1. Emission Limitation:

0.04 grain of particulate matter per dry standard cubic foot

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

2. Emission Limitation:

14.56 pounds of particulate matter per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

3. Emission Limitation:

63.77 tons of PM/PM₁₀ per year

Applicable Compliance Method:

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Compliance shall be determined based upon the following formula:

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

Where:

E = particulate matter emission rate in tons per year.

A = average emission rate in pounds PM per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

4. Emission Limitation:

13.35 pounds of NO_x per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

5. Emission Limitation:

58.47 tons of NO_x per year

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

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

Where:

E = particulate matter emission rate in tons per year.

A = average emission rate in pounds NO_x per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

6. Emission Limitation:

24.92 pounds of CO per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

7. Emission Limitation:

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109.15 tons of CO per year

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

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

Where:

E = CO emission rate in tons per year.

A = average emission rate in pounds CO per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

8. Emission Limitation:

1.47 pounds of SO₂ per hour

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 0.0033 pound of SO₂ per ton from AP-42, Table 11.1-8 (January, '95 version) by the asphalt produced (in tons/hr).

9. Emission Limitation:

6.44 tons of SO₂ per year

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 0.0033 pound of SO₂ per ton from AP-42, Table 11.1-8 (January, '95 version) by the annual 12-month production summation and dividing by 2,000 lbs/ton.

10. Emission Limitation:

22.70 pounds of OC per year

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

11. Emission Limitation:

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Emissions Unit ID: **P901**

63.77 tons of OC per year

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

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

Where:

E = OC emission rate in tons per year.

A = average emission rate in pounds OC per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

12. Emission Limitation:

Less than or equal to 20 percent opacity, as a 6- minute average, except as provided in Part 60

Applicable Compliance Method:

USEPA Method 9

- 13.a. Within 3 months after completion of installation, the permittee shall conduct, or have conducted, an emission test for this emissions unit in order to demonstrate compliance with the allowable mass emission rates for particulate matter, nitrogen dioxide, carbon monoxide, and organic compounds. The compliance test shall be conducted in accordance with the test methods and procedures specified in Method 1-4, 5, 7, 10 and Method 18, 25, or 25A of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity and using only approximately 30% reclaimed materials and 70% virgin aggregate.
- 13.b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 fields office(s) refusal to accept of the emissions 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 regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30

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days following completion of the test(s).

F. Miscellaneous Requirements

The emissions from this emission unit are prohibited from causing a nuisance in violation of OAC rule 3745-15-07. If the Director determines that the emissions from this emissions unit are contributing to a nuisance, the permittee, upon notification by Ohio EPA, shall immediately undertake a program to reduce emissions or the impact of the emissions to achieve compliance with OAC rule 3745-15-07.

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

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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Material handling operation(s)	OAC rule 3745-31-05	PM: 0.73 tpy PM ₁₀ : 0.37 tpy VE: 10 percent opacity, as a three-minute average
	OAC rule 3745-17-07 (B)(1)	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Section A.2.b through A.2.d)
	OAC rule 3745-17-08 (B)	Less stringent than, or equal in stringency to, the above-mentioned visible emission limitation
	OAC rule 3745-17-08	Less stringent than the above-mentioned control measure requirements

2. Additional Terms and Conditions

- 2.a The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

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Emissions Unit ID: **F001**

Aggregate handling by front-end loaders
Aggregate cold feed bins to conveyor line
Conveyor to aggregate scalping screen (double deck)
Aggregate conveyor to stacker

- 2.b** The permittee shall employ best available control measures for the above-identified material handling operation(s) 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 perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
Aggregate handling by front-end loaders	treat aggregate material with water to control dust emissions during subsequent aggregate handling by front-end loaders and minimize drop height distance from front-end loader(s) to truck beds, stock piles, and/or aggregate cold feed bins
Aggregate cold feed bins to conveyor line	treat aggregate material with water to control dust emissions during subsequent aggregate handling.
Conveyor to aggregate scalping screen (double deck)	treat aggregate material with water to control dust emissions during subsequent aggregate handling.
Aggregate conveyor to stacker	treat aggregate material with water to control dust emissions during subsequent aggregate handling and minimize drop height distance.

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

- 2.c** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.d** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
Aggregate material unloading from railcars	daily
Aggregate material unloading from trucks	daily
Aggregate handling by front-end loaders	daily
Aggregate cold feed bins to conveyor line	daily
Conveyor to aggregate scalping screen (double deck)	daily
Aggregate conveyor to stacker	daily

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

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

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
- c. the dates the control measure(s) was (were) implemented; and,
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each

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Emissions Unit ID: **F001**

calendar quarter.

5. 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 limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and,
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. 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 emissions limitations, operational restriction, 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 the 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.)

E. Testing Requirements

1. Emission limitation:

0.73 ton of PM per year

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Emissions Unit ID: **F001**

Applicable compliance method:

Compliance shall be determined by multiplying a controlled emission factor rate of 4.0×10^{-4} lb/ton (from AP-42, table 11.19.2.2 (January, '95 version)) by the annual 12-month summation of aggregate through-put and dividing by 2,000 lbs/ton. (The emission factor is determined by multiplying the listed emission factor by the number of transfer points and by a factor of 2.1 to convert PM₁₀ emissions to PM emissions.)

2. Emission limitation:

0.37 ton of PM₁₀ per year

Applicable compliance method:

Compliance shall be determined by multiplying a controlled emission factor rate of 1.9×10^{-4} lb/ton (from AP-42, table 11.19.2.2 (January, '95 version)) by the annual 12-month summation of aggregate through-put and dividing by 2,000 lbs/ton. (The emission factor is determined by multiplying the listed emission factor by the number of transfer points.)

3. Emission limitation:

10 percent opacity, as a three-minute average

Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None.

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

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>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-08 (B),(B)(6)
Load-in and load-out of storage (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	
Wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	
Load-in and load-out of storage piles, and wind erosion from storage piles	OAC rule 3745-31-05 OAC rule 3745-17-07 (B)(6)	

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Emissions Unit ID: F002

Applicable Emissions
Limitations/Control Measures

no visible emissions except for one minute in any hour

best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)

no visible emissions except for one minute in any hour

best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d, through A.2.f)

PM: 2.54 tpy
PM₁₀: 1.18 tpy

less stringent than the above-mentioned visible emission limitation

less stringent than the above-mentioned visible emission limitation

2. Additional Terms and Conditions

2.a The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

8 Limestone storage piles

57 Limestone storage piles
9 Limestone storage piles
Natural Sand storage piles
Manufactured sand storage piles

- 2.b** The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles 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 load-in and load-out material(s) with water to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** 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.d** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles 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 each storage pile with water to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** 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 or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f** 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 rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

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None.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	weekly

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all	weekly

3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	weekly

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. 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, except if the next required inspection is within one week.

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for 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 appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

8. 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 limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation reports 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. 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 emissions limitations, operational restriction, 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 the 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.)

E. Testing Requirements

1. Emission limitation:

2.54 tons of PM per year

Applicable compliance method:

Compliance can be determined by the following equations:

$$E = k (0.0032)[(U/5)^{1.3} / (M/2)^{1.4}] \quad (\text{AP-42, section 13.2.4, Eq (1)}) \quad (\text{January, '95 version), load-in}$$

Where: E = emission factor (lb/ton)
 k = 0.74 (particle size multiplier for PM < 30 mm, dimensionless)
 U = 10 mph (mean wind speed, 10 mph for Youngstown City)
 M = material moisture content (%)

Wind Erosion Calculation: (AP-42, section 11.2.3, Eq (3)) (May, '83 version)

$$E = 1.7 (s/1.5)[(365-p)/235](f/15) \quad (\text{lb/day/acre})$$

Where: E = total suspended particulate emission factor
 s = silt content of aggregate (%) (1.4%)
 p = number of days with > or = to 0.25 mm (0.01 in.) of precipitation per year (163 days)
 f = percentage of time that the unobstructed wind speed exceeds 5.4 m/s (12 mph) at the mean pile height. (Assume 20%)

The calculated emission factors (E) shall be added and multiplied by the annual 12-month summation of aggregate through-put and dividing by 2,000 lbs/ton.

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2. Emission limitation:

1.18 tons of PM₁₀ per year

Applicable compliance method:

Compliance can be determined by the following equation:

$$E = k (0.0032)[(U/5)^{1.3} / (M/2)^{1.4}]$$

Where: E = emission factor (lb/ton)
k = 0.35 (particle size multiplier for PM < 10 mm, dimensionless)
U = 10 mph (mean wind speed, 10 mph for Youngstown City)
M = material moisture content (%)

The calculated emission factor (E) shall be multiplied by the annual 12-month summation and dividing by 2,000 lbs/ton.

3. Emission limitation:

One (1) minute of visible emission

Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standard of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None.

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

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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
unpaved roadways and parking areas	OAC rule 3745-31-05	PM: 2.85 tpy PM ₁₀ : 0.74 tpy no visible particulate emissions except for 3 minutes during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)
	OAC rule 3745-17-07 (B)(5)	less stringent than the above-mentioned visible emission limitation
	OAC rule 3745-17-08 (B),(B)(2)	less stringent than the above-mentioned control measure requirements

2. Additional Terms and Conditions

- 2.a The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

all unpaved roadways within the facility

unpaved parking areas:

employee parking area

- 2.b** 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 and/or any other suitable dust suppression chemicals, Coherex solution, or emulsified asphalt 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 an 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 using appropriate dust control measures 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 a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.
- 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.

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- 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.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
all	daily

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
all	daily

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, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:

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- 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 updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. 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 limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

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D. Reporting Requirements

1. The permittee shall submit deviation reports 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. 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 emissions limitations, operational restriction, 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 the 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.)

E. Testing Requirements

1. Emission Limitation:

2.85 tons of PM per year PM₁₀: 0.74 tpy

Applicable Compliance Method:

Compliance can be determined by the following equation:

$$E = k(s/12)^a(W/30)^b/(M_{dry}/0.2)^c[(365-p)/365] \quad (\text{AP-42 section 13.2.2}) \quad (\text{Eq. 2})$$

Where: E = annual sized-specific emission factor extrapolated for natural mitigation,
 lb/VMT

M_{dry} = surface material content under dry, uncontrolled condition, %

W = mean vehicle weight (tons)

p = # of days with at least 0.254 mm (0.01 in) of precipitation.

k = 10 (empirical constant for PM, lb/VMT)

s = surface material silt content (%)

a = 0.8 (empirical constant for PM)

b = 0.5 (empirical constant for PM)

c = 0.4 (empirical constant for PM)

The calculated emission factor shall be multiplied by the total miles traveled (in miles/yr) and dividing by 2,000 lbs/ton.

2. Emission Limitation:

0.74 ton of PM₁₀ per year

Applicable Compliance Method:

Compliance can be determined by the following equation:

$$E = k(s/12)^a(W/30)^b/(M_{dry}/0.2)^c[(365-p)/365] \quad (\text{AP-42 section 13.2.2}) \text{ (Eq. 2)}$$

Where: E = annual sized-specific emission factor extrapolated for natural mitigation,
 lb/VMT

M_{dry} = surface material content under dry, uncontrolled condition, %

W = mean vehicle weight (tons)

p = # of days with at least 0.254 mm (0.01 in) of precipitation.

k = 2.6 (empirical constant for PM, lb/VMT)

s = surface material silt content (%)

a = 0.8 (empirical constant for PM₁₀)

b = 0.4 (empirical constant for PM₁₀)

c = 0.3 (empirical constant for PM₁₀)

The calculated emission factor shall be multiplied by the total miles traveled (in miles/yr) and dividing by 2,000 lbs/ton.

3. Compliance with the emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test

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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)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None.

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

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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20,000 gallon fixed roof storage tank with submerged fill pipe	OAC rule 3745-31-05 OAC rule 3745-21-07(D) 40 CFR Part 60, Subpart Kb	OC: 1.0 ton per year This rule is less stringent than OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the types of organic liquids stored in the tank.
2. In accordance with 40 CFR 60.116b (a) and (b), the owner and operator of the storage vessel shall keep readily accessible records showing the dimension of storage vessel and an analysis showing the capacity of storage vessel for the life of each source.

D. Reporting Requirements

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Emissions Unit ID:**T001**

None.

E. Testing Requirements

1. Emission Limitation:

1.0 ton of OC per year

Applicable Compliance Method:

To demonstrate compliance with the annual limit of 1.0 ton per year for organic compound, the permittee shall calculate the annual OC emissions in tons per year using AP-42, section 7.1.3 (September, 1997 version).

F. Miscellaneous Requirements

None.

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

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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
30,000 gallon fixed roof storage tank with submerged fill pipe	OAC rule 3745-31-05 OAC rule 3745-21-07(D) 40 CFR Part 60, Subpart Kb	OC: 1.0 ton per year This rule is less stringent than OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the types of organic liquids stored in the tank.
2. In accordance with 40 CFR 60.116b (a) and (b), the owner and operator of the storage vessel shall keep readily accessible records showing the dimension of storage vessel and an analysis showing the capacity of storage vessel for the life of each source.

D. Reporting Requirements

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Emissions Unit ID: **T002**

None.

E. Testing Requirements

1. Emission Limitation:

1.0 ton of OC per year

Applicable Compliance Method:

To demonstrate compliance with the annual limit of 1.0 ton per year for organic compound, the permittee shall calculate the annual OC emissions in tons per year using AP-42, section 7.1.3 (September, 1997 version).

F. Miscellaneous Requirements

None.