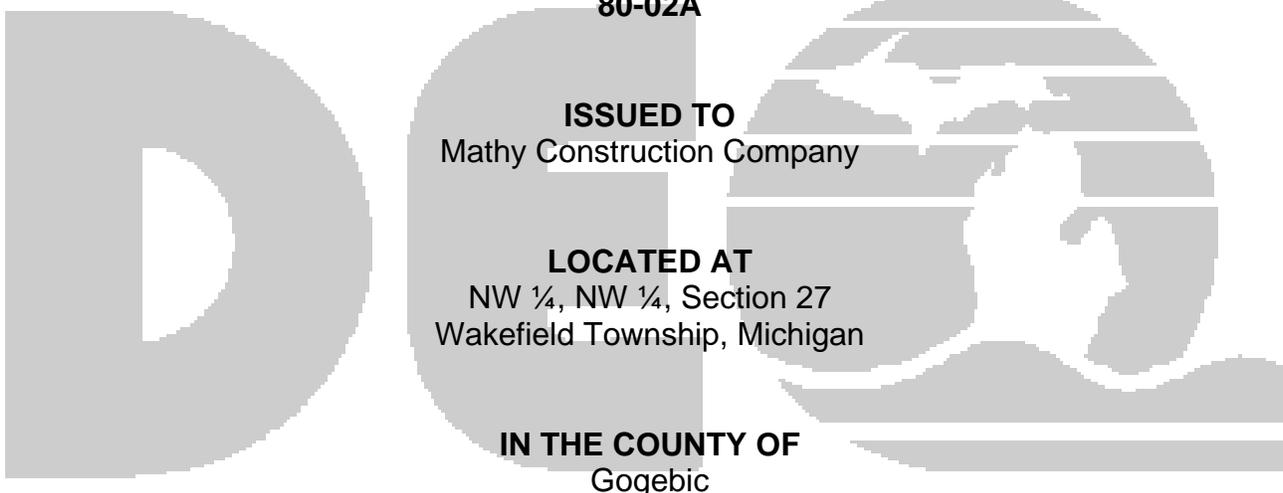


**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

June 8, 2005

**NEW SOURCE REVIEW PERMIT TO INSTALL
80-02A**



ISSUED TO
Mathy Construction Company

LOCATED AT
NW ¼, NW ¼, Section 27
Wakefield Township, Michigan

IN THE COUNTY OF
Gogebic

STATE REGISTRATION NUMBER
SRN: N7121

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: April 27, 2005	
DATE PERMIT TO INSTALL APPROVED: June 8, 2005	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms Used in this Permit to Install

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 ₂ S	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
SC	Special Condition	tpy	Tons per year
SCR	Selective Catalytic Reduction	µg	Microgram
SRN	State Registration Number	VOC	Volatile organic compounds
TAC	Toxic Air Contaminant	yr	Year
VE	Visible Emissions		

* 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. **[R336.1201(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, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **[R336.1201(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 R336.1210, 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. **[R336.1201(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. **[R336.1201(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 R336.1219 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 R336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **[R336.1219]**
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. **[R336.1901]**
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 ten days after the start-up or shutdown occurred, within ten days after the abnormal conditions 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). **[R336.1912]**
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 R336.1301, 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 R336.1303. **[R336.1301]**
 - 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 R336.1370(2). **[R336.1370]**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **[R336.2001]**

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EUHMAPLANT	Hot mix asphalt (HMA) facility including: Aggregate conveyors Gencor 450 tons per hour portable hot mix asphalt facility Fabric filter dust collector	SVHMAPLANT
EUYARD	Fugitive dust sources including: Plant roadways Plant yard Material storage piles Material handling operations (excluding cold feed aggregate bins)	Fugitive Dust
EUACTANKS	Liquid asphalt cement storage tanks	N/A
EUSILOS	Asphalt paving material product storage silo	N/A
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.		

Flexible Group Identification

Flexible Group	Emission Units Included in Flexible Group	Stack Identification
FGFACILITY	EUHMAPLANT, EUYARD, EUACTANKS and EUSILOS	

The following conditions apply to: EUHMAPLANT

Emission Limits

	Pollutant	Limit¹	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1a	PM	0.04 gr/dscf	At least 1 hour	SC 1.12, SC 1.17 SC 1.19(h), SC 1.21	40 CFR 60, Subparts A & I
1.1b	CO	0.201 lb per ton ²	1 hour	SC 1.12, SC 1.14 SC 1.21, SC 1.22	R 336.1205(1)(a), R 336.1205(3)
1.1c	CO	89.4 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 1.12, SC 1.14 SC 1.21, SC 1.22	R 336.1205(1)(a), R 336.1205(3)
1.1d	SO ₂	0.146 lb per ton ²	1 hour	SC 1.12, SC 1.21	R 336.1205(1)(a), R 336.1205(3)
1.1e	NO _x	0.1225 lb per ton ²	1 hour	SC 1.12, SC 1.21	R 336.1205(1)(a), R 336.1205(3)
1.1f	Lead	2.02 E-6 lb per ton ²	Test method ³	SC 1.12	40 CFR 52.21(c) & (d)
1.1g	Benzene	0.001 lb per ton ²	Test method ³	SC 1.11	R 336.1225

	Pollutant	Limit¹	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1h	Toluene	0.006 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1i	Ethylbenzene	0.001 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1j	Xylene	0.001 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1k	Naphthalene	0.001 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1l	Formaldehyde	0.01 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1m	Acrolein	0.0001 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1n	Arsenic	1E-6 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1o	Nickel	1 E-4 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1p	H ₂ SO ₄	0.008 lb per ton ²	Test method ³	SC 1.11	R 336.1225
1.1q	Manganese	3.1 E-5 lb per ton ²	Test method ³	SC 1.11	R 336.1225

¹ Limits based on 500,000 tons HMA production.

² Pounds per ton of asphalt paving material produced.

³ Test plan shall describe averaging times.

Material Usage Limits

1.2 The permittee shall not burn any fuel other than natural gas, No. 2 fuel oil or Recycled Used Oil in EUHMAPLANT. [R 336.1205(1)(a), R 336.1205(3), R 336.1225]

1.3 The permittee shall not burn in EUHMAPLANT any hazardous waste (as defined in state or federal law), blended fuel oil or specification recycled used oil (RUO) containing any contaminant that exceeds the following concentrations or for which the flash point, ash content, or acidity vary from the standards specified in the following table. [R 336.1201(3), R 336.1225]

Contaminant	Limit	Units
Arsenic	5.0	ppmw
Cadmium	2.0	ppmw
Chromium	10.0	ppmw
Lead	100.0	ppmw
PCBs	1.0	ppmw
Total Halogens	1000.0	ppmw
Sulfur	0.7	Weight %
Minimum Flash Point	100.0	°F
Maximum Ash Content	1.0	Weight %
Acidity	Minimum pH = 4 Maximum pH = 10	N/A

- 1.4 The permittee shall not use any asbestos tailing 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 Subpart M]**
- 1.5 The permittee shall limit the asphalt mixture process in EUHMAPLANT to a maximum of 30 percent RAP material based on a monthly average. **[R 336.1225]**
- 1.6 The permittee shall not process more than a combined total of 500,000 tons of asphalt paving materials in EUHMAPLANT per 12-month rolling time period as determined at the end of each calendar month. **[R 336.1205(1)(a), R 336.1205(3), R 336.1225]**

Process/Operational Limits

- 1.7 The permittee shall not operate EUHMAPLANT unless the Compliance Monitoring Plan (CMP) for RUO specified in Appendix C, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. **[R 336.1225]**
- 1.8 The permittee shall not operate EUHMAPLANT unless the program for continuous fugitive emissions control for EUYARD specified in Appendix A has been implemented and is maintained. **[R 336.1371, R 336.1372, Act 451 324.5521]**
- 1.9 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. This shall be done at the startup of the drum mix fuel burners, upon each paving season, after every 500 hours of operation thereafter or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data, whichever occurs first. **[R 336.1205(1)(a), R 336.1205(3), R 336.1901]**

Equipment

- 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 3 and 8 inches of water column. **[R 336.1910]**

Testing

- 1.11 Verification and quantification of emission rates of the HAPs listed below from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, may be required for continued operation. If 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 startup of EUHMAPLANT. 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]**
- 1.12 Verification and quantification of emission rates of PM, CO, SO₂, NO_x, and lead from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, may be required for continued operation. If testing is required, 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 within 120 days of startup of EUHMAPLANT. **[R 336.2001, R 336.2003, R 336.2004, 40 CFR 60 subparts A & I]**

Monitoring

- 1.13 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the virgin aggregate feed rate and the RAP feed rate to the EUHMAPLANT on a continuous basis. **[R 336.1901]**
- 1.14 The permittee shall monitor in a satisfactory manner, the CO emissions from EUHMAPLANT and the production data associated with the time the emissions data were collected. One data set shall be recorded every 500 hours of operation and shall consist of at least eight separate CO readings. The data set 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 not supersede the results of a performance test meeting Department requirements. **[R 336.1205(1)(a), R 336.1205(3), R 336.1901]**
- 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, 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. **[R 336.1331, R 336.1901]**

Recordkeeping/Reporting/Notification

- 1.17 The permittee shall keep, in a satisfactory manner, maintenance records consistent with the preventative maintenance program for the fabric filter dust collector specified in 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 336.1911]**
- 1.18 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]**
- 1.19 The permittee shall keep the following records for each calendar day that EUHMAPLANT is operated:
 - a) Identification, type and the amounts (in gallons or cubic feet) of all fuels 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 virgin hot mix asphalt produced.
 - d) Tons of hot mix asphalt containing RAP produced, including the average percent of RAP per ton of hot mix asphalt produced containing RAP.
 - e) Total hours of operation.

- f) Determination of compliance with the SO₂ emission limits specified in special condition No. 1.1d.
- g) Quantity of RAP used in hot mix asphalt paving materials each calendar month.
- h) All records required in Appendix C, "Compliance Monitoring Plan for Recycled Used Oil".
- i) For facilities that are permitted to burn RUO and/or No. 4, 5, or 6 fuel oil, determine and compute within ten days following the end of each calendar month, for the preceding twelve months, the fuel consumption rate in gallons per ton of hot mix asphalt paving materials 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 336.1225, R 336.1301, R 336.1402]**

- 1.20 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 RAP feed rate (continuous).
 - c) The asphalt paving material product temperature (intermittent).
 - d) 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 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21]**

- 1.21 The permittee shall calculate the actual emissions of PM, CO, SO₂, NO_x, and lead from EUHMAPLANT based on the most recent calendar year. 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, R 336.1220, R 336.1225, R 336.1702, 40 CFR 52.21]**
- 1.22 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 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 336.1205(3), R 336.1901]**
- 1.23 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. All source emissions data and operating information shall be kept on file for a period of at least five years and made available to the Department upon request. **[40 CFR Part 60 Subparts A & I]**

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Dimensions (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirements
1.24	SVHMAPLANT	48 x 60	37	R 336.1225, 40 CFR 52.21(c) & (d)
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

Portable Equipment

1.25 The permittee shall not relocate EUHMAPLANT to any new geographical site, under this permit, in Michigan unless all the following criteria are met:

- a) EUHMAPLANT shall not have any outstanding unresolved violations of any of the Michigan Department of Environmental Quality Air Pollution Control rules, order, or permits: or federal air quality regulations.
- b) The installation of EUHMAPLANT at the geographical site shall be of a temporary nature lasting not more than 24 consecutive months.
- c) A notice of intent to relocate along with a proposed site plan shall be provided to the district office not less than 21 days prior to the scheduled relocation identifying the proposed new geographical site and the probable duration at the new site. All residential or commercial establishments and places of public assembly within 1,000 feet of the proposed plant’s site shall be clearly identified on the proposed site plan.
- d) EUHMAPLANT shall not be located within 800 feet to a residential or commercial establishment or a place of public assembly unless prior written site approval is obtained from the Air Quality Division district office.
- e) A copy of this approved permit and permit conditions shall be clearly posted in the operator’s office or workstation and the permit number shall be posted on the equipment where it is clearly visible from the operator’s office or workstation.
- f) The Department’s Delegation of Authority does not authorize us to approve any site where there is a known unresolved objection. Therefore, requests for site approval or location to a new geographical site where there are known unresolved objections will continue to be handled by the Office of the Director of the Michigan Department of Environmental Quality. **[R336.1201]**

The following conditions apply to: EUYARD

- 2.1 The permittee shall calculate the fugitive dust emissions based on the most recent calendar year. The fugitive dust emissions of particulate matter 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 the Natural Resources and Environmental Protection Act. [R 336.1371, R 336.1372, R 336.1901]

The following conditions apply to: FGFACILITY

- 3.1 The HAP emissions, as defined pursuant to Section 112(b) of the Clean Air Act, for FGFACILITY shall be less than 8.9 tons per year for any individual HAP and 22.4 tons per year for any combination of HAPs at this stationary source. This annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. [R 336.1205(1)(a), R 336.1205(3)]

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. All the roadways on which the HMA haul vehicles will travel are paved with HMA. This includes the roadway on which the vehicles travel around the process equipment to be loaded with HMA paving materials.
- b. During the operating season the paved 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.
- c. 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 Michigan Act 451, Section 5524.
- d. 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 VISIBLE EMISSIONS 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 two 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.

Appendix C
COMPLIANCE MONITORING PLAN (CMP)
FOR FACILITIES BURNING RECYCLED USED OIL (RUO)

A. All RUO monitored using this CMP must be acceptable for use as a fuel under federal and state used oil regulations. A certificate of analysis must accompany each delivery and be kept on file.

Each shipment from the used oil supplier must be accompanied by supplier's documentation demonstrating that the used oil meets specification levels shown in 40 CFR 279.11 and the State of Michigan Department of Environmental Quality Hazardous Waste Management Administrative Rules, Part 111, R 299.9809. The documentation will include supplier certification and analytical data. The analysis will be for the batch of used oil accepted for use as a fuel by the permittee. Separate truckloads may have identical supplier's documentation when they are loaded from a unique batch from a single supplier. A batch is a quantity of used oil, contained in one storage unit (i.e., a tank, tanker truck, barge, etc.) where no additional oil is put into the storage unit after testing. If additional oil is added to a storage unit after testing, a new batch has been created.

The supplier's certificate of analysis shall be reviewed by the permittee to assure that the RUO properties and constituents do not exceed any of the used oil specifications contained in Table 1 of Appendix C prior to acceptance and off-loading of the shipment.

ALLOWABLE LEVELS

Allowable levels for RUO properties and constituents are listed in Table 1.

Table 1

PROPERTY/CONSTITUENT	ALLOWABLE LEVEL
Higher Heating Value	17,000 Btu per pound, minimum
Arsenic	5.0 ppm, maximum
Cadmium	2.0 ppm, maximum
Chromium	10.0 ppm, maximum
Lead	100.0 ppm, maximum
Sulfur	0.7 percent, maximum
Polychlorinated Biphenyls (PCBs)	1.0 ppm, maximum
Total Halogens	1,000 ppm, maximum

Verification: Shipping records for each load received will be maintained a minimum of 5 years.

B. All RUO deliveries shall be screened for halogens.

Upon receipt of each RUO fuel shipment and prior to off-loading the RUO fuel, the permittee shall obtain a representative sample according to methods described in EPA publication SW-846 "Test Methods for Evaluation Solid Waste, Physical/Chemical Methods" and screen the sample for Total Halogens by SW-846 Method 9077.

Verification: Records of the Total Halogens test results will be maintained a minimum of five years.

C. Required Laboratory Analysis

A split sample of the RUO shall be submitted by the facility to an independent laboratory to verify the information provided on the supplier's certificate of analysis for the batch. The laboratory analysis shall include the properties and constituents listed in Table 1 of this CMP. A second split sample shall be maintained by the facility until the end of the calendar year and shall be made available to the AQD upon request.

Laboratory: Any independent laboratory used by the facility for RUO analysis shall develop a Quality Assurance Plan (QAP). A copy of the QAP shall be submitted by the facility to the AQD, District Office 30 days prior to the use of that laboratory. Detailed in the QAP shall be the QA/QC procedures, sample handling, storage, chain of custody procedures, analytical methods for all analyses, a description of the laboratory instrumentation, and the instrumental detection limits. The analytical methods used by the independent laboratory should be consistent with the methods identified in the RUO Supplier's Analysis Plan pursuant to 40 CFR 279.55. A list of acceptable QA/QC requirements may be obtained from AQD, Compliance Support Unit in Lansing. The facility shall maintain a copy of the approved QAP on site or at its corporate offices.

D. Laboratory Analysis Frequency

The laboratory analysis required in this CMP shall be completed per Method 1 and/or Method 2 as applicable.

Method 1 - Pre-Qualification: For a dedicated tank of RUO, one split sample analysis is required.

Batch Documentation: For a single batch of RUO, the laboratory analysis will be required once prior to any shipments from that batch being received at the facility. For Method 1 pre-qualification a batch is a quantity of RUO contained in the suppliers storage unit where no additional oil is put into the storage unit after a representative sample has been collected for analysis. If additional oil is added to the storage unit, both a new supplier certificate of analysis and laboratory analysis are necessary.

Upon receipt of a shipment of RUO, the shipping paper shall be reviewed to determine if the RUO originated from a pre-qualified batch. All RUO shipments which are not from a pre-qualified batch are subject to the quarterly sample analysis required pursuant to verification Method 2.

Verification: A list of RUO batches that have been pre-qualified along with a record of both the RUO supplier's and the permittee's analytical data for the same batch will be maintained a minimum of five years.

Method 2 - On-Site Qualification: A quarterly split sample analysis is required for all shipments which are not from a pre-qualified batch.

When RUO that is not pre-qualified by Method 1 is accepted by the permittee, a minimum of one sample per calendar quarter shall be submitted for the required laboratory analysis. The quarterly sample(s) shall be selected from all RUO batches that are not pre-qualified by Method 1 and are accepted by the permittee. Unless an alternative plan is approved by the AQD district supervisor, the time interval between collection of samples shall be a minimum of 45 days.

Verification: A list of all RUO batches accepted and those that have been selected for quarterly sampling along with a record of both the RUO supplier's and the permittee's analytical data for the same batch will be maintained a minimum of five years.