



09/21/2026

Anthony Ruggiero, III
Mar-Zane Plant #22
P.O. Box 1585
Zanesville, OH 43702-1585

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

Facility ID: 0660015016
Permit Number: P0139707
Permit Type: Renewal
County: Belmont

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (P110) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search / Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Southeast District Office
2195 Front St.
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices / Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-SEDO; Pennsylvania; West Virginia

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [*Weekly Review and Public Notices / Ohio Environmental Protection Agency*](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [*HClerk@epa.ohio.gov*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Renewal

Mar-Zane Plant #22
38824 National Road West
Bethesda, OH 43719

ID#: P0139707

Date of Action: 09/21/2026

Permit Desc: Renewal of federally enforceable permit to install and operate permit for portable asphalt facility. Synthetic minor restriction has been changed from annual hourly limitation to a tons of asphalt per rolling, 12-month limitation.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit # P0139707 in the "Search Projects" search box.



Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

Mar-Zane Plant #22 is a portable drum mix counter-flow asphalt plant with a design capacity of 400 tons per hour, controlled with a baghouse. This is a permit renewal for emission unit P901.

3. Facility Emissions and Attainment Status:

Mar-Zane Plant #22 is a portable plant currently located in Belmont County, Ohio which is currently in attainment for all criteria pollutants but is an appendix A area. This facility has requested a synthetic minor permit because the maximum potential to emit, at 8,760 hours per year, for this emissions unit would make this facility a major source and subject to Title V permitting and PSD requirements. Federally enforceable restrictions will lower the potential emissions to less than 100 TPY for all criteria pollutants. These restrictions will keep the company from the requirements of PSD review and Title V permitting.

4. Source Emissions:

Mar-Zane Plant #22 has requested that the synthetic minor language be updated giving the facility a throughput production limit of 640,000 tons per rolling, 12-month period instead of the 1,600 hours/year per rolling, 12-month period operating time restriction as in the prior permit P0123028. The facility is also requesting a lb/ton short term limit instead of a lb/hour limit as was in the prior permit for all emissions.

5. Conclusion:

The operational restrictions, emission limits, emissions testing, record keeping, and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit from P901.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	14.81
CO	62.79
VOC	37.14
NOx	24.32
SO2	27.49



**Environmental
Protection
Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Mar-Zane Plant #22**

Facility ID:	0660015016
Permit Number:	P0139707
Permit Type:	Renewal
Issued:	09/21/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mar-Zane Plant #22

Table of Contents

Authorization	6
List of Commonly Used Abbreviations.....	8
A. Standard Terms and Conditions	9
B. Facility-Wide Terms and Conditions	14
C. Emissions Unit Terms and Conditions	16
1. P901, Asphalt Plant.....	17

Authorization

Facility ID: 0660015016
Application Number(s): A0080524A0080524
Permit Number: P0139707
Permit Description: Renewal of federally enforceable permit to install and operate permit for portable asphalt facility. Synthetic minor restriction has been changed from annual hourly limitation to a tons of asphalt per rolling, 12-month limitation.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 09/21/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation
Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Mar-Zane Plant #22
38824 National Road West
Bethesda, OH 43719

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

Ohio EPA DAPC, Southeast District Office
2195 Front St.
Logan, OH 43138
(740)385-8501

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

Authorization (continued)

Permit Number: P0139707

Permit Description: Renewal of federally enforceable permit to install and operate permit for portable asphalt facility. Synthetic minor restriction has been changed from annual hourly limitation to a tons of asphalt per rolling, 12-month limitation.

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

Emissions Unit ID:	P901
Company Equipment ID:	Asphalt Plant
Superseded Permit Number:	P0123028
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) None.

2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and I: P901. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District Office or Local air agency.

C. Emissions Unit Terms and Conditions

1. P901, Asphalt Plant
Operations, Property and/or Equipment Description:

Portable 400 TPH drum mix counterflow hot mix asphalt plant primarily burning used oil, can also burn #2, #4, #6 and natural gas; Controlled by a baghouse.

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)j. and d)(9)

- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)a., c)(1), d)(2), e)(3), and f)(1)a.-e.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Install a baghouse designed to meet 0.03 gr per dscf for filterable particulate emissions (PE). The Best Available Technology (BAT) for sulfur dioxide (SO ₂), carbon monoxide (CO), nitrogen oxides (NO _x), volatile organic compound (VOC), and particulate emissions (PE) are all equivalent to the tons per rolling 12-month synthetic minor limits established in b(2)a.
b.	OAC rule 3745-31-05(D) Restrictions to avoid Prevention of Significant Deterioration (PSD), non-attainment new source review (NNSR) and/or Title V permitting requirements.	See b)(2)a. and c)(1) below.
c.	40 CFR Part 60, Subpart I 40 CFR 60.90-93 [In accordance with 40 CFR 60.90(a) and (b), this emissions unit is a hot mix asphalt facility that commenced construction or modification after June 11, 1973.]	No owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from any affected facility any gases which contain PE in excess of 0.04 gr/dscf or exhibit 20 percent opacity, or greater, except as provided by 40 CFR Part 60.11. See b)(2)b. below.



d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation specified in OAC rule 3754-31-05(D) above.
e.	OAC rule 3745-17-07(A)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60, Subpart I.
f.	OAC rule 3745-17-07(B) (if located in an area listed in Appendix A of OAC rule 3745-17-08)	Visible PE from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average, except as provided by rule.
g.	OAC rule 3745-17-08(B) (if located in an area listed in Appendix A of OAC rule 3745-17-08)	See b)(2)c. below.
h.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the than the maximum lb/hr SO ₂ emissions as a result of the fuel sulfur content restrictions and plant capacity contained within this permit.
i.	OAC rule 3745-110-02	The requirements of this rule do not apply because NO _x emissions are limited to less than 25 tons per year in accordance with OAC rule 3745-31-05(D).
j.	OAC rule 3745-114 ORC 3704.03(F)	See d)(9) below.

(2) Additional Terms and Conditions

a. Synthetic Minor Restrictions

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

- i. 14.81 tons of PE/rolling 12-month period (stack and fugitive emissions) and 0.033 lbs. of PE/ton (stack emission);
- ii. 62.79 tons of CO/rolling 12-month period (stack and fugitive emissions) and 0.1937 lbs. of CO/ton (stack emission);
- iii. 37.14 tons of VOC/rolling 12-month period (stack and fugitive emissions) and 0.1 lbs. of VOC/ton (stack emission);
- iv. 24.3 tons of NO_x/rolling 12-month period (stack emissions) and 0.076* lbs of NO_x/ton (stack emission);
- v. The amount of hours of operation and the SO₂ emissions are restricted by the following equation:

$$((0.011 \text{ lb/ton}) * (a) + (0.066 \text{ lb/ton}) * (b) + (0.11 \text{ lb/ton}) * (c) + (0.17 \text{ lb/ton}) * (d) \leq 27.49 \text{ tons per rolling, 12-month period}$$

Where:

a = tons asphalt produced using natural gas per rolling 12-month period;



b = tons asphalt produced using number 2 fuel oil and/or used oil per rolling, 12-month period;

c = tons asphalt produced using number 4 fuel oil per rolling, 12-month summation;

d = tons asphalt produced using number 6 fuel oil per rolling, 12-month summation; and

* = lb(s). per ton emission rates may be revised based upon Ohio EPA validated emissions testing and shall be revised if emissions testing results demonstrate higher emissions.

b. NSPS Applicability

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

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

c. "Appendix A" Area Fugitive Dust Control Measures

- i. The drop height of the front-end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible particulate emissions of fugitive dust from the aggregate storage bins;
- ii. The aggregate loaded into the cold aggregate bins shall have moisture content sufficient to minimize or eliminate the visible particulate emissions of fugitive dust from conveyors and all transfer points to the dryer;
- iii. Install and use of hoods, fans, and other equipment to adequately enclose contain capture, vent and control fugitive dust. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.

c) Operational Restrictions

(1) Synthetic Minor Restriction

The permittee has requested a federally enforceable limitation on the amount of asphalt produced in order to restrict the federal enforceable potential to emit of this emissions unit below Title V thresholds. The maximum annual asphalt throughput rate, for all fuels combined, shall not exceed 640,000 tons, based upon a rolling, 12-month summation of the production rates. This emissions unit has been in operation for more than 12-months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

(2) Fuel Use Restrictions

- a. The permittee shall burn only natural gas, No. 2, No. 4, No. 6 fuel oils (ULSD) and on-spec used oil in this emissions unit.

When a scheduled/planned fuel switch occurs, the permittee shall perform burner tuning in accordance with g)(2).



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

(3) Fuel Sulfur Content Restrictions

- a. No. 2 fuel oil burned in this emissions unit shall meet U.S. EPA's specifications for Ultra Low Sulfur Diesel (ULSD) found in 40 CFR 80.510(c).
- b. The sulfur content of No. 2 fuel oil and on-spec used oil burned in this emissions unit shall not exceed 0.5 percent by weight.
- c. The sulfur content of No. 4 fuel oil burned in this emissions unit shall not exceed 0.8 percent by weight.
- d. The sulfur content of No. 6 fuel oil burned in this emissions unit shall not exceed 1.0 percent by weight.

(4) Used Oil Specifications

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

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

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

Contaminant/Property	Allowable Specifications
Heat Content	135,000 Btu/gallon, minimum



PCBs	Less than 2 ppm
Mercury	1 ppm, maximum

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

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

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

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

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

(5) Raw Material Restrictions

- a. The permittee may substitute reclaimed asphalt pavement (RAP) and/or non-asbestos asphalt shingles in amounts not to exceed 60 percent of all aggregate materials in the raw material feed mix. The permittee may not substitute other raw materials not specifically identified in this FEPTIO without prior approval from Ohio EPA.

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



- b. Asphalt shingles removed from buildings (tear-off material) may be used but only if it has been determined that they do not contain asbestos. No asbestos containing asphalt shingles may be used as part of the feed mix.
- c. The permittee shall only use virgin aggregate, asphalt shingles, and RAP in the raw material feed mix. For the purposes of this permit, virgin aggregate shall be unadulterated mined material.
- d. The permittee may not substitute raw materials for the aggregate such as rubber, shredded tires etc. without prior written approval from Ohio EPA. Issuance of this permit does not constitute prior approval. If the permittee wishes to use other materials, then they must contact Ohio EPA.

(6) Baghouse Operation

The exhaust from this emissions unit shall be vented to and controlled by the baghouse at all times when the emissions unit is in operation.

(7) Burner Tuning/Operation

The permittee shall conduct burner tuning or have burner tuning conducted in accordance with the Burner Evaluation/Tuning provisions established below.

d) Monitoring and/or Recordkeeping Requirements

(1) Used Oil Analysis Records

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

- a. the date the used oil was received at the facility and the amount received;
- b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/refiner, supplier, and/or marketer;
- c. the results of the following chemical analyses, demonstrating that the used oil meets the standards in OAC rule 3745-279-11:
 - i. arsenic content, in ppm;
 - ii. the cadmium content, in ppm;
 - iii. the chromium content, in ppm;
 - iv. the lead content, in ppm;
 - v. total halogens, in ppm; and
 - vi. the flash point;
- d. where the chemical analysis shows a total halogen content between 1,000 ppm, and below 4,000 ppm, the successful demonstration for the rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste, as described in OAC rule 3745-279-63(C); and
- e. the results of the analyses demonstrating that the used oil meets the heating value and the mercury and PCB limitations contained in this permit.

Each analysis shall be kept in a readily accessible location for a period of not less than 5 years* following the receipt of each shipment of used oil and shall be made available to the Ohio EPA



Division of Materials and Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or Local air agency) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses through an independent laboratory.

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

(2) Monthly Record Keeping

The permittee shall maintain monthly records of the following information:

- a. the total asphalt production, in tons;
- b. the total asphalt produced, in tons, for each fuel type;
- c. the maximum amount, in percent, of RAP and/or shingles used in any mix;
- d. the rolling, 12-month summation of the total asphalt production by fuel types;
- e. the rolling 12-month summation of NO_x and SO₂* emissions from the stack by fuel type; and
- f. the total rolling, 12-month summation of CO (stack and fugitive), VOC (stack and fugitive), and PE (stack and fugitive) emissions.

*The rolling, 12-month summation of SO₂ shall be calculated by using the equation found in b)(2)a.v. above.

(3) Fuel Monitoring and Record Keeping

- a. For each day during which the permittee burns a fuel other than natural gas, No. 2, No. 4 and No.6 diesel fuels and or on-spec used oil, the permittee shall maintain a record of the type, percent sulfur content and the quantity of fuel burned in this emissions unit.
- b. The permittee shall maintain documents provided by the oil supplier for each shipment of No. 2 fuel oil to demonstrate compliance with the ULSD requirement. These documents must include the receipt or bill of lading that includes confirmation that the fuel meets the No. 2 fuel oil ULSD standard.
- c. For each shipment of on-spec used oil received for this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's oil supplier's analyses for sulfur content and heat content.
- d. For each shipment of number 4 fuel oil and number 6 fuel 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 analyses for sulfur content and heat content.

(4) Use of Unapproved Raw Materials

For each day during which the permittee uses any raw material that is not specifically identified in the PTIO application submitted for this permit without prior approval from Ohio EPA, the permittee shall maintain a record of the type and quantity of raw material employed in this emissions unit.

(5) Shingles Recordkeeping

Verification that the shingles do not contain asbestos can either be done by actual testing of a representative sample of the shingles, or by verification from the shingle manufacturer that



the shingles do not contain asbestos. Records shall be kept documenting the asbestos verification of any shingles used in the feed mix. These records shall be maintained in accordance with the Standard Terms and Conditions.

(6) Burner Tuning Reporting Form Record

While performing each burner tuning, the permittee shall record the results of the burner tuning using the Burner Tuning Reporting Form for Asphalt Concrete Plants found in the Miscellaneous Requirements terms below. An alternative form may be used upon approval of the appropriate Ohio EPA District Office or Local air agency.

(7) "Appendix A", Daily Fugitive Visible Emissions Checks

If the emissions unit is located in an area listed in Appendix A of OAC rule 3745-17-08.

The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust, including but not limited to the following, as equipped:

- a. aggregate elevators/conveyors and transfer points;
- b. aggregate vibrating screens;
- c. cold aggregate bins;
- d. RAP in-line crushing;
- e. RAP elevators/conveyors and transfer points;
- f. RAP vibrating screens;
- g. the openings of any aggregate drum or hot-mix asphalt drum;
- h. hot-mix asphalt elevators/conveyors and transfer points;
- i. hot-mix asphalt truck loading.

The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- j. the location and color of the emissions;
- k. whether the emissions are representative of normal operations;
- l. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- m. the total duration of any visible emissions event; and
- n. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions event has occurred. The observer does not have to document the exact start and end times for the visible emissions event under item (o) above or continue the daily check until the event has ended. The observer may indicate that the visible emissions event was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.



(8) Maintaining the Baghouse

a. Baghouse Maintenance Plan

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

- i. The frequency of inspection of the baghouse for maintenance purposes;
- ii. A description of the baghouse components to be inspected at each inspection. It is acceptable to have different inspection frequencies for different baghouse components;
- iii. A description of any procedures to be used to verify the proper operation of any of the baghouse components to be inspected at each inspection;
- iv. The identification of the record keeping form/record that will be used to track the maintenance inspection. This form/record should include, at a minimum, the following elements:
 - (a) Date of the maintenance inspection
 - (b) Name of the employee who can verify that the inspection was completed;
 - (c) Result of the inspection (component repaired, in need of repair, replaced, adjusted, no adjustment needed, etc.);
 - (d) Date component repaired, replaced or adjusted;
 - (e) Name of the employee who can verify that the component was repaired, replaced or adjusted;
- v. A description of how and where the records shall be maintained.

The permittee shall begin using the Baghouse Maintenance Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Baghouse Maintenance Plan. The permittee shall submit a copy of proposed revisions to the Baghouse Maintenance Plan to the appropriate District Office or Local air agency (DO/LAA) for review and approval. The permittee can begin using the revised Baghouse Maintenance Plan once the appropriate DO/LAA has approved its use.

b. Baghouse Maintenance Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the baghouse components at frequencies described in the Baghouse Maintenance Plan. The purpose of the inspections is to determine the need for maintenance on components of the baghouse. Inspections may be delayed in the case of unsafe working conditions due to weather etc. Any required inspection that is not performed due to unsafe working conditions shall be performed as soon as practical after the working conditions are considered safe.

c. Baghouse Maintenance Plan Record Keeping

The permittee shall maintain records of the following information:



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

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of A.3 of this permit.

(9) Air Toxics Modeling

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

(10) NSPS Monitoring/Record Keeping Requirements

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

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

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

e) Reporting Requirements

(1) Submitting Reports

All applications, notifications or reports required in writing are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications or reports to Ohio EPA fulfills the requirement to submit information to the director, the DO/LAA, and/or any other individual or organization



identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered submitted on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) Baghouse Maintenance Plan Submission

Within 30 days from the final issuance of the initial permit requiring a Baghouse Maintenance Plan, the permittee shall submit their proposed Baghouse Maintenance Plan to the appropriate Ohio EPA, District Office/Local Air Agency. Permittees do not need to resubmit the Baghouse Maintenance Plan upon the issuance of a renewal permit.

(3) Quarterly Deviation (Excursion) Reports

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

- a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. All exceedances of the rolling, 12-month asphalt production limitation;
 - ii. All exceedances of the tons per rolling, 12-month period of CO, NO_x, SO₂, VOC and PE emission limitations;
 - iii. All exceedances of the lb/ton CO, NO_x, SO₂, VOC and PE emission limitations;
 - iv. All exceedances of the sulfur content limitations in c)(3)a.-d.;
 - v. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to and controlled by the baghouse; and
 - vi. all periods of time when the emissions unit burned a fuel other than natural gas, No. 2, No. 4 and No.6 diesel fuels and or on-spec used oil.
- b. The probable cause of each deviation (excursion);
- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. The magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or Local air agency).

(4) Annual Permit Evaluation Report (PER)

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



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

- a. For the quality of used oil burned in this emissions unit:
 - i. any exceedance of the used oil standards in OAC rule 3745-279-11;
 - ii. any occasion where used oil containing 1,000 ppm or more total halogens was burned prior to receiving information demonstrating a successful rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste;
 - iii. any exceedance of the limitations for mercury and/or PCBs;
 - iv. any deviation from the minimum heat content of 135,000 Btu/gallon;
- b. If the emissions unit is located in an area listed in Appendix A of OAC rule 3745-17-08, all days during which any visible emissions of fugitive PE were observed from fugitive egress points of this emissions unit;
- c. If the emissions unit is located in an area listed in Appendix A of OAC rule 3745-17-08, any corrective actions taken to minimize or eliminate the visible emissions of fugitive PE;
- d. All exceedances of the RAP/shingles raw material mix limitation;
- e. All Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants forms produced during the past calendar year;
- f. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to and controlled by the baghouse;
- g. A description of any failure to implement the Baghouse Maintenance Plan;
- h. Any changes made to a parameter or value entered in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted one-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s) or the exhaust stack(s) have been made, a statement to this effect; and
- i. Where the analytical results for any shipment of used oil burned in this emissions unit establish that the used oil contains total halogens greater than 1,000 ppm, but less than 4,000 ppm, the results of the analysis for total halogens (from the appropriate test Method 9075, 9076, or 9077) and the information obtained to rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste shall be submitted to the appropriate district office or local air agency. Each rebuttal demonstration shall include:
 - i. the date the used oil was received;
 - ii. the facility location or identification number where the oil was or will be burned;
 - iii. the amount of oil in the shipment; and
 - iv. all information, including all the analytical results, relied upon by the permittee to rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste.



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

(5) NSPS Reporting Requirements

The permittee shall comply with all applicable reporting requirements under 40 CFR Part 60, Subpart A and I, including the following sections:

60.7(a)(1)	Construction date (no later than 30 days after such date) Actual construction date as submitted by Mar Zane: 4/17/2015
60.7(a)(3)	Actual start-up date (within 15 days after such date) Actual start-up date as submitted by Mar Zane: 5/8/2015
60.7(a)(4)	Increase in emissions rate (no later than 60 days before change is commenced) Last increase in emissions rate as submitted by Mar Zane: 2/23/2009 and the upcoming 2026 increase.
60.7(a)(6)	Date of performance testing (no later than 30 days prior to testing) Last date of performance testing as submitted by Mar Zane: 8/4/2015.

f) Testing Requirements

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

a. Emissions Limitation

PE from the stack shall not exceed 0.03 gr./dscf.

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

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

PE from this emissions unit (stack and fugitive emissions) shall not exceed 14.81 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance with the 0.03 gr./dscf emissions limitation was demonstrated through emissions testing performed on August 4, 2015.

Ongoing compliance with the 0.04 gr./dscf and the 0.033 lb/ton limitations shall be demonstrated through emission testing performed in accordance with f)(3) below.

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

- i. For stack emissions, multiply 0.033 lb of PE per ton asphalt produced (AP-42 Table 11.1-3 dated 3/2004), or if available, the observed stack emission rate from the most recent emission test, in pounds of PE per ton of asphalt produced, by the actual asphalt production in tons per rolling 12-month



period, as derived from the records required by d)(2) above and divide by 2,000.

- ii. For raw material loaded in the weigh hopper, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate used per ton asphalt produced, and by the emission factor of 0.0048 pounds of PE per ton of raw material (AP-42, Table 11.12-2 dated 06/2006), and divide by 2,000 pounds per ton.
- iii. For aggregate handling, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by 0.95 ton aggregate used per ton asphalt produced, by the emission factor of 0.0069 lb of PE per ton of aggregate (AP-42, Table 11.12-2 dated 06/2006), and divide by 2,000 pounds per ton.
- iv. For sand processing, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by 0.5 ton sand used per ton asphalt produced, by the emission factor of 0.0021 lb of PE per ton of sand (AP-42, Table 11.12-2 dated 06/2006), and divide by 2,000 pounds per ton.
- v. For silo filling, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.000586 lb of PE per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.
- vi. For asphalt loadout, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above multiplied by the emission factor of 0.000522 lb of PE per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.

b. Emissions Limitation

CO emissions (stack) shall not exceed 0.1937 lb/ton.

CO emissions from this emissions unit (stack and fugitive emissions) shall not exceed 62.79 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance with the 0.1937 lb/ton CO emissions limitation was demonstrated through emission testing performed on August 4, 2015.

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

- i. For stack emissions, multiply 0.1937 lb of CO per ton asphalt produced, or if available, the observed stack emission rate from the most recent emission test, in pounds of CO per ton of asphalt produced, by the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above and then divided by 2,000 pounds per ton.
- ii. For silo filling, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the



emission factor of 0.00118 lb of CO per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.

- iii. For asphalt loadout, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.00135 lb of CO per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5 and temperature of 325), and divide by 2,000 pounds per ton.

If required, compliance with hourly CO emission limitation shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

c. Emissions Limitation

VOC emissions (stack) shall not exceed 0.1 lb/ton.

VOC emissions from this emissions unit (stack and fugitive emissions) shall not exceed 37.14 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the 0.1 lb/ton VOC emissions limitation was demonstrated through emissions testing performed on August 4, 2015.

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

- i. For stack emissions, multiply 0.1 lb of VOC per ton asphalt produced, or if available, the observed stack emission rate from the most recent emission test, in pounds of VOC per ton of asphalt produced, by the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above and then dividing by 2,000 pounds per ton.
- ii. For silo filling, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.0122 lb of VOC per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5, temperature of 325, and 100% VOC [Table 11.1-16]), and divide by 2,000 pounds per ton.
- iii. For asphalt loadout, multiply the actual asphalt production in tons per rolling 12-month period, as derived from the records required by d)(2) above by the emission factor of 0.00386 lb of VOC per ton of asphalt produced (AP-42, Table 11.1-14 dated 03/2004, using default asphalt volatility of 0.5, temperature of 325, and 92.7% VOC [7.3% non VOC, Table 11.1-16]), and divide by 2,000 pounds per ton.

If required, compliance with the VOC emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25.

d. Emissions Limitation

NO_x emissions (stack) shall not exceed 0.076 lb/ton.

NO_x emissions from this emissions unit (stack emissions) shall not exceed 24.32 tons per rolling, 12-month period.

Applicable Compliance Method:



Compliance with the 0.076 lb/ton NO_x emissions limitation (while burning natural gas) was demonstrated through emission testing performed on August 4, 2015.

Compliance with the tons per rolling, 12-month limit shall be determined by multiplying 0.076 lb of NO_x per ton asphalt produced (AP-42 11.1-7, dated 03/2004), or if available, the observed stack emission rate from the most recent emission test, in pounds of NO_x per ton of asphalt produced for each fuel, by the actual rolling 12-month summation of asphalt produced for each fuel, in tons per rolling 12-month period (as derived from the records required by d)(2) above), summing the results for all fuels, and dividing by 2,000 pounds per ton.

If required, compliance with hourly NO_x emissions limitation shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 or 7E, as appropriate.

e. Emissions Limitation

SO₂ emissions (stack) shall not exceed 0.011 lb/ton while burning natural gas;

SO₂ emissions (stack) shall not exceed 0.066 lb/ton while burning number 2 fuel oil or used oil;

SO₂ emissions (stack) shall not exceed 0.11 lb/ton while burning number 4 fuel oil; and

SO₂ emissions (stack) shall not exceed 0.17 lb/ton while burning number 6 fuel oil.

SO₂ emissions from this emissions unit (stack emissions) shall not exceed 27.49 tons per rolling 12-month period.

Applicable Compliance Method:

The above lb SO₂/ton emission limits are based on AP-42 factors from either AP-42 Section 11.1, Hot Mix Asphalt Plants or AP-42 Section 1.3, Fuel Oil Combustion.

If required, compliance with the SO₂ emissions limitations shall be demonstrated through stack testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Testing shall be conducted while the emissions unit is operating at or near its maximum capacity.

Compliance with the tons per rolling 12-month period emission limitation shall be determined by using the equation found in b(2)a.v.

f. Emissions Limitation

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g. Emissions Limitation

Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a 3-minute average.

Applicable Compliance Method



If required, compliance shall be determined through visible emissions observations performed in accordance 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

h. Emissions Limitation

No owner or operator subject to the provisions of 40 CFR Part 60, Subpart I shall discharge or cause the discharge into the atmosphere from any affected facility any gasses which contain PE in excess of 0.04 gr/dscf and exhibit 20 percent opacity, or greater.

Applicable Compliance Method

Compliance shall be demonstrated in accordance with the applicable testing requirements specified in 40 CFR Part 60, Subpart I, in accordance with 40 CFR 60.8 and 40 CFR 60.93.

(2) NSPS Testing Requirements

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

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

(3) Subsequent Performance Testing requirements:

Subsequent performance testing shall be conducted on a recurring five-year basis to demonstrate compliance with the following emissions limitations in accordance with the applicable test methods and procedures beginning with the 2027 asphalt production season and shall be conducted to demonstrate compliance with the following emissions limitations in accordance with the applicable test methods and procedures:

Emissions Limitation	Applicable Compliance Method
0.04 gr/dscf	Methods 1-5 of 40 CFR Part 60, Appendix A.

- a. VOC emissions testing when employing RAP or shingles in excess of 60 percent, but not to exceed 75 percent, shall be conducted within 60 days after the increase in RAP



or shingles to demonstrate compliance with the allowable mass emission rate for VOC. The test shall be conducted while this emissions unit is operating at or near its maximum capacity while employing RAP in excess of 60 percent, and burning natural gas, propane, number 2 fuel oil (ULSD), or on-spec used oil, number 4 fuel oil and number 6 fuel oil for VOC, unless otherwise specified or approved by the appropriate Ohio EPA District Office of Local air agency.

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

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

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



The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA district office or local air agency.

(4) On-Spec. Used Oil Testing Requirements

The concentrations of contaminants (arsenic, cadmium, chromium, lead, mercury, PCBs, and total halogens) in the used oil shall be analyzed using a "total constituent analysis" method, as specified in U.S. EPA publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods."

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

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

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

g) Miscellaneous Requirements

(1) Relocation Requirements

- a. At the discretion and following the approval of the director, the permittee may relocate the portable source within the state of Ohio without first obtaining a PTI or PTIO provided that the appropriate exemption requirements have been met. The director may issue a relocation approval for either of the following situations: the permittee notifies the director a minimum of 21 days prior to a one-time relocation pursuant to paragraph (B)(1)(p)(i) of OAC rule 3745-31-03; or the permittee identifies pre-disclosed location(s) to repeatedly relocate to during the approval effective period that meet the criteria found in paragraph (B)(1)(p)(ii) of OAC rule 3745-31-03.
- b. Pursuant to paragraphs (B)(1)(p)(i) and (B)(1)(p)(ii) of OAC rule 3745-31-03 the following criteria shall be met for all portable sources seeking approval for relocation:
 - i. The portable source was installed after January 1, 1974.
 - ii. The portable source has an issued PTI or PTIO and continues to comply with any applicable BAT determination and state and/or federal air pollution rule or law.
 - iii. The portable source is operating pursuant to a currently effective PTI, PTIO, and/or any applicable permit-to-operate (including registration status or currently effective PBR, if applicable) and continues to comply with the requirements of the permit(s).
 - iv. The permittee has provided proper notice of intent to relocate the portable source to the permitting DO/LAA.



- v. The permitting DO/LAA and the DO/LAA having jurisdiction over the new site(s) have determined that the portable source at the proposed site(s) will have an acceptable environmental impact, and that the relocation of the portable source would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site(s).
- vi. The director has issued a public notice, consistent with OAC Chapter 3745-49, in the county(ies) where the proposed site(s) is(are) located, stating that in the director's judgment the portable source at the proposed site(s) will have an acceptable environmental impact.
- c. In order to relocate a portable source in accordance with OAC rule 3745-31-03(B)(1)(p)(i) (that is, the one-time approval option), the following additional criteria must be met:
 - i. The permittee has submitted the required notice of intent to relocate the portable source to the permitting DO/LAA a minimum of 21 days prior to the scheduled relocation.
 - ii. Following the approval of the site by the director, the portable source may relocate to the site one time within 365 days of approval issuance.
- d. A portable source relocating to a site pre-approved by the director in accordance with paragraph (B)(1)(p)(ii) of OAC rule 3745-31-03 (site pre-approval option) may relocate to the pre-approved site at any time on or before the expiration date. Pre-approvals expire within three years of approval issuance.
- e. Within 21 days after relocation to any approved site, the permittee shall provide proper confirmation of the relocation to the permitting DO/LAA.
- f. Failure to receive approval prior to relocation of the portable source or failure to submit relocation confirmation constitute violations of this permit and paragraph (B)(1)(p) of OAC rule 3745-31-03 and may result in fines and civil penalties.

When a portable source is co-located at a stationary source, or is co-located with multiple portable or stationary sources, potential emissions from the portable source may be required to be combined for facility PTE calculations to determine Title V and PSD applicability. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in paragraphs (M)(5) and (M)(3) of OAC rule 3745-31-01, respectively, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC Chapter 3745-77, which may include the requirement to apply for a Title V permit.

(2) Burner Evaluation/Tuning

a. Introduction

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

b. Qualifications for Burner Evaluation/Tuning



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

c. **Portable Monitor Requirements**

Portable monitors used for burner evaluation/tuning shall be properly operated and maintained to monitor the concentration of NO_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 owner or operator of the portable monitor shall maintain records of each portable monitoring device's calibration.

d. **Burner Evaluation/Tuning Procedure**

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

The burner shall be evaluated and, if necessary, tuned based on the frequency described in f)(2)e.

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

- i. Review the plant operations to ensure the plant is operating normally based on weather conditions and production.
- ii. Confirm that the portable monitor is calibrated per the manufacturer's specifications.
- iii. Using the calibrated monitor and the monitor manufacturer's recommended sampling duration, measure the stack exhaust gas values for NO_x, O₂, and CO. These measurements shall be taken at a location representative of stack emissions. Record the values in the "Pre-Tuning" results column on the Burner Tuning Reporting Form for Asphalt Concrete Plants form (as found in g)). An alternative form may be used as long as it contains the same data elements as the Burner Evaluation/Tuning Reporting Form for Asphalt Concrete Plants form.
- iv. Make any necessary adjustments and repairs to the burner in order to make the burner as fuel efficient as possible.
- v. If adjustments or repairs are made to the burner, then the technician shall re-measure the stack exhaust gas values for NO_x, O₂, and CO. This procedure shall be repeated until the technician is satisfied that the burner has been appropriately tuned. Once he/she is satisfied, then the technician shall record the post tune NO_x, O₂, and CO values in the "Post Tuning" results column on the Burner Tuning Reporting Form for Asphalt Concrete Plants (or equivalent) form.

Note that the Ohio EPA reserves the right to require permittees to conduct additional emissions tests to verify compliance. Operators who choose not to keep their burners in tune are more likely to be required by Ohio EPA to



conduct additional emissions tests to verify compliance. Therefore, it is recommended that permittees make necessary adjustments and repairs to burners as soon as possible and verify that the burner is operating as designed.

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

e. Burner Tuning Frequency

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

In addition to the burner evaluation/tuning procedure required above, the permittee shall conduct the burner evaluation/tuning procedure within 20 production days from the date the facility switches to a fuel that is different than the fuel burned during the most recent burner evaluation/tuning procedure.

- (3) Burner Tuning Form (See next page)

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

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

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

Evaluation/Tuning Results:

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

NOx concentrations (ppm) ²		
Oxygen concentrations (per cent) ²		
Asphalt Production (tons/hr.)		

¹ Specify whether on a dry or wet basis.

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

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

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

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