



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

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

CERTIFIED MAIL

RE: FINAL PERMIT TO INSTALL MODIFICATION

MEDINA COUNTY

Application No: 16-02343

Fac ID: 1652000061

DATE: 4/12/2007

J and J Asphalt LLC
James Lytle
1941 Millersburg Rd
Wooster, OH 44691-0082

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR Part 60, Subpart I	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-02343

Application Number: 16-02343
Facility ID: 1652000061
Permit Fee: **\$625**
Name of Facility: J and J Asphalt LLC
Person to Contact: James Lytle
Address: 1941 Millersburg Rd
Wooster, OH 44691-0082

Location of proposed air contaminant source(s) [emissions unit(s)]:
8215 Seville Rd
Lodi, Ohio

Description of proposed emissions unit(s):
Administrative modification to increase the allowable short term emission limits for S02 and OC, as well as the annual emission limit for VOC, based on emission factors developed from stack testing.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
SO ₂	18.00
VOC	18.00
NO _x	10.50
CO	33.00
PE (stack)	12.35
PM ₁₀ (stack)	7.94
PE (fugitive)	4.99
PM ₁₀ (fugitive)	2.41

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - 250 TPH hot mix Custom Built Job Number 69-543 asphaltic concrete batch plant, controlled with a 60,000-ACFM baghouse	OAC rule 3745-31-05 (A)(3)	<p>Carbon monoxide (CO) emissions from burning of natural gas, on-spec used oil, #2 fuel oil, #4 fuel oil, and #6 fuel oil shall not exceed 55.00 lbs/hr.</p> <p>Nitrogen Oxides (NO_x) emissions from burning on-spec used oil, #2 fuel oil, #4 fuel oil, and #6 fuel oil shall not exceed 17.50 lbs/hr.</p> <p>NO_x emissions from burning natural gas shall not exceed 6.25 lbs/hr.</p> <p>Sulfur Dioxide (SO₂) emissions from burning on-spec used oil and #2 fuel oil shall not exceed 30.00 lbs/hr.</p> <p>Sulfur Dioxide (SO₂) emissions from burning #4 fuel oil and #6 fuel oil shall not exceed 10.75 lbs/hr.</p> <p>SO₂ emissions from burning natural gas shall not exceed 2.42 lbs/hr.</p> <p>Volatile Organic Compound (VOC) emissions from burning of natural</p>

gas, on-spec used and #2 fuel oil shall not exceed 43.52 lbs/hr.

Volatile Organic Compound (VOC) emissions from burning #4 fuel oil and #6 fuel oil shall not exceed 30.00 lbs/hr.

PM₁₀ from the stack shall not exceed 0.04 gr/dscf when burning on-spec used oil, number 2 fuel oil, #4 fuel oil, #6 fuel oil or natural gas.

Emissions of fugitive PM₁₀ shall not exceed 10.8 pounds per hour.

Emissions of fugitive particulate emissions shall not exceed 22.5 pounds per hour.

Arsenic, cadmium, chromium, and lead emissions are limited by the fuel specifications in A.2.b below.

Visible particulate emissions from the stack shall not exceed 20% opacity, as a 3-minute average.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section A.2.a).

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

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

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

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 aggregate storage bins.

The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize the visible emissions of fugitive dust from conveyors and all transfer points to the dryer.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and 40CFR Part 60, Subpart I.

See A.I.2.b-f below

Particulate emissions (PE) from the stack shall not exceed 12.35 tons per rolling 12-month period.

PM₁₀ emissions from the stack shall not exceed 7.94 tons per rolling 12-month period.

Fugitive PE shall not exceed 4.99 tons per rolling 12-month period.

Fugitive PM₁₀ emissions shall not exceed 2.41 tons per rolling 12-month period.

CO emissions shall not exceed 33.00 tons per rolling 12-month period.

VOC emissions shall not exceed 18.00 tons per rolling 12-month period.

OAC rule 3745-17-07(A)(1)
 OAC rule 3745-17-11(B)(1)
 OAC rule 3745-18-06(E)

40 CFR Part 60, Subpart I

SO₂ emissions shall not exceed 18.00 tons per rolling 12-month period.

NO_x emissions shall not exceed 10.50 tons per rolling 12-month period.

The emissions limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

PE from the stack shall not exceed 0.04 gr/dscf.

2. Additional Terms and Conditions

2.a All on spec used oil burned in this emissions unit shall meet the following specifications:

<u>Contaminant/Property</u>	<u>Allowable Specifications</u>
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCB's	2 ppm, maximum
total halogens	4000 ppm maximum
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum

2.b Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR Part 266.40(c) and OAC rule 3745-279. Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the supplier [“marketer” in 40 Part CFR 266.43(a)] has demonstrated to the Ohio EPA’s Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.

2.c All number 2 and on-spec used oil burned in this emission unit shall have a sulfur content equal to or less than 0.5%, by weight.

- 2.d** All number 4 fuel oil burned in this emission unit shall have a sulfur content equal to or less than 0.8%, by weight.
- 2.e** All number 6 fuel oil burned in this emission unit shall have a sulfur content equal to or less than 1%, by weight.
- 2.f** The permittee shall conduct, or have conducted, burner performance tuning for purposes of minimizing emissions. Burner performance tuning shall contain at a minimum the evaluation of and adjustment to manufacturer's specifications of the following:

 - i. Fuel flow to the burner (for fuel oil and on spec used oil);
 - ii. Differential pressure of the baghouse to ensure proper air flow through the plant;
 - iii. Flue gas analysis (of gases present in the drum and or stack) for CO, O₂, CO₂, and NO_x;
 - iv. Fuel pressure; and
 - v. For burners that require compressed air for proper operation, correct pressure at the burner.

B. Operational Restrictions

- 1. The permittee shall ensure that the baghouse is operated with sufficient air volume to minimize or eliminate visible fugitive emissions from the rotary drum.
- 2. The permittee may not receive or burn any on spec used oil which does not meet the specifications listed in A.2.b of this permit without first obtaining a permit to install that authorizes the burning of such off-specification used oil. The burning of off-specification used oil is subject to OAC rule 3745-279-60 through 67.
- 3. The maximum annual asphalt production rate for this emissions unit shall not exceed 300,000 tons per year, based upon a rolling, 12-month summation of the asphalt production.

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:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Tons of Hot Mix Asphalt Produced</u>
1	75,000
1-2	150,000
1-3	300,000
1-4	300,000
1-5	300,000
1-6	300,000
1-7	300,000
1-8	300,000
1-9	300,000
1-10	300,000
1-11	300,000
1-12	300,000

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

4. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.
5. The permittee shall conduct, or have conducted, an initial burner tuning within 15 production days after commencement of the production season. The permittee shall conduct, or have conducted, another burner tuning within the time period of 100 production days after the initial burner tuning. For purposes of this permit, the production season is defined as the time period between the date the first ton of asphalt is produced and the date that the last ton of asphalt is produced during the same calendar year.
6. In addition to the burner tuning required above, the permittee shall conduct, or have conducted, additional burner tuning, within 15 production days, for each type of fuel burned during the production season that is different than the fuel(s) burned during the initial burner tuning or the burner tuning described above that occurs 100 production days after the initial burner tuning.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall receive a chemical analysis with each shipment of on spec used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
 - a. Date of shipment or delivery;
 - b. Quantity of on spec used oil received;

- c. The Btu value of the on spec used oil;
- d. The flash point of the on spec used oil;
- e. The arsenic content, in ppm;
- f. The cadmium content, in ppm;
- g. The chromium content, in ppm;;
- h. The lead content, in ppm;;
- i. The PCB content, in ppm;;
- j. The total halogen content, in ppm;; and
- k. The mercury content, in ppm;.

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

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the

total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

Except for an initial operating period after filter media replacement to attain design filtering efficiency, the acceptable range for the pressure drop across the baghouse is 1 to 8 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the ARAQMD. The permittee may request revisions to the pressure drop range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the pressure drop range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.

3. The permittee shall maintain monthly records of the following information:
 - a. The asphalt production for each month;
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the asphalt production;

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative asphalt production for each calendar month; and
 - c. The maximum percentage RAP used for any mix.
4. For each shipment of number 2 fuel oil, number 4 fuel oil, number 6 fuel oil and on-spec used oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittees or oil supplier's analyses for sulfur content and heat content.
5. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the hot aggregate elevator, vibrating screens, and weigh hopper serving this emissions unit. If visible emissions are observed, the permittee shall note the following in the operation log:
 - a. the location and color of the visible emissions;
 - b. the cause of the visible particulate emissions;
 - c. the total duration of any visible emissions incident; and

- d. any corrective actions taken to eliminate the visible emissions.

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

- 6. The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust (from areas other than the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper) serving this emissions unit. If visible emissions are observed, the permittee shall note the following in the operation log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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

- 7. Portable devices to monitor the concentration of NO_x, CO, O₂, and CO₂ present in the flue gases generated within the drum and/or stack during the burner performance tuning shall be properly operated and maintained. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall maintain records of each portable monitoring device's calibration.
- 8. When the required burner tuning has been performed, the permittee shall record the results of the evaluation of the operating parameters listed above in A.2.f and the information required in the form below:

**BURNER TUNING REPORTING FORM FOR:
ASPHALTIC CONCRETE PLANTS**

1. Source Number: _____ 2. Reporting Period: (calendar year): _____

3. Company Information:

Legal Name:	Other company name (if different than legal name):
Mailing Address:	Site Address: (if different than mailing address):

J and J Asphalt LLC

PTI Application: 16-02343

Modification Issued: 4/12/2007

Facility ID: 165200006

Emissions Unit ID: P901

City, State, Zip Code:	City, County, Zip Code:
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4. Site Contact Person:

Name:	Telephone Number:
Title:	Fax Number:

5. Type of plant (ie: batch, drum mix, etc.): _____

6. Company performing tuning: _____

7. Company performing emission monitoring: _____

8. Calibration date for NO_x, CO₂, CO and O₂ analyzers used to perform emission monitoring: _____

9. Date Turning Completed: _____

10. Fuel type employed during burner tuning: _____

11. Tuning Results¹:

Parameter	Results	
	Pre Tuning	Post Tuning ⁴
Exhaust gas flow rate (dscfm)		
Carbon Monoxide (CO) concentrations (ppm) ^{2, 3}		
NO _x concentrations (ppm) ^{2, 5}		
Oxygen concentration (%) ²		
Stack Gas Temperature		
Asphalt Production (tons/hr)		
Asphalt Mix Temperature		
RAP content (as % of mix production)		
Fuel usage (gal/ton, therms/ton, or cf/ton)		

J and J Asphalt LLC
PTI Application: 16-02343
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Facility ID: 165200006
Emissions Unit ID: P901

- ¹ During any year in which burner tuning is required by Condition 3.1 of your General Permit, the tuning must be completed and a report submitted to the Department by July 15th.
- ² Specify whether on a dry or wet basis.
- ³ For Drum mix plants the recommended maximum target concentration for CO is less than or equal to 180 ppm (dry). For Batch plants the recommended maximum target concentration for CO is less than or equal to 155 ppm (dry).
- ⁴ If the plant did not require adjusting, please record N/A in the post tuning column.
- ⁵ For Drum mix plants the recommended maximum target concentration for NOx is less than or equal to XXXX ppm (dry). For Batch plants the recommended maximum target concentration for NOx is less than or equal to XXXX ppm (dry).

12. Certifying Signature

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

PLEASE SUBMIT THIS REPORTING FORM TO:

Please submit this form to the Permit Coordinator at the Ohio Environmental Protection Agency regional office shown on the cover page of the permit assignment form. The Permit Coordinator addresses are also listed in the Administrative Requirements section of the General Air Contaminant Discharge Permit.

Detailed list of adjustments and/or repairs made to bring the operating parameters into conformance with the manufacturers specifications.

D. Reporting Requirements

- 1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month asphalt production limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative production levels. These reports are due by the date described in Part I- General Terms and Conditions of this permit under section (A)(2).
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the RAP limitation specified above. These reports are due by the date described in Part I- General Terms and Condition of this permit under section (A)(2).
4. The permittee shall submit annual reports which specify the total PM, SO₂, NO_x, VOC and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
5. The permittee shall notify the USEPA and the Ohio EPA if any of the on spec used oil exceeded the on spec used oil specifications found in OAC rule 3745-279-11. If the permittee is burning on spec used oil which exceeds the specifications found in OAC rule 3745-279-11, the permittee is subject to that rule and must comply with all provisions of that rule. The required notification shall be submitted within 30 days of the date in which the exceedance occurred.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limit specified above. These reports are due by the date described in Part I- General Terms and Condition of this permit under section (A)(2).
7. The permittee shall submit semiannual written deviation (excursion) reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the hot aggregate elevator, vibrating screens, and weigh hopper serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the ARAQMD by January 31 and July 31 of each year and shall cover the previous 6-month period.
8. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the areas other than the enclosures the hot aggregate elevator, vibrating screens, and weigh hopper, and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the ARAQMD by January 31 and July 31 of each year and shall cover the previous 6-month period.
9. The permittee shall notify the Director (the ARAQMD) in writing of any record in which the baghouse and/or associated control equipment serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the ARAQMD) within 30 days after the event occurs.

10. The permittee shall submit a "Notice of Intent to Relocate a Portable or Mobile Source" from 30 days prior to any planned relocation of this emission unit, in accordance with OAC rule 3745-31-03(A)(6). (A copy of the form is attached to this permit). Approval of the planned relocation must be obtained from the appropriate Ohio EPA district office or local air agency prior to the relocation.
11. The permittee shall submit burner performance tuning reports to the ARAQMD that summarize the results of each burner performance tuning. These reports are due within 30 days of the date that the burner performance tuning was performed.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations: PE shall not exceed 0.04 gr/dscf; VOC emissions from the burning of natural gas, number 2 fuel or on-spec used oil shall not exceed 43.52 lbs/hr, VOC emissions from the burning of number 4 and 6 fuel oil shall not exceed 30.00 lbs/hr; CO emissions from the burning of natural gas, number 2, 4, 6 fuel or on-spec used oil shall not exceed 55.00 lbs/hr; SO₂ emissions from the burning of natural gas shall not exceed 2.42 lbs/hr; SO₂ emissions from the burning of number 4 and 6 fuel oil shall not exceed 10.75 lbs/hr, SO₂ emissions from burning number 2 fuel or on-spec used oil shall not exceed 30.00 lbs/hr; NO_x emissions from burning natural gas shall not exceed 6.25 lbs/hr and NO_x emissions from burning number 2, 4, 6 fuel or on-spec used oil shall not exceed 17.50 lbs/hr.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after initial startup of the emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM, VOC, CO, NO_x and SO₂.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

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

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

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

For CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

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

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity and burning natural gas, numbers 2, 4, or 6 fuel oil or on spec used oil for PM, VOC, CO, NO_x and SO₂ and employing the maximum percentage of RAP listed in the permit to verify VOC emissions, unless otherwise specified or approved by the Ohio EPA, ARAQMD.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District (ARAQMD.) 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 ARAQMD's refusal to accept the results of the emission test(s).

Personnel from ARAQMD 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.

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 ARAQMD 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 ARAQMD.

- b. Emissions Limitation: PE emissions shall not exceed 12.35 tons per rolling 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of PE per ton of asphalt produced, by the actual rolling, 12-month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- c. Emission Limitation: VOC emissions shall not exceed 18.00 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of VOC per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- d. Emission Limitation: CO emissions shall not exceed 33.00 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of CO per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- e. Emission Limitation: SO₂ emissions shall not exceed 18.00 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of SO₂ per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- f. Emission Limitation: NO_x emissions shall not exceed 10.50 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by multiplying the observed emission rate from the most recent emissions testing, in pounds of NO_x per ton of asphalt produced, by the actual rolling 12 month summation of asphalt produced, in tons per rolling 12-month period, (as derived from the records required by term and condition C.3 above) and dividing by 2000.

- g. Emission Limitations: Arsenic, cadmium, chromium and lead emissions are limited by the fuel specifications in A.2.b.

Applicable Compliance Method: Compliance with the emissions limitation for arsenic, cadmium and lead shall be demonstrated by the monitoring and record keeping in Section C.1 of this permit.

- h. Emission Limitation: Visible particulate emissions from the stack shall not exceed 20% opacity as a 3-minute average.

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

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

Applicable Compliance Method: Compliance with the limitations on visible emissions of fugitive dust found in Section A.1 of this permit shall be demonstrated by the monitoring and record keeping in Section C.5.

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

Applicable Compliance Method: Compliance shall be determined 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 paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- k. Emissions Limitation: PM₁₀ emissions from the stack shall not exceed 7.94 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be assumed as long as compliance is maintained with the rolling 12-month emissions limitation for particulate emissions.

- l. Emissions Limitation: Fugitive PM₁₀ emissions shall not exceed 2.41 tons per rolling, 12-month period.

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

Total fugitive emissions equal the summation of HMA loadout operations, conveying

operations, and aggregate material loading operations. Fugitives emissions are calculated as follows:

HMA Loadout Operations: $(0.0003 \text{ lb of PM}_{10}/\text{ton of asphalt loaded})(300,000 \text{ tons asphalt loaded per year})(\text{ton}/2000 \text{ lbs}) = 0.05 \text{ ton of PM}_{10}/\text{year}$

Conveying Operations: (0.0033 lb of PM₁₀/ton of aggregate material)(110,000 tons of total raw aggregates per year)(9 conveyor transfer points)(ton/2000 lbs) = 1.63 tons of PM₁₀/year

Loading Operations: (0.0033 lb of PM₁₀/ton of aggregate material)(110,000 tons of total raw aggregates per year)(4 loading transfer points)(ton/2000 lbs) = 0.73 tons of PM₁₀/year

Total fugitive PM₁₀ emissions are therefore 2.41 tons.

Emissions factor for HMA loadout was obtained from USEPA reference document "AP-42" Chapter 11.1 (Hot Mix Asphalt Plants) Section 11.1.2.5. Using data from Tables 11.1-14 through 11.1-16, version dated (12/00).

Emissions factor for conveying and loading*operations was obtained from USEPA reference document "AP-42" Chapter 11.12 (Concrete Batching) Table 11.12-2, version dated (10/01).

*for purposes of this permit, the emission factor for conveying operations are considered the same for loading operations.

- m. Emissions Limitation: Fugitive PM emissions shall not exceed 4.98 tons per rolling, 12-month period.

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

Total fugitive emissions equal the summation of HMA loadout operations, conveying operations, and aggregate material loading operations. Fugitives emissions are calculated as follows:

HMA Loadout Operations: (0.0003 lb of PM/ton of asphalt loaded)(300,000 tons asphalt loaded per year)(ton/2000 lbs) = 0.05 ton of PM/year

Conveying Operations: (0.0069 lb of PM/ton of aggregate material)(110,000 tons of total raw aggregates per year)(9 conveyor transfer points)(ton/2000 lbs) = 3.42 tons of PM/year

Loading Operations: (0.0069 lb of PM/ton of aggregate material)(110,000 tons of total raw aggregates per year)(4 loading transfer points)(ton/2000 lbs) = 1.52 tons of PM/year

Total fugitive PM emissions are therefore 4.99 tons.

Emissions factor for HMA loadout was obtained from USEPA reference document "AP-42" Chapter 11.1 (Hot Mix Asphalt Plants) Section 11.1.2.5, Using data from Tables 11.1-14 through 11.1-16, version dated (12/00).

Emissions factor for conveying and loading*operations was obtained from USEPA reference document "AP-42" Chapter 11.12 (Concrete Batching) Table 11.12-2, version dated (10/01).

*for purposes of this permit, the emission factor for conveying operations are considered the same for loading operations.

- n. Emission Limitations: Emissions of fugitive PM₁₀ shall not exceed 10.8 pounds per hour.

Applicable Compliance Method: Compliance with this emissions limitation shall be assumed as long as compliance is maintained with the rolling 12-month operational restriction.

Fugitive PM₁₀ emissions are calculated as follows:

$(250 \text{ tons of hot mix asphalt/hour} \times 0.0003 \text{ lb PM}_{10}/\text{ton of hot mix asphalt loadout}) + (250 \text{ tons of raw aggregate conveying/hour} \times 0.0033 \text{ lb PM}_{10}/\text{ton of raw aggregate conveyed} \times 9 \text{ conveyor transfer points}) + (250 \text{ tons of raw aggregate, RAP, and sand/hour} \times 0.0033 \text{ lb PM}_{10}/\text{ton of raw aggregate, RAP, and sand} \times 4 \text{ loading transfer points}) = 10.8 \text{ pounds per hour of PM}_{10}.$

- o. Emission Limitations: Emissions of fugitive PM shall not exceed 22.5 pounds per hour.

Applicable Compliance Method: Compliance with this emissions limitation shall be assumed as long as compliance is maintained with the rolling 12-month operational restriction.

Fugitive PM emissions are calculated as follows:

$(250 \text{ tons of hot mix asphalt/hour} \times 0.0003 \text{ lb PM}/\text{ton of hot mix asphalt loadout}) + (250 \text{ tons of raw aggregate conveying/hour} \times 0.0069 \text{ lb PM}/\text{ton of raw aggregate conveyed} \times 9 \text{ conveyor transfer points}) + (250 \text{ tons of raw aggregate, RAP, and sand/hour} \times 0.0069 \text{ lb PM}/\text{ton of raw aggregate, RAP, and sand} \times 4 \text{ conveyor transfer points}) = 22.5 \text{ pounds per hour of PM}$

2. Burner Tuning

a. Introduction

The permittee is required to conduct periodic tuning of the asphalt plant burner. The purpose of this tuning is to ensure that the burner is adjusted properly so that air pollution emissions remain in compliance with allowable emissions rates and are minimized.

b. Qualifications for Burner Tuning

Technicians who conduct the burner tuning must be qualified to perform the expected tasks. The permittee is required to provide training to the technicians who perform the burner tuning procedure. Technicians who are qualified shall, at a minimum, have passed manufacturer's training concerning burner tuning, or have been trained by someone who has completed the manufacturer's training concerning burner tuning.

c. Portable Monitor Requirements

The permittee shall properly operate and maintain portable device(s) to monitor the concentration of NO_x, O₂ 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 permittee shall maintain records of each portable monitoring device's calibration.

d. Burner Tuning Procedure

The first steps concerning burner tuning involve setting the pollutant baseline levels (concentrations) utilizing the portable monitor. These baselines shall be set during the initial U.S. EPA approved emissions testing that demonstrated the emissions unit was in compliance with all applicable emissions limitations as described in term E.1.a. The baselines shall be determined for NO_x, and CO. Sampling should measure the exhaust gas values exiting the dryer or the baghouse. The duration of each sample shall follow the portable monitor manufacture's recommendations. Record these values on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form (as found in Section F.2) in the "Recent Stack Test Basis Values" column.

Once the pollutant baseline levels are set, the burner shall be next tuned based on the frequency described in Section E.2.e. The general procedure for tuning the burner involves the following steps:

- i. Review the plant operations to ensure the plant is operating normally.

- ii. Confirm that the portable monitor is calibrated per the manufacture's specifications.
- iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for O₂, NO_x, and CO. These measurements shall be taken at the same location as the location where the baseline samples were taken. Record the values in the "Pre Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.
- iv. Compare the measured stack exhaust gas values with the pollutant baseline values. If all of the measured stack exhaust gas values are equal to or less than 115 per cent of the pollutant baseline values, then it is not necessary to tune the burner. Go on to Section v. below.

The permittee shall have the burners tuned within two calendar weeks of any measured stack exhaust values greater than 115 per cent of the baseline values. Make any necessary adjustments and repairs. Repeat Sections iii. and iv. until the measured stack exhaust gas values are equal to or less than 115 per cent of the pollutant baseline values.

- v. Once all of the measured stack exhaust gas values are within the 115 per cent of the pollutant baseline values, record the measured stack exhaust gas values in the "Post Tuning" results column on the *Burner Tuning Reporting Form for Asphalt Concrete Plants* form.
 - vi. By January 31 of each year, submit a copy of all *Burner Tuning Reporting Form for Asphalt Concrete Plants* forms produced during the past calendar year to the appropriate Ohio EPA District Office or local air agency responsible for the permitting of the facility.
- e. Burner Tuning Frequency

The permittee shall conduct the burner tuning procedure within 20 production days after commencement of the production season in the State of Ohio. The permittee shall conduct another burner tuning procedure within 10 production days before or after June 1st of each year and within 10 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 tuning is not required if the production season ends prior to the associated tuning due date. If the baseline level testing or the initial season tuning is done within 30 days prior to June 1 or September 1, the tuning associated with that due date is not required.

J and J Asphalt LLC

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Modification Issued: 4/12/2007

Facility ID: 165200006

Emissions Unit ID: P901

In addition to the burner tuning procedure required above, the permittee shall conduct the burner tuning procedure within 20 production days from the date the facility switches to a fuel that is different than the fuel burned during the initial emissions tests that establish the pollutant baseline levels or the fuel burned during the most recent burner tuning procedure, whichever is later.

F. Miscellaneous Requirements

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

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P901	250 tph asphalt batch plant	Subpart I

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- i. Construction date (no later than 30 days after such date);
- ii. Actual start-up date (within 15 days after such date); and
- iii. Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

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

and

Akron Regional Air Quality Management District
146 South High Street
Suite 904
Akron, OH 44308