

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **06 - 07437**

A. Source Description

Canton Asphalt will operate a stationary, 150 TPH batch mix asphalt plant.

B. Facility Emissions and Attainment Status

The only emissions currently at this facility are minor amounts of fugitive PM. This is in an attainment area not included in Appendix A of OAC 3745-17-08.

C. Source Emissions

Facility emissions of carbon monoxide are calculated from AP-42 at 60.0 #/hr which extrapolates to 263 TPY at year-round operation. While it is not possible to operate an asphalt plant 8760 hours per year at this latitude, emissions still need to be restricted. This is accomplished by limiting production to 150,000 tons per year, which reduces allowable emissions of CO to 30 TPY. Emissions of other pollutants are not significant.

D. Conclusion

Federally enforceable limits in this PTI are adequate to ensure that Title V and PSD thresholds for CO emission rates are not exceeded.



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: DRAFT PERMIT TO INSTALL
TUSCARAWAS COUNTY
Application No: 06-07437**

CERTIFIED MAIL

DATE: 4/8/2004

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

Oster Enterprises (Canton Asphalt Co.)
John Beck
1833 Riverside Dr NW
Massillon, OH 44647

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 **\$1650** 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

SEDO

WV

PA

TUSCARAWAS COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07437 FOR AN AIR CONTAMINANT SOURCE FOR
OSTER ENTERPRISES (CANTON ASPHALT CO.)**

On 4/8/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Oster Enterprises (Canton Asphalt Co.)**, located at **3467 Dover Zoar Rd., Bolivar, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07437:

150 TPH 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.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 06-07437

Application Number: 06-07437

APS Premise Number: 0679000270

Permit Fee: **To be entered upon final issuance**

Name of Facility: Oster Enterprises (Canton Asphalt Co.)

Person to Contact: John Beck

Address: 1833 Riverside Dr NW
Massillon, OH 44647

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

3467 Dover Zoar Rd.

Bolivar, Ohio

Description of proposed emissions unit(s):

150 TPH 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

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 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>
PE (stack)	6.0
SO ₂	0.4
NO _x	1.9
CO	30.0
VOC	8.9
PM-10 (stack)	6.0
PE (fugitive)	2.7
PM-10 (fugitive)	0.4

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 - Plant roadways and parking areas	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.6 tons per year.
paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)	There shall be no visible particulate emissions except for one minute during any 60-minute period. The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c, and A.2.e through A.2.i).
unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-31-05(A)(3)	There shall be no visible particulate emissions except for 3 minutes during any 60-minute period. The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.i).

2. **Additional Terms and Conditions**

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

paved roadways:

Driveway from public road

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

unpaved roadways:

Areas around batch plant

unpaved parking areas:

All

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

remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2.g The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.h 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.i 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 roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
Driveway from public road	Daily, when operating

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	Daily, when operating

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 3.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports 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

1. Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
There shall be no visible particulate emissions except for 1 minute during any 60-minute period for paved roads.
There shall be no visible particulate emissions except for 3 minutes during any 60-minute period for unpaved roads.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 22 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources,” as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation:

Particulate emissions shall not exceed 1.6 TPY.

Applicable Compliance Method:

UNPAVED SURFACES:

Compliance shall be determined based on the emissions factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2 (12/03). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = [k(s/12)^a(W/3)^b[(365-p)/365]]$$

Where:

- E = size-specific emission factor (lb/VMT)
- s = silt content of road surface material (%) = 5.0 %
- W = mean vehicle weight (tons) = 31
- a = constant (dimensionless) = 0.7
- b = constant (dimensionless) = 0.45
- k = particle size multiplier (dimensionless) = 4.9
- p = number of rain days per year >0.01 in = 145

Therefore, E = 4.58 lbs particulate/VMT

Maximum travel = 1,000 VMT/year

$$(1,000 \text{ VMT/yr})(4.58 \text{ lbs/VMT})(1\text{ton}/2000 \text{ lbs}) = 2.29 \text{ TPY uncontrolled PE}$$

Assume 80% control for roadway watering and oil application
(2.29 tons/year)(0.20) = 0.46 TPY controlled PE

c. **PAVED SURFACES:**

Compliance shall be determined based on the emissions factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.1 (12/03). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = k(sL/2)^{0.65}(W/3)^{1.5} -C$$

where:

E = size-specific emission factor (lb/VMT)
k = particle size multiplier (dimensionless) = 0.082
sL = road surface silt loading (g/m²) = 35
W = mean vehicle weight (tons) = 35
C = constant = 0.00047

Therefore, E = 21.0 lb PE/VMT

Maximum travel = 400 VMT/year

$(400 \text{ VMT/yr})(21.0 \text{ lbs/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 4.2 \text{ TPY uncontrolled PE}$

Assume 75% control for roadway watering
 $(4.2 \text{ TPY})(0.25) = 1.05 \text{ TPY controlled PE}$

TOTAL EMISSIONS

Unpaved: 0.46 TPY + Paved: 1.05 TPY = Total: 1.51 TPY

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>F002 - Aggregate storage piles</p> <p>load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)</p>	<p>OAC rule 3745-31-05(A)(3)</p>	<p>Particulate emissions (PE) shall not exceed 0.2 TPY from plant load-in and load-out of storage piles.</p> <p>There shall be no visible particulate emissions except for one minute during any 60-minute period.</p>
<p>wind erosion from storage piles (see Section A.2.a for identification of storage piles)</p>	<p>OAC rule 3745-31-05(A)(3)</p>	<p>The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f).</p> <p>PE shall not exceed 0.1 TPY from wind erosion of storage piles.</p> <p>There shall be no visible particulate emissions except for one minute during any 60-minute period.</p> <p>The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f).</p>

2. Additional Terms and Conditions

- 2.a** The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:
- One sand pile
 - Two aggregate piles
 - One recycled asphalt pavement (RAP) pile
- 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 water, as needed, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.d** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to water, as needed, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC 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:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
One sand pile	Daily, when operating
Two aggregate piles	Daily, when operating
One recycled asphalt pavement (RAP) pile	Daily, when operating

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
One sand pile	Daily, when operating
Two aggregate piles	Daily, when operating
One recycled asphalt pavement (RAP) pile	Daily, when operating

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

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
One sand pile	Daily, when operating
Two aggregate piles	Daily, when operating
One recycled asphalt pavement (RAP) pile	Daily, when operating

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those 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 6.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

1. Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
PE shall not exceed 0.2 TPY from plant load-in and load-out of storage piles.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (01/95). Initial compliance has been determined using inputs representing current conditions as follows:

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

Where:

E = emission factor expressed in pounds (lbs) / ton

k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 9.9

M = material moisture content (%) = 3

Therefore, E = 0.0033 lb PE/ton

maximum annual load-in throughput = 157,300 tons/year

maximum annual load-out throughput= 157,300 tons/year

$$[(157,300 \text{ tons/yr})(0.0033 \text{ lb PE/ton}) + (157,300 \text{ tons/yr})(0.0033 \text{ lb PE/ton})]/2000 \text{ lb/ton} \\ = 0.1 \text{ TPY}$$

- b. Emission Limitation:
PE shall not exceed 0.1 TPY from wind erosion of storage piles.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for wind erosion from storage piles in BACM, Equation 2-12 (September, 1992). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = 1.7(s/1.5)((365-p)/235)(f/15)$$

Where:

E = emission factor expressed in pounds (lbs) /day/acre

s = silt content of road surface material (%) = 0.85 %

p = number of rain days per year > 0.01 in = 140

f = percentage of time wind speed exceeds 12 mph (%) = 30

A = total surface area of storage piles (acres) = 1.5

Therefore, E = 1.85 lbs/day/acre

$$(1.85 \text{ lbs/day/acre})(365 \text{ days/yr})(1.5 \text{ acres})/2000 \text{ lbs/ton} = 0.5 \text{ TPY uncontrolled PE}$$

Assume 80% control for watering (RACM, Table 2.1.1-8)

$$(0.5 \text{ tons/year})(0.20) = 0.1 \text{ TPY controlled PE}$$

Oster Enterprises (Canton Asphalt Co.)
PTI Application: 06-07437
Issued: To be entered upon final issuance

Facility ID: 0679000270
Emissions Unit ID: F002

- c. Emission Limitation:
There shall be no visible particulate emissions except for one minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 22 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None.

OAC rule 3745-17-07 (A)(1)	greater. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart I.
OAC rule 3745-23-06(B)	See Section A.2.b.
OAC rule 3745-18-06(E)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(C)	Particulate emissions (PE) from the stack shall not exceed 6.0 TPY based upon a rolling, 12-month summation of the monthly emissions. PM-10 emissions from the stack shall not exceed 6.0 TPY based upon a rolling, 12-month summation of the monthly emissions. Fugitive PE shall not exceed 0.8 TPY based upon a rolling, 12-month summation of the monthly emissions. Fugitive PM-10 shall not exceed 0.4 TPY based upon a rolling, 12-month summation of the monthly emissions. Emissions of CO shall not exceed 30.0 TPY based upon a rolling, 12-month summation of the monthly emissions. Emissions of NO _x shall not exceed 1.9 TPY based upon a rolling, 12-month summation of the monthly emissions. Emissions of SO ₂ shall not exceed 0.4 TPY based upon a rolling, 12-month summation of the monthly emissions.

hot aggregate elevator, vibrating screens, and weigh hopper

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

Emissions of VOC shall not exceed 8.9 TPY based upon a rolling, 12-month summation of the monthly emissions.

See Section B.1.

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

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.

Fugitive particulate emissions shall not exceed 2.1 pounds per hour.

Fugitive PM-10 shall not exceed 0.8 pound per hour.

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.

The aggregate loaded into the storage bins shall have a moisture content sufficient to eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.

2. Additional Terms and Conditions

- 2.a In accordance with OAC rule 3745-31-05, this emissions unit has been approved for the use of recycled asphalt products.
- 2.b The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06, by committing to comply with the best available

technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

B. Operational Restrictions

- 1. The maximum annual production rate for this emissions unit shall not exceed 150,000 tons, based upon a rolling 12-month summation of the production rates.

To ensure enforceability during calendar year 2004, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Cumulative Allowable Production (tons)
1	1,000
1 - 2	2,000
1 - 3	30,000
1 - 4	60,000
1 - 5	90,000
1 - 6	120,000
1 - 7	150,000
1 - 8	150,000
1 - 9	150,000
1 - 10	150,000
1 - 11	150,000
1 - 12	150,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

- 2. The permittee shall use only natural gas as fuel in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

- 1. 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 any visible particulate emissions from the hot aggregate elevator, vibrating screens, and weigh hopper associated

with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain monthly records of the following information:
- a. The production rate for each month.
 - b. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the production rates.

Also, during calendar year 2004, the permittee shall record the cumulative production rate for each calendar month.

3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that include the following:
 - a. An identification of all days during which any visible particulate emissions were observed from the stack or the aggregate storage bins and cold aggregate elevator associated with this emissions unit.
 - b. A description of any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and, for calendar year 2004, all exceedances of the maximum allowable monthly production levels. These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

3. Pursuant to the 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. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. actual start-up date (within 15 days after such date); and
 - d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Southeast District Office
2195 Front Street
Logan, Ohio 43138

4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:
Emissions of particulate matter shall not exceed 0.04 grains/dscf of exhaust gases.
Emissions of PM-10 shall not exceed 0.04 grains/dscf of exhaust gases.
PE shall not exceed 6.0 TPY based upon a rolling, 12-month summation of the monthly emissions.
PM-10 emissions from the stack shall not exceed 6.0 TPY based upon a rolling, 12-month summation of the monthly emissions.

Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Compliance with the annual limit shall be determined by multiplying the tested emission rate, as determined by the latest stack test, in pounds of emissions per ton of production, by the annual production rate, in tons per year and dividing by 2000 pounds per ton.

b. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 17.8 lb/hour.

Emissions of VOC shall not exceed 8.9 TPY based upon a rolling, 12-month summation of the monthly emissions.

Compliance Methods:

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25a as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Compliance with the annual limit shall be determined by multiplying the tested emission rate, as determined by the latest stack test, in pounds of emissions per ton of production, by the annual production rate, in tons per year and dividing by 2000 pounds per ton.

c. Emissions Limitation:

Emissions of sulfur dioxide (SO₂) shall not exceed 0.7 lb/hour

Emissions of SO₂ shall not exceed 0.4 TPY based upon a rolling, 12-month summation of the monthly emissions.

Compliance Method:

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Initial compliance has been demonstrated by multiplying the emission factor from AP-42, Table 11.1-5 (12/00), 0.0046 pounds of emissions per ton of production, by the maximum hourly production rate of 150 tons per hour to obtain 0.69 lb SO₂ per hour.

Compliance with the annual limit shall be determined by multiplying the tested emission rate, as determined by the latest stack test, in pounds of emissions per ton of production, by the annual production rate, in tons per year and dividing by 2000 pounds per ton.

d. Emissions Limitation:

Emissions of oxides of nitrogen (NO_x) shall not exceed 3.8 lb/hour.

Emissions of NO_x shall not exceed 1.9 TPY based upon a rolling, 12-month summation of the monthly emissions.

Compliance Method:

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Compliance with the annual limit shall be determined by multiplying the tested emission rate, as determined by the latest stack test, in pounds of emissions per ton of production, by the annual production rate, in tons per year and dividing by 2000 pounds per ton.

- e. **Emissions Limitation:**
Emissions of carbon monoxide (CO) shall not exceed 60.0 lbs/hour.
Emissions of CO shall not exceed 30.0 TPY based upon a rolling, 12-month summation of the monthly emissions.

Compliance Method:

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Compliance with the annual limit shall be determined by multiplying the tested emission rate, as determined by the latest stack test, in pounds of emissions per ton of production, by the annual production rate, in tons per year and dividing by 2000 pounds per ton.

- f. **Emission Limitation:**
The emissions unit shall not discharge into the atmosphere any stack gases which exhibit 20 percent opacity or greater.

Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

- g. **Emission Limitation:**
Fugitive dust emissions shall be less than or equal to 10 percent opacity, as a 3-minute average.

Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002, with the modifications found in OAC 3745-17-03(B)(3)(a) and (b).

- h. **Emission Limitation**

Annual emission shall not exceed 0.4 TPY of fugitive PM-10 as a rolling 12-month summation.

Applicable Compliance Method

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

Total fugitive emissions equal the summation of the fugitives from the cold end and the hot end of the plant operations.

Fugitives emissions from the cold end are calculated as follows

$((150,000 \text{ tons of material/year} \times 0.0024 \text{ lb PM-10/ton of material}) + (100,000 \text{ tons of aggregate/year} \times 0.0033 \text{ lb PM-10/ton of aggregate}) + (50,000 \text{ tons of sand/year} \times 0.00099 \text{ lb PM-10/ton of sand})) \times (1 \text{ ton}/2000 \text{ pounds}) = 0.37 \text{ tons of PM-10}$

Fugitives emissions from the hot end are calculated as follows

$(150,000 \text{ tons of asphalt produced} \times 0.0003 \text{ lb of PM-10/ton of asphalt produced}) \times (1 \text{ ton}/2000 \text{ pounds}) = 0.03 \text{ tons of PM-10.}$

Total fugitive emissions are therefore 0.4 tons/yr.

The emission factors in the above equations are derived from AP-42, Fifth edition, Table 11.12-2(10/01) and from AP-42, Fifth edition, 11.1.2.5(12/00)

i. Emission Limitation

Annual emission shall not exceed 0.8 TPY of fugitive particulate emissions as a rolling 12-month summation.

Applicable Compliance Method

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

Total fugitive emissions equal the summation of the fugitives from the cold end and the hot end of the plant operations.

Fugitives emissions from the cold end are calculated as follows

$((150,000 \text{ tons of material/year} \times 0.0051 \text{ lb PM/ton of material}) + (100,000 \text{ tons of aggregate/year} \times 0.0069 \text{ lb PM/ton of aggregate}) + (50,000 \text{ tons of sand/year} \times 0.0021 \text{ lb PM/ton of sand})) \times (1 \text{ ton}/2000 \text{ pounds}) = 0.78 \text{ tons of PM}$

Fugitives emissions from the hot end are calculated as follows

$(150,000 \text{ tons of asphalt produced} \times 0.0003 \text{ lb of PM/ton of asphalt produced}) \times (1 \text{ ton}/2000 \text{ pounds}) = 0.0225 \text{ tons of PM.}$

Total fugitive emissions are therefore 0.8 tons.

The emission factors in the above equations are derived from AP-42, Fifth edition, Table 11.12-2(10/01) and from AP-42, Fifth edition, 11.1.2.5(12/00)

j. Emissions Limitation

Emissions of fugitive PM-10 shall not exceed 0.8 pounds per hour.

Applicable Compliance Method

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

Total fugitive emissions equal the summation of the fugitives from the cold end and the hot end of the plant operations.

Fugitives emissions from the cold end are calculated as follows

$((150 \text{ tons of material/hour} \times 0.0024 \text{ lb PM-10/ton of material}) + (100 \text{ tons of aggregate/hour} \times 0.0033 \text{ lb PM-10/ton of aggregate}) + (50 \text{ tons of sand/hour} \times 0.00099 \text{ lb PM-10/ton of sand})) = 0.74 \text{ lbs/hr of PM-10}$

Fugitives emissions from the hot end are calculated as follows

$(150 \text{ tons of asphalt produced} \times 0.0003 \text{ lb of PM-10/ton of asphalt produced}) = 0.05 \text{ lb/hr of PM-10.}$

Total fugitive PM-10 emissions are therefore 0.8 lb/hr.

The emission factors in the above equations are derived from AP-42, Fifth edition, Table 11.12-2(10/01) and from AP-42, Fifth edition, 11.1.2.5(12/00)

k. Emission Limitation

Emissions of fugitive particulate emissions shall not exceed 2.1 pounds per hour

Applicable Compliance Method

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

Total fugitive emissions equal the summation of the fugitives from the cold end and the hot end of the plant operations.

Fugitives emissions from the cold end are calculated as follows

$((150 \text{ tons of material/hour} \times 0.0051 \text{ lb PM/ton of material}) + (100 \text{ tons of aggregate/hour} \times 0.0069 \text{ lb PM/ton of aggregate}) + (50 \text{ tons of sand/hour} \times 0.0021 \text{ lb PM/ton of sand})) = 1.56 \text{ lb/hr of PM}$

Fugitives emissions from the hot end are calculated as follows

$(150 \text{ tons of asphalt produced} \times 0.0003 \text{ lb of PM/ton of asphalt produced}) = 0.045 \text{ lb/hr of PM.}$

Total fugitive emissions are therefore 2.1 lb/hr.

The emission factors in the above equations are derived from AP-42, Fifth edition, Table 11.12-2(10/01) and from AP-42, Fifth edition, 11.1.2.5(12/00)

F. Miscellaneous Requirements

None.