

INTRODUCTION:

Gerken Materials, Inc. is proposing to install a 330 TPH portable drum mix asphalt plant with a baghouse. The company is required to meet (BAT) NSPS CFR 60, Subpart I. The company's potential to emit is over 100 tons per year for SO₂, CO, and NO_x. Because of this, the company requests to have a production restriction to restrict their potential to emit to under 100 tons per year for these pollutants.

I. EMISSION LIMITATIONS:

No additional emissions limitations and/or control requirements. (See Air Summary for applicable emissions limitations and/or control requirements.)

II. OPERATIONAL RESTRICTIONS:

P001

1. The maximum annual production rate for this emissions unit shall not exceed 495,000 tons.

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 production rates/tons</u>
1	125,000
1-2	250,000
1-3	375,000
1-4	495,000
1-5	495,000
1-6	495,000
1-7	495,000
1-8	495,000
1-9	495,000
1-10	495,000
1-11	495,000
1-12	495,000

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 production.

2. The permittee may substitute recycled asphalt aggregates in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials introduced at any given time.
3. The permittee shall only employ materials/fuels listed in the permit to install application. Any changes in the materials employed/combusted may be deemed a "modification" to the emissions unit and, as such will require prior notification to and approval from the Ohio EPA, Division of Air Pollution Control, Northwest District Office.
4. The permittee shall maintain a pressure drop range of no less than 3 inches of water across the baghouse and no greater than 6 inches of water across the baghouse while the baghouse is in operation.

F001

1. The permittee shall apply dust suppressants to the paved roadways and parking areas for the purpose of ensuring compliance with applicable requirements of this permit. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by (flushing with water, sweeping, and/or watering) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
2. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
3. The permittee shall apply dust suppressants to the unpaved roadways and parking areas for the purpose of ensuring compliance with applicable requirements of this permit. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with (water and/or any other suitable dust suppression chemicals) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
4. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust

suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

5. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
6. Any material carried off of the permittee's property and deposited onto public streets by vehicular traffic or by erosion by water, etc., shall be promptly removed and disposed of properly to minimize or prevent resuspension.

F002

1. Fugitive emissions resulting from wind disturbance of storage piles and areas around piles shall be minimized or eliminated by one or more of the following methods:
 - a. Maintaining a sufficient moisture level in the stone;
 - b. Use of a suitable dust suppressant;
 - c. Use of wind block/screens.

Frequencies for employing these control measures shall be on a daily "as needed" basis, i.e., whenever visible emissions of fugitive dust are observed.

III. MONITORING/RECORD KEEPING REQUIREMENTS:

P001

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

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

2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit P001 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."The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the fabric filter.
3. Records showing the breakdown of the amount of each raw material used in each product mix.
4. Daily records showing the type and amount of each fuel combusted.
5. Fuel analysis from the supplier of each type of fuel at the site.
6. Records showing what types of asphalt being stored on site, the supplier of the asphalt, and an analysis of each asphalt from the supplier.

F001

7. The permittee shall maintain records which include the following information for the unpaved roadways and parking areas:
 - a. The date dust suppressants were applied to the unpaved surfaces.
 - b. The portions of unpaved surfaces that were treated with dust suppressants.
 - c. The application rate of water and any chemical additives (gallons of each per square yard).
 - d. The name of the equipment operator responsible for the application of the dust suppressants.

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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

IV. REPORTING REQUIREMENTS:

1. Quarterly written reports of any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by testing, monitoring and record keeping requirements specified in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken, shall be promptly made to the Ohio EPA, Northwest District Office, Division of Air Pollution Control. these quarterly reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) and pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06.
2. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.
3. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, October 31 of each year and shall cover the previous calendar quarters.
4. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

V. Testing requirements

P001

Compliance Methods Requirements:

1. Compliance with the emissions limitation(s) listed on Air Emission Summary page shall be determined in accordance with

the following method(s):

- 1.a Emission Limitation-
0.04 gr/dscf particulates

Applicable Compliance Method-
Compliance shall be based upon stack testing per OAC rule 3745-17-03 (B)(10).

- 1.b Emissions Limitations-
8.54 TPY particulates

Applicable Compliance Method-
Compliance shall be based upon record keeping specified in the Record Keeping Requirements section, and multiplying each 12-month production summation by the company provided emission factor of (0.034 lbs/ton), and dividing by 2000 lbs/ton.

- 1.c Emissions Limitation-
39.0 lbs/hr SO₂

Applicable Compliance Method-
compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(E).

- 1.d Emissions Limitation-
29.2 tons/yr SO₂

Applicable Compliance Method-
Compliance shall be based upon record keeping specified in in the Record keeping Requirements, multiplying each 12-month production summation by the company provided emission factor of (0.12 lbs/ton) and dividing by 2000 lbs/ton.

- 1.e Emissions Limitation-
31.7 lbs/hr NO_x

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum hourly production rate of (330 lbs/hr) by the company supplied emission factor of (0.095 lbs/ton.) If required, compliance shall be based on conducting a stack test with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.

- 1.f Emissions Limitation-
23.8 tons/yr NO_x

Applicable Compliance Method-

Compliance shall be based on the record keeping specified in the Record Keeping Requirements section, multiplying each 12-month production summation by the company supplied emission factor of (0.095 lbs/ton), and dividing by 2000 lbs /ton.

- 1.g Emissions Limitation-
33.4 lbs/hr Organic Compounds

Applicable Compliance Method-
Compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 25 or 25A (as appropriate), of 40 CFR Part 60, Appendix A.

- 1.h Emissions Limitation-
25.0 tons/yr Organic Compounds

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in the Record Keeping Section, multiplying each 12-month production summation by the company supplied emission factor of (0.10 lbs/ton), and dividing by 2000 lbs/ton.

- 1.i Emissions Limitation-
100.2 lbs/hr CO

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum hourly production rate of (330 tons/hr) by the company supplied emission factor for CO (0.30 lbs/ton). If required, compliance shall be based upon stack testing employing USEPA Reference Method 10 of 40 CFR Part 60, Appendix A.

- 1.j Emissions Limitation-
75.1 tons/yr CO

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in the Record Keeping section, multiplying each 12-month production summation by the company supplied emission factor of (0.30 lbs/ton), and dividing by 2000 lbs/ton.

- 1.k Emissions Limitation-
20 percent opacity as a 3-minute average

Applicable Compliance Method-
OAC rule 3745-17-03(B)(3)

Compliance Methods Requirements:

1. Emissions Limitation-

No visible emissions except for a period of time not to exceed one minute during any 60-minute observation period.
(paved roadways)

No visible emissions except for a period of time not to exceed three minutes during any 60-minute observation period.
(unpaved roadways)

Applicable Compliance Method-
OAC 3745-17-03(B)(4)

F002

Compliance Methods Requirements:

1. Emissions Limitation-

No visible particulate emissions except for a period of time not to exceed three minutes during any 60-minute observation period.

Applicable Compliance Method-
OAC 3745-17-03(B)(4)

T001

Compliance Methods Requirements:

1. Emissions Methods Requirements-
0.001 tons VOC/year

Applicable Compliance Method-
AP-42 Table 4.3 emission factor for Working Loss and Breathing Loss.

T002

Compliance Methods Requirements:

1. Emissions Methods Requirements-
0.022 tons VOC/year

Applicable Compliance Method-
AP-42 Table 4.3 emission factor for Working Loss and Breathing Loss.

PERFORMANCE TESTING REQUIREMENTS:

P001

1. After installation and within 180 days after achieving the emission units maximum production rate, 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 particulates. The particulates test(s) shall be conducted in accordance with the test methods and procedures specified in "USEPA Reference Method 5, of 40 CFR Part 60, Appendix A" while the emissions unit is operating at or near maximum capacity. The company shall demonstrate in the "Intent to Test" what is "Worst Case" for particulate emissions. (e.g. "Virgin aggregate"/slag.) This "Worst Case" scenario shall be pre-approved by the Ohio EPA, Division of Air Pollution Control, Northwest District Office.

After installation and within 180 days after achieving the emissions units maximum production rate, the permittee shall conduct, or have conducted, an emissions 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 "USEPA Reference Method 6, of 40 CFR Part 60, Appendix A" while the emissions unit is operating at or near maximum capacity.

After installation and within 180 days after achieving the emissions units maximum production rate, the permittee shall conduct, or have conducted, an emissions test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for organic compounds. The organic compound test(s) shall be conducted in accordance the test methods and procedures specified in "USEPA Reference Method 25 or 25A (as appropriate), of 40 CFR Part 60, Appendix A" while the emissions unit is operating at or near maximum capacity. The company shall demonstrate in the "Intent to Test" what is "Worst Case" for VOC emissions. (e.g. maximum allowed RAP/Slag content, highest organic content fuel and asphalt.) This "Worst Case" scenario shall be pre-approved by the Ohio EPA, Division of Air Pollution Control Northwest District Office.

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 emission 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 field office's refusal to accept the results of the emissions test(s).

VI. Miscellaneous Requirements:

1. The terms and conditions in numbers 1, 2, 3, 4, and 5 of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
3. 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 emissions unit, in accordance with OAC rule 3745-31-03 (A) (1) (p).