



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: PERMIT TO INSTALL DRAFT
HIGHLAND COUNTY
Application No: 05-0076**

DATE: June 30, 1999

Miller-Mason Paving Inc.
W.C. Mason
8591 Mad River Road
Hillsboro, OH 45133-9472

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
	CEMS
	MACT
X	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$ 2000** will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, SWDO

Kentucky Department of Natural Resources & Environmental Protection
Indiana Office of Air Management



DRAFT PERMIT TO INSTALL 05-0076

Application Number: 05-0076

APS Premise Number: 0536020113

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

Name of Facility: Miller-Mason Paving Inc.

Person to Contact: W.C. Mason

Address: 8591 Mad River Road
Hillsboro, OH 45133-9472

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

**8591 Mad River Road
Hillsboro, OHIO**

Description of proposed emissions unit(s):

125 TPH ASPHALT PLANT.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	3.05
CO	17.0
NO _x	8.5
SO ₂	12.0
OC	2.3

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
125 TPH asphalt plant (P902) (a) rotary dryer, hot aggregate elevator, vibrating screens, and weigh hopper	OAC rule 3745-31-05 Synthetic Minor to avoid Title V requirements	7.63 lbs PM/hr, 3.05 TPY PM, 42.5 lbs CO/hr, 17 TPY CO, 21.25 lbs NO _x /hr, 8.5 TPY NO _x , 30 lbs SO ₂ /hr, 12 TPY SO ₂ , 5.75 lbs TOC/hr, 2.3 TPY TOC, 0% opacity fugitive emissions 17 TPY CO, based upon a rolling, 12-month summation of the monthly emissions, 12 TPY SO ₂ , based upon a rolling, 12-month summation of the monthly emissions, 3.05 TPY PM, based upon a rolling, 12-month summation of the monthly emissions, 8.5 TPY NO _x , based upon a rolling, 12-month summation of the monthly emissions, 2.3 TPY TOC, based upon a rolling, 12-month summation of the monthly emissions; and, 100,000 ton production limit, based

	40 CFR Part 60 Subpart I	upon a rolling, 12-month summation 0.04 gr/dscf, 20% opacity 6-minute average stack emissions
	3745-17-11	Less stringent than OAC rule 3745-31-05
	3745-17-07	Less stringent than OAC rule 3745-31-05
	3745-17-08	See A.2.a. below
(b) aggregate storage bins and cold aggregate elevator	3745-17-07	20% opacity, 3-minute average
	3745-17-08	See A.2.d. below

2. Additional Terms and Conditions

- 2.a** There shall be no visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper
- 2.b** Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a baghouse thru the installation, use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control fugitive dust PM emissions and compliance with the limits in term A.1.
- 2.c** The following conditions apply to the rotary dryer, hot aggregate elevator, vibrating screens, and weigh hopper:
 - 1. Particulate emissions for this source shall not exceed 0.04 grain per dry standard cubic foot of exhaust gases
 - 2. Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule
- 2.d** The following conditions apply to the aggregate storage bins and cold aggregate elevator:
 - 1. The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the elevator loading area

- 2. The aggregate loaded into the storage bins shall have a moisture content sufficient to eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer
- 3. Fugitive dust emissions shall not exceed 20 percent opacity, as a 3-minute average.

B. Operational Restrictions

- 1. To ensure the baghouse is operated according to the manufacturer’s specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 2 inches water column or greater than 6 inches water column shall be maintained at all times.
- 2. The maximum annual production rate for this emissions unit shall not exceed 100,000 tons of asphalt, based upon a rolling, 12-month summation of the production rates.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the fabric filter.
- 2. The permittee shall check the pressure drop once a day and maintain daily records of the pressure drop readings.
- 3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production (tons)
1	11,111 tons
1-2	22,222 tons
1-3	33,333 tons
1-4	44,444 tons
1-5	55,555 tons
1-6	66,666 tons
1-7	77,777 tons
1-8	88,888 tons
1-9	99,999 tons
1-10	100,000 tons
1-11	100,000 tons
1-12	100,000 tons

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

- a. The production rate for each month.
- b. Beginning after the first 12 calendar months of operation after issuance of this permit, the rolling, 12-month summation of the production rates.

Also, during the first 12 calendar months of operation after issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

D. Reporting Requirements

- 1. The permittee shall submit annual deviation (excursion) reports which identify all exceedances of the visible emissions.
- 2. The permittee shall also submit annual reports which specify the total particulate matter, SO₂, NO_x, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the allowable pressure drop range contained in B.1.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative production levels.
- 5. These reports as denoted in term D.3. and D.4. are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

E. Testing Requirements

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

7.63 lbs PM/hr, 3.05 TPY PM, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method

Compliance shall be demonstrated using Method 5, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual PM emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.061 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

b. Emission Limitation

42.5 lbs CO/hr

Applicable Compliance Method

Compliance shall be demonstrated using Method 10, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual CO emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.34 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

c. Emission Limitation

21.25 lbs NO_x/hr, 8.5 TPY NO_x, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method

Compliance shall be demonstrated using Method 7, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual NO_x emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.17 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

d. Emission Limitation

30 lbs SO₂/hr

Applicable Compliance Method

Compliance shall be demonstrated using Method 6, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual SO₂ emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.24 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

e. Emission Limitation

5.75 lbs TOC/hr, 2.3 TPY TOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method

Compliance shall be demonstrated using Method 25, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual TOC emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.046 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

f. Emission Limitation

0% opacity

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”), as such Appendix existed on July 1, 1996, and the modifications listed in OAC rule 3745-17-03.

g. Emission Limitation

17 TPY CO, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method

Compliance shall be demonstrated using Method 10, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual CO emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.34 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

h. Emission Limitation

12 TPY SO₂, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method

Compliance shall be demonstrated using Method 6, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual SO₂ emission rates for the unit utilizing the following equation:

$$E = EF * P$$

Where:

E=Emissions in pounds per hr

EF = emission factor = 0.24 lb/ton (AP-42 11.1, 1-95)

P = production rate in tons per hour

i. Emission Limitation

Opacity limits

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”), as such Appendix existed on July 1, 1996, and the modifications listed in OAC rule 3745-17-03.

j. Emission Limitation

0.04 gr/dscf

Applicable Compliance Method

Compliance shall be demonstrated using Method 5, 40 CFR Part 60, Appendix A.

2. Within 3 months of the issuance of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for particulate matter. The particulate matter test(s) shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

Within 3 months of the issuance of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for volatile organic compounds. The volatile organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Method 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

Within 3 months of the issuance of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for carbon monoxide. The carbon monoxide test(s) shall be conducted in accordance with the test methods and procedures specified in Method 10, as appropriate, of 40 CFR Part 60, Appendix A while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

Within 3 months of the issuance of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for sulfur dioxide. The sulfur dioxide test(s) shall be conducted in accordance with the test methods and procedures specified in Method 6, as appropriate, of 40 CFR Part 60, Appendix A while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

Within 3 months of the issuance of this permit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for nitrogen oxides. The nitrogen oxides test(s) shall be conducted in accordance with the test methods and procedures specified in Method 7, as appropriate, of 40 CFR Part 60, Appendix A while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30 days following completion of the test(s).

F. Miscellaneous Requirements

1. The following thirteen(13) line items are federally enforceable:

- | | | | | |
|--------|--------|--------|--------|--------|
| A.2.c. | A.2.d. | B.2. | C.3. | D.1. |
| D.2. | D.4. | D.5. | E.1.a. | E.1.c. |
| E.1.e. | E.1.g. | E.1.h. | | |