



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL  
GEAUGA COUNTY  
Application No: 02-14304**

**CERTIFIED MAIL**

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

**DATE:** 4/3/2001

Schloss Paving Plant 3  
Raymond Schloss  
13700 McCracken Rd  
Garfield Heights, OH 44125

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

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

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

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

NEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 4/3/2001  
Effective Date: 4/3/2001**

**FINAL PERMIT TO INSTALL 02-14304**

Application Number: 02-14304  
APS Premise Number: 0228000001  
Permit Fee: **\$1000**  
Name of Facility: Schloss Paving Plant 3  
Person to Contact: Raymond Schloss  
Address: 13700 McCracken Rd  
Garfield Heights, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**14948 Mayfield Rd  
East Claridon, Ohio**

Description of proposed emissions unit(s):  
**Modification of asphalt batch plant to allow use of off-spec waste oil as a fuel.**

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 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 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>
PE	11.39
CO	76.5
NOx	18.4
SO2	33.63
OC	5.51

**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>
180 TPH Asphaltic plant fired with 'off-spec waste oil' as the primary fuel (batch mix hot mix asphalt plant). Modification of P901.	OAC rule 3745-31-05 (A)(3)	PE: 0.04 gr/dscf, 13.38 lbs/hr, 11.39 tpy CO: 90 lbs/hr, 76.5 tpy NOx: 21.6 lbs/hr, 18.4 tpy SO2: 39.6 lbs/hr, 33.63 tpy OC: 6.48 lbs/hr, 5.51 tpy  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-35-07(B).
	OAC rule 3745-35-07(B)	CO: 76.5 tons per rolling 12-month period SO2: 33.63 tons per rolling 12-month period
	OAC rule 3745-17-07(A)(1)	Less than or equal to 20 percent opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The permittee shall conduct an initial emissions stack test for particulate, NOx, OC, and CO. See Section E. of this permit.

2.b All recycled, 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	50 ppm, maximum
total halogens	4000 ppm maximum
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum

If the permittee is burning used oil with any quantifiable level (2 ppm) of PCB's, then the permittee is subject to the notification requirements of 40 CFR 279.62.

2.c Off-spec waste 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 3745-58-50. 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 Solid and Hazardous Waste Management that the used oil does not contain any hazardous waste.

**B. Operational Restrictions**

1. The pressure drop range across the baghouse shall be determined from the initial compliance stack emission test. Until the initial compliance stack emission test is conducted, however, the pressure drop across the baghouse shall be maintained according to the manufacturer's recommendation while the emissions unit is operating.
2. The maximum annual operating hours for this emissions unit shall not exceed 1,700 hours, based upon a rolling, 12-month summation of the operating hours.

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

<u>Months(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	142
1-2	283
1-3	425
1-4	567
1-5	709
1-6	851

1-7	993
1-8	1135
1-9	1276
1-10	1418
1-11	1560
1-12	1700

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

3. The permittee may substitute recycled asphalt pavement (RAP) aggregates in the raw material feed mix in amounts not to exceed 50% of all aggregate materials introduced based on a daily average of all aggregate material.
4. The permittee shall burn 'off-spec waste oil' with a maximum sulfur content of 0.7 % by weight.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
  - a. The operating hours 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 operating hours.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

2. The permittee shall record the annual 12-month summation of asphalt produced (in tons).
3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
4. The permittee shall maintain daily records of the percentage of RAP mixed with the raw material feed mix.
5. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analysis for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

6. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analysis for sulfur content and heat content.
7. The permittee shall receive a chemical analysis with each shipment of off-spec waste 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 used oil received,
  - c. the Btu value of the used oil,
  - d. the flash point of the used oil,
  - e. the arsenic content,
  - f. the cadmium content,
  - g. the chromium content,
  - h. the lead content,
  - i. the PCB content,
  - j. the total halogen content, and
  - k. the mercury content.

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 off-spec waste oil shipment received by this facility, of any off-spec waste oil stored at this facility, or of any off-spec waste oil sampled at the dryer.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the RAP percent limitation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the allowable sulfur content (percent).
5. These reports as denoted by terms D.1, - D.4. are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

6. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of off-spec waste oil which is received for burning in this emissions unit. The permittee's or oil supplier's analysis shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur dioxide emission rate (pounds/mmBtu) for the oil received during the calendar month; and,
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during the calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month. These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

7. The permittee shall notify the USEPA and the Ohio EPA if any of the off-spec waste oil exceeds the off-spec waste oil specifications. An identification number from USEPA shall be obtained prior to the combustion of any used oil.

Before the permittee accepts the first shipment of any off-specification used oil from a marketer, the permittee must provide the marketer a one-time, written and signed notice certifying that:

- a. the company has notified USEPA of its off-spec waste oil management activities and that the notice included the location and description of those activities; and
- b. the company will burn the off-spec waste oil only in an industrial furnace or boiler identified in 40 CFR Part 266.41(b) and OAC rule 3745-58-42.

A copy of each certification notice that the permittee sends to a marketer must be kept on file for a minimum of 5 years from the date it last received off-specification used oil from that marketer.

## **E. Testing Requirements**

1. Emission Limitation:

0.04 grain of particulate matter per dry standard cubic foot

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

2. Emission Limitation:

13.38 pounds of particulate matter per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

3. Emission Limitation:

11.38 tons of particulate matter per year

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

E = particulate matter emission rate in tons per year.

A = average emission rate in pounds PM per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

4. Emission Limitation:

21.6 pounds of NO<sub>x</sub> per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

5. Emission Limitation:

18.4 tons of NO<sub>x</sub> per year

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

E = NO<sub>x</sub> emission rate in tons per year.

A = average emission rate in pounds NO<sub>x</sub> per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

6. Emission Limitation:

90 pounds of CO per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

7. Emission Limitation:

76.5 tons of CO per rolling 12-month period

Compliance shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

E = CO emission rate in tons per year.

A = average emission rate in pounds CO per ton of asphalt produced from the most recent performance stack test.

B = annual 12-month summation of asphalt produced (tons).

8. Emission Limitation:

39.6 pounds of SO<sub>2</sub> per hour

Applicable Compliance Method:

Compliance shall be determined based on the record keeping required under section C.

9. Emission Limitation:

33.63 tons of SO<sub>2</sub> per rolling 12-month period

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

$$E = A * B * C [1 \text{ ton} / 2000 \text{ lbs}]$$

Where:

- E = sulfur dioxide emission rate in tons per year.
- A = average emission rate in pounds SO<sub>2</sub> per ton of asphalt produced based on the record keeping required under section C.
- B = annual 12-month summation of the plant operating hours
- C = asphalt production rate, 180 tons/hr

10. Emission Limitation:

6.48 pounds of OC per hour

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.13.

11. Emission Limitation:

5.51 tons of OC per year

Compliance shall be determined based upon the following formula:

$$E = A * B [1 \text{ ton} / 2,000 \text{ lbs}]$$

Where:

- E = OC emission rate in tons per year.
- A = average emission rate in pounds OC per ton of asphalt produced from the most recent performance stack test.
- B = annual 12-month summation of asphalt produced (tons).

12. Emission Limitation:

Less than or equal to 20 percent opacity, as a 6- minute average, except as provided in Part 60

Applicable Compliance Method:

USEPA Method 9

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

- a. The emission testing shall be conducted within 3 months after startup of this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates, NO<sub>x</sub>, CO, and OC.

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
- |                 |  |
|-----------------|--|
| Particulates    | -Method 5 of 40 CFR Part 60, Appendix A              |
| NO <sub>x</sub> | -Method 7, 7E of 40 CFR Part 60, Appendix A          |
| CO              | -Method 10 of 40 CFR Part 60, Appendix A             |
| OC              | -Method 18, 25, or 25A of 40 CFR Part 60, Appendix A |
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate 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.

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 appropriate 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 appropriate Ohio EPA District Office or local air agency.

## F. Miscellaneous Requirements

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-14304

Facility ID: 0228000001

FACILITY NAME Schloss Paving Plant 3

FACILITY DESCRIPTION Modification of 180 TPH asphaltic plant batch hot mix hot asphalt to allow the use of off-spec waste oil as fuel. CITY/TWP East Claridon

SIC CODE 2951 SCC CODE 3-05-002-01 EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION Asphaltic concrete plant to use off-spec waste oil

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	4.32 lbs/hr	3.67	0.04 gr/dscf, 13.39 lbs/hr	11.38
PM <sub>10</sub>					
Sulfur Dioxide	attainment	39.6 lbs/hr	33.63	39.6 lbs/hr	33.63
Organic Compounds	attainment	6.48 lbs/hr	5.51	6.48 lbs/hr	5.51
Nitrogen Oxides	attainment	21.6 lbs/hr	18.4	21.6 lbs/hr	18.4
Carbon Monoxide	attainment	90 lbs/hr	76.5	90 lbs/hr	76.5
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination**

BAT: 0.04 grains of particulate matter per dry standard cubic foot  
Basis: State regulations; Ap-42; similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-14304

Facility ID: 0228000001

FACILITY NAME Schloss Paving Plant 3

FACILITY DESCRIPTION Modification of 180 TPH asphaltic plant batch hot mix hot asphalt to allow the use of off-spec waste oil as fuel. CITY/TWP East Claridon

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

<u>Please fill out the following. If the checkbox does not work, replace it with an 'X'</u>	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0214304c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **ENTER PTI NUMBER HERE**

**A. Source Description**

This source, Schloss Material Co., is proposing to use an 'off-spec waste oil' as the plant's primary fuel for the 180 TPH asphaltic plant at 14948 Mayfield Road in East Claridon. The burner for the asphaltic plant has a maximum rated capacity of 1.0 MMBTU per hour.

**B. Facility Emissions and Attainment Status**

The asphaltic concrete plant is located in Geauga County. Geauga County is attainment for particulate, sulfur dioxide, carbon monoxide, ozone, lead, and oxides of nitrogen. The maximum potential to emit, at 8760 hours per year, for this emissions unit (P901) are 394 and 173 tons per year for carbon monoxide sulfur dioxide respectively. This would make the facility a 'major source' requiring a Title V Permit. The potential emissions of all other pollutants do not reach the 100 TPY level.

**C. Source Emissions**

C:\temp\permits3\4519.wpd

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-14304

Facility ID: 0228000001

FACILITY NAME Schloss Paving Plant 3

FACILITY DESCRIPTION	Modification of 180 TPH asphaltic plant batch hot mix hot asphalt to allow the use of off-spec waste oil as fuel.	CITY/TWP	East Claridon
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Schloss Material Co. will limit the plant's operating hours to 2,000 hours per any rolling 12-month period. With the proposed hours restriction, the total annual CO and SO<sub>2</sub> emissions will be limited to 76.5 and 33.63 tons per year. The PTI require recordkeeping to ensure compliance with the operational hours restriction.

**D. Conclusion**

The emission limits contained in the synthetic minor is adequate to provide federally enforceable limitations for ensuring that the applicable Title V thresholds will not be exceeded and not subject to PSD review requirements.

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	11.39
CO	76.5
NO <sub>x</sub>	18.4
SO <sub>2</sub>	33.63
OC	5.51