MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

June 21, 2004

NEW SOURCE REVIEW PERMIT TO INSTALL

194-03A

ISSUED TO

Duval Developments USA Limited

LOCATED AT

Chard & Three Mile Road Hessel, Michigan

IN THE COUNTY OF

Mackinac

STATE REGISTRATION NUMBER

N7287

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Part 5505(1) of Article II, Chapter I, Part 55 (Air Pollution Control) of P.A. 451 of 1994. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:			
May 28, 2004			
•			
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:		
June 21, 2004			
·			
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms			Pollutant/Measurement Abbreviations		
AQD	Air Quality Division	Btu	British thermal unit		
BACT	Best Available Control Technology	°C	Degrees Celsius		
CAA	Clean Air Act	CO	Carbon monoxide		
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot		
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter		
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit		
EPA	Environmental Protection Agency	gr	Grains		
EU	Emission Unit	Hg	Mercury		
FG	Flexible Group	hr	Hour		
GACS	Gallon of Applied Coating Solids	H_2S	Hydrogen sulfide		
GC	General Condition	hp	Horsepower		
HAP	Hazardous Air Pollutant	lb	Pound		
HMA	Hot Mix Asphalt	m	Meter		
HVLP	High Volume Low Pressure *	mg	Milligram		
ID	Identification	mm	Millimeter		
LAER	Lowest Achievable Emission Rate	MM	Million		
MACT	Maximum Achievable Control Technology	MW	Megawatts		
MAERS	Michigan Air Emissions Reporting System	NO_x	Oxides of nitrogen		
MAP	Malfunction Abatement Plan	PM	Particulate matter		
MDEQ	Michigan Department of Environmental Quality	PM-10	Particulate matter less than 10 microns		
			aerodynamic diameter		
MSDS	Material Safety Data Sheet	pph	Pound per hour		
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million		
NSPS	New Source Performance Standards	ppmv	Parts per million by volume		
NSR	New Source Review	ppmw	Parts per million by weight		
PS	Performance Specification	psia	Pounds per square inch absolute		
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge		
PTE	Permanent Total Enclosure	scf	Standard cubic feet		
PTI	Permit to Install	sec	Seconds		
RACT	Reasonably Available Control Technology	SO_2	Sulfur dioxide		
RAP	Reclaimed Asphalt Pavement	THC	Total hydrocarbons		
ROP	Renewable Operating Permit	tpy	Tons per year		
SC	Special Condition Number	μg	Microgram		
SCR	Selective Catalytic Reduction	VOC	Volatile organic compounds		
SRN	State Registration Number	yr	Year		
TAC	Toxic Air Contaminant				
VE	Visible Emissions				
		j			

^{*} For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. [R 336.1201(1)]
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, relocation, or modification of the equipment allowed by this Permit to Install. [R 336.1201(4)]
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. [R 336.1201(6)(b)]
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. [R 336.1201(8), Section 5510 of Act 451, PA 1994]
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. [R 336.1219]
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. [R 336.1901]
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). [R 336.1912]
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.
- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. [R 336.1301]
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this permit to install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). [R 336.1370]
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. [R 336.2001]

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification		
EUHMAPLANT	Hot mix asphalt (HMA) facility including:	SVHMAPLANT		
	Aggregate conveyors			
	25 tons per hour batch asphalt plant			
	Fabric filter dust collector			
EUYARD	Fugitive dust sources including:	Fugitive Dust		
	Plant roadways			
	Plant yard			
	Material storage piles			
	Material handling operations (excluding cold feed			
	aggregate bins)			
EUACTANK	Liquid asphalt cement storage tank	N/A		
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as				

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.

The following conditions apply to: EUHMAPLANT

Emission Limits

	Pollutout Limit Time Pouled Testing/ Applica				Applicable
	Pollutant	Limit	Time Period	Monitoring Method	Requirements
1.1a	PM	0.04	Test Protocol ²	SC 1.11, SC 1.15, SC 1.16,	40 CFR 60,
1.14	1 1/1	gr/dscf	103(110(000)	SC 1.17, SC 1.19, SC 1.20	Subparts A & I
		81, 4301		SC 1.23, SC 1.25	Suspants II cc I
1.1b	CO	0.0525 lb	Test Protocol ²	GC 13, SC 1.14, SC 1.17	R 336.1205(1)(a),
1.10		per ton ¹	103(110(000)	SC 1.20 SC 1.23 SC 1.24,	R 336.1205(3),
		per ton		SC 1.25	R 336.1224,
				50 1.25	R 336.1225,
					R 336.1702
1.1c	SO ₂	0.0560 lb	Test Protocol ²	GC 13, SC 1.3, SC 1.17,	R 336.1205(1)(a),
	_	per ton ¹		SC 1.20, SC 1.21, SC 1.23,	R 336.1205(3)
				SC 1.25	
1.1d	NO_x	0.1225 lb	Test Protocol ²	GC 13, SC 1.17, SC 1.20	R 336.1205(1)(a),
		per ton ¹		SC 1.23, SC 1.25	R 336.1205(3)
1.1e	Lead	2.0×10 ⁻⁶	Test Protocol ²	GC 13, SC 1.17, SC 1.20	R 336.1225
		lb per		SC 1.23, SC 1.25	
		ton ¹			
1.1f	Benzene	0.001 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.1g	Toluene	0.006 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.1h	Ethylbenzene	0.001 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.1i	Xylene	0.001 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225

	Pollutant	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1j	Naphthalene	0.001 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.1k	Formaldehyde	0.01 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.11	Acrolein	0.001 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.1m	Arsenic	1.0×10 ⁻⁶	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		lb per		SC 1.23, SC 1.25	R 336.1225
		ton ¹			
1.1n	Nickel	1.0×10 ⁻⁴	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		lb per		SC 1.23, SC 1.25	R 336.1225
		ton ¹			
1.1o	H ₂ SO ₄ (sulfuric	0.0032 lb	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
	acid mist)	per ton ¹		SC 1.23, SC 1.25	R 336.1225
1.1p	Manganese	5.0×10 ⁻⁵	Test Protocol ²	SC 1.12, SC 1.17, SC 1.20,	R 336.1224,
		lb per		SC 1.23, SC 1.25	R 336.1225
		ton ¹			

Pound pollutant per ton of HMA paving material produced.

Material Usage Limits

- 1.2 The permittee shall not burn any fuel other than No. 2 fuel oil in EUHMAPLANT. [R 336.1224, R 336.1225, R 336.1702]
- 1.3 The sulfur content of the fuel oil used in EUHMAPLANT shall not exceed 1.0 percent by weight. [R 336.1224, R 336.1225, R 336.1702, R 336.1901]
- 1.4 The permittee shall not use any asbestos tailings or asbestos containing waste materials in EUHMAPLANT pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. [R 336.1225, R 336.1901, 40 CFR Part 61 Subparts A & M]
- 1.5 The permittee shall not use any RAP material in EUHMAPLANT without prior notification to and approval by the AQD. [R 336.1224, R 336.1225, R 336.1702]
- 1.6 The permittee shall not process more than 25 tons of HMA paving materials in EUHMAPLANT per hour based on a 24-hour rolling time period as determined at the end of each hour. [R 336.1224, R 336.1225, R 336.1702]

Process/Operational Limits

- 1.7 The permittee shall not operate EUHMAPLANT unless the program for fugitive emissions control for EUYARD specified in Appendix A has been implemented and is maintained. [R 336.1371, R 336.1372, Act 451 324.5524]
- 1.8 The permittee shall maintain the efficiency of the EUHMAPLANT drum mix burners, by fine tuning the burners for proper burner operation and performance, to control CO emissions. [R 336.1205, R 336.1901]

² Test Protocol shall specify averaging time.

- 1.9 The permittee shall not operate EUHMAPLANT unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. [R 336.1911, R 336.1912]
- 1.10 The permittee shall not operate EUHMAPLANT unless the fabric filter dust collector is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the fabric filter dust collector requires a pressure drop range between 2 and 8 inches of water column. [R 336.1910]

Testing

- 1.11 Within 60 days after achieving the maximum production rate, but not later than 180 days after commencement of trial operation, federal Standards of Performance for New Stationary Sources require verification of particulate emission rates from EUHMAPLANT, by testing at owner's expense, in accordance with 40 CFR Part 60 Subparts A and I. The permittee shall notify the AQD District Supervisor in writing within 15 days of the date of commencement of trial operation in accordance with 40 CFR 60.7(a)(3). Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 60 Appendix A. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. [40 CFR Part 60 Subparts A & I]
- 1.12 Within 90 days of operation after EUHMAPLANT produces 90,000 tons of HMA, Verification and quantification of emission rates of the HAPs listed below from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, will be required for continued operation. When testing is required, a complete test plan shall be submitted to the AQD and shall include an averaging time for each HAP and a provision for monitoring CO emissions. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results within 120 days of completion of testing. HAPs: acrolein, arsenic, benzene, ethylbenzene, formaldehyde, manganese, naphthalene, nickel, sulfuric acid mist, toluene, xylene. [R 336.1225, R 336.2001, R 336.2003, R 336.2004]

Monitoring

- 1.13 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the virgin aggregate feed rate to the EUHMAPLANT on a continuous basis. [R 336.1224, R336.1225, R 336.1702]
- 1.14 The permittee shall monitor, with a handheld CO monitor, the CO emissions from EUHMAPLANT and the production data associated with the time the emissions data were collected. One data set shall be recorded for each of the following occurrences:
 - a) Upon start-up of each paving season.
 - b) Upon a malfunction.
 - c) After every 500 hours of operation.

A data set shall consist of at least eight separate CO readings and shall be taken over a total time period of thirty minutes or longer. Any request for an alternate monitoring schedule shall be submitted in writing to the AQD District Supervisor for review and approval. Data collected by this method shall be used for determining proper burner operation. [R 336.1205(1)(a), R 336.1205(3), R 336.1224, R 336.1225, R 336.1702, R 336.19011

- 1.15 The permittee shall monitor emissions and operating information for EUHMAPLANT in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and I. [40 CFR Part 60 Subparts A & I]
- 1.16 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record, by observation, the pressure drop across the fabric filter dust collector in EUHMAPLANT once per day. The device shall be certified by the manufacturer to be accurate within ±2 inches water gauge pressure and must be calibrated on an annual basis in accordance with manufacturer's instructions. Pressure drop records shall be kept on file in a format acceptable to the AQD District Supervisor for a period of at least five years and made available to the Department upon request. [R 336.1331, R 336.1901]

Recordkeeping/Reporting/Notification

- 1.17 All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R 336.1205(1)(a), R 336.1205(3), R 336.1224, R 336.1225, R 336.1301, R 336.1402, R 336.1702, R 336.1901]
- 1.18 Written notification of construction and operation is required to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR, Part 60.7. This notification shall be submitted to the District Supervisor, Air Quality Division within the time frames specified in 40 CFR, Part 60.7.
- 1.19 The permittee shall keep records of emissions and operating information to comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and I for EUHMAPLANT. All source emissions data and operating information shall be kept on file for a period made available to the Department request. of at least five years and upon [40 CFR Part 60 Subparts A & I]
- 1.20 The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all components of EUHMAPLANT maintained and operating in a satisfactory manner at all times. The owner or operator shall maintain a log of all significant maintenance activities conducted and all significant repairs made to EUHMAPLANT. Maintenance records for the fabric filter dust collector shall be consistent with the preventative maintenance program attached as Appendix B. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R 336.1910, R 336.1911]
- 1.21 The permittee shall keep the following records for each calendar day that EUHMAPLANT is operated:
 - a) Identification, type and the amounts (in gallons) of all fuel oils combusted.
 - b) Sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuel oils being combusted.
 - c) Tons of hot mix asphalt produced. All records shall be kept on file for at least five years and made available to the Department upon request. [R 336.1205(1)(a), R 336.1205(3), R 336.1224, R 336.1225, R 336.1301, R 336.1402, R 336.1702, R 336.1901]

- 1.22 The permittee shall keep records of the following production information for EUHMAPLANT on the basis indicated:
 - a) The virgin aggregate feed rate (continuous).
 - b) The asphalt paving material product temperature (intermittent).
 - c) Information sufficient to identify all components of the asphalt paving material mixture (continuous).

Upon start-up, the initial mix design and time shall be recorded. When a new mix design is activated after start-up, the time and new mix design shall be recorded. All records shall be kept on file until the end of the paving season in which they were recorded and made available to the Department upon request. [R 336.1205(1)(a), R 336.1205(3), R 336.1224, R 336.1225, R 336.1702, R 336.1901]

- 1.23 The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of all criteria pollutants and HAPs listed in the Emission Limit Table for EUHMAPLANT. If stack test results for EUHMAPLANT exist for any of the aforementioned pollutants, those stack test results may be used to estimate pollutant emissions subject to the approval of the AQD. In the event that stack test results do not exist for a specific pollutant, the applicable emission factor listed in the Emission Limit Table shall be used to estimate the emissions of a pollutant from EUHMAPLANT. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R 336.1205(1)(a), R 336.1205(3), R 336.1224, R 336.1225, R 336.1702]
- 1.24 The permittee shall keep records, as described in Special Condition 1.14, of all CO emissions and related production data including the dates and times emissions were monitored. This data shall be used to calculate the pounds of CO emitted per ton of HMA paving materials produced. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1702]
- 1.25 The permittee shall keep, in a satisfactory manner, hourly, monthly and 12-month rolling time period records of the amount of HMA paving materials produced from EUHMAPLANT. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R 336.1205(1)(a), R 336.1205(3)]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Dimensions (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirements
1.26	SVHMAPLANT	14 by 24	12	R 336.1225 R 336.1901

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air. Stack dimensions, height, and exhaust gas flow rate shall be sufficient to comply with the requirements of Rule 901 and General Condition No. 6 of this Permit to Install.

Portable Equipment

1.27 The permittee shall not operate EUHMAPLANT at this site for more than two (2) years beyond the issuance date of this permit. The permittee shall keep a record of the number of years EUHMAPLANT operates at this site. This information shall be kept on file for a period of at least five years and made available to the Department upon request. [R 336.1201]

The following conditions apply to: EUYARD

Process/Operational Limits

- 2.1 The permittee shall not operate EUYARD unless the program for fugitive emissions control specified in Appendix A has been implemented and is maintained. [R 336.1371, R 336.1372, Act 451 324.5524]
- 2.2 Visible emissions from the roadways of EUYARD shall not exceed a six-minute average of 5 percent opacity. [R 336.1901]

Recordkeeping/Reporting/Notification

- 2.3 All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R 336.1371, R336.1372, R 336.1901]
- 2.4 The permittee shall calculate in a satisfactory manner, the annual fugitive dust emissions of particulate matter. The fugitive dust emissions shall be calculated using the current U. S. EPA Compilation of Air Pollutant Emission Factors (AP-42) or other emission factors approved by the Department such as those used in the MAERS. The actual emission levels for EUYARD shall be reported to the AQD through the annual emission reporting required under Section 5503(k) of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. [R 336.1371, R 336.1372, R 336.1901]

The following conditions apply to: EUACTANK

Process/Operational Limits

3.1 The permittee shall not operate EUACTANK unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. [R 336.1224]

Appendix A FUGITIVE DUST CONTROL PLAN

PURPOSE: This plan provides dust control strategies for the areas adjacent to and associated with the equipment operations involved in the manufacture of Hot Mix Asphalt (HMA) paving materials.

1. SITE MAINTENANCE.

- a. Dust on all areas where vehicular traffic will travel shall be controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method. This will occur a minimum of two times per month or more frequently as dictated by weather conditions and vehicular activity. The dust control method shall be acceptable as determined by the District Supervisor.
- b. The speed of vehicles on the site will be limited to 10 miles per hour or less. Signs will be posted to advise drivers of the speed limitation.
- c. Stock piling will be performed in a manner that minimizes freefall drop distance.
- d. Piles will be maintained to prevent fugitive dust. This includes the use of watering, covering and encrusting agents.

2. MANAGEMENT OF ON-SITE ROADWAYS.

- a. During the operating season the plant roads shall be treated with water, vacuumed, or swept in a manner that minimizes the introduction of the dust to the ambient air to control fugitive dust emissions and track-out dust. This will occur a minimum of two times per month or more frequently as dictated by weather conditions and vehicular activity. The dust control method shall be acceptable as determined by the District Supervisor.
- b. During the operating season, the unpaved travel surfaces shall be treated with water, or other acceptable dust control agents on a frequency sufficient to meet the visible emission opacity standard of five (5) percent opacity specified in Section 5524 of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.
- c. Any aggregate spillage on roads shall be removed immediately.

3. ON-SITE MANAGEMENT OF HAUL VEHICLES.

- a. INCOMING TRUCKS: All trucks entering the site to deliver aggregates will be required to have the loads covered.
- b. OUT-GOING TRUCKS: All trucks leaving the site with HMA paving materials will be required to cover their loads prior to leaving the site. A sign shall be posted to advise drivers of this requirement.

Appendix A - Continued

4. MANAGEMENT OF FRONT-END LOADER OPERATIONS.

The front-end loader operator shall be directed to avoid overfilling the bucket of the loader and the feed hoppers to prevent spillage, and to minimize the drop height of the material when loading the feed hoppers or transferring material to stockpiles.

5. RECORDKEEPING.

Records of dust control activities on travel surfaces and other surfaces where fugitive dust emissions occur shall be kept on file and made available to MDEQ staff upon request until the end of the paving season. The records will indicate the date, time, what was observed or the reason for the dust control activity (routine or other), and what action was taken. The record shall be maintained in the Operations Log Book.

6. FUGITIVE EMISSIONS FROM PROCESS EQUIPMENT AND FABRIC FILTER DUST COLLECTOR.

Any fugitive emissions from leak(s) and malfunction(s) from any transfer system, storage bin, mixer, hopper, or fabric filter dust collector shall be immediately corrected to prevent further fugitive emissions.

Appendix B PREVENTATIVE MAINTENANCE PROGRAM FOR THE FABRIC FILTER DUST COLLECTOR

The Preventative Maintenance Program for the Fabric Filter Dust Collector is for the purpose of keeping the dust collector in good operating condition, and thereby, maintaining the rated capture efficiency of the dust collector for the control of particulate matter. ALL REFERENCES TO <u>VISIBLE EMISSIONS</u> IN THIS DOCUMENT, PARTICULARLY IN SEC. 5, REFER SPECIFICALLY TO VISIBLE EMISSIONS CAUSED BY A DUST (PARTICULATE) EMISSION.

1. FABRIC FILTER DUST COLLECTOR OPERATING PRESSURE DROP.

- a. The pressure drop across the fabric filter dust collector shall be continuously measured and the minimum pressure drop shall not be less than 2 inches, water gauge, except when a large number of filter bags have been replaced.
- b. The pressure drop across the fabric filter dust collector shall be recorded at least once per day and kept in a bound notebook. These data shall be recorded in the Daily Operations Log Book.

2. FABRIC FILTER DUST COLLECTOR /PLANT ALARM SYSTEM.

The fabric filter dust collector shall be equipped with a high temperature sensor and alarm system. The alarm system shall be designed to set off an alarm when the high temperature set-point has been violated, and, to begin a sequential shut-down of the plant if the situation is not resolved within a very short period of time after the alarm sounds.

3. HANDLING AND STORAGE OF FABRIC FILTER DUST.

Accumulated fabric filter dust (particulate) shall be stored and/or be disposed of in a manner which minimizes the introduction of the air contaminants to the outer air.

4. PIPING AND SEALS MAINTENANCE.

Piping and seals shall be replaced as needed.

5. VISIBLE EMISSIONS AND ACTIONS TO BE TAKEN IN THE EVENT OF.

In the event visible emissions, which appear to exceed the standard allowed in General Condition No. 11 of this Permit to Install, are observed at the discharge point of the stack, the following actions shall be taken:

If no certified visible emissions reader can be on-site within 60 minutes of observing the visible emissions to verify the emission density, operations shall be ceased immediately and the cause of the visible emissions determined and corrected prior to operating the plant again.

REMINDER: If the visible emissions continue for more than 2 hours, in excess of an emission standard, an excess emissions report must be made to MDEQ.

Appendix B - Continued

6. BLACK LIGHT INSPECTIONS.

A black light test shall be conducted at least once per year - before operations begin for a paving season. Black light inspection equipment and materials shall be available for use at the facility and used as needed during the paving season.

7. INVENTORY OF FILTER BAGS.

An inventory of fabric filter bags shall be maintained by the facility owner or operator so that filter bags will be available to this site within four hours of requesting the filter bags. In addition, a minimum of 15 filter bags shall be kept on-site at all times. An inventory of other replacement parts for the fabric filter dust collector shall be maintained at all times.

8. FABRIC FILTER DUST COLLECTOR INSPECTION RECORD.

A written record in a bound notebook of the following shall be maintained by the owner or operator of the facility:

- Visual inspections of the interior components of the fabric filter dust collector, including date, time, and findings;
- Black light inspections, including date, time, and findings;
- Number of filter bags installed as a result of each inspection to replace filter bags already in use in the fabric filter dust collector, including date, time, location, and whether the replacement filter bag was brand new or a cleaned, previously used filter bag;
- An explanation (i.e., a description of the damage found) for each filter bag removed from the fabric filter dust collector and confirmation that another filter bag was installed to replace it;
- Each observation of visible emissions at the stack discharge point and description of response to the
 observed visible emission, including date and time of visible emission occurrence and results of
 EPA Method 9 observation, if any. A visible emission record sheet will be made available in the
 Daily Operations Log Book.
- All significant maintenance activities performed on the fabric filter dust collector.