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

Permit To Install07-00563

A. Source Description

Rick Eplion Paving Inc. is proposing to use No 2 fuel oil and natural gas fuels, with the flexibility of using propane, No 4 fuel oil and onspec used oil for their 190 TPH portable drum mix asphalt plant.

B. Facility Emissions and Attainment Status

Rick Eplion Paving is located in Lawrence County which is currently attainment for CO, SO2, VOC and Nox. Lawrence County is currently non attainment for PM2.5. With the production restriction of 350,000 TPY, facility emissions for all criteria pollutants will be below 100 TPY.

C. Source Emissions

Rick Eplion Paving will restrict the plant annual production to 350,000 tons per 12-month rolling period. With the proposed production restriction, total annual emissions for the plant will be limited to 22.75 tons CO, 10.68 tons NOx, 19.25 tons SO2, 17.5 tons OC 5.78 tons PE and 3.30 tons fugitive PE. The terms and conditions of the PTI include recordkeeping to ensure compliance with the production restriction.

D. Conclusion

The operation restrictions, emission limits, emission testing, recordkeeping and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit from this emission unit below Title V threshold of 100 tons per year.

State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center

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

Application No: 07-00563
Fac ID: 0744000158

DATE: 1/31/2006

Rick Eplion Paving, Inc.
Steven Gillam
P O Box 712 7159 St Rt 7
Proctorville, OH 456698171

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1700** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **PCHD** **KY** **WV**

LAWRENCE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **07-00563** FOR AN AIR CONTAMINANT SOURCE FOR
Rick Eplion Paving, Inc.

On 1/31/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Rick Eplion Paving, Inc.**, located at **7159 St Rt 7, Proctorville**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 07-00563:

190 ton/hr Counterflow Drum Mix Asphalt Batch Plant with baghouse, Aggregate Storage Piles and Roadways and Parking Areas.

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

Cindy Charles, Portsmouth City Health Department, 740 Second Street, Portsmouth, OH 45662
[(740)353-5156]

DRAFT PERMIT TO INSTALL 07-00563

Application Number:	07-00563
Facility ID:	0744000158
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Rick Eplion Paving, Inc.
Person to Contact:	Steven Gillam
Address:	P O Box 712 7159 St Rt 7 Proctorville, OH 456698171

Location of proposed air contaminant source(s) [emissions unit(s)]:
7159 St Rt 7
Proctorville, Ohio

Description of proposed emissions unit(s):
190 ton/hr Counterflow Drum Mix Asphalt Batch Plant with baghouse, Aggregate Storage Piles and Roadways and Parking Areas.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year

Rick Eplion Paving, Inc. **Facility ID: 0744000158**

PTI Application: 07-00563

Issued

Emissions Unit ID: **F001**

Stack emissions	
CO	**22.75**
VOC	**17.50**
NOx	**10.68**
SO2	**19.25**
PE	**5.78**
fugitive emissions	**3.30**
PE	**0.65**
PM10	**1.90**
OC	**0.30**
CO	

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Aggregate Storage Piles including load-in, load-out and wind erosion	OAC rule 3745-31-05 (A)(3)	0.58 ton/year of fugitive particulate matter of 10 microns or less (PM10) 1.14 tons/year of fugitive particulate emissions (PE) no visible emissions except for a one minute during any 60-minute period. best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections A.2.a through A.2.e) See a.2.f below.

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 the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal

drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

The operator shall avoid dragging any front-end loader bucket along the ground. 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 treat each storage pile with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies 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 0744000158. The emission limitation of 1.14 TPY fugitive PE represents the maximum emissions which will be emitted from the storage piles

for any proposed site for relocation of the portable asphalt plant.

The storage piles 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. The emission limitations and control requirements established by OAC rule 3745-17-08 (B) and OAC rule 3745-17-08 (B) are less stringent than the requirements 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 inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
All	Once during each day of operation

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

storage pile identification	minimum load-out inspection frequency
All	Once during each day of operation

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:

storage pile identification	minimum wind erosion inspection frequency
All	Once during each day of operation

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 shall maintain records of the following information:

a. The date and reason any required inspection was not performed, including those inceptions 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 6.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

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:

      0.58 ton/year of fugitive PM10
      1.14 tons/year of fugitive PE

      Applicable Compliance Method:

      The emission limitation was established by combining the emissions from load-in and load-out operations and from wind erosion from each storage pile as listed in the permittee's application and applying a 95% control efficiency for use of

best available control measures. Load-in and load-out operation emissions are based on a maximum load-in and load-out rate of each product. Wind erosion emissions are based on a maximum storage pile surface area of each product as listed in the permit application:

The emission rate was determined as follows:

i. Load-in - emissions associated with load-in operations were established by multiplying the maximum load-in rate of in tons of each product per year by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95), applying a 95% control efficiency and dividing by 2000 lbs/ton.

ii. Load-out - emissions associated with load-out operations were established by multiplying the maximum load-out rate of in tons of each product per year by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95), applying a 95 % control efficiency and dividing by 2000 lbs/ton.

iii. Wind erosion - emissions were established by multiplying a maximum storage pile surface area of in acres for each product, the appropriate emission factor from USEPA's Control of Open Fugitive Dust Sources (9/88) , a maximum operating schedule of 365 days per year and dividing by 2000 and applying a 95% control efficiency.

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PE limitation will be assumed.

b. 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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of

OAC rule 3745-17-03.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source 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 source is equipped with the best available technology for such portable source;

      ii. the portable source is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;

      iii. the applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and

      iv. in the judgement of the Ohio EPA District Office or local air agency having jurisdiction over the new site, 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 source 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 source permittee possesses an Ohio EPA PTI, PTO or registration status;

      ii. the portable source is equipped with best available technology;

      iii. the portable source owner has identified the proposed site to Ohio EPA;

      iv. Ohio EPA has determined that the portable source, 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 source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and

vii. the portable source 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 permitting Ohio EPA District Office or local air agency 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 source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency 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 portable source 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.

Emissions Unit ID: **F002**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 - Unpaved Plant Roadways and Parking Areas	OAC rule 3745-31-05 (A)(3)	0.07 ton/ year of fugitive particulate matter of 10 microns or less (PM10) 0.24 ton/year of fugitive particulate emissions (PE) 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 PE of fugitive dust (See Sections A.I.2.a through A.I.2.h.)

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 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 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.c 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.d 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.e 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.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 best available technology requirements of OAC rule 3745-31-05.

2.h The unpaved roadways and parking areas are associated with the portable asphalt plant P901 permitted under facility ID 0744000158. The emission limitation of 0.24 tons per year fugitive PE represents the maximum emissions which will be emitted from the roadways and parking areas for any proposed site for relocation of the portable asphalt plant.

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. The emission limitations and control requirements established by OAC rule 3745-17-07 (B) and OAC rule 3745-17-08 (B) are less stringent than the requirements 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 inspections of the roadways and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas	minimum inspection frequency
all unpaved roadways and parking areas	once during each day of operation

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 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 3.d. 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.

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:

0.07 ton/ year of fugitive particulate matter of 10 microns or less (PM10)
0.24 ton/year of fugitive particulate emissions (PE)

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used. These emission limits were based on a maximum of 1,000 vehicle miles traveled per year, and a 95 % control efficiency for PE and PM10.

b. Emission Limitation:

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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule

3745-17-03.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source 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 source is equipped with the best available technology for such portable source;

      ii. the portable source is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;

      iii. the applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and

      iv. in the judgement of the Ohio EPA District Office or local air agency having jurisdiction over the new site, 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 source 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:

      the portable source permittee possesses an Ohio EPA PTI, PTO or registration status;

      ii. the portable source is equipped with best available technology;

      iii. the portable source owner has identified the proposed site to Ohio EPA;

      iv. Ohio EPA has determined that the portable source, 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 source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and

vii. the portable source 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 permitting Ohio EPA District Office or local air agency 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 source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency 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 portable source 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.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P901 - 190 TPH portable counterflow drum mix asphalt plant with baghouse, dryer drum and silo	OAC rule 3745-31-05(A)(3)

Emissions Unit ID: **P901**

OAC rule 3745-31-05(C)		Applicable Emissions Limitations/Control Measures
	OAC rule 3745-23-06(B) OAC rule 3745-21-08(B) OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(B) OAC rule 3745-17-08 OAC rule 3745-18-06(E) 40 CFR Part 60, Subpart I	Stack Emissions: Sulfur dioxide (SO2) emissions while burning natural gas shall not exceed 0.011 pounds per ton of asphalt produced. SO2 emissions while burning propane, on spec used oil or #2 fuel oil shall not exceed 0.066 pound per ton of asphalt produced. SO2 emissions while burning #4 fuel oil shall not exceed 0.11 pound per ton of asphalt produced. Nitrogen oxides (NOx) emissions while burning natural gas shall not exceed 0.027 pounds per ton of asphalt produced. NOx emissions while burning propane, on spec used oil or #2 fuel oil shall not exceed 0.051 pounds per ton of asphalt produced. NOx emissions while burning #4 fuel oil shall not exceed 0.061 pound per ton of asphalt produced. Carbon monoxide (CO) emissions while burning any approved fuels shall not exceed 0.13 pound per

ton of asphalt produced. Volatile organic compound (VOC) emissions while burning any approved fuels shall not exceed 0.10 pound per ton of asphalt produced. Particulate emissions (PE) while burning any approved fuels shall not exceed 0.03 gr/dscf of exhaust gas. Arsenic, cadmium, chromium, and lead emissions are limited by the fuel specifications in A.2.h below. 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 A.2.a-h below. Stack Emissions: PE emissions shall not exceed 5.78 tons per rolling 12-month period. SO2 emissions shall not exceed 19.25 tons per rolling 12-month period. NOx emissions shall not exceed 10.68 tons per rolling 12-month period.	CO emissions shall not exceed 22.75 tons per rolling 12-month period. VOC emissions shall not exceed 17.50 tons per rolling 12-month period. Asphalt Load Out Emissions Emissions from load out operations shall not exceed 0.16 ton CO per rolling 12-month period, 0.073 tons PE per rolling 12-month period and 0.46 tons of OC per rolling 12-month period. Asphalt Silo Filling Emissions Emissions from silo filling operations shall not exceed 0.14 tons CO per rolling 12-month period, 0.09 tons PE per rolling 12-month period and 1.44 tons OC per rolling 12-month period. Cold End Fugitive Dust Emissions Emissions of fugitive dust associated with the cold aggregate, sand and RAP loading, and the cold aggregate, sand and RAP transfer operations shall not exceed 1.76 tons of PE per rolling 12-month period. See A.2.i below.	See A.2.j below. The emissions limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a 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.b 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.

2.c There shall be no visible emissions of fugitive dust from the enclosures for any scalping screens, the rotary drum and hot mix asphalt elevator.

2.d Visible emissions of fugitive dust (from areas other than the enclosures for any scalping screens, the rotary drum and the hot mix asphalt elevator) shall be less than or equal to 10% opacity, as a 3-minute average.

2.e Visible particulate emissions from the stack shall not exceed 20% opacity, as a 3 minute average.

2.f All number 2 fuel oil and on-spec used oil burned in this emission unit shall have a sulfur content equal to or less than 0.5% by weight.

2.g All number 4 fuel oil burned in this emission unit shall have a sulfur content equal to or less than 0.8%, by weight.

2.h All used oil burned in this emissions unit shall be "on-specification" (on-spec) oil and must meet the used oil fuel specifications contained in OAC 3745-279-11, which restricts the used oil to the following limitations:

Contaminant/Property	Allowable Specifications
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
total halogens	4,000 ppm maximum**
flash point	100°F, minimum;

and shall also not exceed the following maximum PCB and mercury limitations

nor fall below the following heating value:

heat content	135,000 Btu/gallon, minimum
PCB's	50 ppm, maximum*
mercury	1 ppm, maximum

* Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-279-10 of the Administrative Code. The permittee may receive and burn used oil exceeding 1,000 ppm total halogens (but less than 4,000 ppm maximum) only if the permittee has demonstrated that the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-63.

The burning of used oil not meeting the above limitations is prohibited in this emissions unit. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter.

2.i 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 15, 2005, OAC rule 3745-23-06 was rescinded and 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 revision to the SIP, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.j The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs

and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range of 3 to 5 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.h 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 permitted has requested a federally enforceable limit on asphalt produced in order to restrict the federally enforceable potential to emit. The amount of asphalt produced is restricted in two ways. First, the total amount of asphalt produced using any fuel is limited to 350,000 tons per rolling 12-month period. Second, the amount of asphalt produced by fuel is restricted by the following equation:

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 on an hourly basis.

6. The permittee shall only burn natural gas, propane, No. 2 fuel oil , No. 4 fuel oil and/or on spec used oil in this emission unit. In order to use fuel on an ongoing basis, the permittee shall complete the emission testing for that fuel per term and condition E.1.a.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall receive and maintain the chemical analyses from the supplier/marketer for each shipment of used oil burned in this emissions unit, which shall contain the following information:

   a. the date the used oil was received at the facility;

b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/re-finer, supplier, and/or marketer;

c. the results of the chemical analyses demonstrating the used oil meets the standards in OAC 3745-279-11, including:

   i. arsenic content, in ppm;
   ii. the cadmium content, in ppm;
   iii. the chromium content, in ppm;
   iv. the lead content, in ppm;
   v. total halogens, in ppm; and
   vi. the flash point

d. the analysis demonstrating that the used oil has a total halogen content below 1,000 ppm, or below 4,000 ppm with the demonstration for the rebuttal of the presumption that the oil is hazardous waste or has been mixed with hazardous waste, as described in OAC rule 3745-279-63 (B); and

e. the results of the analyses demonstrating that the used oil meets the heating value and mercury and PCB limitations contained in this permit.

The metal contents for arsenic, cadmium, chromium, lead, and mercury shall be analyzed using a "Totals Analysis" or Total Metals" testing methodology, Chapter Two of "Testing Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846)" should be referenced to for selecting appropriate test methods for the used oil analyses. Under no circumstances shall the metal contents of the used oil be analyzed using "TCLP", "EP-TOC", or other similar testing procedures, since these tests were developed to gauge leachate mobility from a landfill, of which is an irrelevant property of the used oil burned for energy recovery.

Each analysis shall be kept in a readily accessible location for a period of not less than 3 years following the receipt of each shipment of used oil and shall be made available to the Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses, through an independent laboratory.

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 total asphalt production for each month;

   b. the total asphalt produced for each fuel type for each month;

   c. the rolling, 12 month summation of the total asphalt production and the asphalt production by fuel type; and

   d. the maximum percentage of RAP used for any mix.

4. For each shipment of No. 2 fuel oil, No. 4 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.

5. 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 the visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

   If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

6. 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 enclosures for the hot asphalt elevator, scalping screens, the rotary drum. 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;
   c. the total duration of any visible emissions incident; and
   d. any corrective actions taken to minimize or 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 areas other than the enclosures for the hot asphalt elevator, scalping screens, the rotary drum. 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. 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 the visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

8. While performing each burner tuning, the permittee shall record the results of the burner tuning using the *Burner Tuning Reporting Form Asphalt Concrete Plants form* (as found in F.2). An alternative form may be used upon approval of the appropriate Ohio EPA District Office of local air agency.

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 quarterly deviation (excursion) reports that identify all exceedances of the rolling 12-month SO_2, NOx, OC, CO, and PE emission limitations. These reports are due by the dates described in Part I - General Terms and Condition of this permit under section (A)(2).

5. The permittee shall notify the Ohio EPA Division of Hazardous Waste Management and the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency), in writing and within 30 days, of burning any used oil exceeding the limitations found in OAC rule 3745-279-11 and/or any incident or occurrence of non-compliance with any other applicable requirement of OAC Chapter 3745-279; and shall also notify the Ohio EPA Division of Air Pollution Control, within the same amount of time, if any oil is/was burned which exceeds the mercury limitation of 1 ppm and/or is documented as having a heating value of less than 135,000 Btu/gallon.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limits 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 reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to minimize or eliminate any abnormal 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.

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 enclosures for the rotary drum, scalping screens, or hot asphalt elevator serving this emissions unit, 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 semiannual written deviation (excursion) reports that (a) identify all days during which any visible fugitive particulate emissions were observed from areas other than the enclosures for the rotary drum, scalping screens, or hot asphalt elevator serving this emissions unit, 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.

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

11. Relocation of Portable Sources

    a Pursuant to OAC rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing the following criteria are met:

        i. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;

        ii. the portable emissions unit is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;

        iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site, within a minimum of 30 days prior to the scheduled relocation; and

        iv. in the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site's 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 or mobile 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 (the permitting Ohio EPA District Office or local air agency) 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 or mobile 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 Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the source, and/or appropriate Ohio EPA District Office or local air agency 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 Limitations:

   Sulfur dioxide (SO2) emissions while burning natural gas shall not exceed 0.011 pounds per ton of asphalt produced. SO2 emissions while burning propane, on spec used oil or #2 fuel oil shall not exceed 0.066 pound per ton of asphalt produced. SO2 emissions while burning #4 fuel oil shall not exceed 0.11 pound per ton of asphalt produced. Nitrogen oxides (NOx) emissions while burning natural gas shall not exceed 0.027 pounds per ton of asphalt produced. NOx emissions while burning propane, on spec used oil or #2 fuel oil shall not exceed 0.051 pounds per ton of asphalt produced. NOx emissions while burning #4 fuel oil shall not exceed 0.061 pound per ton of asphalt produced. Carbon monoxide (CO) emissions while burning any approved fuels shall not exceed 0.13 pound per ton of asphalt produced.
   Volatile organic compound (VOC) emissions while burning any approved fuels shall not exceed 0.10 pound per ton of asphalt produced. Particulate emissions (PE) while burning any approved fuels shall not exceed 0.03 gr/dscf of exhaust gas.

   Applicable Compliance Method:

   The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   i. 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.
      Emissions testing for secondary fuels shall be conducted within 60 days after the switch to the secondary fuel.

   ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, VOC, CO, NOx and SO_2 for the primary fuel. Prior to secondary fuel emissions testing, the permittee shall consult the Ohio EPA District Office or local air agency to determine which pollutants should be tested.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

For PE, Methods 1-5 of 40 CFR Part 60, Appendix A.

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

For SO_2, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A

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

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

The VOC pounds per hour emission rate observed during the emissions test shall be calculated in accordance with OAC 3745-21-10(C)(7) where the average molecular weight of the VOC emissions equals 16. i.e., the VOC as carbon emission rate observed during testing shall be converted to the appropriate units by multiplying the VOC as carbon emission rate observed during testing by 16 and dividing by 12.

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

iv. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity and burning natural gas, number 2 fuel oil, number 4 fuel oil or on-spec used oil for PE, VOC, CO, NOx and SO_2 and employing RAP to verify VOC emissions, unless otherwise specified or approved by the Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA District Office or local air agency. 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 District Office or local air agency'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 Ohio EPA District Office or local air agency within 30 days following completion

of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA District Office or local air agency.

b. Emissions Limitation:

PE emissions shall not exceed 5.78 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of PE per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term and condition C.3 above), and dividing by 2000.

c. Emission Limitation:

VOC emissions shall not exceed 17.50 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of VOC per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term and condition C.3 above), and dividing by 2000.

d. Emission Limitation:

CO emissions shall not exceed 22.75 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of CO per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term and condition C.3 above), and dividing by 2000.

e. Emission Limitation:

SO_2 emissions shall not exceed 19.25 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of SO_2 per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term and condition C.3 above), and dividing by 2000.

f. Emission Limitation:

NO_x emissions shall not exceed 10.68 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of NOx per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period (as derived from the records required by term and condition C.3 above), and dividing by 2000.

g. Emission Limitations:

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

Applicable Compliance Method:
Compliance with the emissions limitation for arsenic, cadmium and lead shall be demonstrated by the monitoring and record keeping in Section C.1 of this permit.

h. Emission Limitation:

There shall be no visible emissions of fugitive dust from the enclosures for any screens, the rotary drum and the hot mix asphalt elevator.

Applicable Compliance Method:

Compliance with the limitations on visible emissions of fugitive dust found in Section A.2 of this permit shall be demonstrated by the monitoring and record keeping in Section C.6. Upon request by the Ohio EPA District Office or local air agency, 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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

i. Emission Limitation:

Visible emissions of fugitive dust (from areas other than the enclosures for any scalping screens, the rotary drum and the hot mix asphalt elevator) shall be less than or equal to 10% opacity, as a 3-minute average.

Applicable Compliance Method:

Upon request by the Ohio EPA District Office or local air agency, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

j. Emission Limitation: Visible particulate emissions from the stack shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Upon request by the Ohio EPA District Office or local air agency, compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 2002 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

k. Emissions Limitation:

Emissions of fugitive dust associated with the cold aggregate, sand and RAP loading, and the cold aggregate, sand and RAP transfer operations shall not exceed 1.76 tons of PE per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be assumed based upon the following worst case calculations:

Fugitives emissions from the cold end are calculated as follows

Hopper loading:

350,000 tons of material/year X 0.0051 lb PE/ton of material = 1785 lbs PE/yr

Aggregate transfer:

210,000 tons of aggregate/year X 0.0069 lb PE/ton of aggregate = 1449 lbs PE/yr

Sand transfer:

140,000 tons of sand/year X 0.0021 lb PE/ton of sand = 294 lbs PE/yr

The sum of the above is 3528 lbs PE/yr X 1 ton/2000 pounds = 1.76 tons PE

I. Emissions Limitation:

Fugitive emissions from the hot end (hot mix asphalt load-out and silo filling):

a. Emissions from load out operations shall not exceed 0.16 ton CO per rolling 12-month period, 0.073 tons PE per rolling 12-month period and 0.46 tons of OC per rolling 12-month period.

b. Emissions from silo filling operations shall not exceed 0.14 tons CO per rolling 12-month period, 0.09 tons PE per rolling 12-month period and 1.44 tons OC per rolling 12-month period.

Applicable Compliance Method:

Emissions from asphalt load out and silo filling operations are calculated as follows:

Asphalt plant silo filling and plant load-out emissions from AP-42, Table 11.1-14 dated 3/2004

Known:
V = -0.5 Asphalt Volatility factor (default)
T = 310 HMA mix temp (F)

For silo filling, 1.4% of TOC is not OC AP-42 Table 11.1-16 dated 3/2004
For plant load-out, 7.3% of TOC is not OC AP-42 Table 11.1-16 dated 3/2004

Activity	Pollutant	Predictive Emission Factor Equation, lb/ton
Silo filling	PE	$EF=0.000332+0.00105(-V)e^{((0.0251)(T+460)-20.43)}$
Load-out	PE	$EF=0.000181+0.00141(-V)e^{((0.0251)(T+460)-20.43)}$
Silo filling	OC	$EF=0.0504(-V)e^{((0.0251)(T+460)-20.43)}$
Load-out	OC	$EF=0.0172(-V)e^{((0.0251)(T+460)-20.43)}$
Silo filling	CO	$EF=0.00488(-V)e^{((0.0251)(T+460)-20.43)}$
Load-out	CO	$EF=0.00558(-V)e^{((0.0251)(T+460)-20.43)}$

Based on the above information, the emission factors and emissions are as follows:

Activity	Pollutant	lb/ton	tons/yr (at 350,000 tons/yr production)
Silo filling	PE	5.1 x 10-4	0.09
Load-out	PE	4.2 x 10-4	0.073
Silo filling	OC	8.2 x 10-3	1.44
Load-out	OC	2.6 x 10-3	0.46
Silo filling	CO	8.0 x 10-4	0.14
Load-out	CO	9.0 x 10-4	0.16

2. Burner Tuning

a. Introduction

The permittee 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 emission rates and are minimized.

b. Qualifications for Burner Tuning

Technicians who conduct the burner tuning must be qualified to perform the expected tasks. The permittee is required to provide training to the technicians who perform the burner tuning procedure. Technicians who are qualified shall, at a minimum, have passed manufacturer's training concerning burner tuning, or have been trained by someone who has completed the manufacturer's training concerning burner tuning.

c. Portable Monitor Requirements

The permittee shall properly operate and maintain portable device(s) to monitor the concentration of NOx, O^2 and CO in the stack exhaust gases from this emissions unit. The monitor(s) shall be capable of measuring the expected concentrations of the measured gases. 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.

d. Burner Tuning Procedure

The first steps concerning burner tuning involve setting the pollutant baseline

levels (concentrations) utilizing the portable monitor. 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 E.1.a. The baselines shall be determined for NOx, and CO. Sampling should measure the exhaust gas values exiting the baghouse. The duration of each sample shall follow the portable monitor manufacturer's recommendations. Record these values on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form (as found in 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 E.2.e. 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 and monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for NOx, and CO. These measurements shall be taken at the same location as the location where the baseline samples were taken. 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 115 percent of the pollutant baseline values, then it is not necessary to tune the burner. Go on to section v. below. The permittee shall have the burners tuned within two calendar weeks of any measured stack exhaust values greater than 115 percent of the baseline values. Make any necessary adjustments and repairs. Repeat sections iii. and iv. until the measured stack exhaust gas values are equal to or less than 115 percent of the pollutant baseline values.

v. Once all of the measured stack exhaust gas values are within the 115 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. By January 31st of each year, submit a copy of all Burner Tuning Reporting Form for Asphalt Concrete Plants forms produced during the past calendar year to the Ohio EPA District Office or local air agency responsible for the permitting of the facility.

e. 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. A burner tuning is not required if the production season ends prior to the associated tuning due date. The second and third burner tuning of the season is not required if the initial baseline level testing or the initial season testing was done within 30 days prior to June 1 or September 1.

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.

Source Number	Source Description	NSPS Regulation (Subpart)
P901	190 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 Ohio EPA District Office or local air agency responsible for the permitting of the facility.

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 ☐ Propane ☐ #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)			
Fuel pressure (psi)			
For burners that require compressed air for proper operation, pressure at the burner (psi)			
Carbon Monoxide (CO) concentrations (ppm)[2]			
NOx concentrations (ppm)[2]			
CO_2 concentrations (ppm)[2]			

Rick Eplion Paving, Inc. **Facility ID: 0744000158**

PTI Application: 07-00563

Issued

Emissions Unit ID: **P901**

Oxygen concentrations (%)[2]			
Asphalt Production (tons/hr)			

[1]These 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. Use additional paper if necessary.

_____

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: