



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
HIGHLAND COUNTY  
Application No: 05-13195**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
subpart I	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE: 4/20/2004**

Roberts Paving Incorporated  
Craig Roberts  
4450 Wildcat Road  
Hillsboro, OH 45133

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

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

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

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

Sincerely,

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

cc: USEPA

SWDO



Permit To Install  
Terms and Conditions

Issue Date: 4/20/2004  
Effective Date: 4/20/2004

**FINAL PERMIT TO INSTALL 05-13195**

Application Number: 05-13195  
APS Premise Number: 0536000133  
Permit Fee: **\$2725**  
Name of Facility: Roberts Paving Incorporated  
Person to Contact: Craig Roberts  
Address: 4450 Wildcat Road  
Hillsboro, OH 45133

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4354 Wildcat Road**  
**Hillsboro, Ohio**

Description of proposed emissions unit(s):  
**130 TPH asphalt plant with baghouse and 10000 gallon AC tar tank and 8000 gallon no. 2 fuel oil tank.**

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

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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	53.6
VOC	13.8
CO	68.3
SO2	7.9
NOx	71.2

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Material storage piles	OAC rule 3745-31-05	<p>Particulate emissions from material storage piles, and load in and load out operations shall not exceed 12.5 tons per year (TPY).</p> <p>There shall be no visible particulate emissions from any material storage pile, or from any load in and load out operations, except for a total of one minute, during any 60 minute observation period.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see terms and conditions A.2.b - A.2.d)</p>

**2. Additional Terms and Conditions**

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

All Storage Piles

- 2.b The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to watering and reduction of drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** The above-mentioned control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintenance of as low a pile height as possible to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The permittee shall employ best available control measures on all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the storage piles 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.f** 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 storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.g** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

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

Storage Pile Identification  
All Storage Piles

Minimum Load-In Inspection Frequency  
Once During Each Day of Operation

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

Storage Pile identification

All Storage Piles

Minimum Load-Out Inspection Frequency

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

All Storage Piles

Minimum Wind Erosion Inspection Frequency

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 may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

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

**D. Reporting Requirements**

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

**E. Testing Requirements**

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:

1. Emission Limitation:

There shall be no visible particulate emissions from any material storage pile, except for a total of one minute, during any 60 minute observation period.

Applicable Compliance Method:

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

2. Emission Limitation:

Particulate emissions from material storage piles, and load in and load out operations shall not exceed 12.5 tons per year (TPY).

Applicable Compliance Method:

This emission limitation results from the sum of the emission factors for storage piles operations (from AP-42 Section 13.2.4) and wind erosion from storage piles (from "Reasonably Available Control Measures for Fugitive Dust Sources, Equation 4).

**F. Miscellaneous Requirements**

None.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Plant roadways and parking lots	OAC rule 3745-31-05	<p>There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any sixty-minute observation period.</p> <p>There shall be no visible particulate emissions from any unpaved roadway and parking area except for a period of time not to exceed three minutes during any 60-minute observation period.</p> <p>Particulate emissions from paved roadways shall not exceed 8.4 ton per year (TPY).</p> <p>Particulate emissions from unpaved parking lots and working areas shall not exceed 14.1 ton per year (TPY).</p>

**2. Additional Terms and Conditions**

- 2.a The roadways and parking areas that are covered by this permit and are subject to the requirements of OAC rules 3745-31-05(A)(3) are listed below:

Paved roadways:

1,600 linear feet of paved road from West Wildcat Road to the unpaved parking lot and working area for the Roberts Paving, Inc. asphalt plant

Section of West Wildcat Road that lies adjacent to facility property

Unpaved Area:

Parking and working area comprising just over 2 acres surrounding the Roberts Paving, Inc. drum mix asphalt plant

- 2.b** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with speed reduction, good housekeeping practices and watering, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.
- 2.e** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved roadways and streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means. In accordance with the permittee's permit application, the permittee has committed to treat the adjacent public paved roadways with water flushing at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.g** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

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

<u>Paved Roadways</u>	<u>Minimum Inspection Frequency</u>
All	Once during each day of operation

<u>Unpaved Working and Parking Areas</u>	<u>Minimum Inspection Frequency</u>
All	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 that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**D. Reporting Requirements**

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

## **E. Testing Requirements**

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:

### 1. Emission Limitations:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any sixty-minute observation period.

There shall be no visible particulate emissions from any unpaved roadway and parking area except for a period of time not to exceed three minutes during any 60-minute observation period.

#### Applicable Compliance Method:

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

### 2. Emission Limitations:

Particulate emissions from paved roadways shall not exceed 8.4 ton per year (TPY).

#### Applicable Compliance Method:

This emission limitation was developed by applying a 0% control efficiency to a maximum potential uncontrolled emission rate of 0.39 TPY fugitive PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors from Chapter 13.2.1 (12/03) and a maximum 32,175 vehicle miles traveled, assuming 120 days per year of natural mitigation. 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.

The equation reads as follows:

$$E = \{ [k(sL/2)^{0.65}] [(W/3)^{1.5}] - 0.00047 \} [1 - (120/365)] [VMT] [(1/2,000)]$$

where:

- E = annual particulate emission rate, TPY;
- k = particle size multiplier from Table 13.2-1.1;
- sL = road surface silt loading (g/m<sup>2</sup>);
- W = average vehicular weight (tons);
- VMT = vehicular miles traveled per year.

3. Emission Limitation:

Particulate emissions from unpaved parking lots and working areas shall not exceed 14.1 ton per year (TPY).

Applicable Compliance Method:

This emission limitation was developed by applying a 0% control efficiency to a maximum potential uncontrolled emission rate of 0.65 TPY fugitive PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors from Chapter 13.2.2 (12/03) and a maximum 6,435 vehicle miles traveled, assuming 120 days per year of natural mitigation. 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.

The equation reads as follows:

$$E = [k(sL/2)^{0.7}] [(W/3)^{0.45}] [(365-D)/365] [1-CE] [VMT] [1/2000]$$

- E = annual particulate emission rate, TPY;
- k = particle size multiplier from Table 13.2-1.1;
- sL = road surface silt loading (g/m<sup>2</sup>);
- W = average vehicular weight (tons);
- D = number of days per year with at least 0.01 inches of rain;
- CE = control efficiency of watering (0 used for calculation)
- VMT = vehicular miles traveled per year.

**F. Miscellaneous Requirements**

None

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - 350 kilowatt diesel generator	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.77 lb/hr and 3.4 TPY.
		Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.8 lb/hr and 3.1 TPY.
		Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 10.9 lbs/hr and 47.6 TPY.
		Carbon monoxide (CO) emissions shall not exceed 2.35 lbs/hr and 10.3 TPY.
		See Section B.1. below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
		See Sections B.2. and B.3. below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(5)(a)	The PE limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(G)	See Section A.2.b.

OAC rule 3745-21-07(B)	See Section A.2.a.
OAC rule 3745-21-08(B)	See Section A.2.a.
OAC rule 3745-23-06(B)	See Section A.2.a.

**2. Additional Terms and Conditions**

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" for this emissions unit, as required pursuant to OAC rule 3745-21-07(B) and the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 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 (PTI).
- 2.b** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

**B. Operational Restrictions**

- 1. The permittee shall use only diesel fuel (number 2 fuel oil) for combustion in this emissions unit.
- 2. The permittee may not receive or burn any used fuel oil.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. For each day during which the permittee burns a fuel other than diesel fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. The permittee shall also maintain documentation of the sulfur content of all fuels received.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports that identify each day during which a fuel other than diesel fuel was burned in this emissions unit.

**E. Testing Requirements**

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

- 1. Emission Limitation: Particulate emissions (PE) shall not exceed 0.77 lb/hr and 3.4 TPY.

Applicable Compliance Method: Compliance with the hourly limit shall be determined by multiplying the maximum rate of operation 350 HP by the emission factor of 0.0022 lb PE/hp-hr, as specified in U.S. EPA reference document AP-42, 3.3-1 (10/96). Compliance with the annual

limit shall be determined by multiplying the hourly limit by 8,760 hours per year and dividing by 2000 pounds per ton.

2. Emission Limitation: Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.8 lb/hr and 3.1 TPY.

Applicable Compliance Method: Compliance with the hourly limit shall be determined by multiplying the maximum rate of operation 350 HP by the emission factor of 0.002 lb SO<sub>2</sub>/hp-hr, as specified in U.S. EPA reference document AP-42, 3.3-1 (10/96). Compliance with the annual limit shall be determined by multiplying the hourly limit by 8,760 hours per year and dividing by 2000 pounds per ton.

3. Emission Limitation: Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 10.9 lbs/hr and 47.6 TPY.

Applicable Compliance Method: Compliance with the hourly limit shall be determined by multiplying the maximum rate of operation 350 HP by the emission factor of 0.031 lb NO<sub>x</sub>/hp-hr, as specified in U.S. EPA reference document AP-42, 3.3-1 (10/96). Compliance with the annual limit shall be determined by multiplying the hourly limit by 8,760 hours per year and dividing by 2000 pounds per ton.

4. Emission Limitation: Carbon monoxide (CO) emissions shall not exceed 2.35 lbs/hr and 10.3 TPY.

Applicable Compliance Method: Compliance with the hourly limit shall be determined by multiplying the maximum rate of operation 350 HP by the emission factor of 0.0067 lb CO/hp-hr, as specified in U.S. EPA reference document AP-42, 3.3-1 (10/96). Compliance with the annual limit shall be determined by multiplying the hourly limit by 8,760 hours per year and dividing by 2000 pounds per ton.

5. Emission Limitation: Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## **F. Miscellaneous Requirements**

None.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - 130 TPH asphalt drum mix plant	OAC rule 3745-31-05(A)(3)	<p>Carbon monoxide (CO) emissions from this emissions unit shall not exceed 17.55 lb CO/hour</p> <p>Oxides of nitrogen (NOx) emissions from this emissions unit shall not exceed 7.15 lb NOx/hour</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions from this emissions unit shall not exceed 1.43 lb SO<sub>2</sub>/hour</p> <p>Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 4.16 lb VOC/hour</p> <p>Particulate emissions (PE) from this emissions unit shall not exceed 4.29 lb PE/hour</p> <p>CO emissions from this emissions unit shall not exceed 55.8 TPY CO</p> <p>NOx emissions from this emissions unit shall not exceed 23.6 TPY NOx</p> <p>SO<sub>2</sub> emissions from this emissions unit shall not exceed 4.8 TPY SO<sub>2</sub></p> <p>VOC emissions from this emissions unit shall not exceed 13.8 TPY VOC</p>

<p>OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2)</p> <p>40 CFR Part 60, Subpart I</p>	<p>PE from this emissions unit shall not exceed 14.2 TPY PE</p> <p>Visible particulate emissions from the stack shall not exceed 10% opacity, as a 3-minute average.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section A.2.a).</p> <p>No visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper.</p> <p>Visible emissions of fugitive dust (from areas other than the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper) shall be less than or equal to 10% opacity, as a 3-minute average.</p> <p>The emissions limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>PE from the stack shall not exceed 0.04 gr/dscf</p>
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**2. Additional Terms and Conditions**

- 2.a** The permittee shall ensure that the baghouse is operated with sufficient air volume to minimize or eliminate visible fugitive emissions from the rotary drum.
- 2.b** The permittee shall conduct burner performance tuning for purposes of minimizing emissions. Burner performance tuning shall contain at a minimum the evaluation of and adjustment to manufacturer's specifications of the following:
  - i. Fuel flow to the burner;

- ii. Differential pressure of the baghouse to ensure proper air flow through the plant;
- iii. Flue gas analysis (of gases present in the drum and or stack) for CO, O<sub>2</sub>, CO<sub>2</sub>, and NO<sub>x</sub>;
- iv. Fuel pressure; and
- v. For burners that require compressed air for proper operation, correct pressure at the burner;

**B. Operational Restrictions**

1. The permittee shall burn only No. 2 fuel oil in this emissions unit. The permittee may not receive or burn any used fuel oil.
2. The permittee shall conduct an initial burner tuning within 30 production days after commencement of the production season. The permittee shall conduct another burner tuning within the time period of 90 to 120 production days after the initial burner tuning. 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.
3. The pressure drop across the fabric filter shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.
4. The exit of the stack serving this emissions unit shall be a minimum of 35 feet above ground.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter 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 fabric filter on daily basis.
2. For each shipment of number 2 fuel 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.
3. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the enclosures for the hot aggregate elevator, vibrating screens and weigh hopper servicing this emissions unit. If visible particulate emissions are observed, the permittee shall note the following in the operation log:
  - a. The color of the visible particulate emissions;

- b. The cause of the visible particulate emissions;
- c. The total duration of the visible particulate emission incident; and
- d. Corrective actions taken to eliminate the visible particulate emissions.

The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the visible particulate emissions requirements.

- 4. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any abnormal visible particulate emissions from the stack, aggregate storage bins and cold aggregate elevator/conveyor serving this emissions unit. If abnormal visible emissions are observed, the permittee shall note the following in the operation log:
  - a. The color of the abnormal visible particulate emissions;
  - b. The cause of the abnormal visible particulate emissions;
  - c. The total duration of any abnormal visible particulate emissions incident; and
  - d. Any corrective actions taken to eliminate the abnormal visible particulate emissions.

The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the visible particulate emissions requirements.

- 5. The permittee shall properly operate and maintain portable devices to monitor the concentration of NO<sub>x</sub>, CO, O<sub>2</sub>, and CO<sub>2</sub> present in the flue gases generated within the drum and/or stack during the burner performance tuning. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall maintain records of each portable monitoring device's calibration.
- 6. While performing the required burner tuning, the permittee shall record the following information:
  - a. Date of the burner tuning;
  - b. Results of the evaluation of the operating parameters listed above in A.I.2.b.;
  - c. Detail list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturer's specifications; and
  - d. Type of fuel(s) employed during the burner tuning.

**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 of 2 to 8 inches. These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(2).
2. The permittee shall submit quarterly deviation (excursion) reports which identify all instances when fuel other than No. 2 fuel oil was combusted in this emission unit. These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A)(2).
3. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Identify all days during which any abnormal visible particulate emissions were observed from the stack, aggregate storage bins and cold aggregate elevator/conveyors serving this emissions unit;
  - b. Identify all days during which any visible fugitive particulate emissions were observed from the enclosures for the hot aggregate elevator, vibrating screens, weigh hopper;
  - c. Describe any corrective actions taken to eliminate the abnormal visible particulate emissions.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(1).

4. The permittee shall submit burner performance tuning reports to the Ohio EPA Southwest District Office that summarize the results of each burner performance tuning. These reports are due within 30 days of the date that the burner performance tuning was performed.

**E. Testing Requirements**

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

1. Emissions Limitation: CO emissions from this emissions unit shall not exceed 17.55 lb CO/hour

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour by the emission factor of 0.13 lb CO/ton, as specified in U.S. EPA reference document AP-42, 11.1-7 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

Emissions Limitation: CO emissions from this emissions unit shall not exceed 55.8 TPY CO

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour for 6,600 hours by the emission factor of 0.13 lb CO/ton, as specified in U.S. EPA reference document AP-42, 11.1-7 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

2. Emissions Limitation: NO<sub>x</sub> emissions from this emissions unit shall not exceed 7.15 lb NO<sub>x</sub>/hour

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour by the emission factor of 0.055 lb NO<sub>x</sub>/ton, as specified in U.S. EPA reference document AP-42, 11.1-7 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

Emissions Limitation: NO<sub>x</sub> emissions from this emissions unit shall not exceed 23.6 TPY NO<sub>x</sub>

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour for 6,600 hours by the emission factor of 0.055 lb NO<sub>x</sub>/ton, as specified in U.S. EPA reference document AP-42, 11.1-7 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

3. Emissions Limitation: SO<sub>2</sub> emissions from this emissions unit shall not exceed 1.43 lb SO<sub>2</sub>/hour

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour by the emission factor of 0.011 lb SO<sub>2</sub>/ton, as specified in U.S. EPA reference document AP-42, 11.1-7 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6 or 6C. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

Emissions Limitation: SO<sub>2</sub> emissions from this emissions unit shall not exceed 4.8 TPY SO<sub>2</sub>

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour for 6,600 hours by the emission factor of 0.011 lb SO<sub>2</sub>/ton, as specified in U.S. EPA reference document AP-42, 11.1-7 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6 or 6C. If site-specific emissions testing is required, upon request, Ohio EPA

will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

4. Emissions Limitation: VOC emissions from this emissions unit shall not exceed 4.16 lb VOC/hour

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour by the emission factor of 0.032 lb VOC/ton, as specified in U.S. EPA reference document AP-42, 11.1-8 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, 25 and/or 18. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

Emissions Limitation: VOC emissions from this emissions unit shall not exceed 13.8 TPY VOC

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour for 6,600 hours by the emission factor of 0.032 lb VOC/ton, as specified in U.S. EPA reference document AP-42, 11.1-8 (12/00). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, 25 and/or 18. If site-specific emissions testing is required, upon request, Ohio EPA will review the allowable emission limit to determine if it needs to be adjusted due to the change in the compliance method.

5. Emissions Limitation: PE from this emissions unit shall not exceed 4.29 lb PE/hour

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour by the emission factor of 0.033 lb PE/ton, as specified in U.S. EPA reference document AP-42, 11.1-3 (12/00).

Emissions Limitation: PE from this emissions unit shall not exceed 14.2 TPY PE

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum hourly production rate of 130 tons/hour for 6,600 hours by the emission factor of 0.033 lb PE/ton, as specified in U.S. EPA reference document AP-42, 11.1-3 (12/00).

6. Emissions Limitation: PE from the stack shall not exceed 0.04 gr/dscf

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

7. Emissions Limitation: Visible particulate emissions from the stack shall not exceed 10% opacity, as a 3-minute average.

Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- 8. Emissions Limitation: No visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper.

Applicable Compliance Method: Compliance shall be determined using Method 22 as set forth in 40 CFR Part 60 Appendix A.

- 9. Emissions Limitation: Visible emissions of fugitive dust (from areas other than the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper) shall be less than or equal to 10% opacity, as a 3-minute average.

Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

**F. Miscellaneous Requirements**

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

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P901	130 tph 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:

Ohio Environmental Protection Agency  
 DAPC- Air Quality Modeling and Planning  
 P.O. Box 1049  
 Columbus, OH 43216-1049

and

Southwest District Office  
 Division of Air Pollution Control  
 401 East Fifth Street  
 Dayton, Ohio 45402-2911

2. The terms and conditions of this PTI are federally enforceable.