

Synthetic Minor Determination and/or Netting Determination

Permit To Install 08-04565

A. Source Description

Valley Asphalt Walls-Fort Jefferson is converting the old batch plant to more efficient and higher production drum plant (400 tons/hr). The facility is proposing to restrict the maximum annual asphalt production tonnage for emissions unit P901 to 500,000 tons/yr as a rolling 12-month summation, therefore avoiding Title V and major NSR permitting requirements.

B. Facility Emissions and Attainment Status

Without federally enforceable restrictions, the potential Carbon Monoxide (CO) and Sulfur Dioxide (SO₂) emissions are 227.76 tons/yr and 101.62 respectively. The emissions unit is located in Darke county which is currently designated as attainment for all criteria pollutants.

C. Source Emissions

With a restriction on the maximum annual asphalt production tonnage of 500,000 as a rolling 12-month summation, CO and SO₂ emissions are 32.5 tons/yr and 14.5 tons/yr respectively. This is below the major source threshold of 100 tons/yr for CO and SO₂ which would require the facility to obtain a Title V permit at this time and <250 TPY for major NSR permitting requirements.

D. Conclusion

With the federally enforceable asphalt production rate, based on a rolling 12 month basis emission rate of CO and SO₂ are below major source thresholds. The corresponding monitoring and/or record keeping and reporting requirements, will ensure compliance with these federally enforceable restrictions on the production rate.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
DARKE COUNTY
Application No: 08-04565**

CERTIFIED MAIL

DATE: 3/16/2004

Valley Asphalt-Walls Fort Jefferson
Daniel Crago
11641 Mosteller Rd
Cincinnati, OH 45241-1570

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 or 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 **\$900** 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.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN

DARKE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04565 FOR AN AIR CONTAMINANT SOURCE FOR
VALLEY ASPHALT-WALLS FORT JEFFERSON**

On 3/16/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Valley Asphalt-Walls Fort Jefferson**, located at **3690 Hollansburg-Sampson Rd, Greenville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04565:

drum, hot mix asphalt plant.

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main street, Dayton, OH 45422-12084
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04565

Application Number: 08-04565
APS Premise Number: 0819010076
Permit Fee: **To be entered upon final issuance**
Name of Facility: Valley Asphalt-Walls Fort Jefferson
Person to Contact: Daniel Crago
Address: 11641 Mosteller Rd
Cincinnati, OH 45241-1570

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3690 Hollansburg-Sampson Rd
Greenville, Ohio**

Description of proposed emissions unit(s):

Drum, hot mix asphalt plant.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. Permit to Install General Terms and Conditions****1. Compliance Requirements**

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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>
particulate matter	3.5
volatile organic compound	8.0
nitrogen oxide	13.75
sulfur dioxide	14.5
carbon monoxide	32.5

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property,
and/or Equipment

P901 - 400 tons/hr, Drum Mix Hot
Mix Asphalt Plant; rotary dryer
controlled with baghouse

(Non-Appendix A area)

*modification

aggregate storage bins, cold aggregate
elevator, load-out and silo filling
operations

Valley

PTI A

Emissions Unit ID: **P901**

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Applicable Rules/Requirements

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

OAC rule 3745-17-07(A) and 3745-17-11(B)

OAC rule 3745-18-06(E)(2)

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

OAC rule 3745-35-07(B)
(Synthetic minor to avoid Title V)

NSPS 40 CFR Part 60, Subpart I

**Valley
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Emissions Unit ID: **P901**

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<p style="text-align: center;"><u>Applicable Emissions Limitations/Control Measures</u></p>		
<p>The requirements of this rule also include compliance with the requirements of NSPS 40 CFR Part 60, Subpart I, and OAC 3745-35-07(B).</p>	<p>The sulfur dioxide (SO₂) emissions from this emissions unit when burning natural gas shall not exceed 1.36 and 0.85 tons/yr.</p>	<p>not exceed 20 percent opacity, as a 6-minute average, from the stack, except as provided by 40 CFR Part 60, Subpart I.</p>
<p>The particulate emissions (PE) from the stack for this emissions unit shall not exceed 3.5 tons/yr.</p>	<p>The sulfur dioxide (SO₂) emissions from this emissions unit when burning #2 oil shall not exceed 4.4 lbs/hr and 2.75 tons/yr.</p>	<p>The emission limitations specified in these rules are less stringent than the emission limitations specified in 40 CFR Part 60, Subpart I.</p>
<p>The fugitive particulate emissions from sand, aggregate and weigh hopper loading of materials (cold end) shall not exceed 2.02 tons/yr.</p>	<p>The sulfur dioxide (SO₂) emissions from this emissions unit when burning off-spec used oil shall not exceed 23.2 lbs/hr.</p>	<p>The emission limitation specified by this rule is less stringent than the emission limitation specified in OAC rule 3745-18-06(H) (i.e. 40 CFR, Part 60 Subpart I).</p>
<p>The carbon monoxide (CO) emissions from this emissions unit when burning off-spec used oil, #2 fuel oil and natural gas shall not exceed 52 lbs/hr.</p>	<p>The volatile organic compound (VOC) emissions from this emissions unit when burning natural gas, #2 oil and off-spec used oil shall not exceed 12.8 lbs/hr and 8.0 tons/yr.</p>	<p>The fugitive particulate emissions from silo filling and plant load out (hot end) shall not exceed 0.28 ton/yr.</p>
<p>The nitrogen oxide (NO_x) emissions from this emissions unit when burning natural gas shall not exceed 10.4 lbs/hr and 6.5 tons/yr.</p>	<p>The CO emissions from this emissions unit when burning natural gas, #2 oil and off-spec used oil shall not exceed 32.5 tons/yr.</p>	<p>The fugitive VOC emissions from silo filling and plant load out (hot end) shall not exceed 4.0 tons/yr.</p>
<p>The nitrogen oxide (NO_x) emissions from this emissions unit when burning #2 oil shall not exceed 22 lbs/hr and 13.75 tons/yr.</p>	<p>The SO₂ emissions from this emissions unit when burning off-spec used oil shall not exceed 14.5 tons/yr.</p>	<p>Visible particulate emissions from any fugitive source shall not exceed 20 percent opacity, as a 3-minute average.</p>
<p>The nitrogen oxide (NO_x) emissions from this emissions unit when burning off-spec used oil shall not exceed 22 lbs/hr and 13.75 tons/yr.</p>	<p>The ton/yr limitations are based upon a rolling 12-month summation.</p>	<p>The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the elevator loading area.</p>
<p>Visible particulate emissions shall</p>	<p>Particulate emissions from the stack shall not exceed 0.04 grain per dry standard cubic foot of exhaust gases.</p>	<p>The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize or eliminate the visible emissions of fugitive dust from the elevator and the transfer point to</p>

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Issued

Facility ID: 0819010076

Emissions Unit ID: **P901**

the dryer.

2. Additional Terms and Conditions

- 2.a** The 52 lbs/hr of CO, 22 lbs/hr of NO_x, 23.2 lb/hr of SO₂ and 12.8 lbs/hr of VOC emissions limitations were established for PTI purposes to reflect the potential to emit for this

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emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

- 2.b** This emissions unit has been approved for the use of recycle asphalt products.
- 2.c** The particulate emission limitation specified above includes particulate matter (PM₁₀) emissions that are less than 10 microns in diameter.

B. Operational Restrictions

1. The maximum annual production rate for this emissions unit shall not exceed 500,000 tons, based upon a rolling 12-month summation. Since this is an existing source it has existing records and therefore does not need to be limited to first year monthly amounts of production.
2. The pressure drop across the baghouse shall be maintained within the range of 3 to 6 inches of water when the emissions unit is in operation.
3. All recycled, off spec used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Specifications*
arsenic	3 ppm, maximum
cadmium	5 ppm, maximum
chromium	25 ppm, maximum
lead	150 ppm, maximum
PCB's	10 ppm, maximum**
total halogens	4000 ppm maximum***
mercury	1 ppm, maximum
flash point	100 degrees Fahrenheit, minimum
heat content	135,000 Btu/gallon, minimum

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

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

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4. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total quantity of asphalt products produced each month; and
 - b. the rolling, 12-month summation of the monthly production rates.
 - c. the maximum percentage RAP used for any mix.
2. The permittee shall properly, operate, and maintain equipment to monitor the pressure drop across the baghouse when the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
3. The permittee shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
 - a. The date of shipment or delivery.
 - b. The quantity of used oil received.
 - c. The Btu value of the used oil, in BTU/gallon.
 - d. The flash point of the used oil in degrees F.
 - e. The arsenic content, in ppm.
 - f. The cadmium content, in ppm.
 - g. The chromium content, in ppm.
 - h. The lead content, in ppm.
 - i. The PCB content, in ppm.
 - j. The total halogen content, in ppm.
 - k. The mercury content, in ppm.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Director (the appropriate Ohio EPS District Office or local air agency) upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by this facility, of any used oil stored at this facility, or of any used

oil sampled at the dryer.

4. 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 and for any visible fugitive particulate emissions from the hot aggregate elevator, vibrating screens, weigh hopper, aggregate storage bins and cold aggregate elevator 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the abnormal 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.

5. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
6. The permit to install for this emissions unit P901 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Emissions Unit ID: **P901**

Pollutant: Heptane

TLV (mg/m³): 1639.26

Maximum Hourly Emission Rate (lbs/hr): 3.76

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 20.35

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

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "TLVs and BEIs" by the American Conference of Governmental Industrial Hygienists (ACGIH), than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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PTI A

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Emissions Unit ID: P901

Valley**PTI A**Emissions Unit ID: **P901****Issued: To be entered upon final issuance****D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate District Office or local air agency) which identify all exceedances of the rolling, 12-month production rate limitation.
2. The permittee shall submit pressure drop quarterly 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.
3. The permittee shall submit quarterly deviation (excursion) reports to the USEPA and the Ohio EPA (appropriate DO or LAA) if any of the used oil exceeds the used oil specifications in this permit. An identification number from USEPA shall be obtained prior to the combustion of any used oil.

Before the permittee accepts the first shipment of any off-specification used oil from a marketer, the permittee must provide the marketer a one-time, written and signed notice certifying that:

- a. the company has notified USEPA of its used oil management activities and that the notice included the location and description of those activities; and
- b. the company will burn the used oil only in an industrial furnace or boiler identified in 40 CFR Part 266.41(b) and OAC rule 3745-279-42.

A copy of each certification notice that the permittee sends to a marketer must be kept on file for a minimum of 5 years from the date it last received off-specification used oil from that marketer.

4. The permittee shall submit annual reports of the production rate and the total PM, OC, NO_x, SO₂ and CO emissions for this emissions units. These reports shall be submitted by January 31 of each year to the Director (District Office or Local Air Agency).
5. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed in excess of the allowable opacity limit specified above from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed in excess of the allowable opacity limit specified above from the hot aggregate elevator, vibrating screens, weigh hopper, aggregate storage bins and cold aggregate elevator serving this emissions unit, and (c) describe any corrective actions taken to minimize the abnormal visible particulate and/or visible fugitive particulate emissions.
6. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate

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District Office or local air agency) which identify all exceedances of the RAP limitation specified above.

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E. Testing Requirements

1. Compliance Methods

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

- a. Emission Limitation-
PE emissions shall not exceed 0.04 gr/dscf; CO emissions when burning off-spec used oil or #2 fuel oil or natural gas shall not exceed 52 lbs/hr; NO_x emissions when burning off-spec used oil or #2 fuel oil shall not exceed 22 lbs/hr, NO_x emissions when burning natural gas shall not exceed 10.4; SO₂ emissions when burning natural gas shall not exceed 1.36 lbs/hr, SO₂ emissions when burning #2 oil shall not exceed 4.4 lbs/hr, SO₂ emissions when burning off-spec used oil shall not exceed 23.2 lbs/hr; VOC emissions when burning off-spec used oil or #2 fuel oil or natural gas shall not exceed 12.8 lbs/hr.

Applicable Compliance Method-

During the first full production season in which this permit is effective, the permittee shall conduct, or have conducted, emission testing for this emissions unit shall be conducted in order to demonstrate compliance with the allowable mass emission rate for PM, CO, NO_x, VOC and SO₂.

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

PM, USEPA Reference Methods 1-5, of 40 CFR Part 60, Appendix A.

CO, USEPA Reference Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

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

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

SO₂, USEPA Reference Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A.

The test shall be conducted while the emissions unit is operating at or near maximum capacity and burning natural gas or #2 or off spec used oil for PM, CO, NO_x, VOC and SO₂ 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

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"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

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dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA 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 emissions test(s) shall be submitted 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 appropriate Ohio EPA District Office or local air agency.

- b. Emission Limitation -
Particulate emissions from the stack shall not exceed 3.5 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method -

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.014 lb PM/ton, as specified in USEPA reference document AP-42, 11.1-3 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

- c. Emissions Limitation-
CO emissions when burning natural gas or #2 oil or off spec used oil shall not exceed 32.5 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.13 lb CO/ton, as specified in USEPA reference document AP-42, 11.1-7 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

- d. Emissions Limitation-
NOx emissions when burning #2 oil or off spec used oil shall not exceed 13.75 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.055 lb NOx/ton, as specified in USEPA reference document AP-42, 11.1-7 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be

verified by conducting an initial stack test in accordance with Section E.1.a.

- e. Emissions Limitation-
NOx emissions when burning natural gas shall not exceed 6.5 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.026 lb NOx/ton, as specified in USEPA reference document AP-42, 11.1-7 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

- f. Emissions Limitation-
SO2 emissions when burning natural gas shall not exceed 0.85 ton/yr, on a 12-month rolling basis.

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.0034 lb SO2/ton, as specified in USEPA reference document AP-42, 11.1-7 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

- g. SO2 emissions when burning #2 oil shall not exceed 2.75 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.011 lb SO2/ton, as specified in USEPA reference document AP-42, 11.1-7 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

- h. SO2 emissions when burning off spec used oil shall not exceed 14.5 tons/yr, on a 12-month rolling basis.

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.058 lb SO2/ton, as specified in USEPA reference document AP-42, 11.1-7 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

- i. Emission Limitation-
VOC emissions from this emissions unit when burning off-spec used oil, #2 fuel oil and natural gas shall not exceed 8.0 tons/yr, on a 12-month rolling basis.

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Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month production summation by the emission factor of 0.032 lb VOC/ton, as specified in USEPA reference document, AP-42, 11.1-8 (12/00), and dividing by 2,000 pounds per ton. Compliance shall also be verified by conducting an initial stack test in accordance with Section E.1.a.

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- j. Emission Limitation -
Fugitive particulate emissions shall not exceed 2.30 tons/yr, on a 12-month rolling basis.
- Applicable Compliance Method -
Compliance with the annual fugitive particulate emissions shall be assumed based upon the following worst case calculations:
- Total fugitive particulate emissions equal the summation of the fugitives particulate from the cold end and the hot end of the plant operations.
- Fugitive particulate emissions from the cold end are calculated as follows
- $$(500,000 \text{ tons/yr of material/yr} \times 0.0051 \text{ lb PM/ton} \times \text{ton}/2000 \text{ lbs}) + (165,000 \text{ tons of aggregate/yr} \times 0.0069 \text{ lb PM/ton} \times \text{ton}/2000 \text{ lbs}) + (165,000 \text{ tons of sand/yr} \times 0.0021 \text{ lb PM/ton} \times \text{ton}/2000 \text{ lbs}) = 2.02 \text{ tons particulate emissions}$$
- Fugitive particulate emissions from the hot end are calculated as follows
- $$\text{Silo filling } (500,000 \text{ tons/yr of material/yr} \times 0.00052 \text{ lb PM/ton} \times \text{ton}/2000 \text{ lbs}) + \text{Plant Load Out } (500,000 \text{ tons/yr of asphalt produced/yr} \times 0.00058 \text{ lb PM/ton} \times \text{ton}/2000 \text{ lbs}) = 0.28 \text{ ton particulate}$$
- k. Emission Limitation -
Fugitive VOC emissions shall not exceed 4.0 tons/yr, on a 12-month rolling basis.
- Applicable Compliance Method -
Compliance with the annual fugitive VOC emissions shall be assumed based upon the following worst case calculations:
- Fugitive VOC emissions from the hot end are calculated as follows
- $$\text{Silo filling } (500,000 \text{ tons/yr of material/yr} \times 0.012 \text{ lb VOC/ton} \times \text{ton}/2000 \text{ lbs}) + \text{Plant Load Out } (500,000 \text{ tons/yr of asphalt produced/yr} \times 0.004 \text{ lb PM/ton} \times \text{ton}/2000 \text{ lbs}) = 4.0 \text{ tons VOC}$$
- l. Emissions Limitation-
20 percent opacity as a 6-minute average, from the stack
- Applicable Compliance Method-
Compliance shall be demonstrated through visible emissions observations in accordance

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with OAC rule 3745-17-03(B)(1).

- m. Emission Limitation-
20 percent opacity as a 3-minute average, from fugitives

Applicable Compliance Method-

Compliance shall be demonstrated through visible emissions observations in accordance with OAC rule 3745-17-03(B)(3).

F. Miscellaneous Requirements

1. This modification represents an increase to a higher production hot mix drum plant. Terms in this permit supercede those identify in PTI 08-03265 issued 04/22/03 and reflects the following changes in the allowable emissions: PM +1.0 TPY, CO -57.5 TPY, NOx -13.25 TPY, SO2 -5.3 TPY, VOC +1.32 TPY.
2. The Terms and Conditions of Sections A, B, C 1.- C.5, D and E are federally enforceable.