



Mike DeWine, Governor  
 Jon Husted, Lt. Governor  
 Anne M. Vogel, Director

05/01/2023

Charles Mull  
 Scioto Materials Plant 134  
 17531 Waterford Road  
 Fredericktown, OH 43019

**RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE**

Facility ID: 0145000597  
 Permit Number: P0133749  
 Permit Type: Initial Installation  
 County: Licking

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Newark Advocate. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) website here: <https://epa.ohio.gov/dapc/permitsonline>. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
 Permit Review/Development Section  
 Ohio EPA, DAPC  
 50 West Town Street Suite 700  
 PO Box 1049  
 Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office  
 50 West Town St., 5th Floor  
 P.O. Box 1049  
 Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Robert F. Hodanbosi, P.E.  
 Chief Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification  
 Ohio EPA-CDO



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Scioto Materials Plant 134 is proposing to install a new 400 ton per hour (TPH) continuous, counterflow drum-mix asphalt plant utilizing natural gas, propane, ultra-low sulfur diesel (ULSD), or on-spec used oil. The asphalt plant employs conventional equipment for the transfer and conveyance of raw materials and the dryer drum will be vented to a baghouse to control particulate emissions.

In addition to the asphalt plant (P901), this project also includes the installation of paved and unpaved roadways and parking areas (F001) that will be utilized by trucks delivering raw materials and trucks carrying hot mix asphalt to various paving projects and storage piles for conventional raw materials (F002) including virgin aggregate, sand, and reclaimed asphalt pavement (RAP). Emissions units F001 and F002 have been issued general permits (P0133756) as a direct final permit issuance in order to satisfy the 45-day rule requirement established in OAC rule 3745-31-29(D)(1). Emissions from these sources as they apply to consideration of the entire project are included in this document.

Permit issuance for the project has been separated into two permitting workflows; PTIO P0133756 issued February 17, 2023, for EUs F001 and F002 in order to accommodate the expedited general permit issuance requirement and FEPTIO P0133749 for EU P901.

3. Facility Emissions and Attainment Status:

Licking County is currently designated as Full Attainment for all pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. Note that Licking County is recognized as a Maintenance Area for the the 2015, 8-hour Ozone standard. No additional permitting considerations are necessary for Maintenance Areas. The construction of this facility, taking into consideration restrictions established within these permitting actions, will not result in the installation of a Major Stationary Source; therefore, consideration of Prevention of Significant Deterioration (PSD) requirements is not necessary.

The following table identifies the potential to emit for the entire project taking into consideration operational restrictions and emissions limitations established, where applicable, within the associated permitting actions:

Activity	Pollutant (Tons per year)						
	PE	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	VOC	SO <sub>2</sub>
F001-roadways	65.0	19.1	19.1				
F002-storage piles	12.0	5.9	5.9				
P901-stack*	9.9	2.97	2.08	90	16.5	45	19.8
P901-fugitive							
processing*	5.96	5.96	5.96				
HMA load-out				0.41		1.16	

HMA silo filling				0.35		3.66	
<b>Total:</b>	<b>92.86</b>	<b>33.93</b>	<b>33.04</b>	<b>90.76</b>	<b>16.5</b>	<b>49.82</b>	<b>19.8</b>
<b>Total (modeling)*:</b>		<b>8.93</b>	<b>8.04</b>	<b>90</b>	<b>16.5</b>		<b>19.8</b>

\* In accordance with Question 4.1 from Engineering Guide #69 (EG#69), non-process, fugitive sources aren't considered when comparing the project emissions with the Ohio Modeling Significant Emission Rates found in Table 3 of EG#69; therefore, only those processes identified with the '\*' above are included in the modeling total for the purpose of determining compliance with EG#69. Note that particle size distribution percentages from AP-42 Table 11.1-4 were used to calculate PM<sub>10</sub>(30%) and PM<sub>2.5</sub>(21%) stack emissions from EU P901.

Title V applicability: The table above demonstrates that, as a result of these permitting actions, the potential to emit for each pollutant will be less than the Title V applicability threshold of 100 tons. This evaluation incorporates a combination of federally enforceable limitations that are established through applicability of federal rules (e.g., NSPS Subpart I for particulate emissions) and through synthetic minor emissions limitations and operational restrictions assigned within the applicable permits (e.g., 600,000 tons HMA per rolling, 12-month period production limitation for EU P901).

Modeling Considerations: As identified above, the potential emissions from this project do not trigger PSD requirements; therefore, for modeling purposes, project emissions were compared only to the Ohio Modeling Significant Emission Rates found in Table 3 of EG#69. This evaluation incorporates a combination of federally enforceable limitations that are established through applicability of federal rules (e.g., NSPS Subpart I for particulate emissions) and through synthetic minor emissions limitations and operational restrictions assigned within the applicable permits (e.g., 600,000 tons HMA per rolling, 12-month period production limitation for EU P901). As demonstrated in the table above [Total (modeling)\*], the total project emissions, are below the Ohio Modeling Significant Emission Rates found in Table 3 of EG#69 for each pollutant, taking into consideration the provisions identified in EG#69, and the state and federally enforceable restrictions established within the applicable permits.

Hazardous Air Pollutant (HAP) emissions: The following HAP calculations demonstrate that the uncontrolled potential to emit from the asphalt plant does not exceed the Title V thresholds for individual HAP emissions (10 tons) or for total combined HAP emissions (25 tons). All emissions factors are taken from AP-42 Table 11.1-10 and the calculations are performed using the unrestricted, maximum annual asphalt production capability of the facility (400 tph \* 8,760 hr/yr = 3,504,000 tpy). Formaldehyde represents the highest emitted HAP because it has the highest emissions factor listed in AP-42 Table 11.1-10. The calculations demonstrate that an asphalt production limitation isn't necessary for the purpose of avoiding Title V for HAP emissions because the unrestricted potential to emit for individual and total combined HAPs are below the respective thresholds.

Highest individual HAP (Formaldehyde):  $3,504,000 \text{ tpy} * 0.0031 \text{ lb/ton} = 10,862.4 \text{ lb} = 5.43 \text{ tpy}$   
 Total combined HAPs (on-spec used oil):  $3,504,000 \text{ tpy} * 0.010 \text{ lb/ton} = 35,040 \text{ lb} = 17.52 \text{ tpy}$

Toxic Air Contaminants (TAC) review: Modeling to demonstrate compliance with Ohio Revised Code (ORC) 3704.03(F)(4)(b) was not necessary because the uncontrolled potential to emit for each TAC is less than 1 ton per year. The following calculation demonstrates the potential to emit for Formaldehyde taking into consideration the asphalt production limitation established for EU P901 (600,000 tons HMA per rolling, 12-month period). Formaldehyde represents the highest emitted TAC because it has the highest emissions factor listed in AP-42 Table 11.1-10.

Highest TAC:  $600,000 \text{ tpy} * 0.0031 \text{ lb/ton} = 1,860 \text{ lb} = 0.93 \text{ tpy}$

4. Source Emissions:

EU F001 (paved and unpaved roadways and parking areas):

The permittee applied for and received general permit PTIO P0133756 for this emissions unit. The general permit limits PE from this source to 65 tpy and limits PM<sub>10</sub> emissions to 19.1 tpy as identified in question 4 of the qualifying criteria document. The general permit also limits vehicle miles traveled to 320,000 miles per year as identified in question 2 of the qualifying criteria document.

BAT for this source is established as development and implementation of a site-specific work practice plan.

EU F002 (storage piles):

The permittee applied for and received general permit PTIO P0133756 for this emissions unit. The general permit limits PE from this source to 12.0 tpy and limits PM<sub>10</sub> emissions to 5.9 tpy as identified in question 5 of the qualifying criteria document. The general permit also limits the amount of material throughput to 3,000,000 tons per year and limits the maximum surface area of all storage piles to 15 acres as identified in questions 3 and 4 of the qualifying criteria document and included in the EU description in the applicable permit.

BAT for this source is established as development and implementation of a site-specific work practice plan.

EU P901 (asphalt plant):

OAC rule 3745-31-05(A)(3) - BAT for NO<sub>x</sub>, CO, VOC, and SO<sub>2</sub> emissions are determined to be equivalent to the rolling, 12-month emissions limitations established pursuant to OAC rule 3745-31-05(D).

OAC rule 3745-31-05(A)(3)(a)(ii) - Identifies that BAT does not apply to the PM<sub>10</sub> or PM<sub>2.5</sub> emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year.

OAC rule 3745-31-05(D) - Establishes rolling, 12-month asphalt production limitation, lb/ton (stack) emissions limitations, and a corresponding rolling, 12-month emissions limitation for PE, NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC emissions. Emissions limitations (lb/ton) are established for each pollutant using the maximum rated capacity and the accepted emissions factors for each pollutant. Compliance with the stack portion of the rolling, 12-month PE limitation is demonstrated utilizing the lb/ton emissions limitation and the corresponding recordkeeping requirements until a site-specific, stack test derived emissions factor is available following completion of emissions testing. Compliance with the stack portion of the rolling, 12-month NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC emissions limitations is determined by calculation using the corresponding, lb/ton emissions limitation and the 600,000 ton per rolling, 12-month period production limitation. Compliance with the fugitive portions of the CO, PE, and VOC emissions limitations is determined by calculation using the applicable emissions factors, and the 600,000 ton per rolling, 12-month period production limitation.

OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-11(B)(1) – Identifies that the particulate emissions limitations established by these rules are less stringent than the limitations established in accordance with NSPS Subpart I and/or the limitations established pursuant to OAC rule 3745-31-05(D).

OAC rule 3745-18-06(E) – Identifies that the SO<sub>2</sub> emissions limitation established by this rule is less stringent than the lb/ton SO<sub>2</sub> emissions limitations established in accordance with OAC rule 3745-31-05(D).

Calculated Emissions:

Rolling, 12-month emissions limitations were established in accordance with the calculations provided in the testing requirements section for each pollutant, and include, where applicable, both stack and fugitive emissions.

5. Conclusion:

The terms and conditions contained within PTIOs P0133749 & P0133756 are sufficient to ensure compliance with all state and federal regulations and are consistent with current DAPC policy and guidelines.

6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary for P0133749 and P0133756, combined (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	92.86
PM <sub>10</sub>	33.93
PM <sub>2.5</sub>	33.04
CO	90.8
NO <sub>x</sub>	16.5
VOC	49.8
SO <sub>2</sub>	19.8

## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <https://epa.ohio.gov/actions> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation  
Scioto Materials Plant 134  
1400 Tharp Rd  
Alexandria, OH 43001

ID#: P0133749  
Date of Action: 05/01/2023

Permit Desc: Initial installation synthetic-minor FEPTIO for a 400 TPH hot-mix asphalt plant fueled by propane, natural gas, ultra-low sulfur diesel, and/or on-spec used oil and utilizing a baghouse for control of particulate emissions. Licking County

PUBLIC NOTICE PUBLIC HEARING  
Issuance of Draft Air Pollution Permit  
Scioto Materials Plant 134

Issue Date: 5/1/2023  
Permit Number: P0133749  
Permit Type: FEPTIO  
Facility ID: 0145000597  
Facility Location: 1400 Tharp Rd  
Alexandria, OH 43001

Permit/Facility Description: Permit-to-install and operate (PTIO) for a new 400 ton per hour asphalt plant

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus, Ohio has issued a draft air pollution permit-to-install and operate for the listed facility. The draft permit is being issued to solicit comments from any interested party for the director to consider prior to making a final decision.

The proposed allowable emission rates from the facility in tons per year are: Nitrogen Oxides (NOx) 16.5; PM less than or equal to 10 microns (PM10) 8.9; PM less than or equal to 2.5 microns (PM2.5) 8.0; Sulfur Dioxide (SO2) 19.8; Volatile Organic Compounds (VOC) 49.8; Carbon Monoxide (CO) 90.

A public hearing on the draft air permit is scheduled for June 8, 2023, at the Church of Christ at Alexandria located at 5380 Moots Run Rd., Alexandria, OH 43001. An information session will commence at 6:00 pm followed by a public hearing to accept comments on the draft permit. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard.

All interested persons are entitled to attend or be represented and give written or oral comments on the draft permit at the hearing. Written comments on the draft permit must be received by the close of the business day (5:00 pm) on Thursday, June 15, 2023. Comments received after this date may not be considered a part of the official record. Written comments may be submitted at

the hearing or sent to: Benjamin Halton, Ohio EPA Central District Office, P.O. Box 1049, Columbus, Ohio 43216-1049 and [benjamin.halton@epa.ohio.gov](mailto:benjamin.halton@epa.ohio.gov).

The draft permit may be obtained at: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/issued-air-permits> by clicking on "Launch Search Issued Permits" and entering the permit number P0133749. Physical copies of the permit or copies of supporting records may be inspected and copied at the Ohio EPA Central District Office, 50 West Town Street, Columbus, Ohio 43215, telephone number 614-728-3898.

Persons interested in joining Ohio EPA's mailing list concerning this or similar actions may contact Paul Braun at [paul.braun@epa.ohio.gov](mailto:paul.braun@epa.ohio.gov), or 614-644-3734.







**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Scioto Materials Plant 134**

Facility ID:	0145000597
Permit Number:	P0133749
Permit Type:	Initial Installation
Issued:	05/01/2023
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Scioto Materials Plant 134

**Table of Contents**

Authorization .....	1
List of Commonly Used Abbreviations .....	3
A. Standard Terms and Conditions .....	4
1. What does this permit-to-install and operate (PTIO) allow me to do? .....	5
2. Who is responsible for complying with this permit? .....	5
3. What records must I keep under this permit? .....	5
4. What are my permit fees and when do I pay them? .....	5
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	5
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	6
7. What reports must I submit under this permit? .....	6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit? .....	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	7
13. Can I transfer this permit to a new owner or operator? .....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	8
15. What happens if a portion of this permit is determined to be invalid? .....	8
B. Facility-Wide Terms and Conditions .....	9
C. Emissions Unit Terms and Conditions .....	11
1. P901, Asphalt Plant with Baghouse .....	12





**Draft Permit-to-Install and Operate**

Scioto Materials Plant 134

**Permit Number:** P0133749

**Facility ID:** 0145000597

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

## Authorization

Facility ID: 0145000597  
Application Number(s): A0073843  
Permit Number: P0133749  
Permit Description: Initial installation synthetic-minor FEPTIO for a 400 TPH hot-mix asphalt plant fueled by propane, natural gas, ultra-low sulfur diesel, and/or on-spec used oil and utilizing a baghouse for control of particulate emissions.  
Permit Type: Initial Installation  
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 05/01/2023  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Scioto Materials Plant 134  
1400 Tharp Rd  
Alexandria, OH 43001

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town St., 5th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Anne M. Vogel  
Director



**Draft Permit-to-Install and Operate**

Scioto Materials Plant 134

**Permit Number:** P0133749

**Facility ID:** 0145000597

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

## Authorization (continued)

Permit Number: P0133749

Permit Description: Initial installation synthetic-minor FEPTIO for a 400 TPH hot-mix asphalt plant fueled by propane, natural gas, ultra-low sulfur diesel, and/or on-spec used oil and utilizing a baghouse for control of particulate emissions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID:**

**P901**

Company Equipment ID:

Asphalt Plant with Baghouse

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

## List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	IBR = Incorporation by Reference	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	ID = Identification Number (typically referring to a facility ten-digit ID number)	PM = particulate matter
BACT = Best Available Control Technology	LAER = Lowest Achievable Emission Rate	PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	lb(s)/hr = pound(s) per hour	PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act (1955, 70, 77, 80)	LDAR = Leak Detection and Repair	ppb = parts per billion
CAAA = Clean Air Act Amendments (1990)	LPG = liquefied petroleum gas/propane	ppm = parts per million
CAM = Compliance Assurance Monitoring	MACT = Maximum Achievable Control Technology	PSD = Prevention of Significant Deterioration
CEM = Continuous Emissions Monitor	MAGLC = Maximum Acceptable Ground Level Concentration	psi = pounds per square inch
CEMS = Continuous Emissions Monitoring System	mg/m <sup>3</sup> = milligrams per cubic meter	psia = pounds per square inch absolute
CFC = chlorofluorocarbon	MM = million	PTE = Potential-to-Emit
CFR = Code of Federal Regulations	MMBtu = million British Thermal Units	PTI = Permit-to-Install
CH <sub>4</sub> = methane	MON = Miscellaneous Organic Chemical Manufacturing NESHAP	PTIO = Permit-to-Install and Operate
CI = compression ignition	MSDS = Material Safety Data Sheet	PTO = Permit-to-Operate
CO = carbon monoxide	MSW = Municipal Solid Waste	PWR = process weight rate
CO <sub>2</sub> = carbon dioxide		RACM = Reasonably Available Control Measures
COM = Continuous Opacity Monitor	NAAQS = National Ambient Air Quality Standard	RACT = Reasonably Available Control Technology
DAPC = Division of Air Pollution Control	NESHAP = National Emission Standard for Hazardous Air Pollutants	RATA = Relative Accuracy Test Audit
DO/LAA = District Office/Local Air Agency	NG = natural gas	RTO = regenerative thermal oxidizer
dscf = dry standard cubic foot	ng/m <sup>3</sup> = nanograms per cubic meter	SB265 = Senate Bill 265
EAC = Emissions Activity Category	NH <sub>3</sub> = ammonia	scfm = standard cubic feet per minute
eDocs = Electronic Documents Database	NMHC = non-methane hydrocarbons	SI = spark ignition
ERAC = Environmental Review Appeals Commission	NMOC = non-methane organic compound	SIP = State Implementation Plan
ESP = electrostatic precipitator	NNSR = Nonattainment New Source Review	SM = Synthetic Minor
EU = Emissions Unit	NO = nitrogen oxide	SO <sub>2</sub> = sulfur dioxide
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NO <sub>2</sub> = nitrogen dioxide	SOB = Statement of Basis
FER = Fee Emissions Report	NO <sub>x</sub> = nitrogen oxides	SSMP = Startup, Shutdown and Malfunction Plan
FR = Federal Register	NSPS = New Source Performance Standard	T & C = Term and Condition
GACT = Generally Achievable Control Technology	NSR = New Source Review	TDS = total dissolved solids
GHG = greenhouse gases	NTV = Non-Title V	TLV = Threshold Limit Value
gr = grains	O&M = Operation and Maintenance	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	O <sub>3</sub> = ozone	TPH = ton(s) per hour
H <sub>2</sub> S = hydrogen sulfide	OAC = Ohio Administrative Code	TPY = ton(s) per year
H <sub>2</sub> SO <sub>4</sub> = sulfuric acid	OC = organic compound	TSP = total suspended particulates
HAP = hazardous air pollutant	OEPA = Ohio Environmental Protection Agency	VE = visible emissions
HCl = hydrochloride	ORC = Ohio Revised Code	VMT = vehicle miles traveled
HF = hydrogen fluoride	Pb = lead	VOC = volatile organic compound
Hg = mercury	PBR = Permit-By-Rule	WPP = Work Practice Plan
HON = Synthetic Organic Chemical Manufacturing NESHAP	PCB = polychlorinated biphenyl	µg/m <sup>3</sup> = micrograms per cubic meter
hp = horsepower	PE = particulate emissions	
HVLP = high volume, low pressure	PEMS = Predictive Emissions Monitoring System	





**Draft Permit-to-Install and Operate**  
Scioto Materials Plant 134  
**Permit Number:** P0133749  
**Facility ID:** 0145000597  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate (PTIO) allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio

EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.



**Draft Permit-to-Install and Operate**

Scioto Materials Plant 134

**Permit Number:** P0133749

**Facility ID:** 0145000597

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

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

Scioto Materials Plant 134

**Permit Number:** P0133749

**Facility ID:** 0145000597

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and I: **P901**. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District Office or Local air agency.
3. All applications, notifications or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications or reports to Ohio EPA fulfills the requirement to submit information to the director, the DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



**Draft Permit-to-Install and Operate**  
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## **C. Emissions Unit Terms and Conditions**





**1. P901, Asphalt Plant with Baghouse**

**Operations, Property and/or Equipment Description:**

400 TPH continuous, counterflow drum-mix asphalt plant utilizing natural gas, propane, ultra-low sulfur diesel (ULSD), or on-spec used oil and controlled by a baghouse.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. See b)(1)j. and d)(7) below.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. See b)(1)c., b)(2)a., c)(1), c)(2)a., c)(3), d)(2), d)(3), e)(2), f)(1)a., f)(1)c. through f)(1)k., and f)(3) below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	BAT for NO <sub>x</sub> , CO, VOC, and SO <sub>2</sub> emissions is determined to be equivalent to the rolling, 12-month emissions limitation established pursuant to OAC rule 3745-31-05(D) below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM <sub>10</sub> and PM <sub>2.5</sub> emissions from this air contaminant source since the potential to emit for each pollutant is less than 10 tons/year taking into account the federally enforceable restriction in b)(1)c. below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD, NNSR, and/or Title V)	See b)(2)a. c)(1), c)(2)a. and c)(3) below.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 60, Subpart I	No owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from any affected facility any gases which contain PE in excess of 0.04 gr/dscf or exhibit 20 percent opacity, or greater, except as provided by 40 CFR Part 60.11.  See b)(2)b. below.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation specified in OAC rule 3745-31-05(D) above.
f.	OAC rule 3745-17-07(A)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60, Subpart I.
g.	OAC rule 3745-17-07(B)	See b)(2)c. below.
h.	OAC rule 3745-17-08(B)	See b)(2)d. below.
i.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation specified in OAC rule 3745-31-05(D) above.
j.	OAC rule 3745-114 ORC 3704.03(F)	See d)(7) below.

(2) Additional Terms and Conditions

a. Synthetic Minor Restrictions

For purposes of securing federally enforceable terms to avoid federal based PSD, NNSR and/or Title V rules, the following emission limitations apply:

- i. 15.9 tons of PE/rolling 12-month period (stack and fugitive emissions) and 0.033 lb PE/ton (stack emissions);
- ii. 90.8 tons of CO/rolling 12-month period (stack and fugitive emissions) and 0.30 lb CO/ton (stack emissions);



- iii. 49.8 tons of VOC/rolling 12-month period (stack and fugitive emissions) and 0.15 lb VOC/ton (stack emissions);
- iv. 16.5 tons of NO<sub>x</sub>/rolling 12-month period and 0.055 lb NO<sub>x</sub>/ton (stack emissions); and
- v. 19.8 tons of SO<sub>2</sub>/rolling 12-month period, 0.011 lb SO<sub>2</sub>/ton when burning natural gas, propane, or ULSD and 0.066 lb SO<sub>2</sub>/ton when burning on-spec used oil (stack emissions).

- b. In accordance with 40 CFR Part 60.90(a) and (b), this emissions unit is a hot mix asphalt plant that has commenced construction or modification after June 11, 1973, and is subject to requirements specified in 40 CFR Part 60 Subpart I.

The permittee shall comply with the applicable emissions limitations, monitoring and/or recordkeeping requirements, reporting and/or notification requirements, and compliance methods established pursuant to 40 CFR Part 60, Subpart I and in accordance with the applicable provisions of Subpart A.

- c. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) **Operational Restrictions**

- (1) The asphalt production rate for this emissions unit shall not exceed 600,000 tons, based upon a rolling, 12-month summation of the monthly production rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

<b>Months</b>	<b>Maximum Allowable Cumulative Production (tons)</b>
1	150,000
1-2	300,000
1-3	450,000
1-12	600,000

After the first 12 calendar months of operation or the first 12 calendar months 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) Raw Material and Fuel Use Restrictions

- a. The permittee shall burn only propane, natural gas, ultra-low sulfur diesel (ULSD), or on-spec used oil in this emissions unit.
- b. The permittee may not receive or burn any used oil which does not meet the standards in OAC rule 3745-279-11 and the specifications listed in this permit without first obtaining a permit-to-install or permit-to-install and operate that authorizes the burning of off-specification used oil. The burning of off-specification used oil, subject to OAC rule 3745-279-60 through 67, is prohibited as a fuel in this emissions unit.
- c. The permittee may substitute reclaimed asphalt pavement (RAP) or asphalt shingles in amounts not to exceed 60 percent of all aggregate materials in the raw material feed mix.

For each increase in the percent of RAP/shingles in the raw material feed mix exceeding 60 percent, but not to exceed 75 percent, the permittee shall comply with the testing requirements in f)(3)b. and f)(3)c. for compliance demonstrations through additional emissions testing.

- d. Asphalt shingles removed from buildings (tear-off material) may be used but only if it has been determined that they do not contain asbestos. No asbestos containing asphalt shingles may be used as part of the feed mix. Verification that the shingles do not contain asbestos can either be done by actual testing of a representative sample of the shingles, or by verification from the shingle manufacturer that the shingles do not contain asbestos. Records shall be kept documenting the asbestos verification of any shingles used in the feed mix. These records shall be maintained in accordance with the Standard Terms and Conditions.

(3) Fuel Sulfur Content Restrictions

- a. ULSD burned in this emissions unit shall not exceed the limit for sulfur as specified by 40 CFR 1090.305, i.e., the sulfur content of ULSD shall not exceed 15 ppm or 0.0015 percent sulfur by weight.
- b. The sulfur content of on-spec used oil burned in this emissions unit shall not exceed 0.5 percent by weight.

(4) Used Oil Specifications

The permittee may not receive or burn any used oil which does not meet the standards in OAC rule 3745-279-11 and the specifications listed in this permit without first obtaining a permit-to-install or permit-to-install and operate that authorizes the burning of off-specification used oil. The burning of off-specification used oil, subject to OAC rule 3745-279-60 through 67, is prohibited as a fuel in this emissions unit.

Each shipment of oil burned in this emissions unit shall be “on-specification” (on-spec) oil and shall meet the used oil specifications contained in OAC rule 3745-279-11. The permittee shall determine that the used fuel oil meets these specifications by performing analyses or obtaining copies of analyses or other information from the supplier documenting that the used fuel oil does not exceed (except for flash point which shall not fall below) the following limitations:

<b>Contaminant/Property</b>	<b>Allowable Specifications</b>
Arsenic	5 ppm, maximum
Cadmium	2 ppm, maximum
Chromium	10 ppm, maximum
Lead	100 ppm, maximum
Total Halogens	Less than 1,000 ppm; or 4,000 ppm maximum if the presumption that the used oil contains hazardous waste is rebutted, as described below.
Flash Point	100°F, minimum

The used oil burned in this emissions unit shall contain less than the quantifiable levels of PCBs as defined in 40 CFR 761.3, and also shall not exceed the following mercury limitation nor fall below the following heating value:

<b>Contaminant/Property</b>	<b>Allowable Specifications</b>
Heat Content	135,000 BTU/gallon, minimum
PCBs	Less than 2 ppm
Mercury	1 ppm, maximum

Used oil containing 1,000 ppm or greater total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-279-10 of the Administrative Code. The permittee may receive and burn used oil equaling or exceeding 1,000 ppm total halogens, but less than 4,000 ppm, only if the permittee has successfully demonstrated, pursuant to OAC rule 3745-279-63, that the used oil does not contain a listed hazardous waste, by either acquiring and maintaining source process information which demonstrates that the used oil was contaminated by halogenated constituents that would not be listed hazardous waste or by demonstrating that the used oil does not contain significant concentrations of halogens by acquiring and maintaining representative analytical data. Acceptable analytical test protocols that can be used to analyze used oil for halogenated hazardous constituents include SW-846 Test Methods 9075, 9076, and 9077\*

If analytical results demonstrate that used oil containing 1,000 ppm or more total halogens, but less than 4,000 total halogens, does not contain greater than 100 ppm of any individual halogenated hazardous constituent found in the F001 and F002 listings in OAC rule 3745-51-31 and there is no information suggesting that any other halogenated hazardous constituent (e.g., chlorinated pesticides) has come in contact with the oil, then the presumption that the oil contains hazardous waste has been successfully rebutted.\*\* The rebuttable presumption does not apply to either metal working oils/fluids containing chlorinated paraffins, if processed through a tolling arrangement as described in OAC rule 3745-279-24(C), or used oils contaminated with chlorofluorocarbons removed from refrigeration units.

The burning of used oil not meeting the above limitations is prohibited in this emissions unit and the fuel oil analyses shall document compliance with each limitation before it is burned. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter. If the used oil analyses show total halogens of 1,000 ppm or greater, the permittee shall obtain and maintain all the necessary records to successfully rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste in accordance with this permit.

\*EPA publication SW-846, 3rd (or most current) edition, is available from the Government Printing Office, P.O. Box 371954, Pittsburgh, PA 15250-7954; 202/512-1800, document number 955-001-00000-1.

\*\*DMWM policy documented in "Used Oil Burners - New Guidance for Rebuttable Presumption", published April 2008 or most current policy.

- (5) The exhaust from this emissions unit shall be vented to and controlled by the baghouse at all times when the emissions unit is in operation.
  - (6) The permittee shall conduct burner tuning or have burner tuning conducted in accordance with the Burner Evaluation/Tuning provisions established below.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Used Oil Analysis Records

The permittee shall receive and maintain the chemical analyses from the supplier/marketer for each shipment of used oil burned in this emissions unit (or if the oil is generated on site, the permittee shall conduct the chemical analyses), which shall contain the following information:

- a. the date the used oil was received at the facility and the amount received;
- b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/refiner, supplier, and/or marketer;
- c. the results of the following chemical analyses, demonstrating that the used oil meets the standards in OAC rule 3745-279-11:

- i. arsenic content, in ppm;
  - ii. the cadmium content, in ppm;
  - iii. the chromium content, in ppm;
  - iv. the lead content, in ppm;
  - v. total halogens, in ppm; and
  - vi. the flash point;
- d. where the chemical analysis shows a total halogen content between 1,000 ppm, and below 4,000 ppm, the successful demonstration for the rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste, as described in OAC rule 3745-279-63(C); and
- e. the results of the analyses demonstrating that the used oil meets the heating value and the mercury and PCB limitations contained in this permit.

Each analysis shall be kept in a readily accessible location for a period of not less than 5 years\* following the receipt of each shipment of used oil and shall be made available to the Ohio EPA Division of Materials and Waste Management or the DAPC (the appropriate DO/LAA) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses through an independent laboratory.

\* The DAPC requires these records to be maintained for 5 years.

- (2) The permittee shall maintain monthly records of the following information:
- a. the total asphalt produced, in tons;
  - b. the total asphalt produced, in tons, for each fuel type;
  - c. the maximum concentration, in percent by weight, of RAP or shingles used in any mix;
  - d. the rolling, 12-month summation of total asphalt produced, in tons; and
  - e. the rolling 12-month summation of the PE, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO emissions, in tons.
- (3) Fuel Monitoring and Recordkeeping
- a. For each day during which the permittee burns a fuel other than propane, natural gas, ULSD, or on-spec used oil, the permittee shall maintain a record of the type, percent sulfur content and the quantity of fuel burned in this emissions unit.

- b. The permittee shall maintain documents provided by the fuel supplier for each shipment of number 2 fuel oil to demonstrate compliance with the ULSD requirement. These documents must include the date the shipment was received receipt or bill of lading that includes confirmation that the fuel meets the ULSD standard.
- c. For each shipment of on-spec used oil received for this emissions unit, the permittee shall maintain records of:
  - i. the date each shipment was received;
  - ii. the total volume of oil received, in gallons;
  - iii. the oil supplier's analyses for sulfur content, in percent by weight; and
  - iv. the heat content, in BTU/gal.

(4) Shingles Containing Asbestos Record

The permittee shall maintain documentation verifying that any shingles employed do not contain asbestos as described in c)(2)d. above.

(5) Maintaining the Baghouse

a. Baghouse Maintenance Plan

The owner/operator shall develop and implement a baghouse maintenance plan designed to ensure that the baghouse continues to operate as designed. This Baghouse Maintenance Plan can either be developed in-house or can be developed by the manufacturer of the baghouse. This Baghouse Maintenance Plan shall include, at a minimum, the following elements:

- i. The frequency of inspection of the baghouse for maintenance purposes;
- ii. A description of the baghouse components to be inspected at each inspection. It is acceptable to have different inspection frequencies for different baghouse components;
- iii. A description of any procedures to be used to verify the proper operation of any of the baghouse components to be inspected at each inspection;
- iv. The identification of the record keeping form/record that will be used to track the maintenance inspection. This form/record should include, at a minimum, the following elements:
  - (a) Date of the maintenance inspection
  - (b) Name of the employee who can verify that the inspection was completed;



- (c) Result of the inspection (components repaired, in need of repair, replaced, adjusted, no adjustment needed, etc.);
- (d) Date component repaired, replaced or adjusted;
- (e) Name of the employee who can verify that the component was repaired, replaced or adjusted;

v. A description of how and where the records shall be maintained.

The permittee shall implement the Baghouse Maintenance Plan within 30 days after the date Ohio EPA approves the initial plan. As needs warrant, the permittee can revise the Baghouse Maintenance Plan. The permittee shall submit a copy of proposed revisions to the Baghouse Maintenance Plan to the appropriate DO/LAA for review and approval. Implementation of the revised Baghouse Maintenance Plan may begin once the appropriate DO/LAA has approved the revisions.

b. Baghouse Maintenance Plan Inspections

The permittee shall perform inspections of each of the baghouse components at frequencies described in the Baghouse Maintenance Plan. Inspections may be delayed in the case of unsafe working conditions due to weather etc. Any required inspection that is not performed due to unsafe working conditions shall be performed as soon as practical after the working conditions are considered safe.

c. Baghouse Maintenance Plan Record Keeping

The permittee shall maintain records of the following information:

- i. The records required to be collected under the Baghouse Maintenance Plan, and
- ii. The date and reason any element of the Baghouse Maintenance Plan was not implemented.

The permittee shall maintain these records in accordance with the Standard Terms and Conditions of this permit.

(6) Burner Tuning Reporting Form Record

While performing each burner tuning measurement, the permittee shall record the results of the burner tuning measurement using the Burner Tuning Reporting Form for Asphalt Concrete Plants form [as found in g)(1) below]. An alternative form may be used upon approval of the appropriate Ohio EPA DO/LAA.

(7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745 31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or

use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

(8) NSPS Monitoring/Recordkeeping Requirements

The permittee shall comply with the applicable monitoring and/or recordkeeping requirements, established pursuant to 40 CFR Part 60, Subpart A and Subpart I, including but not limited to the following relevant sections:

Applicable Rule	Monitoring and/or Recordkeeping Requirements
40 CFR 60.7(b)	Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
40 CFR 60.7(f)	Any owner or operator subject to the provisions of this part shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years* following the date of such measurements, maintenance, reports, and records.

\*The Division of Air Pollution Control requires these records to be maintained for 5 years.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Baghouse Maintenance Plan to the appropriate DO/LAA.
- (2) Quarterly Deviation (Excursion) Reports

The permittee shall submit quarterly deviation (excursion) reports that identify;

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month asphalt production limitation;
  - ii. all exceedances of the rolling, 12-month total PE, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO emission limitations;

- iii. all exceedances of the lb/ton PE, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO emission limitations;
  - iv. all exceedances of the fuel sulfur content limitations for ULSD and used oil; and
  - v. all periods of time when the emissions unit burned a fuel other than natural gas, propane, ULSD, or on-spec used oil.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate DO/LAA).

(3) Annual Permit Evaluation Report (PER)

The permittee shall submit an annual PER to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

In addition to the reporting the information as required by the PER instructions, the permittee shall provide the following additional information in the PER:

- a. For the quality of used oil burned in this emissions unit:
  - i. any exceedance of the used oil standards in OAC rule 3745-279-11;
  - ii. any occasion where used oil containing 1,000 ppm or more total halogens was burned prior to receiving information demonstrating a successful rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste;
  - iii. any exceedance of the limitations for mercury and PCBs;
  - iv. any deviation from the minimum heat content of 135,000 Btu/gallon;
- b. All exceedances of the RAP or shingles raw material mix limitation;
- c. All Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants forms produced during the past calendar year;



- d. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to and controlled by the baghouse;
- e. A description of any failure to implement the Baghouse Maintenance Plan; and
- f. Where the analytical results for any shipment of used oil burned in this emissions unit establish that the used oil contains total halogens greater than 1,000 ppm, but less than 4,000 ppm, the results of the analysis for total halogens (from the appropriate test Method 9075, 9076, or 9077) and the information obtained to rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste shall be submitted to the appropriate district office or local air agency. Each rebuttal demonstration shall include:
  - i. the date the used oil was received;
  - ii. the facility location or identification number where the oil was or will be burned;
  - iii. the amount of oil in the shipment; and
  - iv. all information, including all the analytical results, relied upon by the permittee to rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste.

The above information shall be provided as an attachment to the PER. If there is no exceedance(s), day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no exceedances, days and/or corrective actions happened and/or were taken.

(4) NSPS Reporting/Notification Requirements

The permittee shall comply with the applicable reporting and/or notification requirements, established pursuant to 40 CFR Part 60, Subpart A and Subpart I, including but not limited to the following relevant sections:

Applicable Rule	Reporting and/or Notification Requirements
40 CFR 60.7(a)	Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:
40 CFR 60.7(a)(1)	A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
40 CFR 60.7(a)(3)	A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
40 CFR 60.7(a)(4)	A notification of any physical or operational change to an existing facility which may increase the emission rate of any air



Applicable Rule	Reporting and/or Notification Requirements
	pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
40 CFR 60.7(a)(6)	A notification of the anticipated date for conducting the opacity observations required by 40 CFR 60.11(e)(1) of this part. The notification shall also include, if appropriate, a request for the Administrator to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date.

40 CFR 60.7 establishes notification, recordkeeping, and reporting requirements that are applicable to the affected facilities subject to 40 CFR Part 60, Subpart I. Certain notification and reporting requirements are expected to be a singular occurrence (e.g., initial notification of construction commencement and notification of initial startup). Issuance of this permit does not establish subsequent notification or reporting requirements for affected facilities that have already satisfied these requirements.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE from the stack shall not exceed 0.033 lb/ton.

Applicable Compliance Method:

Compliance shall be demonstrated through the emissions testing conducted in accordance with f)(3) below.

b. Emissions Limitations:

No owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from any affected facility any gasses which:

- (1) contain PE in excess of 0.04 gr/dscf;
- (2) exhibit 20 percent opacity, or greater.



Applicable Compliance Method:

Compliance shall be demonstrated through the emissions testing conducted in accordance with f)(2) and f)(3) below.

c. Emissions limitation:

CO emissions while burning any approved fuel shall not exceed 0.30 pound per ton.

Applicable Compliance Method:

If required, CO 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".

d. Emissions limitation:

VOC emissions while burning any approved fuel shall not exceed 0.15 pound per ton.

Applicable Compliance Method:

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

e. Emissions limitation:

NO<sub>x</sub> emissions while burning any approved fuel shall not exceed 0.055 pound per ton.

Applicable Compliance Method:

If required, NO<sub>x</sub> 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".

f. Emissions limitations:

SO<sub>2</sub> emissions shall not exceed 0.011 pound per ton while burning natural gas, propane, or ULSD;

SO<sub>2</sub> emissions shall not exceed 0.066 pound per ton while burning on-spec used oil;

Applicable Compliance Method:

If required, SO<sub>2</sub> 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".

g. Emissions Limitation:

PE from this emissions unit (stack and fugitive emissions) shall not exceed 15.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the tons per rolling, 12-month period limitation shall be determined by a sum of the following calculations:

- i. For stack emissions, multiply 0.033 lb of PE per ton asphalt produced (AP-42 Table 11.1-3 dated 3/2004), or if available, the observed stack emission rate from the most recent emission test, in pounds of PE per ton of asphalt produced, by the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above and divide by 2,000.
- ii. For raw material loaded in the weigh hopper, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate used per ton asphalt produced, and by the emission factor of 0.0048 pounds of PE per ton of raw material (AP-42, Table 11.12-2 dated 06/2006), and divide by 2,000 pounds per ton.
- iii. For aggregate and sand handling, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate (including sand) used per ton asphalt produced, by the emission factor of 0.0069 lb of PE per ton of aggregate (AP-42, Table 11.12-2 dated 06/2006), and divide by 2,000 pounds per ton.
- iv. For RAP crushing, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate (including sand) used per ton asphalt produced, by 0.60 ton RAP used per ton aggregate (including sand) used, by the emission factor of 0.0054 lb of PE per ton of aggregate (AP-42, Table 11.19.2-2, uncontrolled tertiary crushing, dated 08/2004), and divide by 2,000 pounds per ton.
- v. For aggregate screening, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate (including sand) used per ton asphalt produced, by the emission factor of 0.0022 lb of PE per ton of aggregate (AP-42, Table 11.19.2-2, controlled screening, wet material, dated 08/2004), and divide by 2,000 pounds per ton.
- vi. For raw material conveying, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate (including sand) used per ton asphalt produced, multiplied by 20 (the number of transfer points), by the emission factor of 0.00014 lb of PE per ton of aggregate (AP-42, Table 11.19.2-2,

controlled transfer point, wet material, dated 08/2004), and divide by 2,000 pounds per ton.

- vii. For silo filling, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.000586 lb of PE per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.
- viii. For asphalt loadout, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.000522 lb of PE per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.

h. Emissions Limitation:

CO emissions (stack and fugitive emissions) shall not exceed 90.8 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the tons per rolling 12-month period limitation shall be determined by a sum of the following calculations:

- i. For stack emissions, multiply 0.30 lb of CO per ton asphalt produced, or if available, the observed stack emission rate from the most recent emission test, in pounds of CO per ton of asphalt produced, by the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above and divide by 2,000 pounds per ton.
- ii. For silo filling, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.00118 lb of CO per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.
- iii. For asphalt loadout, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.00135 lb of CO per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.

i. Emissions Limitation:

VOC emissions (stack and fugitive emissions) shall not exceed 49.8 tons per rolling, 12-month period.



Applicable Compliance Method:

Compliance with the tons per rolling 12-month period limitation shall be determined by a sum of the following calculations:

- i. For stack emissions, multiply 0.15 lb of VOC per ton asphalt produced, or if available, the observed stack emission rate from the most recent emission test, in pounds of VOC per ton of asphalt produced, by the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above and divide by 2,000 pounds per ton.
- ii. For silo filling, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.0122 lb of VOC per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5, temperature of 325, and 100% VOC [Table 11.1-16]), and divide by 2,000 pounds per ton.
- iii. For asphalt loadout, multiply the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.00386 lb of VOC per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5, temperature of 325, and 92.7% VOC [7.3% non VOC, Table 11.1-16]), and divide by 2,000 pounds per ton.

j. Emissions Limitation:

NO<sub>x</sub> emissions (stack emissions) shall not exceed 16.5 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by multiplying 0.055 lb of NO<sub>x</sub> per ton asphalt produced (AP-42 11.1-7, dated 03/2004), or if available, the observed stack emission rate from the most recent emission test, in pounds of NO<sub>x</sub> per ton of asphalt produced, by the actual asphalt production in tons per rolling, 12-month period, as derived from the records required by d)(2) above and dividing by 2,000 pounds per ton.

k. Emissions Limitation:

SO<sub>2</sub> emissions (stack emissions) shall not exceed 19.8 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by a sum of the following calculations:

- i. For asphalt produced while using propane, natural gas, or ULSD, multiply 0.011 lb of SO<sub>2</sub> per ton asphalt produced, or if available, the observed stack emission rate from the most recent fuel-specific emission test, in pounds of

SO<sub>2</sub> per ton of asphalt produced, by the actual asphalt production using natural gas and ULSD in tons per rolling, 12-month period, as derived from the records required by d)(2) above and divide by 2,000 pounds per ton.

- ii. For asphalt produced while using on-spec used oil, multiply 0.066 lb of SO<sub>2</sub> per ton asphalt produced, or if available, the observed stack emission rate from the most recent fuel-specific emission test, in pounds of SO<sub>2</sub> per ton of asphalt produced, by the actual asphalt production using on-spec used oil in tons per rolling, 12-month period, as derived from the records required by d)(2) above and divide by 2,000 pounds per ton.

(2) NSPS Testing Requirements

The permittee shall comply with the applicable testing requirements, established pursuant to 40 CFR Part 60, Subpart A and Subpart I, including but not limited to the following relevant sections:

40 CFR 60.8(a) through (i)	General Provisions - Performance Tests requirements
40 CFR 60.11(a) through (g)	General Provisions - Compliance with standards and maintenance requirements
40 CFR 60.93(b)(1)	Method 5 shall be used to determine the particulate matter concentration. The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).
40 CFR 60.93(b)(2)	Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.

Each affected facility, as described in 40 CFR 60.90, shall demonstrate initial compliance with 40 CFR 60.92 in accordance with the requirements identified in the table above.

40 CFR Part 60 Subpart I and the applicable provisions of 40 CFR Part 60, Subpart A do not establish subsequent/continuing performance testing requirements for affected facilities; however, affected facilities are required to be in compliance with 40 CFR 60.92 at all times, except as provided in 60.11. Issuance of this permit does not establish initial performance testing requirements for affected facilities that have already satisfied these requirements.

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

- a. Initial performance testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit to demonstrate compliance with the following emissions limitations in accordance with the applicable test methods and procedures:



Emissions Limitation:	Applicable Compliance Method:
0.04 gr/dscf	See f)(2) above.
0.033 lb PE/ton of asphalt produced (stack emissions)	Methods 1-5 of 40 CFR Part 60, Appendix A.
20% opacity	See f)(2) above.

- b. Emission testing when employing RAP in excess of 60 percent, but not to exceed 75 percent, shall be conducted within 60 days after the increase in RAP to demonstrate compliance with the allowable mass emission rate for VOC.

If the permittee increases the RAP percentage above an amount that was used in a mix that demonstrated compliance, then the permittee shall conduct additional testing within 60 days after that increase.

In all cases, the permittee is restricted to the increase in RAP percentage as allowed in this permit that demonstrated compliance with the mass emissions rate for VOC.

- c. If VOC testing is required, the VOC emissions rate observed during the emission test shall be calculated in accordance with OAC rule 3745-21-10(C)(7). In lieu of this, the permittee shall convert the observed mass emissions rate from an as-carbon to an as-VOC basis by assuming the carbon fraction of propane, i.e., the VOC emission rate observed during testing shall be converted to the appropriate units by multiplying the VOC emission rate (in lb/hr as carbon) by 44 and dividing by 36.
- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA district office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA district office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA district office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s)

of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Ohio EPA district office or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the Ohio EPA district office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA district office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA district office or local air agency.
- (4) The concentrations of contaminants (arsenic, cadmium, chromium, lead, mercury, PCBs, and total halogens) in the used oil shall be analyzed using a "total constituent analysis" method, as specified in U.S. EPA publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods."

The applicable test methods that should be used are as follows:

- a. Arsenic, cadmium, chromium, and lead: SW-846, Method 3031 or 3051 (digestion procedures) followed by analysis using Method 6010B or 6020;
- b. Mercury: SW-846, Method 7471A;
- c. PCBs: SW-846, Method 8270C or 8082; and
- d. Total halogens: SW-846, Method 9075, 9076, or 9077.

The permittee shall submit a written request and receive approval from Ohio EPA Division of Materials and Waste Management and/or the Division of Air Pollution Control, of Central Office, before an alternative test method, not listed above, can be used for the total constituent analysis of the above-mentioned used oil contaminants.

(5) Burner Evaluation/Tuning

a. Introduction

The permittee is required to conduct periodic evaluation/tuning of the asphalt plant burner as set forth below. The purpose of this evaluation/tuning is to ensure that the burner is adjusted and maintained in order to make the burner as fuel efficient as possible.

b. Qualifications for Burner Evaluation/Tuning

Technicians who conduct the burner evaluation/tuning must be qualified to perform the expected burner evaluation/tuning tasks. In order to be qualified, the technician must have passed manufacturer's training concerning burner evaluation/tuning, or must have been trained by someone who has completed the manufacturer's training concerning burner evaluation/tuning. Burner evaluation/tuning technicians can be either permittee employees or outside parties.

c. Portable Monitor Requirements

Portable monitors used for burner evaluation/tuning shall be properly operated and maintained to monitor the concentration of NO<sub>x</sub>, O<sub>2</sub> and CO in the stack exhaust gases from this emissions unit. The monitor(s) shall be capable of measuring the expected concentrations of the measured gases. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The owner or operator of the portable monitor shall maintain records of each portable monitoring device's calibration.

d. Burner Evaluation/Tuning Procedure

An alternative form may be used as long as it contains the same data elements as the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants form.

The burner shall be evaluated and, if necessary, tuned based on the frequency described in f)(5)e. below.

The general procedure for evaluating and, if necessary, tuning the burner involves the following steps:

- i. Review the plant operations to ensure the plant is operating normally based on weather conditions and production.
- ii. Confirm that the portable monitor is calibrated per the manufacturer's specifications.
- iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for NO<sub>x</sub>, O<sub>2</sub>, and CO. These measurements shall be taken at a location representative of stack emissions. Record the values in the "Pre-Tuning" results column on the Burner Tuning Reporting Form for Asphalt Concrete Plants form [as found in g)(1)]. An alternative form may be used as long as it contains the same data elements as the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants form.
- iv. Make any necessary adjustments and repairs to the burner in order to make the burner as fuel efficient as possible.
- v. If adjustments or repairs are made to the burner, then the technician shall re-measure the stack exhaust gas values for NO<sub>x</sub>, O<sub>2</sub>, and CO. This procedure shall be repeated until the technician is satisfied that the burner

has been appropriately tuned. Once he/she is satisfied, then the technician shall record the post tune NO<sub>x</sub>, O<sub>2</sub>, and CO values in the "Post Tuning" results column on the Burner Tuning Reporting Form for Asphalt Concrete Plants (or equivalent) form.

Note that the Ohio EPA reserves the right to require permittees to conduct additional emissions tests to verify compliance. Operators who choose not to keep their burners in tune are more likely to be required by Ohio EPA to conduct additional emissions tests to verify compliance. Therefore, it is recommended that permittees make necessary adjustments and repairs to burners as soon as possible and verify that the burner is operating as designed.

- vi. Submit a copy of all Burner Evaluation/Tuning Reporting Form(s) for Asphalt Concrete Plants forms produced during the past calendar year to the appropriate Ohio EPA DO/LAA responsible for the permitting of the facility with the PER. Note: These forms are required to be submitted even if the burner is not actually adjusted.

e. Burner Tuning Frequency

The permittee shall conduct the burner evaluation/tuning procedure within 30 production days after commencement of the production season in the State of Ohio. The permittee shall conduct another burner evaluation/tuning procedure within 15 production days before or after June 1st of each year and within 15 production days before or after September 1st of each year. For purposes of this permit, the production season is defined as the time period between the date the first ton of asphalt is produced and the date that the last ton of asphalt is produced during the same calendar year. A burner evaluation/tuning is not required if the production season ends prior to the associated evaluation/tuning due date. If the baseline level testing or the initial season evaluation/tuning is done within 30 days prior to June 1 or September 1, the tuning associated with that due date is not required.

In addition to the burner evaluation/tuning procedure required above, the permittee shall conduct the burner evaluation/tuning procedure within 20 production days from the date that a scheduled/planned fuel switch occurs.

g) Miscellaneous Requirements

- (1) Burner Tuning Form (see next page)

## BURNER EVALUATION/TUNING REPORTING FORM FOR ASPHALT CONCRETE PLANTS

Facility ID:	Evaluation/Tuning Date:
Legal Name:	Other Company Name (if different than legal name):
Mailing Address:	Other Company Site Address: (if different than mailing address):
City, State, Zip Code:	Other Company City, County, Zip Code:
Site Contact Person:	Site Contact Telephone Number:
Site Contact Title:	Site Contact Fax Number:
Name of company performing evaluation/tuning:	Name of company performing emission monitoring:
Type of plant (ie: batch, drum mix, etc.):	Calibration date for analyzers:

Reason for Evaluation/Tuning:     Season Initial Tuning     June Tuning     September Tuning  
 Fuel Switch     Other (describe)

Fuel employed during evaluation/tuning:     Natural Gas     Propane     # 2 Fuel Oil     # 4 Fuel Oil  
 Used Oil     Other (describe)

**Evaluation/Tuning Results:**

<b>Parameter</b>	<b>Results</b>	
	<b>Pre Tuning</b>	<b>Post Tuning<sup>2</sup></b>
Fuel flow to the burner (gallon/hr.) (for fuel oil and on-spec used oil)		
Fuel pressure (psi)		
For burners that require compressed air for proper operation, pressure at the burner (psi)		
Carbon Monoxide (CO) concentrations (ppm) <sup>1</sup>		
NOx concentrations (ppm) <sup>2</sup>		
Oxygen concentrations (per cent) <sup>2</sup>		

Asphalt Production (tons/hr.)		
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<sup>1</sup> Specify whether on a dry or wet basis.

<sup>2</sup> If the burner did not require adjusting, please record N/A in the post tuning column.

Describe in detail a list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturer's specifications. Use additional paper if necessary.

Authorized Signature: This signature shall constitute personal affirmation that all statements or assertions of fact made in this form are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

Name of Official (Printed or Typed):	Title of Official and Phone Number:
Signature of Official:	Date: